LANDMATTERS

APPLICATION AND ASSESSMENT OF ENVIRONMENTAL EFFECTS

ADDRESS
765 MUHUNOA WEST ROAD , ŌHAU

Client **Grenadier Limited**
July 2021

DOUGLAS LINKS GOLF COURSE

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APPLICATION ON BEHALF OF: Grenadier Limited

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TABLE OF CONTENTS

CONSENTS SOUGHT

Horizons Regional Council

1. Land use consent for land disturbance outside the coastal foredune and any identified at-risk or rare habitats as a **controlled activity** under Rule 13-2 of the Horizons One Plan;
2. Land use consent for land disturbance and vegetation clearance within the coastal foredune but outside any identified at-risk or rare habitats as a **discretionary activity** under Rule 13-7 of the Horizons One Plan;
3. Land use consent for land disturbance and vegetation clearance within identified at-risk habitats as a **discretionary activity** under Rule 13-8 of the Horizons One Plan;
4. Land use consent for land disturbance and vegetation clearance within identified rare habitats as a **non-complying activity** under Rule 13-9 of the Horizons One Plan;
5. Discharge consent for the discharge of treated domestic wastewater into ground as a **discretionary activity** under Rule 14-30 of the Horizons One Plan;
6. Consent to take groundwater at a rate exceeding 50m^3/day per property for golf course irrigation as a **discretionary activity** under Rule 16-9 of the Horizons One Plan

Overall, an out of an abundance of caution, the proposed activity should be processed as a non-complying activity.

Horowhenua District Council

7. Land use consent for a golf course activity as a **discretionary activity** under Rule 19.4.1 of the Horowhenua District Plan.
8. Land use consent for a clubhouse, 10x two-bedroom accommodation units and driving range building as a **discretionary activity** under Rule 19.4.1 of the Horowhenua District Plan.

   Note: the owner's residence is considered to be a **permitted activity** under Rule 19.1(b) and the maintenance sheds and stables are considered to be **permitted activities** under Rule 19.1(c).
9. Land use consent for earthworks both within and outside the Coastal Outstanding Natural Feature and Landscape as **restricted discretionary activities** under Rule 19.3.1(a).

   Overall, the proposed activity should be processed as a **discretionary activity**.

1. BACKGROUND

The land at 765 Muhunoa West Road , Ōhau is a large, undeveloped block of coastal farmland on the northern bank of the Ōhau River. Grenadier Limited (the **Applicant**) is seeking resource consent to develop a links golf course with associated driving range, club house and accommodation units on the property. Landscaping and native revegetation of the property also form part of the proposed activities.

The proposed development will be a tourist destination for the region if approved on the terms sought.

2. INTRODUCTION

This set of documents forms a set of resource consent applications under the Resource Management Act 1991 (**RMA**).

The next section of this report describes the subject site and the surrounding environment. Section 4 outlines the activities proposed to be undertaken by the Applicant in order to give effect to the development. Section 5 outlines the resource consents sought from HDC and Horizons Regional Council (**Horizons**). Section 7 contains an assessment of the actual and potential environmental effects of the proposal. Sections 8 and 9 provide a consideration of the relevant statutory considerations of the RMA, regional and district planning documents. Section 10 outlines consultation undertaken by the Applicant regarding the proposed activity and Section 11 considers the proposed activity against the notification provisions of the RMA.

3. SITE DESCRIPTION & SURROUNDING ENVIRONMENT

The following sections give a general description of the site and the surrounding environment.

3.1. Legal Description and Zoning

Details of the application site are as follows:

Street address	765 Muhunoa West Road , Ōhau (and part of Esplanade Reserve 770 Muhunoa West Road)
Legal Description	Lots 1 & 2 DP 51446 (and part of Lot 4 DP 44581 Blks I III Waitohu SD (Esplanade Reserve)
Certificate of Title (CT)	WN20D/892 & WN20D/893
Registered interests	• No interests registered on WN20D/892 • WN20D/893 contains a notice (ref. 9110030.1) pursuant to Section 195(2) of the Climate Change Response Act 2002 identifying part of the land as pre-1990 forest.
Site area	107.2ha (20.8ha + 86.4ha)
District Plan zoning	Rural Zone
Landscape Domain	Coastal Environment
District Plan features	• Coastal Natural Character and Hazard Area

	• Flood Hazard Area (in part) • Coastal Outstanding Natural Feature/Landscape

A copy of the titles and notice are provided at **Appendix 1** to this application.

3.2. General Site Description

The application site is three parcels of land held in one fee simple title and one esplanade reserve. It is located at the western end of Muhunoa West Road, accessed from the south side of the road end. The property is approximately 107ha in area and extends south west from the end of Muhunoa West Road to the Ōhau River in the south and to the coast in the west. An esplanade reserve runs along the coastal (western) boundary between the subject property and the coast.

The location of the site is generally shown outlined in **Figure 1** below.

Figure 1 *Application site*

The property displays a characteristic inland dune topography with areas of rolling dunes and other areas of flatter land that have been used for both plantation forestry and farming. Parts of the property, particularly within the south alongside the Ōhau River around the saltmarsh wetland, are around 2.5m above datum. The highest point in the property is approximately 32.5m above datum at the top of the dune in the centre of the property.

The foredune area rises from approximately 7m above datum at the boundary of the open space reserve to a high point of around 17m above datum. Behind the foredune the land drops to between 3m and 10m above datum over the grassed area before rising up over the inland dune system. The Eco Nomos report at **Volume 2** describes the coastal environment in this area as

follows:

> *This coastline is vulnerable to wind erosion and the development of inland migrating dunes; due to the abundant sediment supply from rivers to the north, the fine-grained nature of the sediments, and the strong onshore winds. However, with appropriate procedures, the threat from wind erosion can be readily managed and is unlikely to present significant issues for the proposed course. The proposed course does not affect the sensitive frontal dune area in which most serious wind erosion issues develop.*
>
> *In terms of coastal erosion, the ocean shoreline is subject to periods of storm erosion, but, when averaged over time, the shoreline is building seaward (due to the large volumes of sand moved southwards alongshore from rivers to the north). The average seaward advance rate over time will be assessed in more detail but appears to be at least 0.5-1m per year. In the longer term, projected sea-level rise may slow the seaward advance rate, depending on the rate and scale of sea-level rise and other factors. However, even with up to 1m sea level rise over the next 100 years, the shoreline seaward of the course is likely to advance by over 100m. Accordingly, coastal erosion does not pose any significant risk to the proposed development.*
>
> *The western margin of the property borders the Ohau River, and has been subject to significant erosion over the last 100 years. Available data suggests that, over long periods of time, the rate of bank erosion averages about 1-2 m/yr. The erosion is probably episodic, with significant erosion possible during major flood events, with periods of much lesser erosion between such events. Any parts of the golf course (fairways, tees etc.) located close to the river margin may periodically need to be moved due to erosion. The areas likely to be at highest risk from erosion with existing channel geometry are identified.*

Current vegetation cover varies significantly across the property. The Eco Nomos report describes the vegetation cover on the property as follows:

> *Given the recent land use history of pines followed by pastoral faming, the remnant areas of native ecosystems which have developed in recent decades largely occur on the reserve to seaward and in isolated areas along the river margin. However, there are also small but significant areas of kanuka shrubland on the property itself (Dayly, 2020). The majority of the remnant native ecosystems are dune ecosystems, but there are also small areas of estuarine and other wetlands (Dayly, 2020).*

The property is predominantly kept under pasture, although it is not currently grazed and is essentially vacant without a productive use. The property has previously been used for plantation forestry with harvesting understood to have taken place in 2014. Unharvested pines remain in a number of locations on the property, mainly on the inland dunes.

Since the completion of harvesting, the property has mainly been used for grazing bulls but is not being grazed at present.

As stated in the Engineering Report in **Volume 2**:

> *The soils are mapped as sandy raw and sandy recent. The geology in this area is mapped as aeolian sand dunes. There is pasture in the majority of the property with stands of mature trees. There is a thin topsoil layer on top of the sand.*

As stated in the Bay Geological Services report at **Volume 2**:

> *The property lies centrally within the Horowhenua lowlands, across NNE-SSW-trending*

marine deposits elevated some 5 to 40 m above sea level, formed sub-parallel to the western coastline north of Paekakariki. The Holocene marine and marginal marine terraces mantle the project area, adjacent to alluvium deposited by the Ohau River that drains westward to the coast approximately 250 m south of Well that has been drilled on the site.

There are no HDC potable water, sanitary sewer or stormwater services available on Muhunoa West Road.

Overhead power lines are located on the northern side Muhunoa West Road and terminate outside the entrance to the property. Underground distribution lines extend from the last pole to the Ōhau Sands subdivision at 762 Muhunoa West Road.

The Chorus telecommunication network extends down the southern side of Muhunoa West Road and terminates just prior to the property.

There are no existing gas lines at the western end of Muhunoa West Road.

There is a small bach located in the centre of the site on a high point of one of the inland stable dunes. The bach is located and orientated to take in views of the Ōhau River, river mouth, coast and Kāpiti Island. There is currently no other built form on the property.

There are a number of existing internal farm tracks across the property providing access to the existing bach, the river estuary and along the eastern boundary of the property from the site access towards the river to the south.

The property is to the south of the western end of Muhunoa West Road and currently has a single entrance from the public road network via a formed, unsealed vehicle crossing and farm gate leading to a farm access track into the property. The existing access to the property from Muhunoa West Road is shown in **Figure 2** below.

Figure 2 *Existing property access from Muhunoa West Road (sourced from Google Streetview)*

Horizons Regional Council ecologists undertook a 'Schedule F' assessment of the property "*to identify potential areas of indigenous vegetation that meet the description for rare, threatened or at-risk habitat under Schedule F of the One Plan.*" A copy of the report of that assessment is at **Volume 2** of this application. This assessment has been supplemented by an Ecological Survey undertaken by Boffa Miskell. The Boffa Miskell survey includes a Schedule F significance assessment and a copy of the report of that survey is also provided at **Volume 2**.

As stated in the Landscape Assessment prepared by Frank Boffa (a copy of which is at **Volume 2**):

*In the context of the Resource Management Act (**RMA**), the Horowhenua District Council has aligned its landscape classifications and identification of landscapes and natural character with the relevant provisions of the New Zealand Coastal Policy Statement 2010 (**NZCPS**), the Regional Policy Statement and the One Plan. Accordingly, and in the context of the Douglas Links Golf Course site, coastal edge including the foredunes and adjacent stable dunelands, have been identified as an Outstanding Natural Feature and Landscape (ONFL). The coastal dunes have also been identified as having a high level of Natural Character. In addition, the Coastal Environment has been identified as having a high amenity value. The District Plan also recognises the vulnerability of the coastal dunes, their characteristic topography, their visibility and visual qualities and their susceptibility to change. While the planning provisions seek to identify and protect areas of high value, they also actively seek to promote rehabilitation, restoration enhancement and sensitive management of landscapes, natural character and biodiversity within the Coastal Environment.*

…

Coastal Outstanding Natural Features and Landscape

Relative to the Douglas Links site, the Coastal ONFL identified in the District Plan generally incorporates both the coastal foredune and the more detailed stable secondary dunes that extend from the mean high water through and into the exotic tree plantings associated with the stable secondary dunes. As the original mapping of the ONFL was based on 1:50,000 contour mapping, the identified area generally appears to follow a line some 300-350m inland from mean high water.

Following several site visits and a review of more recent and more detailed topographic and aerial photography, a refined ONFL boundary has been prepared. The purpose of reviewing the ONFL boundary was not to dispute the District Plan line, it was simply reviewed in order to update the line based on more detailed and recent data, and an acknowledgment that landscape change has occurred subsequent to what was identified in 2012.

…

High Natural Character Area

The reviewed assessment confirms that in line with the District Plan assessment, there are no areas of outstanding natural character within the Douglas Links site. The review confirms that while there are areas of very high natural character within the Douglas Links site, there are no areas of outstanding natural character within the site. The areas identified in this assessment as having very high natural character include the active coastal foredune and the salt marsh wetland on the Ohau River.

3.3. Surrounding Environment

The subject property is surrounded by a range or rural and rural-lifestyle activities.

To the west of the property is the expansive sandy beach and foredune system running the length of the Horowhenua coast and beyond. The coastal Tasman sea lies beyond the beach.

To the south of the property is the mouth of the Ōhau River. The Ōhau River rises in the Tararua Ranges as both the North Ōhau River and the South Ōhau River, joining in the west of the ranges to flow west to the river mouth south of the subject property. The lower reaches of the river are managed through a number of stopbanks either side of the river for flood control. The channel

of the river itself has been largely left to meander through the farmland across the coastal plain to the coast.

As it passes the southern edge of the subject property the river is coastal estuary with saltmarsh wetland and a moving river channel and river mouth. Currently the river swings to the south at the coast to reach the sea 500m to the south of the subject property.

Further south of the Ōhau River is the Tahamata dairy farm, an iwi-owned 310 hectare dairy farm on the low-lying, mainly sandy soil inland from the coast. The Tahamata farm extends inland on both sides of the Ōhau River.

To the north is the Ōhau Sands rural-lifestyle subdivision. Ōhau Sands is a 100ha gated coastal lifestyle subdivision with 15 lifestyle allotments of between 1.2ha and 7ha. All allotments have an equal share in the surrounding 50ha balance allotment which is managed through an approved management plan.

An unformed easement for public access (pedestrian only) from the western end of Muhunoa West Road to the coast runs along the boundary between the subject property and Ōhau Sands.

To the east of the subject property lie further dairy and dry stock farms in different ownership across the coastal plain between the coast and State Highway 1 accessed either from Muhunoa West Road or Kuku Beach Road.

Muhunoa West Road is a non-exit Local Road (as set out in HDC's roading hierarchy in Section 21.1.8 of the District Plan) running west from a crossroads with State Highway 1 (and Muhunoa East Road) in the east at Ōhau to dead end north of the subject property. Along the eastern part of the road, the speed limit is 50km/h and the road runs straight east-west, serving a range of residential and lifestyle properties within Ōhau. Beyond the urban area the speed limit increases to 80km/h before reducing to 60km/h for the remainder of the road's length. As it runs further west, past the Kikopiri Marae the road meanders through the inland dunes and serves the more rural properties closer to the coast.

In general, surrounding land is low-lying coastal farmland with some pockets of plantation forestry. The land is mostly coastal plain with a range of inland sand dunes dotted throughout the landscape.

4. PROPOSED DESCRIPTION OF ACTIVITIES

4.1. Introduction

This section provides details of the suite of activities that make up the development proposal as a whole. It includes a description of all construction, earthworks, vegetation clearance, landscape planting, built form, services and discharges.

4.2. Golf course activity

The primary activity of the proposal is the development of an eighteen-hole links golf course over the majority of the subject property. The course layout has been designed by Darius Oliver. Darius is an Australian golf course designer and has designed The Hills Golf Club in Queenstown, Cape Wickham Links on King Island in Tasmania and The Cliffs golf course on Kangaroo Island. Darius' design work is focused solely on projects of significance, such as sandy or coastal sites, short courses or important restoration/redesign projects.

Input on the layout has been provided by the full project team, including Dr. Frank Boffa and Jim Dahm in relation to visual, landscape, coastal geomorphology and coastal ecology and from Brett

Thomson of RBT Design in relation to landscape architecture. Consideration of Horizons Regional Council's *Schedule F* assessment has also been an integral part of the course design process.

Through the development process within the project team, the course design has been through a number of design iterations to refine and improve the layout from a resource management, environmental and golf experience perspective.

The final course design has been reached following that iterative design process and is considered to represent the best compromise between achieving a high quality golfing experience while achieving a positive outcome for many of the existing areas of natural character on site and facilitating greater public access to the coast and enhancement of a number of areas of degraded natural character. Some of the holes have been located on the coastal margin with the aim of making this one of the better Links courses in the world.

The golf course will be eighteen holes plus a driving range. When visitors to the golf course arrive at the property, the majority of the course will be hidden from view with a 'reveal' of the Horowhenua coastline available within the property.

There is no intention to use the golf course for large-scale professional events, although in the long term the development and encouragement of amateur events may occur. The design of the course incorporates all existing aspects and features of the land, from straight forward golf holes in the centre of the property to river views and duneland holes that play along the coast.

The intent for the course is not to be a traditional golf club in that there will be limited or no members. The course will be a stay-and-play style golf club. The vision is that the price of accommodation and playing will be kept reasonable, so the majority of kiwi golfers are able to visit and play at the Douglas Links. The vision of the course patron Hamish Edwards describes the proposed asset and is at the forefront of this application.

Like any project of this scale, the course design (shown on the drawings at **Volume 3**) will be subject to adjustments during final detailed design and construction but will be in general accordance with the drawings included with these application documents. We suggest the detail of buildings, services, earthworks, vegetation clearance (including restoration) are the subject of detailed plans submitted post consent.

4.3. Built form

Ancillary to the golf course development will be a range of buildings in two locations across the property. The focal point of the course will be the clubhouse located in the centre of the site on an established inland dune with 10 accommodation units skirting around the base of the dune below the clubhouse. An owner's residence, stables and maintenance sheds will be located to the west of the site entrance from Muhunoa West Road .

Details of the proposed built form are provided in the Assembly Architects Limited drawings in **Volume 3** of this application and in the sections below.

4.3.1. Clubhouse

The proposed clubhouse will be located on an earthworked, stable inland dune in the centre of the property. It is proposed to undertake cut earthworks (as described below) to provide a flat platform for construction of the clubhouse and car park on the dune. These earthworks will enable the clubhouse to be constructed at approximately 22m above datum and to be recessed into the landscape. As shown in the Assembly Architects plans in **Volume 3**, the clubhouse will comprise:

- Dining room for an absolute maximum of 100 diners;
- Lounge;
- Kitchen with attached cool store;
- Changing rooms and showers;
- Staffroom and office;
- Rooms for retail, storage and gymnasium.

The design intent for the clubhouse (subject to final design) is for a timber clad structure with full length windows orientated towards the west and south west over the golf course, coast, river and towards Kāpiti Island.

4.3.2. Accommodation units

Ten two-bedroom accommodation units will be located to the south east of the clubhouse contoured around the dune at approximately the same elevation as the clubhouse (approx. 22m above datum). The accommodation units will be accessed via a footpath from the clubhouse. The footpath will run along the rear of the accommodation units providing access between the clubhouse (and car park) and the accommodation units.

The units will be single-storey, mono-pitched roofed structures (sloping from the rear to the front (east to west)) and will have a floor area of 7.7m x 7m (approximately 54m^2).

The units are intended (design yet to be finalised) to be timber-clad with full length windows looking out to the south west to obtain views of the golf course, Ōhau River, coastline and Kāpiti Island.

4.3.3. Owner's residence

A four-bedroom owner's residence will be located to the south-west of the site entrance from Muhunoa West Road . The residence will overlook the second and third holes. The residence will provide accommodation for the owner of the course and their invited guests and will comprise a mono-pitch roof, single storey structure. The building will be fully self-contained (in terms of kitchen and bathroom facilities) and will be accessed via a separate access track from the main internal road network within the golf course.

Preliminary design plans for the owner's residence are provided at **Volume 3** of this application.

4.3.4. Maintenance sheds, stables and driving range shed

Other built form on the property includes:

- Two maintenance sheds (540m^2 and 360m^2 in floor area), to be located in the south east of the site immediately south of the proposed driving range.
- Horse stables located between the maintenance sheds and the owner's residence. Nominally, these stables will be 18m x 12m.
- A driving range building at the head of the driving range to the south-east of the clubhouse and parking area. Nominally, this building will be 18m x 7.7m with three bays for driving, a training room, store and toilets.

Preliminary design plans for all proposed built form, showing locations, floor plans and elevations, is provided at **Volume 3** of this application.

4.4. Access and parking

Access to the site will continue to be via Muhunoa West Road in the same location as the current farm track into the property. An additional vehicle crossing for service vehicles will give direct access to the maintenance sheds and parking area.

The existing vehicle crossing into the property will be upgraded to provide a hard surface with gated entrance into the golf course.

Muhunoa West Road is a Local Road (as set out in HDC's roading hierarchy in Section 21.1.8 of the District Plan). As already detailed, Muhunoa West Road has a speed limit of 60km/h at the subject property and has a no exit turning head 70m beyond the site access.

The internal access within the property will follow the route of the existing farm track around the eastern edge of the property before veering west onto the stable dune (just north of the driving range) to provide access to the clubhouse, car parking, driving range and accommodation units.

A separate access network from the service entrance will provide access to the stables, maintenance sheds and on to the owners' residence. This internal road will also connect to the main internal access within the property further into the site.

Internal accesses will be constructed at least to the minimum HDC standards for private ways in the rural environment (*i.e.* minimum of 5m formed width and surfaced with either metal, chip seal or hot mix depending on finished design chosen by the applicant).

Onsite parking will be provided both at the entrance to the site (adjacent to the maintenance sheds) for maintenance vehicles and within the site adjacent to the clubhouse for golfers and visitors. The car park adjacent to the clubhouse will have space for at least 40 parks.

4.5. Earthworks and vegetation clearance

The philosophy of a links golf course is for the course to follow the existing topography of the landscape as much as possible. To that end, bulk earthworks have been kept to a minimum over the majority of the site. The golf course itself will not require significant bulk earthworks to create the landform for the finished course.

The main area of earthworks proposed is the reduction in height of one of the main inland stable dunes in the centre of the site to create the building platform for the clubhouse, parking area, access road, practice green and pedestrian access to the accommodation units around the edge of the re-shaped dune. This will involve removal of vegetation from the dune and removing sand from the top of the dune down to a height of approximately 21m above datum. The removed sand will be to fill some depressions around the edge of the dune to achieve the flat building pad for the activities on the dune. Some sand fill will also be required for the building area of the driving range building at the base on this dune.

An outline of the vegetation clearance, earthworks and construction process is provided in **Volume 2** of this application and reproduced below:

1. ***Vegetation clearance***
    a. *Remove all undesirable trees and shrubs.*
    b. *Spray out any undesirable grasses and vegetation eg couch and lupin. This process will be ongoing due to the seed bed in the sandy/soil.*
    c. *Harvest any useable timbers.*

d. *Mulch and/or burn remaining vegetative piles. Slash piles to be buried.*

e. *Strip the topsoil, if any, to stockpile for re-use*

2. ***Bulk Earthworks***

   a. *Undertake the cut to fill earthworks programme in accordance with the golf designers plans*

3. ***Rough Shaping***

   a. *Sculpt and shape the material in accordance with the designers plans and site instruction, to create natural patterns and landforms, so that it appears that nothing has actually been done to the landscape at all.*

   b. *Ensure that general overland drainage patterns are functioning. Adjust as required to ensure positive drainage.*

4. ***Final Shaping***

   a. *Create the detail shapes and features that bring the course 'alive' for the designer and golfer.*

5. ***Irrigation***

   a. *Install pump delivery system.*

   b. *Install the irrigation system on a hole by hole basis.*

   c. *The irrigation install follows in behind the golf course construction team so that 'sow out' can occur shortly after install, to stabilise the ground.*

6. ***Drainage***

   a. *Install subsurface drainage, if required. A sandy subgrade will require little drainage due the 'free draining' natural of the land.*

7. ***Final Preparation & Sow Out of Golf Hole***

   a. *Undertake final preparation of the finished sandy surface after drainage and irrigation has been installed.*

   b. *Sow out and hydro-mulch the golf hole.*

   c. *Irrigate little and often to ensure an early grass strike.*

   d. *Establish for a period of approx. 16 week.*

8. ***Grow In***

   a. *Grow- In : Post establishment. The process of taking the newly grown turf, from the 16 week timeframe through to maturity, to the point when golf will be playable. A period of approx. 12- 18 months.*

Proposed earthworks over the property are shown on the plans in **Volume 3** of this application with calculation of areas and volumes in the table below.

Earthworks	Total Area (m^2)	Total Volume (m^3)
Cut	114,000	118,000
Fill		83,000

Elsewhere, as stated above, earthworks will be kept to a minimum. The golf course will require some earthworks, as shown in the cut/fill plan appended to this application to create greens, tees and other minor topography changes to create the finished landform for the course design. These proposed earthworks cover small, isolated parts of the property and will be managed in each area through appropriate erosion and sediment control measures. The fairways will have some regrading and recreated dunes between them. These are difficult to portray on the earthwork plans, but will be a progressive/staged activity.

Vegetation clearance will take place over large parts of the property. This will be predominantly grass, weed species (lupin etc), wilding pines and macrocarpa trees.

4.6. Activities in the public open space

The strip of land between the subject property in private ownership and the coast is public esplanade reserve, under the control of HDC. The proposal involves the placement of some golf course holes within this area, as shown on the drawing at **Volume 3** of this application. The following parts of the golf course will be partly or wholly located within the public reserve land:

- The tee, majority of fairway and part of the green of the 4th hole
- Part of the fairway and green of the 16th hole
- The tee, majority of fairway and part of the green of the 17th

In addition, vegetation clearance and replanting with native species between the golf holes will be undertaken within the esplanade reserve.

The issues relating to tenure and occupation of this land are addressed separately to this resource consent application. The resource management considerations of development within this area are considered in this report. HDC has advised the preference to address the RMA process first before the necessary dealings under the Reserves Act. Nevertheless, there is support for this approach from HDC, subject to acceptance of the assessment of environmental effects.

4.7. Water takes

Water supply for the development will be provided by groundwater from two on-site bores and/or from roof water capture. Full details of the supply arrangements are provided in the Engineering Report in **Volume 2** of this application.

One deep bore will be used to provide irrigation supply to irrigate the golf course development. Another shallower bore will likely be used for domestic potable water supply. If the quality of the water from the deep bore is of a suitable standard all water may be provided from this bore only.

Horizons Regional Council has granted consents for the drilling of an exploratory bore (to be retained as a monitoring well) as well as the deep irrigation bore and the domestic supply bore, as follows:

Reference	Date Granted	Lapse Date	Consent
APP-2020202949.00	27 August 2020	27 August 2025	Drill an exploration bore to retain as a monitoring well at 765 Muhunoa West

			Road , Ōhau
APP-2020203002.00	6 October 2020	5 October 2025	Drill two bores (one for irrigation and one for domestic water supply) at 765 Muhunoa West Road , Ōhau

The bores are to be drilled by Nevill Webb Welldrilling. The bores will be constructed in a manner which assumes it cannot access more than one aquifer and does not result in leakage from the ground surface to groundwater.

4.7.1. Irrigation supply

The irrigation bore will be drilled on Lot 2 DP 51446, at a maximum depth of 100m and a diameter of 300mm. This bore will supply irrigation water for the golf course.

The rate of take for the irrigation supply is required to be 1500m^3 to 2000m^3/day in order to irrigate 38.76 to 51.68ha comprising 18 greens, 36 tees and a practice tee with an estimated volume of 168,060 to 224,806m^3/year during establishment of vegetation cover over the course. Following the 2 year establishment phase, the rate of take from the irrigation bore can reduce.

A Pump Test Report and AEE has been prepared by Bay Geological Services Limited (at **Volume 2**) into the well testing from the bore drilled on site and reviewing the feasibility report (prepared by Lattey Group and also at **Volume 2**).

That discussion document states:

> *Analysis of the pump test results focused on the Recovery data which is considered a true reflection of aquifer conditions, as the pump is switched off and down-hole turbulence has ceased. The data exhibits rapid recovery of the water level to within 6.70 m of the initial water level after 1 min of the pump stopping. After 40 mins of Recovery time, the well has recovered to within 3.15 m of the initial water level, and within 1.0 m after 430 mins of Recovery time. However, it is noted that full recovery (to within 150 mm of the initial SWL) did not occur until after 3210 mins (2.2 days into the Recovery Period) taking into consideration the effect of tidal fluctuations.*

To ensure security of investment, consent is sought for the maximum term of 35 years.

4.7.2. Domestic supply

The domestic supply bore will be drilled on Lot 1 DP 51446, with consented maximum depth of 100m (although the actual depth is likely to be significantly shallower) and a diameter of 150mm. This bore will supply domestic (potable) water for the clubhouse and other potable water needs in combination with rainwater collection from roofs (see Engineering report at **Volume 2** for details). Treatment of this water is likely, as described in the engineering report.

Take from the domestic supply bore will not exceed the 50m3/day permitted activity maximum volume.

Potable water supplied by the shallow bore for the Clubhouse, accommodation units and driving range building will be stored in multiple tanks located to the east of the accommodation units.

Potable water for the Owner's Cottage will be captured from the roof. HDC Subdivision and Development Principles and Requirements 2014 (SDPR), Section 12.4 states that the minimum potable water storage is 25,000 litres. It is recommended that the Owner's Cottage potable water supply be stored in two 25,000 litre rain tanks.

Rainfall from the two maintenance sheds will be stored in rain tanks, one for each building.

To ensure security of investment, consent is sought for the maximum term of 35 years.

4.8. Wastewater discharge

Domestic wastewater will be generated from a number of facilities within the development. These include the clubhouse kitchen, accommodation units, owner's residence, maintenance sheds and staffrooms. We have worked on the following assumptions of wastewater volumes:

- **Clubhouse kitchen:** 100 people per day @ 30 litres/person = 3m³/day
- **Accommodation units:** 10x two-bedroom accommodation units and ancillary buildings (approx. 50 people @ 190 litres/person) = 9.5m³/day
- **Owners residence:** 3 bedrooms (6 people @ 220 litres/person) = 1.32m³/day
- **Staff:** 8 staff @ 30 litres/person = 0.23m³/day
- **Total:** 14.05m³/day

Full details of the intended wastewater treatment and discharge infrastructure are contained in the Engineering report in **Volume 2** of this application.

4.9. [1]Landscaping and revegetation

A comprehensive development and land management plan has been prepared by Brett Thomson of RBT Design to accompany the golf course development. Details of both the development plan and the land management plan are provided in **Volume 3** of this application.

The Land Management Plan at **Volume 3** sets out the general conservation planting and management areas for the property, with a particular focus on revegetating the foremost stable duneland with appropriate native species to replace the dominant macrocarpa and exotic invasive species.

The management plan at **Volume 3** also provides an existing and proposed cross-section through the coastal part of the property in the area of the proposed 15th and 16th holes. This cross-section provides an indication of the proposed change to the coastal areas on the application site. As can be seen in these cross-sections, the active foredune will be retained in its current state with no activity proposed. Inland from this, small pockets of golf management (the greens for the 4th, 16th, and 17th holes, tees for the 4th and 17th holes and some fairway areas that will be mown grass) will be developed in the stable duneland with native revegetation areas surrounding these areas of golf course. Further inland, it is proposed to provide further native revegetation and coastal shrub and tree planting amongst the areas of managed rough and fairways, tees and greens. Typically the result will resemble the indicative photos in **Volume 2** of this application.

The indicative images in **Volume 2** show a number of typical links courses in Australia and Scotland. Image 1 (Barnbougle) shows a natural coastal sand dune hole, that also runs alongside a river - similar to the proposed 14th hole. The Cape Wickham photographs (Images 3-6) are indicative of the light touch coastal links holes designed by Darius Oliver and demonstrate his experience in these environments.

Overall, land management areas for the property will be:

[1] *GWRC s.88 letter – Point 6*

Management area	Type	Area (ha)
Conservation planting & management	Active foredune management	5.98
	Stable dune buffer revegetation	13.17
	Saltmarsh/wetland management	2.06
	Coastal dune shrubland/treeland	12.95
Golf course planting & management	Mown grass (incl. tees, greens and fairways)	33.34
	Rough (infrequently mown)	45.00

The species list has been developed in collaboration between Eco Nomos (Jim Dahm), Frank Boffa, Darius Oliver and RBT Design and reviewed by Boffa Miskell.

4.10. Public access

The applicant is currently exploring options for improved public access to the coast from the end of Muhunoa West Road as part of the development of the property.

There is currently a partially unformed reserve through the property to the north of the application site securing public pedestrian access to the coast from Muhunoa West Road. However, given the topography of the land covered by the reserve, physically forming a walkway in this area would be highly problematic.

As part of the development proposals for the golf course the applicant is investigating ways in which public access opportunities could be facilitated by the proposal as a means of providing public benefit in this regard.

The applicant will continue to work with HDC to explore these options with a view to securing a useable public access to the coast in this location, and in consideration of the full reserves discussion.

4.11. Services and other infrastructure

The following is taken from the Engineering Report at **Volume 2** of this application:

> *Overhead power lines are located on the northern side Muhunoa West Road and terminate outside the entrance to the property. The buildings can be supplied from these existing overhead lines.*
>
> *The Chorus telecommunication network extends down the southern side of Muhunoa West Road and terminates just prior to the property. This existing network could be used to service the new golf course buildings. Satellite internet is available country wide and would provide faster internet speeds.*
>
> *There is no existing gas supply at this end of Muhunoa West Road. No gas connections are proposed for the Gold Course.*

4.12. Summary of activities

The primary activity proposed on the application site is the development and operation of an 18-hole links golf course over the majority of the property. All other activities (including vegetation clearance, earthworks, revegetation, water take, wastewater treatment and discharge, buildings, internal roads and paths) are ancillary to this proposed use.

The proposed golf course will be developed and managed in accordance with a comprehensive development masterplan and revegetation strategy that will see large parts of the property returned to native vegetation cover and the removal of a number of weed and pest species.

Water takes will be managed in accordance with sustainable limits and wastewater will be treated and discharged in accordance with best practice and to achieve acceptable discharge rates and loads into the ground.

Built form will remain sparse and low-profile over the site and will not dominate the landscape at any location. Earthworks will be kept to a minimum to ensure the natural topography is a feature of the golf course.

The development of an 18-hole links golf course on this property has the potential to provide a number of economic, environmental, social and cultural benefits to the local and wider area (as detailed in Section 7 of this report).

It is envisaged the final plans for golf course layout, engineering design and earthworks management will be subject to detailed design work which the applicant proposes can be secured by condition of consent.

5. RESOURCE CONSENTS REQUIRED

Resource consents are required as detailed in the following sections.

5.1. National Environmental Standards

5.1.1. National Environmental Standards for Freshwater

The National Environmental Standards (**NES**) for Freshwater regulations came into force on 3 September 2020. Of potential relevance, the standards control vegetation clearance and earthworks in proximity to existing inland and coastal wetlands.

Clause 52(1) states:

> *Earthworks outside, but within a 100 m setback from, a natural wetland is a non-complying activity if it—*
>
> *(a) results, or is likely to result, in the complete or partial drainage of all or part of a natural wetland; and*
>
> *(b) does not have another status under any of regulations 38 to 51.*

Clause 54 states:

The following activities are non-complying activities if they do not have another status under this subpart:

> *(a) vegetation clearance within, or within a 10 m setback from, a natural wetland:*
>
> *(b) earthworks within, or within a 10 m setback from, a natural wetland:*
>
> *(c) the taking, use, damming, diversion, or discharge of water within, or within a 100 m setback from, a natural wetland.*

The golf course activities, including all earthworks and vegetation clearance, are at least 10m (minimum 11m) from the saltmarsh. All works for holes 2 and 3 are at least 12m from the small wetland identified by Boffa Miskell (area 11).

No vegetation clearance or earthworks are therefore proposed within 10m of any existing natural wetland. No earthworks within 100m of any existing natural wetland will result in the complete or partial drainage of the wetland. As such, the rules of the Freshwater NES do not apply to the proposed development.

5.1.2. Other National Environmental Standards

No other NES are considered relevant to this proposal.

5.2. Regional Plan Rules and Standards

The relevant rules and standards of the Horizons One Plan are set out below.

Chapter 13 – Land Use Activities and Indigenous Biological Diversity

Permitted Activity Rule 13-1: Small-scale land disturbance

Except as regulated by Rules 13-6, 13-8 and 13-9, any land disturbance pursuant to s9(2) RMA of a total area up to 2500m^2 per property per 12-month period and any ancillary:

a. diversion of water pursuant to s14(2) RMA on the land where the land disturbance is undertaken, or

b. discharge of sediment into water pursuant to s15(1) RMA resulting from the land disturbance

More than 2,500m^2 of land will be disturbed by the proposed activity.

Controlled Activity Rule 13-2: Large-scale land disturbance, including earthworks

Except as regulated by Rules 13-6, 13-8 and 13-9, any land disturbance pursuant to s9(2) RMA of a total area greater than 2500m^2 per property per 12-month period and any ancillary:

a. diversion of water pursuant to s14(2) RMA on the land where the land disturbance is undertaken, or

b. discharge of sediment into water pursuant to s15(1) RMA resulting from the land disturbance.

Consideration of the proposal against the relevant standards of Rule 13-2 is provided below.

Standard	Complies?	Comment
The activity must not take place on land that is within a coastal foredune	☒	Part of the proposed works will be undertaken within the coastal foredune.
The activity must be undertaken in accordance with an Erosion and Sediment Control Plan.	☑	An erosion and sediment control plan will be prepared and implemented for the works.
Any ancillary discharge of sediment into water must not, after reasonable mixing, cause the receiving water body to breach the water quality standards for visual clarity set out in Schedule E for that water body.	☑	No discharge of sediment into water will incur.
The activity must not occur on land that is in, or within 5 m of:	☑	No land disturbance within 5m of a permanently flowing river bed or within 1m of a non-permanent

i. the bed of a river that is permanently flowing, ii. the bed of a river that is not permanently flowing and has an active bed width greater than 1 m, iii. the bed of a lake.		river bed is proposed.
The activity must not occur on land that is in, or within 10 m of: i. A wetland as identified in Schedule F, ii. Sites valued for Trout Spawning as identified in Schedule B, iii. Sites of Significance - Aquatic as identified in Schedule B.	☑	No land disturbance or vegetation clearance within 10m of a Schedule F wetland or any Schedule B site is proposed.

The proposed land disturbance outside the coastal foredune is considered to be a **controlled activity** under Rule 13-2 of the One Plan. Land disturbance within the coastal foredune is considered under the rules below.

The proposed vegetation clearance rules are considered below.

Permitted Activity Rule 13-5:Vegetation Clearance

Except as regulated by Rules 13-6, 13-8 and 13-9, any vegetation clearance pursuant to s9(2) RMA and any ancillary:

(a) diversion of water pursuant to s14(2) RMA on the land where the vegetation clearance is undertaken,

(b) discharge of sediment into water pursuant to s15(1) RMA resulting from the vegetation clearance.

Standard	Complies?	Comment
The activity must not take place on land that is within a coastal foredune	☒	Part of the proposed works will be undertaken within the coastal foredune.
Any ancillary discharge of sediment into water must not, after reasonable mixing, cause the receiving water body to breach the water quality standards for visual clarity set out in Schedule E for that water body.	☑	No discharge of sediment into water will incur.
The activity must not occur on land that is in, or within 5 m of: i. the bed of a river that is permanently flowing, ii. the bed of a river that is not permanently flowing and has an active bed width greater than 1 m,	☑	No land disturbance within 5m of a permanently flowing river bed or within 1m of a non-permanent river bed is proposed.

iii. the bed of a lake.		
The activity must not occur on land that is in, or within 10 m of: i. A wetland as identified in Schedule F, ii. Sites valued for Trout Spawning as identified in Schedule B, iii. Sites of Significance - Aquatic as identified in Schedule B.	☑	No land disturbance or vegetation clearance within 10m of a Schedule F wetland or any Schedule B site is proposed.

The proposed vegetation clearance outside the coastal foredune is considered to be a **permitted activity** under Rule 13-5 of the One Plan. Vegetation clearance within the coastal foredune is considered under the rules below.

Discretionary Activity Rule 13-7: Vegetation clearance, land disturbance, cultivation or forestry that does not comply with Rules 13-1 to 13-6

Except as regulated by Rule 13-8 and 13-9, any vegetation clearance, land disturbance, cultivation or forestry pursuant to s9(2) RMA that does not meet the conditions, standards or terms of Rules 13-1, 13-2, 13-3, 13-4, 13-5 or 13-6 and any ancillary:

(a) disturbance of the bed of a river or lake by forestry authorised by those rules pursuant to s13(1) RMA

(b) diversion of water authorised by those rules pursuant to s14(2) RMA, or

(c) discharge of sediment or slash authorised by those rules pursuant to s15(1) RMA.

The proposed vegetation clearance and land disturbance within the coastal foredune is considered to be a **discretionary activity** under Rule 13-7 (except where covered by rules 13-8 and 13-9 for at-risk and rare habitats).

Discretionary Activity 13-8: Some activities within at-risk habitats

Except as regulated by Rules 14-5, 14-13, 14-24, 16-9, 17-2, 17-4, 17-5, 17-7 in relation to any existing small dam structure, 17-14 and 17-15, any of the following activities within an at-risk habitat:

(a) vegetation clearance, land disturbance or cultivation pursuant to s9(2) RMA

(b) forestry pursuant to s9(2) RMA that does not meet condition, standard or term of Rule 13-3(b)(iii) or (e)

(c) the drilling, construction or alteration of any bore pursuant to s9(2) RMA

(d) activities restricted by s13(1) or s13(2) RMA in the beds of rivers or lakes

(e) the taking, using, damming or diverting of water pursuant to s14(2) RMA

(f) discharge of water or contaminants into water or onto or into land pursuant to s15(1) or s15(2A) RMA.

This rule does not apply to activities described in paragraphs (a) to (f) where they are carried out for the purposes of protecting or enhancing the habitat, including the control of pest animals and pest plants.

The proposed vegetation clearance and land disturbance within identified at-risk habitats is

considered to be a **discretionary activity** under Rule 13-9.

Non-complying Activity Rule 13-9: Some activities within rare habitats and threatened habitats

Except as regulated by Rules 14-5, 14-13, 14-24, 16-9, 17-2, 17-4, 17-5, 17-7 in relation to any existing small dam structure, 17-14 and 17-15, any of the following activities within a rare habitat, threatened habitat:

(a) vegetation clearance, land disturbance or cultivation pursuant to s9(2) RMA

(b) forestry pursuant to s9(2) RMA that does not meet condition, standard or term of Rule 13-3 (b)(iii) or (e)

(c) the drilling, construction or alteration of any bore pursuant to s9(2) RMA

(d) activities restricted by s13(1) or s13(2) RMA in the beds of rivers or lakes (e) the taking, using, damming or diverting of water pursuant to s14(2) RMA

(e) discharge of water or contaminants into water or onto or into land pursuant to s15(1) or s15(2A) RMA.

This rule does not apply to activities described in paragraphs (a) to (f) where they are carried out for the purposes of protecting or enhancing the habitat, including the control of pest animals and pest plants.

The proposed vegetation clearance and land disturbance within identified rare habitats is considered to be a **discretionary activity** under Rule 13-9.

Chapter 14 – Discharges to Land and Water

Permitted Activity Rule 14-14: New and upgraded discharges of domestic wastewater

The discharge of domestic wastewater onto or into land pursuant to ss15(1) or 15(2A) RMA and any ancillary discharge of contaminants into air pursuant to ss15(1) or 15(2A) RMA from a new or upgraded onsite wastewater treatment and land application system which either:

a. is newly established after this rule becomes operative, or

b. involves the upgrade of a system that existed at the date that this rule becomes operative.

An assessment against the relevant standards of Rule 14-14 is provided in the table below.

Standard	Complies?	Comment
The activity must comply with conditions (a) to (g) of Rule 14-13: a. The design flow as specified in section 3 of the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010) must be no greater than 2m^3/d (2,000 litres per day). b. The flow allowance used to calculate the system design flow must be no less than 145 litres per person per day where the water supply is provided by	☒	Design flow is approximately 14.05m^3/day.

roof water collection, or no less than 180 litres per person per day for other sources of water supply. c. The discharge must consist only of contaminants normally associated with domestic sewage and greywater. d. There must be no direct discharge of wastewater to groundwater. e. The discharge must comply with the following separation distances: i. at least 20m from any bore used for drinking water supply ii. at least 20m from surface water bodies, artificial watercourses and the coastal marine area. f. The discharge must not cause any offensive or objectionable odour beyond the property boundary. g. There must be no increase in the concentration of pathogenic organisms in any surface water body as a result of the discharge.		
All aspects of the wastewater treatment and land application system, including soil assessment, design, installation and operation, must be in accordance with the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010).	☑	The system will be designed, installed and operated in accordance with the Manual for On-Site Wastewater Systems Design and Management.
Where the property within which the discharge occurs is 10ha or greater: i. septic tanks must be fitted with effluent outlet filters, unless the equivalent level of treatment is provided within a secondary or advanced secondary wastewater treatment system ii. the areal loading rate within the wastewater land application area must be no greater than the least conservative rate provided in Tables 6.2, 6.6, 6.8 and 6.10 of the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010).	☑	The system will be designed, installed and operated in accordance with the Manual for On-Site Wastewater Systems Design and Management.

Separation distances to water bodies and property boundaries must be in accordance with those specified in Table 2.2 in the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010).	☑	Separation distances can meet the minimum standards in the Manual for On-Site Wastewater Systems Design and Management.
The placement, burial, covering and exclusion of the land application area must be as specified in section 6 in the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010).	☑	The system will be designed, installed and operated in accordance with the Manual for On-Site Wastewater Systems Design and Management.
For secondary treatment systems there must be at least a 50% reserve disposal area allocation. For primary treatment systems this reserve area allocation must be not less than 100%. i. The activity must not take place in any rare habitat, threatened habitat or at-risk habitat	☑	Sufficient reserve disposal area can be provided within the proposed discharge area.
The activity must not be to any historic heritage identified in any district plan or regional plan.	☑	The discharge will be well separated from the identified historic heritage feature on the property.
The wastewater treatment and land application system must be maintained by a manufacturer approved contractor in accordance with the supplier's specifications or the requirements of the Manual for On-Site Wastewater Systems Design and Management (Horizons Regional Council, 2010), whichever are the more stringent. All records of each maintenance action must be retained and made available for inspection by the Regional Council or its agents upon request.	☑	All systems will be maintained in accordance with the manufacturer's specifications and records will be retained.
The discharge must not cause any offensive or objectionable odour beyond the property boundary.	☑	There will be no odour beyond the property boundary from the proposed discharge.

As the proposed discharge does not meet all standards of permitted activity rule 14-14, restricted discretionary activity rule 14-15 is relevant.

Restricted Discretionary Activity Rule 14-15: Discharges of domestic wastewater not complying with Rules 14-13 and 14-14

The discharge of domestic wastewater onto or into land pursuant to ss15(1) or 15(2A) RMA and any ancillary discharge of contaminants into air pursuant to ss15(1) or 15(2A) RMA from an on-site wastewater treatment and disposal system that does not comply with one or more of the conditions of Rules 14-13 or 14-14.

An assessment against the relevant standards of Rule 14-15 is provided in the table below.

Standard	Complies?	Comment
The design flow must not exceed 6 m ^{3}/d.	☒	Design flow is approximately 14.05m^3/day.
The flow allowance used to calculate the system design flow must be no less than 145 litres per person per day where the *water* supply is provided by roof *water* collection, or no less than 180 litres per person per day for other sources of *water* supply.	☑	An appropriate flow allowance has been used to calculate design flow.
The *discharge* must consist only of *contaminants* normally associated with domestic sewage and greywater.	☑	The discharge will consist only of contaminants normally associated with domestic sewage and greywater.
The activity must not take place in any rare habitat, threatened habitat or at-risk habitat.	☑	The discharge area will be well separated from any rare habitat, threatened habitat or at-risk habitat.
The activity must not be to any *historic heritage* identified in any *district plan* or *regional plan*.	☑	The discharge will be well separated from the identified historic heritage feature on the property.

As the proposed discharge does not meet all standards of restricted discretionary activity rule 14-15, discretionary activity rule 14-30 is relevant.

Permitted Activity Rule 14-18: Discharges of stormwater to surface water and land

The discharge of storm water into surface water pursuant to s15(1) RMA or onto or into land pursuant to ss15(1) or 15(2A) RMA, and any ancillary takes or diversions of stormwater pursuant to s14(2) RMA forming part of the stormwater system.

An assessment against the relevant standards of Rule 14-18 is provided in the table below.

Standard	Complies?	Comment
The discharge must not include stormwater from any: i. industrial or trade premises where hazardous substances stored or used may be entrained by the stormwater ii. contaminated land where the	☑	No industrial or trade hazardous substances will be discharged with the stormwater. There is no contaminated land, quarry or mineral extraction site on the property

contaminants of concern may be entrained by the stormwater iii. operating quarry or mineral extraction site unless there is an interceptor system in place.		
The discharge must not cause or exacerbate the flooding of any other property.	☑	There will be no resultant flooding of other properties.
The activity must not cause erosion of any land or the bed of any water body beyond the point of discharge unless this is not practicably avoidable, in which case any erosion that occurs as a result of the discharge must be remedied as soon as practicable.	☑	There will be no erosion of any land or the bed of any water body beyond the point of discharge.
There must be no discharge to any rare habitat, threatened habitat, at-risk habitat, or reach of river or its bed with a Schedule B Value of Natural State.	☑	Any stormwater discharge will be separated from the identified rare habitat, threatened habitat, at-risk habitat and river.
For discharges of stormwater onto or into land: i. the discharge must be below a rate that would cause flooding outside the design discharge soakage area, except in rain events equivalent to or greater than the 10% annual exceedance probability design storm. Any exceedance must go into designated overland flow paths ii. there must not be any overland flow resulting in a discharge to a natural surface water body, except in rain events equivalent to or greater than the 10% annual exceedance probability design storm iii. the discharge must not contain concentrations of hazardous substances that are toxic to aquatic ecosystems, or accumulate in soil.	☑	Discharge rates will be below any level that will cause flooding or discharge to natural surface water bodies. No hazardous substances are anticipated to be discharged.
For discharges of stormwater into surface water bodies the discharge must not cause any permanent reduction of the ability of the receiving water body or its bed to convey flood flows.	N/A	No discharge into surface water is proposed.

For discharges of stormwater into surface water bodies the discharge must not cause, after reasonable mixing, any of the following effects in the receiving water body: i. the production of conspicuous oil or grease films, scums or foams, or floatable or suspended materials ii. any conspicuous change in the colour or visual clarity of the receiving water iii. any emission of objectionable odour iv. the rendering of fresh water unsuitable for consumption by farm animals v. toxicity to aquatic ecosystems.	N/A	No discharge into surface water is proposed.
The activity must not be to any historic heritage identified in any district plan or regional plan.	☑	There are no features of historic heritage identified in any district plan or regional plan on the property.

The proposed stormwater discharge is therefore a **permitted activity** under Rule 14-18 of the One Plan.[2]

Discretionary Activity Rule 14-30: Discharges of water or contaminants to land or water not covered by other rules in this Plan or chapter

The discharge of water or contaminants into surface water pursuant to s15(1)(a) RMA or discharge of contaminants onto or into land pursuant to ss15(1)(b), 15(1)(d) or 15(2A) RMA which are not regulated by other rules in this Plan, or which do not comply with the permitted activity, controlled activity or restricted discretionary activity rules in this chapter.

The proposed discharge of treated domestic wastewater into an irrigation field is therefore considered to be a **discretionary activity** under Rule 14-30 of the One Plan.

Chapter 16 – Takes, Uses and Diversions of Water, and Bores

Permitted Activity Rule 16-2: Minor takes and uses of groundwater

The take or use of groundwater pursuant to s14(2) and s14(3)(b) RMA.

The following assessment against the standards of Rule 16-2 relates to the proposed domestic supply on Lot 1 DP 51446. Note: The proposed irrigation supply is on a separate title (Lot 2 DP WN20D/893) and is considered separately below.

Standard	Complies?	Comment
The rate of take must not exceed:	☑	The take rate of take for the

[2] *GWRC S.88 letter – Point 7*

i. 400 l/ha per day for animal farming up to a maximum of 50m^3/day per property ii. 50m^3/day per property where the water is for any other use. The rates of take allowed under (i) and (ii) cannot be added: the maximum allowable rate of take under this rule is 50m^3/day per property.		proposed domestic supply will be less than 50m^3/day and is the only take on the subject property (Lot 1 DP 51446)
The take must not be located within 50 m of any other bore on any other property.	☑	The nearest bore is the irrigation supply bore on the property which is more than 50m from the domestic supply bore.
The take must not be located within 100 m of any river or lake, or within 200 m of any wetland that is a rare habitat or threatened habitat	☑	The bore is more than 100m from the Ōhau River and more than 200m from any rare or threatened habitat wetland.
The take must not be from any rare habitat, threatened habitat or at-risk habitat	☑	The take is not located within any rare habitat, threatened habitat or at-risk habitat.
The take must not lower the water level in any wetland that is a rare habitat or threatened habitat	☑	No wetland will be affected by the take.
There must be a means of controlling the rate of flow where a bore would otherwise be free-flowing, and water must not be allowed to run to waste.	☑	Rate of flow will be controlled and water will not be allowed to go to waste.
The water must be used on the property.	☑	The water will be used as domestic supply for the clubhouse, accommodation units and ancillary uses.
The Regional Council must be notified in writing of the location of the take, the maximum instantaneous rate of take and the intended use of water.	☑	Records of the take and rate will be kept and made available to the regional council.

The proposed domestic supply water take is therefore considered to be **permitted activity** under Rule 16-2 of the One Plan.[3]

Discretionary Activity Rule 16-9: Other takes and uses of water

The take or use of surface water or groundwater pursuant to s14(2) RMA, which is not regulated by any other rules in this chapter or which does not comply with the permitted activity or controlled activity rules in this chapter, or the take or use of groundwater at a rate exceeding

[3] *GWRC S.88 letter – Point 3*

50m^3/day per property, except takes for bore or groundwater testing permitted under Rule 16-4.

The proposed irrigation supply water take is a groundwater take at a rate exceeding 50m^3/day and is therefore considered to be a **discretionary activity** under Rule 16-9 of the One Plan.

5.3. District Plan Rules and Standards

5.3.1. Zoning

The site is in the *Rural Zone* of the Operative District Plan. It is within the *Coastal Environment* Rural Landscape Domain.

Excerpt from the District Plan maps for the application site are provided in **Figures 3 and 4** below.

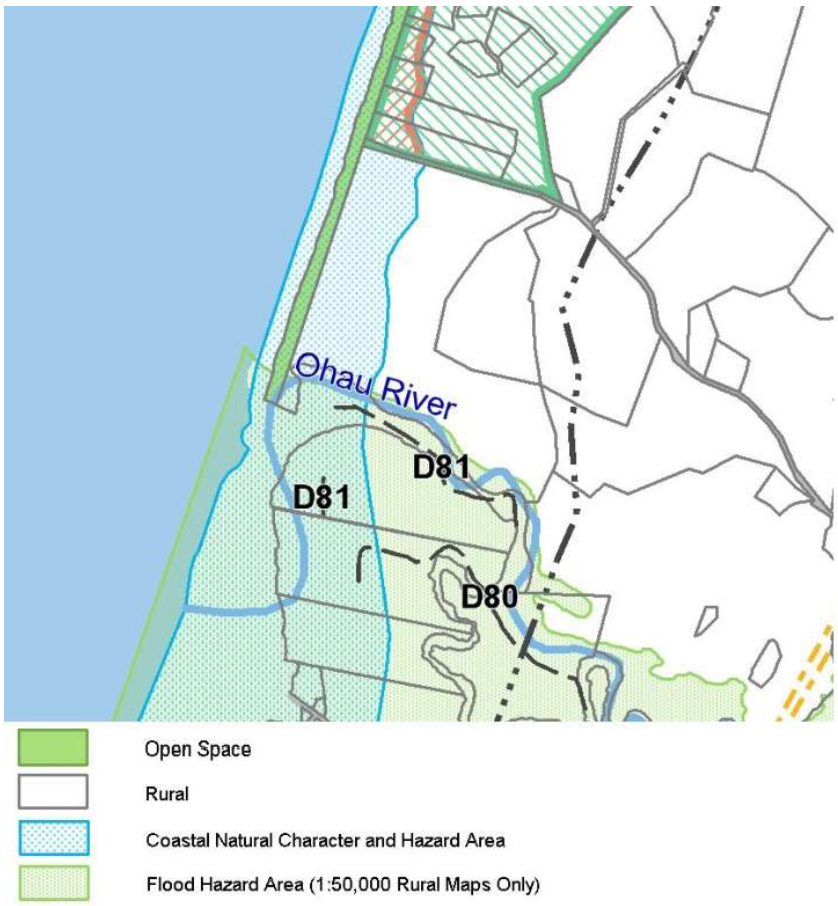


Figure 3 *District Plan map for the application site (Source: Horowhenua District Council)*

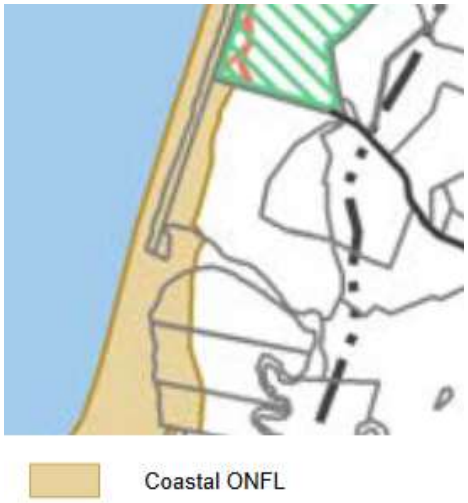


Figure 4 *Outstanding Natural Features map (Source: Horowhenua District Council)*

5.3.2. Operative District Rules and Standards

The relevant rules of the Rural Zone are set out below.

Rule 19.1 Permitted Activities

The following activities are permitted activities in the Rural Zone provided activities comply with all relevant conditions in Rule 19.6 and Chapters 21, 22, 23 and 24.

(f) Visitor accommodation for up to four people per site within any residential dwelling unit and/or family flat.

Visitor accommodation for more than four people per site is proposed and therefore the proposal does not comply with this rule.

(i) The construction, alteration of, addition to, and demolition of buildings and structures for any permitted activity.

The proposed buildings (including the clubhouse, accommodation units, owner's residence and maintenance sheds) are assessed against the relevant permitted activity standards in the table below.

(v) Earthworks within both the Coastal Outstanding Natural Feature and Landscape and Coastal Foredune Area, being the strip of land between the coastal marine area and a line roughly parallel with the beach, extending 200 metres inland of the first line of vegetation, for which a consent is not required by the Manawatu-Wanganui Regional Council, or for which a consent has been granted by the Manawatu-Wanganui Regional Council and has been provided to the Council prior to any earthworks being undertaken.

(w) Earthworks within the Coastal Outstanding Natural Feature and Landscape, but outside the Coastal Foredune Area, being the strip of land between the coastal marine area and a line roughly parallel with the beach, extending 200 metres inland of the first line of vegetation, that comply with the following:

(i) No more than 2.5metres (cut or fill) measured vertically

(ii) Where earthworks exceed 2.5 metres (cut or fill) measured vertically, those

earthworks shall not exceed 3.5 metres (cut or fill) measured vertically and shall not exceed a distance of 50 metres in continuous horizontal length

(iii) Where the earthworks are to be undertaken on a dune, the vertical height of the dune, or any part of that dune, prior to the earthworks shall be no greater at any point than 10metresfrom toe to summit.

(iv) All disturbed surfaces shall be revegetated within 6 months of the completion of the earthworks.

The proposed earthworks are assessed against the relevant permitted activity standards in the table below.

Standard	Complies?	Comment
Number of Residential Dwelling Units and Family Flats (a) One residential dwelling unit and one family flat per site on sites up to 40 hectares. (b) Two residential dwelling units and one family flat per site on sites between 40 hectares up to 100 hectares. (c) Three residential dwelling units and one family flat per site on sites 100 hectares and over.	☑	Only one residential dwelling unit (the owner's residence) is proposed on site.
Maximum Building Height (a) No part of any building intended for residential activities shall exceed a height of 10 metres. (b) No part of any other building shall exceed a height of 15 metres.	☑	All buildings (including the clubhouse, accommodation units, owner's residence and maintenance sheds) will be less than 10m in height.
Building Setbacks from Boundaries and Separation Distances All buildings shall comply with the following setbacks: (i) 10 metres from any District road boundary; (ii) 15 metres from any State Highway boundary; (iii) 10 metres from any other site boundary;	☑	All built form will comply with the minimum building setbacks from boundaries.

(iv) 15 metres from any bank or stream edge; (v) 20 metres from the bed of any water body listed in Schedule 12–Priority Water Bodies.		
All residential dwelling units, family flats and sensitive activities shall comply with the following additional setbacks and separation distances: (i) 300 metres from any building containing an existing intensive farming activity on any other site; (ii) 150 metres from any piggery effluent storage and treatment facilities or human effluent storage and treatment facilities (excluding domestic wastewater systems)on any other site; (iii) 20 metres from any other farm (e.g. dairy and poultry) effluent storage and treatment facilities on any other site. (iv) 30 metres from the edge of an existing plantation forest under separate ownership. (v) 200 metres from existing aggregate extraction activities on the Ohau River (area shown on the Planning Maps). (vi) On a site of 5,000m^2 or less that adjoins a site of 20,000m^2 or more, 10 metres from the boundary between the 5,000m^2 site and the 20,000m^2 site.	☑	All residential dwelling units, family flats and sensitive activities will meet these setbacks.
Noise	☑	All noise limits can be complied with.
Vibration	☑	No significant vibration is

		expected from any activity on site.
Odour	☑	No offensive odour is anticipated.
Flood Hazard Overlay Area (a) Within a Flood Hazard Overlay Area (excluding Moutoa Floodway) earthworks shall not exceed 20m^3 per site within any 12 month period. Except, the earthworks volume limit does not apply to tracks where the existing ground level is not altered by greater than 0.1 metres in any 12 month period or to the installation of underground network utilities undertaken in accordance with (c) below. (b) Within a Flood Hazard Overlay Area (excluding the Moutoa Floodway), the erection, placement, alteration of or addition to any non-habitable structure, with an unsealed or permeable floor shall not exceed a gross floor area of 40m^2 per site. Exceptions: (i) The above two standards (a) and (b) do not apply to any soil conservation and river/flood control works carried out by or on behalf of Horizons Regional Council. (ii) The standard in (b) above does not apply to non-habitable structures/buildings or activities for primary production activities. For the purposes of this rule, "non-habitable" means a structure where people will not sleep. (iii) The standards in (a)	☒	Earthworks within the Flood Hazard Overlay Area may exceed 20m^3 over a 12 month period. No buildings or structures are proposed in the Flood Hazard Overlay Area.

above do not apply to aggregate extraction activities. (c) Within a Flood Hazard Overlay Area (excluding Moutoa Floodway), earthworks associated with the installation of underground network utilities shall reinstate ground level as close as practicable to its state prior to disturbance and the standards in (a) above do not apply. Within a Flood Hazard Overlay Area (excluding Moutoa Floodway), new network utility cabinets/buildings shall not exceed 5m^2 gross floor area.		
Earthworks - Specific Landscape Domains (a) Earthworks, other than cut for a building platform, on land that is not an Outstanding Natural Landscape and Feature, shall not exceed the following: (i) Coastal Environment and Coastal Lakes Landscape Domains • 2.5 metres (cut or fill) measured vertically • Where earthworks exceed 2.5 metres (cut or fill) measured vertically, those earthworks shall not exceed 3.5 metres (cut or fill) measured vertically and shall not exceed a distance of 50 metres in continuous horizontal length. • Where earthworks are to be undertaken	☒	Some earthworks will exceed 3.5 vertical metres and will exceed 50 metres in length. In addition, some dunes to be earthworked exceed 10 vertical metres from toe to summit.

on a dune, the vertical height of the dune, or any part of that dune, prior to the earthworks shall be no greater at any point than 10 metres from toe to summit. (d) Exception: Earthworks provisions shall not apply to production forestry harvesting on a dune 10 metres in height or lower.		
Sites of Significance to Tangata Whenua No activity or development shall modify, demolish or remove any site of significance to Maori where such site has been identified to Council and recorded by the Council in a register of sites prior to the time that any activity or development is proposed.	☑	No identified site of significance will be modified, demolished or removed. There are no sites of significance recorded in the District Plan on the application property. Any sites discovered during works on site will be managed in accordance with an approved archaeological management plan.
Water Supply All activities occurring on any site shall be supplied with sufficient water suitable for consumption by the people and by the livestock associated with the activity/activities and in accordance with Chapter 24.	☑	Adequate water supply will be provided from on-site bores.
Surfacewater Disposal All activities shall make provision for the management of stormwater as means of dealing with water quantity and water quality to avoid significant adverse effects or nuisance.	☑	Stormwater from all impermeable surfaces will be disposed in a manner that does not generate significant adverse effects or nuisance.
Engineering Works All activities, subdivision and development shall comply with the permitted activity conditions	☑	The relevant provisions of Chapter 24 will be complied with.

in Chapter 24.		
Vehicle Access All activities shall be provided with practicable vehicle access from a public road in accordance with the permitted activity conditions in Chapter 21.	☑	Access to the property will be designed and constructed in accordance with the relevant provisions of Chapter 21.
Vehicle Parking, Manoeuvring, and Loading All activities shall provide onsite vehicle parking spaces, manoeuvring areas, and loading facilities in accordance with the permitted activity conditions in Chapter 21.	☑	Adequate on-site parking, manoeuvring and loading areas will be provided within the property.
Hazardous Substances All activities using or storing hazardous substances shall comply with the Hazardous Substances Classification parameters for the Rural Zone in Table 23.2 in Chapter 23 and shall comply with all relevant permitted activity standards in that Chapter.	☑	All maximum permitted thresholds for the storage of fuels and other substances will be complied with.
Signs	☑	The maximum permitted size for signage will be met.
Notable Trees	☑	There are no notable trees on the property.

The owner's residence, maintenance sheds and stables comply with the relevant standards of Rule 19.1 and are therefore **permitted activities**.

The other proposed activities (including golf course, clubhouse, accommodation units, driving range building and earthworks) do not comply in full with all relevant standards of permitted activity rule 19.1. As such, restricted discretionary activity rule 19.3.1 is relevant.

19.3 Restricted Discretionary Activities

The following activities shall be restricted discretionary activities in the Rural Zone provided activities comply with all relevant conditions in Rule 19.8.

19.3.1 Non-compliance with Permitted Activity

(a) Any permitted activity which does not comply with any condition in Rule 19.6 or Chapters 21, 22, 23 and 24 of this District Plan shall be a restricted discretionary activity except for activities that are specified as discretionary activities or non-

complying activities in Rules 19.4 and 19.5.

The proposed earthworks on site do not comply with the relevant permitted activity standards in Section 19.6 of the District Plan. As such, the proposed earthworks are **restricted discretionary activities** under Rule 19.3.1(a).

The other proposed activities (including golf course, clubhouse, accommodation units and driving range building) are not permitted activities. As such, discretionary activity rule 19.4 is relevant.

19.4 Discretionary Activities

The following activities shall be discretionary activities in the Rural Zone:

19.4.1 General

(a) Any activity that is not a permitted, controlled, restricted discretionary, or non-complying activity is a discretionary activity.

The proposed golf course activity is a discretionary activity under Rule 19.4.1.

The proposed clubhouse, accommodation units, and driving range building are discretionary activities under Rule 19.4.1.

19.4.7 Buildings, Structures and Subdivision in the Coastal Natural Character and Hazard Overlay Area

(a) Any buildings, structures and the subdivision of land (excluding boundary adjustments) in the Coastal Natural Character and Hazard Overlay Area identified on the Planning Maps.

For the purposes of this rule, 'structures' does not include permanent or temporary structures designed to assist or restrict pedestrian access (such as fences, bollards, timber walkways and steps) or for passive recreation use (such as picnic tables, barbeques, and rubbish/recycling bins).

No buildings, structures or subdivision (with the exception of structures excluded from this rule) are proposed in the identified Coastal Natural Character and Hazard Overlay Area.

19.4.8 Flood Hazard Overlay Area (excluding Moutoa Floodway)

(a) Any activity within the Flood Hazard Overlay Areas (excluding Moutoa Floodway) that is not listed as a permitted or controlled activity, including but not limited to the following:

(i) Any erection, placement, alteration of or addition to any habitable building or structure.

No habitable buildings or structures are proposed in the identified Flood Hazard Overlay Area.

19.5 Non-Complying Activities

The following shall be non-complying activities in the Rural Zone:

19.5.3 Outstanding Natural Features and Landscapes

(a) Any building or network utility with a height of more than 7 metres, or earthworks

on any land shown or specified as an Outstanding Natural Feature and Landscape on the Planning Maps, except for earthworks on land that is within the Coastal Outstanding Natural Feature and Landscape that are Permitted, Restricted Discretionary, or Discretionary activities.

No buildings will exceed 7m in height.

The Outstanding Natural Feature and Landscape (**ONFL**) identified on the property is a Coastal ONFL. The proposed earthworks within the Coastal ONFL are a restricted discretionary activity in accordance with Restricted Discretionary Activity Rule 19.3.1(a). As such, Non-Complying Activity Rule 19.5.3 does not apply.

The relevant rules of the Open Space Zone are set out below.

20.1 Permitted Activities

The following activities are permitted activities in the Open Space Zone provided an activity complies with all relevant conditions in Rule 20.6 and Chapters 21, 22, 23 and 24.

(a) Recreation activities.

…

(n) Earthworks within the Coastal Outstanding Natural Feature and Landscape.

The proposed activities in the Open Space Zone are assessed against the relevant permitted activity standards in the table below.

Standard	Complies?	Comment
Maximum Height (a) No part of any building shall exceed a height of 8.5 metres. (b) All poles, support structures and fixtures associated with artificial lighting shall not exceed a height of 13.5 metres.	☑	No buildings are proposed in the Open Space Zone.
Fence Height The maximum height of a fence on a boundary shall not exceed 2 metres.	☑	No fence over 2m will be erected in the Open Space Zone.
Daylight Setback Envelope No part of any building shall encroach outside an envelope created, in relation to a Residential or Rural Zone boundary, by a line drawn vertically 2.7 metres above the ground level at the boundary and inclined at an angle of 45 degrees	☑	No buildings are proposed in the Open Space Zone.

(1:1 slope) inwards from that point.		
Building and Structure Setbacks (a) All buildings and structures shall be setback 4.5 metres from the Residential Zone and Rural Zone boundary. (b) All buildings and structures greater than 10m² shall be setback 4 metres from the front (road) boundary.	☑	No buildings are proposed in the Open Space Zone.
Maximum Building Coverage (a) The proportion of any site covered by buildings shall not exceed 5%. (b) For the purposes of Rule 20.6.5, boardwalks, cycle tracks, bridges, playground equipment and temporary buildings are excluded as 'buildings' in the calculation of building coverage.	☑	No buildings are proposed in the Open Space Zone.
Light Spill The spill of light from any artificial lighting shall not exceed 10 lux (lumens per square metre) onto any site within the Residential Zone. The maximum lux shall be measured horizontally or vertically at the Residential Zone site boundary.	☑	There will be no light spill into any site within the Residential Zone.
Noise Noise from any activity shall not exceed the following limits when measured at, or within, any point in any site in the Residential, Greenbelt Residential or Rural Zone …	☑	Noise levels will not exceed any of the maximum values at any point in the Residential, Greenbelt Residential or Rural Zone outside the property.
Vibration No activity shall create any vibration which exceeds the limits in the following standards:	☑	No activity generating vibration that exceeds the set limits is proposed.

…		
Odour No activity shall give rise to offensive or objectionable odours able to be detected at the boundary of any adjoining residential property or at the boundary of any property in any other zone.	☑	No activity that gives rise to offensive or objectionable odours detectable at the boundary of any other property is proposed.
Storage of Goods and Materials All areas used for the storage of goods, materials or waste products shall be maintained in a tidy condition and shall be screened from view from adjoining properties in the Residential Zone and from roads.	☑	No goods, materials or waste products are proposed to be stored in the Open Space Zone. Any temporary storage areas will be maintained in a tidy condition and screened from view from adjoining properties and roads.
Flood Hazard Overlay Areas (a) Within a Flood Hazard Overlay Area earthworks shall not exceed 20m³per site within any 12 month period. Except: The earthworks volume limit does not apply to tracks where the existing ground level is not altered by greater than 0.1 metres in any 12 month period or to the installation of underground network utilities undertaken in accordance with (c) below. (b) Within a Flood Hazard Overlay Area, the erection, placement, alteration of, or addition to, any non-habitable structure, with an unsealed or permeable floor shall not exceed a gross floor area of 40m²per site. Except the above two standards (a) and (b) do not apply to any soil conservation and river/flood control works carried out by or on behalf of Horizons Regional Council. (c) Within a Flood Hazard Overlay	☑	Only a very small part of the Open Space Zone is also within a Flood Hazard Overlay Area. No work is proposed in this area.

Area, earthworks associated with the installation of underground network utilities shall reinstate ground level as close as practicable to its state prior to disturbance. (d) Within a Flood Hazard Overlay Area, new network utility cabinets/buildings shall not exceed 5m^2 gross floor area.		
Surfacewater Disposal All activities shall make provision for the management of stormwater as means of dealing with water quantity and water quality to avoid significant adverse effects or nuisance.	☑	Stormwater from all impermeable surfaces will be disposed in a manner that does not generate significant adverse effects or nuisance.
Engineering Works All activities, subdivisions and developments shall comply with the permitted activity conditions in Chapter 24.	☑	The relevant provisions of Chapter 24 will be complied with.
Vehicle Access All activities shall be provided with practicable vehicle access from a public road in accordance with the permitted activity conditions in Chapter 21.	☑	Access to the property will be designed and constructed in accordance with the relevant provisions of Chapter 21.
Vehicle Parking, Manoeuvring, and Loading All activities shall provide on-site vehicle parking, manoeuvring areas, and loading facilities as required in Chapter 21.	☑	Adequate on-site parking, manoeuvring and loading areas will be provided within the property. This will not be within the Open Space Zone.
Hazardous Substances	☑	No hazardous substances will be stored in the Open Space Zone
Signs	☑	The only signs in the Open Space Zone will be for way finding.
Notable Trees	☑	There are no notable trees on the subject property.
Sites of significance to Tangata Whenua	☑	There are no identified sites of significance within the Open Space Zone of the property.

Based on this assessment, all activities in the Open Space Zone can be undertaken as permitted activities under Rule 20.1.

5.4. Consent Summary

The proposed development requires the following resource consents:

Horizons Regional Council

10. Land use consent for land disturbance outside the coastal foredune and any identified at-risk or rare habitats as a **controlled activity** under Rule 13-2 of the Horizons One Plan;
11. Land use consent for land disturbance and vegetation clearance within the coastal foredune but outside any identified at-risk or rare habitats as a **discretionary activity** under Rule 13-7 of the Horizons One Plan;
12. Land use consent for land disturbance and vegetation clearance within identified at-risk habitats as a **discretionary activity** under Rule 13-8 of the Horizons One Plan;
13. Land use consent for land disturbance and vegetation clearance within identified rare habitats as a **non-complying activity** under Rule 13-9 of the Horizons One Plan;
14. Discharge consent for the discharge of treated domestic wastewater into ground as a **discretionary activity** under Rule 14-30 of the Horizons One Plan;
15. Consent to take groundwater at a rate exceeding 50m^3/day per property for golf course irrigation as a **discretionary activity** under Rule 16-9 of the Horizons One Plan;

Horowhenua District Council

16. Land use consent for a golf course activity as a **discretionary activity** under Rule 19.4.1 of the Horowhenua District Plan.
17. Land use consent for a clubhouse, 10x two-bedroom accommodation units and driving range building as a **discretionary activity** under Rule 19.4.1 of the Horowhenua District Plan.

    Note: the owner's residence is considered to be a **permitted activity** under Rule 19.1(b) and the maintenance sheds and stables are considered to be **permitted activities** under Rule 19.1(c).
18. Land use consent for earthworks both within and outside the Coastal Outstanding Natural Feature and Landscape as **restricted discretionary activities** under Rule 19.3.1(a).

Overall, the proposed activity should be processed as a **discretionary activity**.

6. OTHER CONSENTS AND APPROVALS REQUIRED

6.1. Consents to drill bores

Horizons Regional Council has already granted consents for the drilling of an exploratory bore (to be retained as a monitoring well), an irrigation bore and a domestic supply bore, as follows:

Reference	Date Granted	Lapse Date	Consent
APP-2020202949.00	27 August 2020	27 August 2025	Drill an exploration bore to retain as a monitoring well at 765 Muhunoa West Road , Ōhau
APP-2020203002.00	6 October 2020	5 October 2025	Drill two bores (one for irrigation and one for domestic water supply) at 765 Muhunoa West Road , Ōhau

The application for consent to take water from the irrigation and domestic supply bores is contained within these application documents.

6.2. Archaeological Authority

There is an identified archaeological site in the south west corner of the property. Although there is no intention to disturb the identified site, given the earthworks proposed on the site, the applicant is likely to apply for an archaeological authority for the works around the identified site and to manage any accidental discoveries during the proposed earthworks.

The archaeological authority process to cover the works should not have any bearing on the consideration of the proposed activities under the resource consent process.

6.3. Reserves Act 1977

The Applicant has an understanding with the HDC that it will have appropriate tenure under the Reserves Act 1977 for the duration of the golf course. This will be through either a licence to occupy, lease or ownership of the applicable areas.

6.4. Other

No other consents are considered necessary for the activity proposed.

7. ASSESSMENT OF ENVIRONMENTAL EFFECTS

7.1. Introduction

This section provides a comprehensive assessment of the environmental effects of the proposal. In accordance with Section 88 and Schedule 4 of the RMA, this assessment is provided at a level of detail that corresponds with the scale and significance of the effects that the activity may have on the environment.

7.2. Site Suitability

The application site is within the Rural Zone (and the Coastal Environment Rural Landscape Domain) of the operative District Plan. The proposed development has been designed in full accordance with the intent and provisions of the relevant district plan zone and domain and in with full regard to the relevant regional matters of importance identified in the Horizons One Plan.

The coastal nature, dune topography and size and shape of the existing cadastral boundaries of the property lend well to the development of a links golf course with minimal change required to the existing landform and the integration of a number of topographical features on the property into the design of the course.

Access to the site will remain as per the existing arrangement (with an additional site entrance to provide for maintenance and service vehicles). Internal roading and access will not require

significant amounts of land recontouring. A combination of roof water collection and shallow bore for groundwater is a viable option for potable water supply with a deep well supply providing water for course irrigation. The property can accommodate wastewater and stormwater treatment and disposal measures within the boundaries of the site without creating adverse off-site effects.

This report demonstrates that the proposed development can be undertaken without adversely affecting the character or the establishment amenity values of the surrounding area.

As such, it is considered that the application site is suitable for the development of a link golf course with associated earthworks, building and ancillary activities as proposed by this application on the basis that the proposal will provide benefits in terms of native revegetation, better understanding of the cultural value of identified sites within the property, employment and economic opportunities for the local and wider community and enhance public access to the Horowhenua coast.

7.3. Landscape and coastal environment effects

The effects of the proposal on the landscape and coastal environment have been assessed by Dr. Frank Boffa and Jim Dahn. Copies of their reports are provided in **Volume 2** of this application. Their assessment has informed this section of the AEE.

The following is taken from the Landscape Assessment prepared by Dr. Frank Boffa:

> *The Douglas Links Development Plan, Land Management Plan and Cross Sections illustrate the proposed golf course development. As previously noted, aspects of the plan were reviewed following the initial landscape, natural character and visual considerations review. Being a links course, the layout has sought to utilise in part, the coastal dunes and more particularly the more stable inland dunes. Thus, the relationship between the course layout, the active foredune and the stable secondary is best illustrated with reference to the Land Management Plan.*
>
> *In this plan, the active foredune is represented by the light green shade overlay which extends along the coastal length of the site, extending around the north side of the Ohau River to the salt marsh wetland. Immediately inland of the active foredune are the stable dunes represented by a darker green overlay. The seaward property boundary of the Douglas Links site also traverses the stable dunes. As previously noted, the boundary between the active foredune and the stable dunes generally follows the seaward edge of the exotic tree plantings.*
>
> *While three golf holes are in part sited within the adjacent Esplanade Reserve (holes 4, 16 and 17), this area is largely within the exotic treed area with very little undergrowth and/or biodiversity values. The intention is to remove the exotic trees and, as appropriate, carry out minor reshaping earthworks followed by revegetation as outlined in Mr Dahm's report in conjunction with the golf course grassing layout proposed. The refined and combined high natural character area and the Coastal ONFL area which includes the salt marsh wetland, the stable dunes and the active foredune, also incorporates additional golf holes, namely holes 4, 12, part of 13, 15, and in part 3 and 11. The coastal dune restoration and rehabilitation measures proposed by Mr Dahm will extend as appropriate into these areas.*
>
> *The balance, and most of the golf course area, is located inland within the area identified as not having high natural character, and inland of the Coastal ONFL. While there will be minor earthworks within this area of the golf course, the area will be revegetated and*

managed as illustrated in the Land Management Plan and, where appropriate, in accordance with the recommendations in Mr Dahm's report.

In the context of the development of built structures and associated infrastructure, these all occur inland of the coastal dunes and the identified high natural character and Coastal ONFL areas. These "built" or unnatural elements which include the clubhouse, chalets, maintenance area and roading, are all discreetly and sensitively sited and will have minimal landscape or visual effects from both within or beyond the site boundaries. The landscape change that will be apparent will be the land cover and vegetation patterns which will be of a restorative nature, given the relatively degraded landscape that currently exists. The change that will occur to the landscape will essentially be a change in the appearance of "naturalness" rather than a change to a more built or "developed" landscape. While some natural elements will be different, natural patterns and natural processes, while different, will continue to be natural and will be enhanced to the extent that they will be perceived as being at the high end of the natural character scale.

Landscape Assessment

Based on an assessment of the site in the context of its coastal setting, the relevant statutory provisions and the proposed layout of the links golf course, the landscape assessment concludes as follows –

1. *That in terms of landscape considerations the proposed development –*
    - *Has taken into account the Coastal ONFL classification and provisions, and has had regard to other landscapes having high amenity.*
    - *Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.*
    - *Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.*
    - *Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.*
    - *Will protect, expand and manage areas of significant indigenous vegetation and habitat.*
2. *That in terms of Coastal Environment considerations, the proposed development –*
    - *Will preserve the natural character of the Coastal Environment.*
    - *Will increase and enhance the levels of natural character throughout the site.*
    - *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.*
    - *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.*
3. *That in terms of visual effects considerations, the proposed development –*
    - *Will not create adverse visual or amenity effects from locations within or beyond the site.*
    - *Will enhance the visual amenity of the landscape in the context of its coastal*

setting.

Conclusions

The proposed Douglas Links Golf Course will –

1. *Have no adverse effects on the environment that cannot be readily mitigated, and will in fact enhance the landscape character, biodiversity habitat and the amenity values of the coastal landscape.*
2. *Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin.*
3. *Will protect and enhance natural character values throughout the site.*

With respect to the coastal environment, the Eco Nomos report (at **Volume 2**) states:

However, while the site is clearly prone to wind erosion, techniques for stabilising sands are now well established. No significant problems with wind erosion should be experienced provided planting is undertaken soon after earthworks, and any blow-outs that do develop are attended to rapidly.

It is also particularly important to ensure that the coastal margin dunes seaward of the property remain well vegetated to provide a natural buffer, as this is the area where serious wind erosion and transgressive dunes have typically commenced in the past.

...

… coastal erosion is not likely to pose a threat to the proposed Links course over the next 100 years, based on best present information on projected future sea level rise over that period.

Based on the above, we consider the proposal will result in less than minor adverse landscape character, biodiversity habitat and the amenity values of the coastal landscape and will provide a number of positive landscape character and biodiversity habitat effects and enhancements of the amenity value of the coastal landscape.

7.4. Ecological effects

As concluded in the Boffa Miskell Ecological Survey report at **Volume 2**:

The Schedule F areas on site total approximately 16.12 ha. Of these areas, 2.12 ha is proposed to be converted to fairways permanently. Two Schedule F habitat types are encompassed by the current design, with 1.67 ha stable duneland and 0.34ha active duneland (both rare habitat types). The salt marsh (1.98 ha, threatened) is not proposed to be negatively impacted by the course, though management through enrichment planting is proposed. The Schedule F area of kanuka (0.29 ha, Map 3) will be avoided. Accessways between fairways and services have not been quantified, but these would be additional to the current areas calculated.

It is proposed that alongside the permanent conversion of Schedule F habitat to fairways, the surrounding habitat – including that which does not meet Schedule F – would be enhanced ecologically through actions such as pest (predator and weed) control, exotic species clearance, and vegetation rehabilitation/planting. Adding to this, the surrounding macrocarpa, grassland, and exotic habitats (not significant), where not converted to fairways or course related areas, would be revegetated to become representative, diverse,

indigenous stable duneland or coastal dune shrubland. These actions would enhance the current ecological values of the site, even when permanent clearance of some Schedule F habitat (through golf course creation) occurs, as community types will be enhanced and restored as a result of the project.

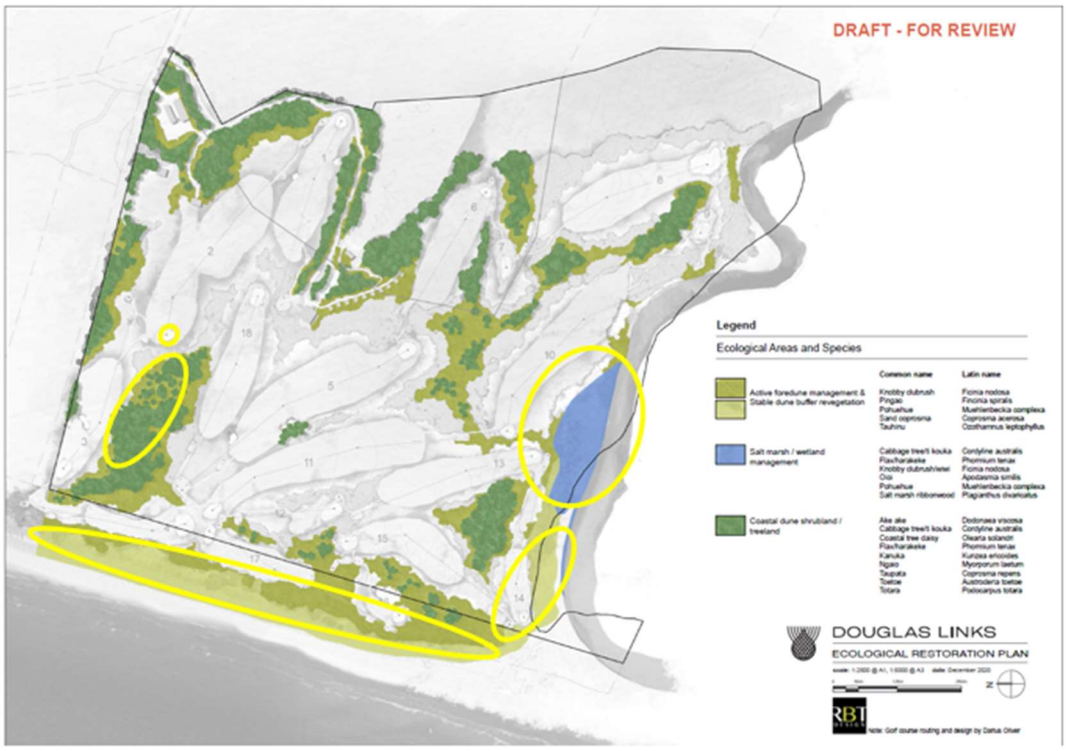
It is noted that large tracts of stable duneland (Schedule F area), although meeting regulatory requirements for protection, do not hold a particularly high ecological value due to the presence of exotic species and lack of native diversity (those areas which are native dominated are almost pure knobby clubrush). Considering this predominantly native community is interspersed with exotic species throughout its range, sometimes forming dominant clumps of lupin and gorse, it is recognised that this community is not typically representative of the historic expected community, and that conversion of some of this area to fairway would be no more than minor in effect. The revegetation of the remaining (between golf infrastructure) habitat to include a more diverse range of native species (those proposed in preliminary plans of Dr. Boffa) include tauhinu, knobby clubrush, pōhuehue and sand coprosma, in addition to pest control and the removal of exotic species and these actions and restoration would outweigh any minor effects on the habitat lost from fairway conversion.

A small area of active duneland proposed for a fairway is located in one area near the Ōhau river mouth (~70m from the river edge). This duneland is a Schedule F area and the proposed fairway contains large amount of bare sand, with scattered spinifex and marram grass, and dense lupin encroaching from the landward side. The conversion of this habitat to fairway would be a loss of Schedule F area. However, considering the small area that would be impacted (0.34 ha), the level of encroaching exotic species present (mostly lupin) in the fairway area, and the surrounding large areas of active dune that cover site, this loss would be of minimal ecological concern. As above, the remaining active dune on site (6.19 ha) would be subject to predator control and the protection/enhancement of the sand daphne population (we recommend) and also native planting as part of active foredune management. Although effects would be no more than minor on the active duneland habitat at the site scale, and therefore no mitigation required under 13-4 (b), the proposed management actions in the surrounding habitat will enhance the ecological value of the active dunes and result in a net gain ecologically.

Many small areas of kanuka treeland are present on site which do not qualify as Schedule F areas due a combination of size, height, and fullness requirements. While these do not qualify as Schedule F habitats, they may be a valuable addition to any areas converted to coastal scrubland and retaining these areas to enhance future restoration would be beneficial to the project. This is also recognised by the project course designer, and as such any reduction in these non-Schedule F areas of kanuka will be minimised, and carried out thoughtfully and selectively as their value in future restoration and habitat creation is acknowledged. The 0.29 ha area of Schedule F kanuka (rare-significant) will be entirely avoided.

The small raupō wetland discovered, although smaller than a typical assemblage of its type, can be conservatively considered a Natural Wetland. Following the recent (2020) National Policy Statement on freshwater management the Council are directed to avoid any loss of extent of natural wetlands. The current course design avoids this feature, and no earthworks downslope of this are proposed We recommend ensuring that any water takes do not draw down near this wetland.

A draft ecological restoration plan has been developed by the project landscape architect and Dr Boffa. We assume and expect that the existing natives such as the titoki and totara will form part of that restoration effort. An indication of the species to be used and the areas to be revegetated and provided is shown in [the figure below]. *While additional native plant species could be added, the backbone of the assemblages in the plan are appropriate, and the areas and sizes will result in a net indigenous biodiversity and functional gain. We indicate on this figure by way of the yellow circles the areas for ecological offset focus, either to enhance the existing (back dunes) or recreate new native assemblages. The communities outlined by the yellow circles include: active duneland (and sand daphne), stable duneland knobby clubrush, kanuka treeland, exotic native mix, saltwater marsh and freshwater wetland.*



Based on the findings of this assessment, and the fact that the Applicant and design team have accepted the recommendations of the Boffa Miskell in terms of course design and avoidance of identified features, we consider the proposal will result in no more than minor adverse ecological effects.

7.5. Cultural and archaeological effects

A cultural report is being prepared in conjunction with Ngāti Kikopiri. A copy of that report is contained in **Volume 2** of this application.

The Cultural Values Assessment (**CVA**) and consultation undertaken by the Applicant has revealed that Ngāti Kikopiri have mana whenua over the land. The understanding from those reports and consultation is that Te Runanga o Raukawa and the Muaūpoko Tribal Authority have an interest in this area and the connection of members of Ngāti Kikopiri are part of those groups. This application has support of iwi and an Memorandum of Understanding records that.

Mary O'Keefe of Heritage Solutions has undertaken an archaeological assessment of the subject

property and the proposed development. A copy of the archaeological report to accompany the proposal is provided in **Volume 2** of this application and informs this section of the AEE.

An archaeological assessment was undertaken in support of the resource consent application (and to accompany the application for an archaeological authority for the proposed works). The assessment summarises that:

> "*Based on information of site nature and occurrence inferred from archaeological work on the Kapiti and Horowhenua area, the most likely site type is middens. Midden sites are not so archaeologically significant as to preclude their destruction by the proposed work. However, they are very likely to contain valuable scientific information on subsistence activities and wider environment factors, so analysis of these sites will be required during and after their destruction.*"

The archaeological assessment states that sites that may have been present in the area where commercial forestry occurred are very likely to have been destroyed by harvesting activities.

Archaeological sites "*have been recorded in the intact coastal dunes in the south-west corner of the proposed area of work. The dunes in the area of proposed work are largely intact, so there is a high probability of sites in them…*". Many of the dunes in this area are not being modified for the proposed course construction. Where modification does occur, "*the loss of the archaeological sites can be mitigated through analysis of them to extract their scientific information*".

Based on the above and the full report in **Volume 2**, we consider the archaeological effects of the proposed activity, provided an appropriate management plan is followed for the duration of the construction works, can be managed so as they are minor.

7.6. Rural character and amenity

The subject property and surrounding environment are characterised by predominantly rural activities (mainly dairy and drystock farming) with some areas of plantation forestry and rural lifestyle blocks. Built form is sparsely distributed across the landscape and generally low profile with a mixture of residential dwellings and farm buildings (including sheds, barns and other accessory buildings).

Vegetation cover in the local environment is predominantly grass pasture and pine plantation with coastal dune species becoming more prevalent closer to the coast. On the subject property itself, coastal dunes have been planted with macrocarpa with a range of other non-native species in the under-storey.

The proposal will retain and, in some ways, enhance the character and amenity of the subject property and surrounding area.

Earthworks over the property will be kept to a minimum with the links golf course working with the existing topography and using the dune landscape as a feature of the course. The foredune topography will be protected throughout the proposed works and subsequent development and vegetation cover enhanced through the removal of non-native macrocarpa and other weed species along the property's coastal margin and replanting with native species that will effectively stabilise the foredune without encouraging the spread of non-native species.

Built form on the property will maintain the low-density, low-profile character established in the surrounding rural area. All buildings will be single storey and in many cases recessed into the dune topography to avoid any visual dominance. Larger buildings such as the maintenance sheds, stables and driving range building will be rural in nature and character and are considered to be

appropriate in this location. All built from within the proposed development will be set back well within the property and will not be visually dominant from any point outside the property.

Vehicle movements to and from the property will increase as a result of the proposed development. As stated in the Integrated Transportation Assessment (**ITA**) prepared by Tim Kelly Transportation Planning Limited (**TKTPL**), "*the volume of additional traffic activity associated with the operation of the golfcourse will be low and dispersed over time*". Alternative potential uses for the land, such as plantation forestry, would generate significant vehicle movements, including the use of more heavy vehicles, at stages of the operation. This would likely have a greater impact on the character, safety and efficiency of Muhunoa West Road .

There will be no fragmentation of the land resource with all existing property boundaries retained by the proposed development. Access to the property will continue to be from the end of Muhunoa West Road , as is the current situation. An additional site entrance is proposed to provide access to the maintenance sheds and stables to minimise any conflict at the site access.

The proposal will be self sufficient in terms of servicing for water supply, wastewater treatment and disposal and stormwater management with all three being managed within the boundaries of the property (see below for an assessment of the effects relating to infrastructure and servicing).

The proposal will not generate significant levels of noise or odour either during construction or operation. Construction activities will be at a level typical of activities within the rural environment.

As such, it is considered the proposed development will have less than minor adverse effects on the character and amenity of the application site and surrounding area and will provide positive effects to the coastal character of the property through the reinstatement of native species along the coastal foredune.

7.7. Infrastructure effects

7.7.1. Roading, traffic and access effects

Tim Kelly Transportation Planning Limited (**TKTPL**) has undertaken an Integrated Transportation Assessment (**ITA**) of the proposed golf course development. The purpose of the ITA is to assess the proposal in terms of any potential effects upon the operation of the transportation network, identify appropriate mitigation measures and assess compliance with the relevant provisions of the district plan.

As stated in the ITA:

The potential transportation effects of the proposal are:

- *the safety of vehicular movements entering and exiting the site;*
- *the impacts of additional vehicular activity along Muhunoa West Road;*
- *the impacts of additional vehicular turning activity at the SH1 / Muhunoa West Road intersection;*
- *the adequacy of on-site parking provision, disability access and servicing facilities; and*
- *construction traffic activity.*

The following is taken from the conclusion of the ITA and is adopted for the purpose

of this assessment of environmental effects:

This assessment has reviewed the transportation aspects and potential effects of a proposed golf-course development, to be located at the western end of Muhunoa West Road, and concludes that:

- *the volume of additional traffic activity associated with the operation of the golf-course will be low and dispersed over time;*
- *this additional traffic activity will be able to be accommodated by Muhunoa West Road and its intersection with SH1 without any adverse operational or safety effects which are more than minor;*
- *the on-site parking proposed will be adequate for the typical demands generated by the facility, but the nature of the site means that further areas are available for parking in the unlikely event that these are required; and*
- *the proposal will or is able to comply with the relevant requirements of the district plan.*

On the basis of the transportation issues addressed by this assessment, it is recommended that consent be granted for the proposal.

Based on this assessment, we consider the proposed golf course development will result in less than minor adverse roading, traffic and access effects.

7.7.2. Stormwater effects

The following is taken from the Engineering Report at **Volume 2** of this application:

> *Percolation tests were undertaken in several locations across the site. The percolation rates were high due to the sandy soils. On average a soak rate with a factor of safety of 4 applied was 400mm/hr.*
>
> *Stormwater captured from the roofs of all buildings on the golf course will be captured and reused for potable water. This minimizes the amount the stormwater discharging to land. There may be times when the potable water tanks are full and a storm event occurs. An overflow pipe at the top of the tanks will discharge the excess water into soak pits. The soak pits will be relatively small given the high percolation rates and 100% rainwater reuse target.*
>
> *During detailed design the raintanks and soakage pits will be sized.*
>
> *…*
>
> *Stormwater neutrality is achieved by attenuating the peak discharge in a 10-year, 10 minute duration event by capturing the water from the roof in the rain tanks and releasing it slowly through a small orifice.*

Based on the soakage rates on the property and the availability of land for soakage to ground we consider the proposal will result in less than minor adverse stormwater effects.

7.7.3. Water and wastewater effects

The following is taken from the Engineering Report at Volume 2 of this application:

> *Potable water for the Clubhouse, 10 accommodation units and driving range will*

> *be from a shallow bore, which will be supplemented by stormwater captured from the roofs of the Clubhouse and accommodation units.*
>
> *Potable water for the Owner's Cottage, Stables and Maintenance sheds will be captured from the roof of each building and stored in tanks.*
>
> *…*
>
> *Wastewater from the Clubhouse, accommodation units, and driving range building will be treated in an on-site secondary treatment plant. The treated effluent will be disposed using a PCDI* [pressure compensating drip irrigation] *system.*
>
> *Wastewater from the owner's cottage will be treated in a residential secondary treatment tank and disposed using a PCDI system.*
>
> *Wastewater from the stables and maintenance sheds will be treated in one secondary treatment plant and disposed of via a PCDI system.*

We consider the proposed methods of water supply and wastewater treatment and discharge.

Based on the above, it is considered the proposal will result in less than minor adverse infrastructure effects.

7.8. Ground conditions and geological effects

The bore log from the exploration well currently being drilled on the property is appended to the Pump Test Report and AEE prepared by Bay Geological Services and at **Volume 2** of this application.

In terms of foundation design for the proposed buildings, there is considered to be adequate good quality sand on the property available for making suitable ground conditions for building foundations. Specific design is required for building foundations. The engineering report at **Volume 2** states:

> *All the proposed buildings within the property will have an importance level of 2 as per NZS3604. Ground investigations as prescribed in NZS3604 Section 3 were undertaken. Based on these investigations and the scala penetrometer results the soil conditions are not classed as good ground. Specific engineering design will be required for all building foundations.*

Provided specific foundation design is undertaken for the proposed buildings, we consider the potential ground condition effects will be less than minor.

7.9. Water quality and quantity effects

The main potential effects on the quality and quantity of water are from the abstraction of groundwater, in particular if issues arise with connectivity to the Ōhau River or from saltwater intrusion. The abstraction could also impact on surface water resource (including wetlands) through modification of ground water depth and flows.

These matters have been assessed and addressed in the Water Feasibility Study prepared by Lattey Group and in the Pump Test Report and AEE by Bay Geological Services. Those technical reports are contained in **Volume 2** of this application.

In addition to monitoring ground water at depth (through bore monitoring) the hydrogeologist installed a shallow water monitoring site next to the Ōhau River

The Bay Geological Services report concludes:

- *A new Douglas Links Well was drilled in November – February 2021, to 104.60 m toc, screened from 96.91 – 102.91 m toc (6 m) across a sandy gravel aquifer with trace shell material, with an initial SWL of -11.22 m toc;*
- *Constant flow aquifer testing of the pumped Well was carried out from 10 to 14 May 2021 at a rate of 16.07 l/s (1388.45 m^3/day) for 5760 mins, followed by a 4320 min Recovery period;*
- *The maximum recorded drawdown in the pumped Well was 18.92 m after 5685 mins pumping, following which drawdown approached stabilisation;*
- *The Recovery response upon cessation of pumping was instantaneous and the well returned to within 150 mm of the initial SWL after 3210 mins' Recovery;*
- *Four shallow to intermediate depth bores within 2 km of the pumped well were monitored during pumping and recovery periods, which did not did not experience measurable drawdown attributed to pumping;*
- *The pumped Well drawdown data was initially matched using the Cooper-Jacob (1946) curve with a transmissivity T = 108.90 m^2/day; and the Neuman-Witherspoon (1969) solution for leaky confined aquifers with T = 25.11 m^2/day were found using Aqtesolv (Duffield, 2007);*
- *Transmissivity values ranging from T = 103.85 to 105.00 m^2/day were calculated using MS Excel and the Recovery data, along with the Aqtesolv software;*
- *Aquifer parameters of T = 105 m^2/day and adopted storativity, s = 0.0001 (reflecting confined aquifer conditions) are considered appropriate for well interference calculations;*
- *Analysis of pump test data reveals a leaky confined aquifer with a degree of vertical contribution from an overlying aquifer, logged as a fine to medium sand from 68.0 to 79.1 m toc;*
- *An instantaneous flow rate of 16.07 l/s and volume of 1500 to 2000 m^3/day (17.36 to 23.15 l/s), and 168,060 to 224,806 m^3/year is sought to develop and irrigate the new Links course;*
- *The Aqtesolv (Duffield, 2007) software and Drawdown.xls program (Scott, 2001) estimates conservative long-term well interference effects of approximately 4.72 and 3.88 m within the same aquifer at distances of 2km and 3 km respectively, based on pumping 24/7 for 150 days at 16.07 l/s (using the Theis (1935) solution for confined aquifers). However, the aquifer response displays a 'leaky' component with vertical contribution, potentially reducing the predicted well interference response in neighbouring wells;*
- *The Hunt (2003) model was used to estimate stream depletion of approximately 4% when pumping the new Well at 16.07 l/s over 100 days which is deemed to be low using the Table 16.1 classification in the Horizons 'One Plan';*

- *Using the Ghyben–Herzberg ratio, and water table measurement of approximately 14.76 m amsl, then the saltwater-freshwater interface is inferred to be about 590 m depth bgl. The confined nature of the aquifer producing from a deep gravel unit and the relatively low flow rate (16.06 l/s) resulting in moderate drawdown suggests that the risk of saline intrusion would be low;*
- *Water quality testing of the pumped aquifer was completed by Hill Laboratories, who provided the following Final Assessment: The parameters Turbidity, Total Iron and Total Manganese did NOT meet the guidelines laid down in the publication 'Drinking-water Standards for New Zealand 2005 (Revised 2018)' published by the Ministry of Health for water which is suitable for drinking purposes;*
- *The Land Air Water Aotearoa (LAWA) website reveals a monitor bore about 4.5 km east of the Well. The 100 mm diam. bore is very shallow (16.30 m depth) in comparison to the new Well and results suggest that it is susceptible to near-surface activities and potential contaminants in shallow groundwater such as E. coli, which is not expected within the deep pumped Well;*
- *Of the 27 Mm^3/year allocation limit set for the Horowhenua Groundwater Management Zone (HGMZ), approximately 12.8% (3,458,853 m^3/year, and 18,963 m^3/day) has been allocated as at June 2021, which suggests sufficient allocation is available within the HGMZ.*

This result indicates a 'leaky' confined aquifer with the typical drawdown response of a confined aquifer, that also exhibits a degree of vertical leakage providing aquifer recharge. Therefore, pumping the Well is likely to affect surrounding wells screened within the same deep gravel aquifer at similar depths, however to a lesser extent than a fully confined well given the vertical contribution.

It is considered that pumping the Applicant's Well at a constant rate of 16.07 l/s over 150 days is likely to result in tolerable well interference effects in deep gravel aquifer bores (of which there are none within 2 km) due to the available head of water; and effects on the environment are considered no more than minor. Given the nature of the aquifer, it is considered that the Well would be able to sustain a greater abstraction rate without resulting in significant adverse effects; however, this assumption would need to be tested through a similar regime of assessment covered in this report.

Based on the above conclusion, it is our opinion that the proposal will result in no more than minor effects on groundwater quantity and quality.

The proposed activities will not influence surface water features (including wetlands) and the monitoring that has occurred during investigations confirms the effects will be less than minor.

The potential effects on water quality from the proposed earthworks will be managed through employment of an approved Erosion and Sediment Control Plan and Construction Management Plan (drafts of which is at **Volume 2**) and are addressed elsewhere in this report.

We therefore consider the potential effects on water quality and quantity will be minor.

7.10. Potential visual effects

The introduction of a golf course, additional built form and ancillary activities in the rural environment has the potential to result in adverse visual effects if not appropriately managed. There are a number of locations from which the application property can be viewed, including

publicly accessible locations and neighbouring properties.

A number of measures have been incorporated into the design of the development to ensure the visual effects will be less than minor. These include:

- The links course has been designed to minimise topography changes to provide for holes to be integrated into the existing landforms as much as possible. Proposed earthworks volumes and areas have consequently been minimised. All earthworks will be stabilised and revegetated as quickly as practical to ensure the visual effects of the construction are temporary only.
- The foredune area along the coast (at the rear of the beach) and the river margins along the Ōhau River will be unchanged by the proposed development. These will remain in their current state. This will minimise any potential visual impact from the beach or the river. These will be enhanced according to the Eco Nomos report.
- Any vegetation clearance, including the removal of macrocarpa trees in the stable duneland behind the foredune, will be replaced with suitable coastal species to return large parts of this dune land to a more natural state, interspersed with golf holes as shown on the plans in the appendices to this application.
- All built form on the site has been designed to be low profile (mainly single storey with single pitched roofs) to integrate the buildings into the landscape. All buildings are also setback well inside the boundaries of the property, resulting in them being well screened from external view and maintaining the rural visual amenity of the property.
- Colours for external cladding of buildings will be natural tones to further minimise the visual impact of the buildings proposed.
- Minimal activity is proposed at site entrance from Muhunoa West Road. The existing access will be upgraded and an additional service access will be installed to the west of the existing access. There will therefore be minimal visual impact resulting from the proposed activity viewed from the public road.

Based on the above, we consider the proposed Douglas Links golf course development will result in less than minor adverse visual effects.

7.11. Construction effects

The construction of the proposed development involves:

- Drilling the water supply bores (for irrigation and domestic supply)
- Some vegetation clearance and site clearance
- Bulk cut-to-fill earthworks and recontouring to achieve the finished ground level for both the course itself but also building platforms and internal road alignments
- Golf hole construction process (a copy of a construction methodology is provided at **Volume 2** to this application).
- Construction of the buildings (clubhouse, accommodation units, owner's residence, driving range building, maintenance sheds and stables)
- Construction of internal roads and parking and manoeuvring areas
- Landscaping and planting of finished development

In relation to traffic effects from construction, the ITA in **Volume 2** of this application states:

> *The site preparation and construction phases of the project will result in some additional vehicular movements in this area, especially trucks. The level of activity will be negligible and little different to that associated with the construction of private dwellings. Consequently, there will be a negligible impact upon other vehicle movements in this area.*

Internal roads follow existing track alignments wherever possible to minimise the need for long cuts/fills along road alignments.

Standard best practice construction methodologies can be used to ensure the earthworks required do not result in accelerated erosion on the site or surrounding area. Other construction effects such as noise and construction traffic will also be managed through standard best practice methods including reasonable operating hours.

All works will be undertaken in accordance with suitable erosion and sediment controls (in accordance with the best practice measures outlined in the Greater Wellington Regional Council document '*Erosion and Sediment Control Guidelines*' which has been adopted by Horizons Regional Council). This will ensure the proposed works will not result in uncontrolled discharge of sediment to any waterbody (including the Ōhau River), accelerated erosion or scouring of any stream bank.

The proposal will result in less than minor adverse construction effects.

7.12. Environment enhancement effects

As detailed in other parts of this report and the appended documents, the proposal will provide a series of environmental enhancements including:

- Removal of the existing macrocarpa and other exotic, invasive species from the coastal dunelands;
- Replanting of the majority of these areas with suitable native species that will both stabilise the dunelands and return the vegetation cover to its natural state;
- Augmentation of existing isolated stands of kanuka across the property with additional planting around the isolated remnants; and
- On-going protection of identified valuable habitats and ecosystems (including the saltmarsh wetland, kanuka remnants and coastal foredunes.

7.13. Tourism effects

The development of a links golf course on the Horowhenua coast, with associated accommodation and clubhouse facilities, will provide tourism benefits to the wider area through securing an attraction that will draw visitors from across New Zealand and overseas.

The applicant's original brief for finding suitable sites for the links golf course included the need for the site to be within one hour's drive of a regional airport. In this case, the property is within one hour of Palmerston North Airport. The development of Douglas Links will therefore bring tourism benefits to the local area through an increase in visitors to the Horowhenua district.

The proposal will also generate the potential for the Douglas Links course to be included in golf tour packages which may include playing at a number of NZ's highest ranking courses on inclusive tours and would further generate tourism benefits for the Horowhenua district and the wider region.

We therefore consider the proposal will generate positive tourism effects.

7.14. Employment effects

The golf course, clubhouse, accommodation and ancillary activities will generate a number of employment opportunities, predominantly for local people. The Applicant estimates there will be around 20 permanent employees at Douglas Links (some on roster).

In addition, during construction the proposal will generate jobs for builders and other tradespeople, civil contracting firms, landscaping firms and more. There will be upwards of 35 contractors and builders working on the project during course construction.

The proposal will result in positive employment effects as a result.

7.15. Economic development effects

The combination of positive tourism effects and positive employment effects from the proposed development will have consequential positive economic development effects.

Both during construction and operation of the golf course, the proposal will generate local employment opportunities for the construction sector and in the hospitality sector with associated direct and indirect flow on economic development benefits.

The arrival of visitors to the golf course will provide potential benefits to local businesses, in particular in the hospitality sector between Palmerston North Airport and the application site. This will result in positive economic development effects for the Horowhenua district and, to a lesser extent, the wider region.

7.16. Cumulative effects

Section 3 of the RMA defines cumulative effects as those effects which arise "*over time or in combination with other effects*". This section considers the cumulative implications of the effects considered in the preceding sections to provide an assessment of the combined and over time effect of the proposal.

In all cases, the effects of the proposal have been determined to be minor, less than minor or positive. When considered in combination with each other the overall adverse effects are considered to be less than minor. The significant removal of weed and invasive species and revegetation proposed, combined with the economic, tourism and employment effects create strong positive impacts. The combined adverse effects are minor.

We therefore consider any adverse cumulative effects of the proposal will be less than minor.

7.17. Horowhenua District Plan assessment criteria

To assist with assessment of the proposal against the assessment criteria of the Horowhenua District Plan, we have summarised the assessment of environmental effects against the relevant parts of Chapter 25 below.

Criterion	Assessment
General	
The extent of the non-compliance(s) and/or any worsening of existing non-compliance(s).	There will only be minor non-compliances with permitted activity standards (separation distance between the two vehicle crossings, minor

	earthworks). The extent of these is minimal and the effects will be less than minor.
The physical features of the site and surrounds and any unique characteristics that makes compliance with permitted activity standards unachievable.	Compliance with the permitted standards is not achievable given the existing road frontage onto Muhunoa West Road and the nature of earthworks proposed.
The location, bulk and dominance of the building or structure and the actual and potential adverse affects on the character and amenity of the surrounding area.	All buildings are located internal to the application property and are to be low-profile in design and external surfaces. Buildings will be recessed into the landscape and not visually dominant from any property boundary or publicly accessible location.
The likelihood of the proposed activity to generate reverse sensitivity effects on the primary production, intensive farming activities and other lawfully established activities, and the potential impact these may have on the continuing effective and efficient operation of the primary production, intensive farming activities and other lawfully established activities.	Reverse sensitive effects will not result from the proposed activities. The golf course and built form are well contained within the application site and surrounding land uses will not be affected by the proposal. Neighbouring landowners have provided their written approval to the proposed activities.
The extent to which the design of the building and activity is compatible with the activities, character and amenity of the area.	The proposed built form has been design and located to integrate into the landscape and be compatible with the surrounding coastal rural character and amenity.
The level, duration and frequency of any noise likely to be generated and the degree to which this will contrast with the existing noise environment and the impact of any cumulative increase, taking into account the nature of any measures to mitigate excessive noise levels and the degree to which they are likely to be successful.	Noise generated from the proposed activities will be minimal and will not be excessive or adversely affect any surrounding activity.
Whether the development would have an adverse effect on the safety and efficiency of the road network, including consideration of the volume and type of traffic which may be generated to the site and the ability of the site to accommodate parking, loading, manoeuvring and access requirements, including the extent to which the	The Integrated Transport Assessment provided in **Volume 2** confirms the existing road network has sufficient capacity to accommodate the proposed activities without generating adverse effects on the safety and efficiency of the network (including Muhunoa West Road and State Highway 1 at Ōhau).

frequency and timing of vehicle movements and the impact these may have on the surrounding environment in terms of noise, vibration, and glare from headlights.	On-site, internal access, parking and manoeuvring can be provided without affecting the public road network.
Whether establishment of the activity would adversely affect the efficient functioning of the Rural Zone or other zones, or result in significant social or economic impacts.	There will be no impact on the efficient functioning of the rural environment or any existing rural activity. The proposal will result in positive social and economic impacts.
The extent to which the activity promotes the optimum and efficient use of the rural land resource.	The subject land has proved unproductive for farming. Alternative productive uses for the land, such as plantation forestry, would like have a greater environmental effect and have additional effects on the road network etc.
The proposed methods for avoiding, remedying or mitigating adverse effects including the design of the building or structure, the use of materials, design, screening, landscaping.	A full suite of incorporated mitigation is proposed as part of the comprehensive development plan for the project. This includes a programme of native revegetation, on-site landscaping and careful choice of building materials and locations.
The extent to which alternative sites, designs and layout have been considered.	Alternative sites throughout New Zealand have been considered for the proposed activity. The subject property has the ideal combination of coastal and river frontage, sufficient land resource for an eighteen hole course and proximity (within an hour's drive) to a regional airport (in this case Palmerston North airport).
The proposed methods for avoiding, remedying or mitigating reverse sensitivity effects on transport networks, including railway corridors from new or altered buildings accommodating new noise sensitive activities.	N/A
The positive local, regional and national benefits of undertaking the activity.	The proposal will result in significant economic, employment and tourism effects for the Horowhenua district and will provide benefits to the subject property through a programme of native revegetation and protection of existing areas of high natural and coastal character and vegetation.

Whether the development or activity would have an adverse effect on the operation, maintenance, upgrading or development of the National Grid.	The proposal will have no impact on the operation, maintenance, upgrading or development of the National Grid.
The extent to which a proposed activity will affect the efficient and effective operation of district significant infrastructure. Consideration will be given to advice provided by the manager of the potentially affected infrastructure.	The proposal will have no impact on the efficient and effective operation of district significant infrastructure.
Buildings	
The extent of any adverse effects on the environment from exceeding maximum height and in particular the effect of any increased building height on the visual character of the area and its compatibility with the scale of adjoining buildings.	All buildings will comply with permitted height limits and will be recessed and integrated into the landscape to minimise any potential effect. The feeling of open space and sparse, distributed built form will remain following the proposed development.
The degree to which the building has an adverse effect on the rural character of the site and the surrounding area.	Proposed buildings will retain the current rural character through careful siting and choice of building materials and wall and roof colours.
The design and appearance of the building and its compatibility with the surrounding environment in terms of design, height, and scale.	The proposed buildings are low profile in design, with some of the buildings (in particular the maintenance sheds) displaying a rural character and design. The proposed buildings are considered to be appropriate for a rural location.
The need for two or more residential dwelling units on a site to provide for farmworker accommodation.	N/A
The extent to which encroachment of a building setback or separation distance to enable more efficient, practical and/or pleasant use of the remainder of the site.	No building will encroach the building setback or separation standards.
The extent to which alternative practical locations or designs are available for the building.	Alternative locations for buildings were considered during the design phase. The chosen locations were considered to have the minimum potential impact and visual dominance of all potential options.
Any adverse effects of the proximity or bulk of the building, in terms of visual dominance by buildings on the outlook	No proposed buildings will be in close proximity to adjoining sites. All buildings have been designed

from adjoining sites and buildings, which is out of character with the local environment.	to integrate into the landscape to minimise any potential effect on the surrounding environment. Neighbouring landowners have provided their written approval to the proposed activities.
Any adverse effects on adjoining sites of the proximity of the building, in terms of reduced privacy through being overlooked from or being in close proximity to neighbouring buildings, to an extent which is inconsistent with the surrounding environment.	No building will overlook any neighbouring property in any way that will affect privacy or increase overlooking of that neighbouring property. Neighbouring landowners have provided their written approval to the proposed activities.
The extent to which the use of the proposed building will detract from the pleasantness or amenity of adjoining sites, in terms of such matters as noise, smell, dust, glare or vibration.	The proposed activities will not generate levels of noise, smell, dust, glare or vibration to the extent that neighbouring amenity levels will be affected. During construction, activities will be managed in accordance with an approved Erosion and Sediment Control Plan to ensure construction activities do not contribute adversely to these matters.
The ability to mitigate any adverse effects of the proposal on adjoining sites, including through the provision of landscape plantings.	Mitigation measures have been incorporated into the design of the development, including significant landscape and native revegetation planting. In any event, the effects of the proposed built form have been determined to be less than minor. Neighbouring landowners have provided their written approval to the proposed activities.
Whether development within the National Grid Corridor would have an adverse effect on the operation, maintenance, upgrading or development of the electricity transmission network.	N/A
The proposed methods for avoiding, remedying or mitigating reverse sensitivity effects on transport networks, including railway corridors from new or altered buildings accommodating new noise sensitive activities.	N/A
Tree Planting	
The proximity to and potential effects on residential dwellings, roads, and/or	None of the proposed planting will have any effect on residential dwellings, roads or utilities.

utilities from established trees in terms of tree debris, shading and icing of roads, maintenance of level crossing sightlines, residential and rural amenity.	
Non-Primary Production Activities	
Actual or potential effects (including cumulative effects) on the sustainable management of the rural land resource and, in particular, versatile land.	The application property is not classified as versatile land. Previous uses of the land have demonstrated that the land is not economically productive for most traditional forms of primary production activities and is therefore considered suitable for the proposed use. The proposed activity will have no effect on the productive capability of surrounding land.
Whether the development has a functional need to locate in the Rural Zone, and whether the development meets an identified need within the local community.	The proposed links golf course requires a coastal location and sufficient land resource for the development of the course. As such, a rural location is required for the proposed activity.
Whether alternative locations (including possible locations in urban areas) have been considered.	Alternative sites throughout New Zealand have been considered for the proposed activity. The subject property has the ideal combination of coastal and river frontage, sufficient land resource for an eighteen hole course and proximity (within an hour's drive) to a regional airport (in this case Palmerston North airport).
Whether the scale of the development is in keeping with the rural character of the area.	It has been demonstrated elsewhere in this report that the low-density, sparse built form, proposed grass cover and revegetation plan are consistent with the rural character of the local area.
Whether the proposal will adversely affect the open space and rural character of the surrounding area.	The open space feeling and rural character of the local environment will be retained. Built form will continue to be sparse, low-profile and/or rural in nature and design. Land use activities will generally contribute to and retain the existing levels of open space in the surrounding environment.
The extent to which the non-primary production activity has the potential to generate reverse sensitivity effects and reduces the efficient and effective use of the Rural Zone by primary production activities.	Reverse sensitive effects will not result from the proposed activities. The golf course and built form are well contained within the application site and surrounding land uses will not be affected by the proposal. Neighbouring landowners have provided their written approval to the proposed activities.

Whether the site contains an adequate area of land which will enable the effects of the activity to be contained on the site.	It has been demonstrated that all adverse effects of the proposed activity will be internalised to the extent that they will be less than minor beyond the boundaries of the application property.
The hours of operation of the activity and the effect it may have on the amenity enjoyed by the existing and future residents of the locality.	The proposal will not generate a level of nuisance effect that would result in any change to the enjoyment of the rural character and amenity for surrounding residents.
Actual or potential adverse effects on the occupants of nearby dwellings (e.g. noise, odour, and glare).	The proposed activities will not generate levels of noise, odour or glare to the extent that neighbouring amenity levels will be affected.
The advantages of the development with respect to the processing of local products or materials on or near their sites of origin, if applicable.	N/A
Outstanding Natural Features and Landscapes and Domains with High Landscape Amenity	
The extent to which the proposal adversely affects the landscape values of the landscape in which it is located.	The proposed Douglas Links Golf Course will – 1. Have no adverse effects on the environment that cannot be readily mitigated, and will in fact enhance the landscape character, biodiversity habitat and the amenity values of the coastal landscape. 2. Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin. 3. Will protect and enhance natural character values throughout the site.
The extent to which there are cumulative effects on landscape values.	
The extent to which landscape effects are able to be effectively avoided, remedied or mitigated.	
The extent to which the proposal provides for rehabilitation and restoration of landscape and associated values or the offsetting of those values by another form of environmental compensation using a 'no net loss' approach.	Significant rehabilitation, restoration and native revegetation will be undertaken in the stable dunes behind the foredunes, replacing the weed, invasive and exotic species currently present in this area. This is considered to represent a significant environment benefit from the proposal.
The extent to which the proposal leads to buildings, structures and earthworks being highly visible.	Buildings will be sparsely distributed, low-profile and of a design appropriate for the rural environment. No structures will dominant the landscape. The proposed earthworks will return the land to a natural dune contour and will be stabilised and revegetated on completion.

	No buildings, structures or earthworks will therefore be highly visible.
The extent to which the proposal is in accordance with the Rural Subdivision and Development Design Guide.	Building location and design for the proposed development has considered the principals of the Horowhenua Rural Subdivision and Development Design Guide, in particular the *Building Design and Appearance in Outstanding Natural Landscapes and Landscape Domains of High Amenity* section. All buildings are single-storey, low profile and recessed into the landscape. Building cladding and colours use natural tones to integrate the proposed built form into the surrounding rural environment.
The extent to which a proposal on an Outstanding Natural Feature or Landscape, or domain with High Landscape Amenity, affects the backdrop of the Tararua Ranges.	The location of the application property and the low-profile of all development proposed will ensure the proposal will have no effect on the backdrop of the Tararua Ranges.
The extent to which the proposal is visible from the coast.	Parts of the proposed development will be visible from the coast. The landscape assessment confirms: *That in terms of landscape considerations the proposed development –* • *Has taken into account the Coastal ONFL classification and provisions, and has had regard to other landscapes having high amenity.* • *Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.* • *Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.* • *Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.* • *Will protect, expand and manage areas of significant indigenous vegetation and habitat.* The removal of macrocarpa and other exotic species from the dunes will result in a positive visual effects from the coast.

The extent to which the proposal is consistent with any relevant provisions in National Policy Statements, Regional Policy Statements and objectives and policies of the District Plan.	The proposed activity has been assessed against the NZ Coastal Policy Statement, other National Policy Statements, the Horizons One Plan (both the Regional Policy Statement and the Regional Plan) and the relevant objectives and policies of the Horowhenua District Plan. It is concluded that the proposal is consistent with the relevant resource management policy documents.
Any relevant criteria in Chapter 25 relating to the effects of subdivision and development.	The assessment criteria in Chapter 25 have been considered in full in this assessment.
The extent to which the location and design of the activity is constrained by functional, operational and technical constraints.	The location and design of the proposed activities are constrained to a certain extent by the requirements of a links golf course. However, the design approach has been led by site constraints, existing landscapes and features and areas of native vegetation to ensure the features of significance remain and are protected throughout the proposed activities' development and operation.
The extent to which the activity will generate benefits relating to the social, economic and environmental wellbeing of communities.	Significant social, economic and environmental benefits will result from the proposed activities. • The proposal will generate direct and indirect employment opportunities, tourism activities and wider economic development potential. • The proposal will generate recreational enjoyment from the ability to play golf in the coastal location of the application property. • The native revegetation proposed and protection of existing valued vegetation on the property will generate environmental benefits from the proposal.

7.18. Summary of environmental effects

This assessment of the actual and potential effects of the proposed activity is at a level of detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment.

In accordance with Section 3 and the requirements of Section 104 of the RMA, the assessment covers positive or adverse; temporary or permanent; past, present, or future; and cumulative effects. It also considers both potential effects of high probability and potential effects of low probability but high potential impact.

The assessment confirms that the proposed activity can be undertaken without generating more than minor adverse environmental effects. The assessment details the measures proposed to

avoid, remedy or mitigate any potential adverse environmental effects, including temporary effects, so that they will be less than minor.

7.19. Conclusion

This assessment considers the full suite of activities proposed for which resource consent is sought. This includes those matters under the jurisdiction of both the regional and the district council. The effects have been considered in a combined, comprehensive manner to ensure the full impact of the proposed activities are considered.

This assessment concludes that the proposed activity will not generate more than minor adverse effects, including when considered cumulatively. The assessment also concludes that the proposed activity will generate a significant number of positive effects, including environmental, cultural, economic and social effects that would not be achievable from alternative uses of the application property.

8. STATUTORY CONSIDERATIONS

8.1. Introduction

This section provides an assessment against the relevant statutory requirements of the RMA, including the general purpose and principles in Part 2 of the RMA and the specific matters relating to resource consents in Part 6.

8.2. Part 2 – Purpose and Principles

8.2.1. Section 5 - Purpose

Section 5 defines "sustainable management" as:

> *"managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enable people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while-*
>
> *(a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
>
> *(b) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
>
> *(c) avoiding, remedying, or mitigating any adverse effects of activities on the environment."*

It is shown elsewhere in these application documents that the proposed activity will not be contrary to the purpose of the RMA.

The proposal demonstrates sustainable use and development of the site, providing a range of positive outcomes for the site and the wider community.

The life-supporting capacity of air, water, soil and ecosystems will be safeguarded through a range of measures incorporated into the development proposal, as described elsewhere in this report.

Any actual or potential adverse environmental effects can be avoided, remedied or mitigated in the manner described in Section 7 of this report.

8.2.2. Section 6 – Matters of National Importance

In exercising its powers and functions under the RMA, consent authorities are required to recognise and provide for the matters of national importance listed in Section 6 of the RMA.

These matters have been addressed through the assessment of environmental effects in Section 7 of this report and in the policy assessment appended to this report. A summary of the specific considerations against the provisions of Section 6 is provided below.

(a) the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:

(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:

Design of the proposed golf course and ancillary buildings and activities used a first principles approach to the protection of natural character (including the coastal environment, wetlands and the Ōhau River) natural features and landscapes considered to be outstanding or of significant value. This included use of the existing district-level maps of features and landscapes and fine-tuning the definition of those features and landscapes with aerial mapping and on-site walkovers.

The Applicant also invited Horizons Regional Council ecologists to map and assess on sites and habitats of ecological value on the site prior to development of the course design. The report of that assessment process is provided in **Volume 2** of this application.

Development of the golf course layout and design followed on from this fine-grained site assessment and has taken full account of the natural character, features and landscapes of significant value and measures have been put in place to ensure those areas are protected from inappropriate use and development. In some cases, as described in Section 7 of this report and in the supporting reports appended to this application, some enhancement of those features will be generated by the proposal through the removal of weed and exotic vegetation species within some of those features, replanting with native and more suitable species (as shown in the RBT Design drawings in **Volume 3** of this application) and some augmentation of those areas through additional native plantings around the edges of the existing features of significant value on the property.

(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:

Areas of significant indigenous vegetation, in particular those identified as being rare, threatened or at risk in the Horizons Regional Council ecological report, will be protected, or in some cases enhanced, through the proposed works which include significant native revegetation planting on the property.

No significant habitats of indigenous fauna were identified on site.

(d) the maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers:

Public access to the coast will be enhanced through facilitating the provision of a walkway to the beach from the end of Muhunoa West Road . There will be no change to public access to other waterbodies, including the Ōhau River, although the golf course activity adjacent to the river will provide greater opportunities for access to the river.

(e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:

The Applicant has worked with Ngāti Kikopiri to better understand and appreciate their

relationship to the land and water, sites, waahi tapu and other taonga and to ensure these relationships are not hindered by the proposed development

(f) the protection of historic heritage from inappropriate subdivision, use, and development:

Measures have been taken, as detailed elsewhere in this report, including the protection of identified sites of historic value and the preparation of an archaeological authority application, to ensure historic heritage is protected during and after the proposed development. The Applicant is working with Ngāti Kikopiri regarding appropriate methods to recognise and interpret features of historic heritage value.

(g) the protection of protected customary rights:

No customary rights will be affected by the proposal.

(h) the management of significant risks from natural hazards.

The areas of the property identified as being susceptible to flooding will be managed so as to ensure there is no increase in risk from on-site flooding. No buildings are proposed in those areas. Coastal erosion risk will be managed through revegetation planting around the foredune. Building foundations will be designed to ensure the risk from liquefaction will be managed to acceptable levels. No other natural hazards are considered to present significant risks to the proposal.

Based on the above and the general assessment elsewhere in this report and its appendices we consider the proposal to be consistent with the relevant provisions of Section 6 of the RMA.

8.2.3. Section 7 – Other Matters

The other matters to which the local authorities must have particular regard in relation to managing the use, development, and protection of natural and physical resources are listed in Section 7 of the RMA.

Section 7 of this report (assessment of actual and potential effects) addresses the matters listed in Section of 7 of the RMA, in particular:

(a) kaitiakitanga:

(aa) the ethic of stewardship:

The Applicant is developing an ongoing relationship with tangata whenua regarding the protection and guardianship of the land, the water and the natural environment. The success of the links golf course depends on the protection of the intrinsic value of the land and water resource and the Applicant is very keen to ensure the undertake good natural resource management both for the benefit of the golf course development and in their role as guardians of the valuable resource.

The project includes the replacement of exotic and weed vegetation species with suitable native species. The building of a links course on a sandy subsoil has minimal effect on the surrounding environment. The design incorporates the replanting, regeneration and rejuvenation of the coastal environment. The golf course design seeks to return the dunes to, and maintain them in, a natural state. No soil will be removed or brought into the site. Organic fertilisers will be used and only the playing corridors (fairways and greens) will be watered to maintain grass growth. The grass type will be fescue, which is ideal for a coastal environment. On-site wastewater treatment will be to a high standard and there will be no discharge or drawing of waters into or out of the river. Building materials will be energy efficient and solar panels will be incorporated

into the designs.

(b) the efficient use and development of natural and physical resources:

The proposed activity is considered to be an efficient use and development of the land and other resources on the property and will enable the enjoyment of the coastal land resource, improved public access to the coast, enhancement of the native vegetation cover on the property and an appropriate activity on the property.

(ba) the efficiency of the end use of energy:

Energy efficiency measures have been incorporated into the design and proposed construction of the buildings on site.

(c) the maintenance and enhancement of amenity values:

The means by which amenity values are maintained and enhanced is addressed in Section 7 of this report.

(d) intrinsic values of ecosystems:

The means by which the value of ecosystems on the property and neighbouring properties are to be maintained and enhanced is addressed in Section 7 of this report.

(f) maintenance and enhancement of the quality of the environment:

The AEE in Section 7 of this report also details the means by which the quality of the environment of the site and the surrounding area will be maintained and enhanced by the proposed development.

(g) any finite characteristics of natural and physical resources:

The finite nature of existing resources has been addressed in consideration of the proposed water extraction, vegetation removal and replanting, earthworks and land use.

(i) the effects of climate change:

The effects of climate change, in particular as they relate to coastal processes, are considered in the Eco Nomos report at **Volume 2** of this application.

8.2.4. Section 8 – Principles of the Treaty of Waitangi

Section 8 of the RMA requires the local authority to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) when considering applications for resource consent.

The Applicant has entered into ongoing discussions with tangata whenua regarding opportunities for working together, in the spirit of kotahitanga, to seek mutually beneficial outcomes in relation to the land and resource.

A cultural report is being prepared in conjunction with Ngāti Kikopiri. A copy of that report is contained in **Volume 2** of this application.

The proposed activity is not considered to be inconsistent with the principles of the Treaty.

8.3. Part 6 – Resource Consents

The matters to which a consent authority shall have regard when considering applications for resource consents and submissions include sections 104, 105, 106, 107 and 108 of the RMA. The particular considerations for determining applications for discretionary activities are set out in section 104B of the RMA.

8.3.1. Section 88 – Making an application

Section 88 of the RMA (at Subsection (2)) and Schedule 4 set out the information requirements for resource consent applications.

It is considered this application meets all the requirements of Section 88 and the Schedule 4 to the RMA (*Information required in application for resource consent*).

8.3.2. Section 104 – Consideration of applications

Section 104(1) states:

> *When considering an application for resource consent and any submissions received, the consent authority must, subject to Part 2, have regard to –*
>
> *(a) any actual and potential effects on the environment of allowing the activity; and*
>
> *(b) any relevant provisions of –*
>
> *i. a national environmental standard;*
>
> *ii. other regulations;*
>
> *iii. a national policy statement;*
>
> *iv. a New Zealand coastal policy statement;*
>
> *v. a regional policy statement or proposed regional policy statement;*
>
> *iv. a plan or proposed plan; and*
>
> *(c) any other matters the consent authority considers relevant and reasonably necessary to determine the application.*

The provisions of Section 104 are subject to Part 2 of the RMA (sections 5 to 8), which means that the purpose and principles of the RMA are paramount. Part 2 of the RMA is discussed in Section 8.2 of this report, above.

An assessment of the proposal's consistency with the Regional Policy Statement component of the Horizons One Plan and the objectives and policies of the Horowhenua District Plan is provided in **Volume 2** of this application. An assessment of the actual and potential adverse effects of the proposal is provided in Section 7 of this report. That assessment confirms the effects of the proposal will be avoided, remedied or mitigated so as to be less than minor.

8.3.3. Section 104B – Determination of applications for discretionary and non-complying activities

Section 104B (*Determination of applications for discretionary or non-complying activities*) states:

> *After considering an application for a resource consent for a discretionary activity or non-complying activity, a consent authority—*
>
> *(a) may grant or refuse the application; and*
>
> *(b) if it grants the application, may impose conditions under section 108.*

Based on the assessment of the actual and potential effects of the proposal and the consideration of the relevant statutory considerations, it is considered that this application can be granted consent in accordance with Section 104B.

9. RELEVANT OBJECTIVES AND POLICIES

9.1. National, regional and district policy

This section provides a full assessment of the proposed activity against relevant national, regional and district policy documents and standards prepared under the Resource Management Act 1991 (**RMA**).

The assessment incorporates commentary from the relevant technical experts involved in the development of the project.

National Policy Statements

NZ Coastal Policy Statement		
Reference	**Text**	**Comment**
Objective 1	To safeguard the integrity, form, functioning and resilience of the coastal environment and sustain its ecosystems, including marine and intertidal areas, estuaries, dunes and land, by: • maintaining or enhancing natural biological and physical processes in the coastal environment and recognising their dynamic, complex and interdependent nature; • protecting representative or significant natural ecosystems and sites of biological importance and maintaining the diversity of New Zealand's indigenous coastal flora and fauna; and • maintaining coastal water quality, and enhancing it where it has deteriorated from what would otherwise be its natural condition, with significant adverse effects on ecology and habitat, because of discharges associated with human activity.	The assessment of effects and assessment against NZCPS and regional and district plan policy sets out how the proposal has been designed and has incorporated mitigation measures that ensure the integrity, form, functioning and resilience of the coastal environment are safeguarded and its ecosystems are sustained.
Objective 2	To preserve the natural character of the coastal environment and protect natural features and landscape values through: • recognising the characteristics and qualities that contribute to natural character, natural features and landscape values and their location and distribution;	The assessment of effects and assessment against NZCPS and regional and district plan policy sets out how the proposal has been designed and has incorporated mitigation measures preserve the natural character of the coastal environment and protect natural features and landscape values.

	• identifying those areas where various forms of subdivision, use, and development would be inappropriate and protecting them from such activities; and • encouraging restoration of the coastal environment.	
Objective 3	To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by: • recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources; • promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act; • incorporating mātauranga Māori into sustainable management practices; and • recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.	The applicant has established, and will continue to foster, ongoing relationships with tangata whenua in a genuine effort to recognise the role of tangata whenua as kaitiaki and to provide for tangata whenua involvement in the ongoing management of the coastal environment.
Objective 4	To maintain and enhance the public open space qualities and recreation opportunities of the coastal environment by: • recognising that the coastal marine area is an extensive area of public space for the public to use and enjoy; • maintaining and enhancing public walking access to and along the coastal marine area without charge, and where there are exceptional reasons that mean this is not practicable providing alternative linking access close to the coastal marine area; and	Public access and open space in the coastal environment has the potential to be improved as a result of the proposed development through options for an improved walkway to the coast. Recreation opportunities will be enhanced through the opening up of the property for golf. The potential implications of climate change have been considered in the Eco Nomos report in **Volume 2** of this application.

	• recognising the potential for coastal processes, including those likely to be affected by climate change, to restrict access to the coastal environment and the need to ensure that public access is maintained even when the coastal marine area advances inland.	
Objective 5	To ensure that coastal hazard risks taking account of climate change, are managed by: • locating new development away from areas prone to such risks; • considering responses, including managed retreat, for existing development in this situation; and • protecting or restoring natural defences to coastal hazards.	As already detailed, the Eco Nomos report in **Volume 2** of this application considers the potential coastal hazard risk, taking into account climate change. That report confirms the coastal hazard risks (taking account of climate change): *is not likely to pose a threat to the proposed Links course over the next 100 years, based on best present information on projected future sea level rise over that period.*
Objective 6	To enable people and communities to provide for their social, economic, and cultural wellbeing and their health and safety, through subdivision, use, and development, recognising that: • the protection of the values of the coastal environment does not preclude use and development in appropriate places and forms, and within appropriate limits; • some uses and developments which depend upon the use of natural and physical resources in the coastal environment are important to the social, economic and cultural wellbeing of people and communities; • functionally some uses and developments can only be located on the coast or in the coastal marine area; • the coastal environment contains renewable energy resources of significant value;	As detailed elsewhere in these application documents, the proposed activity will provide social and economic benefits through opportunities for employment, tourism and economic development whilst ensuring the identified values of the coastal environment are protected and enhanced through a programme of native revegetation and dune recontouring.

	• the protection of habitats of living marine resources contributes to the social, economic and cultural wellbeing of people and communities; • the potential to protect, use, and develop natural and physical resources in the coastal marine area should not be compromised by activities on land; • the proportion of the coastal marine area under any formal protection is small and therefore management under the Act is an important means by which the natural resources of the coastal marine area can be protected; and • historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use, and development.	
Objective 7	To ensure that management of the coastal environment recognises and provides for New Zealand's international obligations regarding the coastal environment, including the coastal marine area.	The proposal will have no impact on New Zealand's international obligations regarding the coastal environment.
Policy 1 Extent and characteristics of the coastal environment	1. Recognise that the extent and characteristics of the coastal environment vary from region to region and locality to locality; and the issues that arise may have different effects in different localities. 2. Recognise that the coastal environment includes: a. the coastal marine area; b. islands within the coastal marine area; c. areas where coastal processes, influences or qualities are significant,	As part of the development process for the proposed activity, the project team has reviewed the coastal environment provisions in the relevant policy documents, in particular the Horowhenua District Plan. Following the review of the policy documents, the project team undertook a more fine-grained analysis of the coastal features, vegetation areas and hazard areas on the application site and surrounding area. This approach has provided a site-specific analysis of the coastal environment and features in the local area from which development of the proposed activity could commence.

	including coastal lakes, lagoons, tidal estuaries, saltmarshes, coastal wetlands, and the margins of these; d. areas at risk from coastal hazards; e. coastal vegetation and the habitat of indigenous coastal species including migratory birds; f. elements and features that contribute to the natural character, landscape, visual qualities or amenity values; g. items of cultural and historic heritage in the coastal marine area or on the coast; h. inter-related coastal marine and terrestrial systems, including the intertidal zone; and i. physical resources and built facilities, including infrastructure, that have modified the coastal environment.	This has placed the coastal environment of the application property at the forefront of the design and assessment process and has resulted in the features of significance being protected and enhanced by the proposed activities. We therefore consider the proposal is consistent with Policy 1 of the NZCPS.
Policy 2 The Treaty of Waitangi, tangata whenua and Māori	In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment: a. recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment, including places where they have lived and fished for generations; b. involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by	As detailed elsewhere in this report, the applicant has, and will continue to engage with iwi and hāpu throughout the development and on-going operation of the proposed golf course. The intent for both parties is to recognise the role tangata whenua has in the management of the land and resource, including the application property and to recognise the value and expertise each party brings to the development potential of the property and the surrounding resources. The applicant is working towards an agreement or memorandum of

	undertaking effective consultation with tangata whenua; with such consultation to be early, meaningful, and as far as practicable in accordance with tikanga Māori; c. with the consent of tangata whenua and as far as practicable in accordance with tikanga Māori, incorporate mātauranga Māori in regional policy statements, in plans, and in the consideration of applications for resource consents, notices of requirement for designation and private plan changes; d. provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga, may have knowledge not otherwise available; e. take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council, to the extent that its content has a bearing on resource management issues in the region or district; and i. where appropriate incorporate references to, or material from, iwi resource management plans in regional policy	understanding with Ngāti Kikopiri as well as continued engagement with tangata whenua.

	statements and in plans; and ii. consider providing practical assistance to iwi or hapū who have indicated a wish to develop iwi resource management plans; f. provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as: i. bringing cultural understanding to monitoring of natural resources; ii. providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua; iii. having regard to regulations, rules or bylaws relating to ensuring sustainability of fisheries resources such as taiāpure, mahinga mātaitai or other non commercial Māori customary fishing; g. in consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising that tangata whenua have the right to choose not to identify places or values of historic,	

	cultural or spiritual significance or special value: i. recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and cultural impact assessments; and ii. provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages.	
Policy 3 Precautionary approach	1. Adopt a precautionary approach towards proposed activities whose effects on the coastal environment are uncertain, unknown, or little understood, but potentially significantly adverse. 2. In particular, adopt a precautionary approach to use and management of coastal resources potentially vulnerable to effects from climate change, so that:	The precautionary approach to managing potential effects from the coastal location has been integral to the project design throughout development of the project. The coastline in this location is not particularly susceptible to coastal erosion and the potential effects of climate change have been taken into account and assessed as part of the project design. In particular the Eco Nomos report considers in full the potential effect of climate change in combination with other contributing factors, including accretion

	a. avoidable social and economic loss and harm to communities does not occur; b. natural adjustments for coastal processes, natural defences, ecosystems, habitat and species are allowed to occur; and c. the natural character, public access, amenity and other values of the coastal environment meet the needs of future generations.	along this stretch of the coast, to provide a comprehensive indication of the likely effects.
Policy 4 Integration	Provide for the integrated management of natural and physical resources in the coastal environment, and activities that affect the coastal environment. This requires: a. co-ordinated management or control of activities within the coastal environment, and which could cross administrative boundaries, particularly: i. the local authority boundary between the coastal marine area and land; ii. local authority boundaries within the coastal environment, both within the coastal marine area and on land; and iii. where hapū or iwi boundaries or rohe cross local authority boundaries; b. working collaboratively with other bodies and agencies with responsibilities and functions relevant to resource	The Applicant has embraced an integrated management approach to the development, construction and management of the project. A co-ordinated approach has been employed through consultation with Horizons Regional Council, Horowhenua District Council, Ngāti Kikopiri and neighbouring properties. The Applicant engaged with these parties at an early stage in the process for a range of matters, including ecological site assessment, site walkovers and others. The resource consent application has been prepared as a comprehensive document covering both regional and district matters in a single set of documents so that all matters relating to the proposed development can be considered in the round. This approach is considered to achieve the integrated approach to resource management sought by Policy 4.

	management, such as where land or waters are held or managed for conservation purposes; and c. particular consideration of situations where: i. subdivision, use, or development and its effects above or below the line of mean high water springs will require, or is likely to result in, associated use or development that crosses the line of mean high water springs; or ii. public use and enjoyment of public space in the coastal environment is affected, or is likely to be affected; or iii. development or land management practices may be affected by physical changes to the coastal environment or potential inundation from coastal hazards, including as a result of climate change; or iv. land use activities affect, or are likely to affect, water quality in the coastal environment and marine ecosystems through increasing sedimentation; or v. significant adverse cumulative effects are	

	occurring, or can be anticipated.	
Policy 6 Activities in the coastal environment	1. In relation to the coastal environment: a. recognise that the provision of infrastructure, the supply and transport of energy including the generation and transmission of electricity, and the extraction of minerals are activities important to the social, economic and cultural well-being of people and communities; b. consider the rate at which built development and the associated public infrastructure should be enabled to provide for the reasonably foreseeable needs of population growth without compromising the other values of the coastal environment; c. encourage the consolidation of existing coastal settlements and urban areas where this will contribute to the avoidance or mitigation of sprawling or sporadic patterns of settlement and urban growth; d. recognise tangata whenua needs for papakāinga, marae and associated developments and make appropriate provision for them; e. consider where and how built development on land should be controlled so that it does not compromise activities of national or regional importance that have a functional need to	The landscape and visual impact assessment and the assessment of coastal geomorphology and ecology provided in **Volume 2** of this application, as well as the overall design for the golf course, consider the effects of the proposal on the coastal environment. Those assessments take into account the landscape and coastal features identified by the District Council and assessed on the ground by the Regional Council and the project team. The coastal environment assessment in the landscape and visual impact assessment states: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* It goes on: *The proposed Douglas Links Golf Course will –* *1. Have no adverse effects on the environment that cannot be readily mitigated, and will in fact enhance the landscape character, biodiversity habitat and the amenity values of the coastal landscape.*

	locate and operate in the coastal marine area; f. consider where development that maintains the character of the existing built environment should be encouraged, and where development resulting in a change in character would be acceptable; g. take into account the potential of renewable resources in the coastal environment, such as energy from wind, waves, currents and tides, to meet the reasonably foreseeable needs of future generations; h. consider how adverse visual impacts of development can be avoided in areas sensitive to such effects, such as headlands and prominent ridgelines, and as far as practicable and reasonable apply controls or conditions to avoid those effects; i. set back development from the coastal marine area and other water bodies, where practicable and reasonable, to protect the natural character, open space, public access and amenity values of the coastal environment; and j. where appropriate, buffer areas and sites of significant indigenous biological diversity, or historic heritage value. 2. Additionally, in relation to the coastal marine area: a. recognise potential contributions to the social,	2. *Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin.* 3. *Will protect and enhance natural character values throughout the site.* There is also a functional need for the coastal location for the proposed activity given links golf courses are located on the marginal coastal land behind the foredunes. Based on this assessment, we consider the proposal is consistent with Policy 6 and, together with the positive effects derived from the proposed revegetation of the coastal dunes, is consistent with Policy 6 of the NZCPS.

	economic and cultural wellbeing of people and communities from use and development of the coastal marine area, including the potential for renewable marine energy to contribute to meeting the energy needs of future generations; b. recognise the need to maintain and enhance the public open space and recreation qualities and values of the coastal marine area; c. recognise that there are activities that have a functional need to be located in the coastal marine area, and provide for those activities in appropriate places; d. recognise that activities that do not have a functional need for location in the coastal marine area generally should not be located there; and e. promote the efficient use of occupied space, including by: i. requiring that structures be made available for public or multiple use wherever reasonable and practicable; ii. requiring the removal of any abandoned or redundant structure that has no heritage, amenity or reuse value; and iii. considering whether consent conditions should be applied to ensure that space	

	occupied for an activity is used for that purpose effectively and without unreasonable delay.	
Policy 11 Indigenous biological diversity (biodiversity)	To protect indigenous biological diversity in the coastal environment: a. avoid adverse effects of activities on: i. indigenous taxa that are listed as threatened or at risk in the New Zealand Threat Classification System lists; ii. taxa that are listed by the International Union for Conservation of Nature and Natural Resources as threatened; iii. indigenous ecosystems and vegetation types that are threatened in the coastal environment, or are naturally rare; iv. habitats of indigenous species where the species are at the limit of their natural range, or are naturally rare; v. areas containing nationally significant examples of indigenous community types; and vi. areas set aside for full or partial protection of indigenous biological diversity under other legislation; and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on:	It is considered the proposal will result in some positive impacts on indigenous biological diversity in the coastal environment through the comprehensive revegetation programme and the protection (and augmentation) of existing areas of native vegetation, including the isolated kanuka remnants on the property.

	i. areas of predominantly indigenous vegetation in the coastal environment; ii. habitats in the coastal environment that are important during the vulnerable life stages of indigenous species; iii. indigenous ecosystems and habitats that are only found in the coastal environment and are particularly vulnerable to modification, including estuaries, lagoons, coastal wetlands, dunelands, intertidal zones, rocky reef systems, eelgrass and saltmarsh; iv. habitats of indigenous species in the coastal environment that are important for recreational, commercial, traditional or cultural purposes; v. habitats, including areas and routes, important to migratory species; and vi. ecological corridors, and areas important for linking or maintaining biological values identified under this policy.	
Policy 13 Preservation of natural character	1. To preserve the natural character of the coastal environment and to protect it from inappropriate subdivision, use, and development: a. avoid adverse effects of activities on natural character in areas of the coastal environment with	As stated in the landscape and visual impact assessment in **Volume 2**: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.*

	outstanding natural character; and b. avoid significant adverse effects and avoid, remedy or mitigate other adverse effects of activities on natural character in all other areas of the coastal environment; including by: c. assessing the natural character of the coastal environment of the region or district, by mapping or otherwise identifying at least areas of high natural character; and d. ensuring that regional policy statements, and plans, identify areas where preserving natural character requires objectives, policies and rules, and include those provisions. 2. Recognise that natural character is not the same as natural features and landscapes or amenity values and may include matters such as: a. natural elements, processes and patterns; b. biophysical, ecological, geological and geomorphological aspects; c. natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks; d. the natural movement of water and sediment;	• *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* We therefore consider the proposal is consistent with Policy 13.

	e. the natural darkness of the night sky; f. places or areas that are wild or scenic; g. a range of natural character from pristine to modified; and h. experiential attributes, including the sounds and smell of the sea; and their context or setting.	
Policy 14 Restoration of natural character	Promote restoration or rehabilitation of the natural character of the coastal environment, including by: a. identifying areas and opportunities for restoration or rehabilitation; b. providing policies, rules and other methods directed at restoration or rehabilitation in regional policy statements, and plans; c. where practicable, imposing or reviewing restoration or rehabilitation conditions on resource consents and designations, including for the continuation of activities; and recognising that where degraded areas of the coastal environment require restoration or rehabilitation, possible approaches include: i. restoring indigenous habitats and ecosystems, using local genetic stock where practicable; or ii. encouraging natural regeneration of indigenous species, recognising the need for effective weed and animal pest management; or	Restoration and rehabilitation of the coastal environment will be provided for through the removal of exotic, invasive and weed species from the coastal dunes and replacement with more appropriate native species using a species list developed by the project team. Existing areas of native vegetation will be protected and augmented with additional plantings.

	iii. creating or enhancing habitat for indigenous species; or iv. rehabilitating dunes and other natural coastal features or processes, including saline wetlands and intertidal saltmarsh; or v. restoring and protecting riparian and intertidal margins; or vi. reducing or eliminating discharges of contaminants; or vii. removing redundant structures and materials that have been assessed to have minimal heritage or amenity values and when the removal is authorised by required permits, including an archaeological authority under the Historic Places Act 1993; or viii. restoring cultural landscape features; or ix. redesign of structures that interfere with ecosystem processes; or x. decommissioning or restoring historic landfill and other contaminated sites which are, or have the potential to, leach material into the coastal marine area.	
Policy 15 Natural features and natural landscapes	To protect the natural features and natural landscapes (including seascapes) of the coastal environment from inappropriate subdivision, use, and development:	The landscape assessment at **Volume 2** states: *That in terms of landscape considerations the proposed development –*

	a. avoid adverse effects of activities on outstanding natural features and outstanding natural landscapes in the coastal environment; and b. avoid significant adverse effects and avoid, remedy, or mitigate other adverse effects of activities on other natural features and natural landscapes in the coastal environment; including by: c. identifying and assessing the natural features and natural landscapes of the coastal environment of the region or district, at minimum by land typing, soil characterisation and landscape characterisation and having regard to: i. natural science factors, including geological, topographical, ecological and dynamic components; ii. the presence of water including in seas, lakes, rivers and streams; iii. legibility or expressiveness – how obviously the feature or landscape demonstrates its formative processes; iv. aesthetic values including memorability and naturalness; v. vegetation (native and exotic); vi. transient values, including presence of	• *Has taken into account the Coastal ONFL classification and provisions, and has had regard to other landscapes having high amenity.* • *Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.* • *Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.* • *Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.* • *Will protect, expand and manage areas of significant indigenous vegetation and habitat.* *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* *That in terms of visual effects considerations, the proposed development –* • *Will not create adverse visual or amenity effects from locations within or beyond the site.* • *Will enhance the visual amenity of the landscape in the context of its coastal setting.*

	wildlife or other values at certain times of the day or year; vii. whether the values are shared and recognised; viii. cultural and spiritual values for tangata whenua, identified by working, as far as practicable, in accordance with tikanga Māori; including their expression as cultural landscapes and features; ix. historical and heritage associations; and x. wild or scenic values; d. ensuring that regional policy statements, and plans, map or otherwise identify areas where the protection of natural features and natural landscapes requires objectives, policies and rules; and e. including the objectives, policies and rules required by (d) in plans.	
Policy 17 Historic heritage identification and protection	Protect historic heritage in the coastal environment from inappropriate subdivision, use, and development by: a. identification, assessment and recording of historic heritage, including archaeological sites; b. providing for the integrated management of such sites in collaboration with relevant councils, heritage agencies, iwi authorities and kaitiaki;	Measures have been taken, as detailed elsewhere in this report, including the protection of identified sites of historic value and the preparation of an archaeological authority application, to ensure historic heritage is protected during and after the proposed development. The Applicant is working with Ngāti Kikopiri regarding appropriate methods to recognise and interpret features of historic heritage value. We therefore consider the proposal is consistent with Policy 17.

	c. initiating assessment and management of historic heritage in the context of historic landscapes; d. recognising that heritage to be protected may need conservation; e. facilitating and integrating management of historic heritage that spans the line of mean high water springs; f. including policies, rules and other methods relating to (a) to (e) above in regional policy statements, and plans; g. imposing or reviewing conditions on resource consents and designations, including for the continuation of activities; h. requiring, where practicable, conservation conditions; and i. considering provision for methods that would enhance owners' opportunities for conservation of listed heritage structures, such as relief grants or rates relief.	
Policy 18 Public open space	Recognise the need for public open space within and adjacent to the coastal marine area, for public use and appreciation including active and passive recreation, and provide for such public open space, including by: a. ensuring that the location and treatment of public open space is compatible with the natural character, natural features and landscapes, and amenity values of the coastal environment; b. taking account of future need for public open space within and	Other than the beach itself, there is no public open space at the coast or coastal marine area in this location. The creation of a golf course, while not public, will improve opportunities for access the coast through playing a round of golf amongst the dunes. No access is currently available while the land is farmed and no access would be allowed in the case of the majority of potential uses for the application site. With the potential improvement of public access to the beach and the potential for more access across the property itself, it

	adjacent to the coastal marine area, including in and close to cities, towns and other settlements; c. maintaining and enhancing walking access linkages between public open space areas in the coastal environment; d. considering the likely impact of coastal processes and climate change so as not to compromise the ability of future generations to have access to public open space; and e. recognising the important role that esplanade reserves and strips can have in contributing to meeting public open space needs.	is considered the proposed activity is consistent with Policy 18.
Policy 19 Walking access	1. Recognise the public expectation of and need for walking access to and along the coast that is practical, free of charge and safe for pedestrian use. 2. Maintain and enhance public walking access to, along and adjacent to the coastal marine area, including by: a. identifying how information on where the public have walking access will be made publicly available; b. avoiding, remedying or mitigating any loss of public walking access resulting from subdivision, use, or development; and c. identifying opportunities to enhance or restore public	Walking access along the beach will not be affected by the proposal. Walking access along this part of the Horowhenua coast is not currently easily accessible given the distance north to any public access points. Hokio Beach, over 6km to the north of the subject property, is the nearest public access point to the beach in this area. An easement for public pedestrian access from the end of Muhunoa West Road has been secured by HDC over the land to the north (Ōhau Sands). However, the existing topography of the land over which the easement is registered makes forming a physical walkway in this area will be problematic. As such, the applicant is exploring options to facilitate better public access to the coast from the end of Muhunoa West Road. The applicant will continue discussions with HDC regarding options to facilitate this to find a suitable

	walking access, for example where: i. connections between existing public areas can be provided; or ii. improving access would promote outdoor recreation; or iii. physical access for people with disabilities is desirable; or iv. the long-term availability of public access is threatened by erosion or sea level rise; or v. access to areas or sites of historic or cultural significance is important; or vi. subdivision, use, or development of land adjacent to the coastal marine area has reduced public access, or has the potential to do so. 3. Only impose a restriction on public walking access to, along or adjacent to the coastal marine area where such a restriction is necessary: a. to protect threatened indigenous species; or b. to protect dunes, estuaries and other sensitive natural areas or habitats; or c. to protect sites and activities of cultural value to Māori; or d. to protect historic heritage; or	outcome that better facilitates public access to the coast. We therefore consider the proposed activity will not restrict any existing public walking access and has the potential to improve public walking access in this area and is therefore consistent with Policy 19.

	e. to protect public health or safety; or f. to avoid or reduce conflict between public uses of the coastal marine area and its margins; or g. for temporary activities or special events; or h. for defence purposes in accordance with the Defence Act 1990; or i. to ensure a level of security consistent with the purpose of a resource consent; or j. in other exceptional circumstances sufficient to justify the restriction. 4. Before imposing any restriction under (3), consider and where practicable provide for alternative routes that are available to the public free of charge at all times.	
Policy 20 Vehicle access	1. Control use of vehicles, apart from emergency vehicles, on beaches, foreshore, seabed and adjacent public land where: a. damage to dune or other geological systems and processes; or b. harm to ecological systems or to indigenous flora and fauna, for example marine mammal and bird habitats or breeding areas and shellfish beds; or c. danger to other beach users; or	The proposal will not enable any vehicular access on the beach, foreshore or seabed. Some vehicular access will be required to the esplanade reserve during construction for vegetation clearance and earthworks in the stable dunes. This vehicle access will be temporary and controlled and all land will be reinstated on completion. As such, any effect will be transient and will not cause harm to the dune or ecological system, or any other protected value of the coast. The temporary vehicular access will not affect any existing activities on the beach and is therefore considered to be consistent with Policy 20.

	d. disturbance of the peaceful enjoyment of the beach environment; or e. damage to historic heritage; or f. damage to the habitats of fisheries resources of significance to customary, commercial or recreational users; or g. damage to sites of significance to tangata whenua; might result. 2. Identify the locations where vehicular access is required for boat launching, or as the only practicable means of access to private property or public facilities, or for the operation of existing commercial activities, and make appropriate provision for such access. 3. Identify any areas where and times when recreational vehicular use on beaches, foreshore and seabed may be permitted, with or without restriction as to type of vehicle, without a likelihood of any of (1)(a) to (g) occurring.	
Policy 22 Sedimentation	1. Assess and monitor sedimentation levels and impacts on the coastal environment. 2. Require that subdivision, use, or development will not result in a significant increase in sedimentation in the coastal marine area, or other coastal water. 3. Control the impacts of vegetation removal on sedimentation including	The proposal will not result in significant increase in sedimentation of the coastal marine area or coastal water. During construction, earthworks will be managed in accordance with an approved erosion and sediment control plan to ensure sand and other sediment is not discharged to coastal waters. Any vegetation clearance will also be managed to avoid discharge of exposed sand and soil and will be re-established with revegetation as soon as practical.

	the impacts of harvesting plantation forestry. 4. Reduce sediment loadings in runoff and in stormwater systems through controls on land use activities.	
Policy 23 Discharge of contaminants	1. In managing discharges to water in the coastal environment, have particular regard to: a. the sensitivity of the receiving environment; b. the nature of the contaminants to be discharged, the particular concentration of contaminants needed to achieve the required water quality in the receiving environment, and the risks if that concentration of contaminants is exceeded; and c. the capacity of the receiving environment to assimilate the contaminants; and: d. avoid significant adverse effects on ecosystems and habitats after reasonable mixing; e. use the smallest mixing zone necessary to achieve the required water quality in the receiving environment; and f. minimise adverse effects on the life-supporting capacity of water within a mixing zone. 2. In managing discharge of human sewage, do not allow:	The proposed development has the potential for discharges from the earthworks during construction and from treated wastewater during operation of the golf course. In both these instances, the works will be managed to avoid any discharges to water in the coastal environment. The proposed earthworks will be managed in accordance with appropriate erosion and sediment controls to ensure discharge to coastal water does not occur. The wastewater treatment and discharge proposed will occur in a location away from the coastal part of the property and irrigation rates will be such that the surrounding land will be capable of containing the discharge of treated wastewater. We therefore consider the proposal is consistent with Policy 23.

	a. discharge of human sewage directly to water in the coastal environment without treatment; and b. the discharge of treated human sewage to water in the coastal environment, unless: i. there has been adequate consideration of alternative methods, sites and routes for undertaking the discharge; and ii. informed by an understanding of tangata whenua values and the effects on them. 3. Objectives, policies and rules in plans which provide for the discharge of treated human sewage into waters of the coastal environment must have been subject to early and meaningful consultation with tangata whenua. 4. In managing discharges of stormwater take steps to avoid adverse effects of stormwater discharge to water in the coastal environment, on a catchment by catchment basis, by: a. avoiding where practicable and otherwise remedying cross contamination of sewage and stormwater systems; b. reducing contaminant and sediment loadings in	

	stormwater at source, through contaminant treatment and by controls on land use activities; c. promoting integrated management of catchments and stormwater networks; and d. promoting design options that reduce flows to stormwater reticulation systems at source. 5. In managing discharges from ports and other marine facilities: a. require operators of ports and other marine facilities to take all practicable steps to avoid contamination of coastal waters, substrate, ecosystems and habitats that is more than minor; b. require that the disturbance or relocation of contaminated seabed material, other than by the movement of vessels, and the dumping or storage of dredged material does not result in significant adverse effects on water quality or the seabed, substrate, ecosystems or habitats; c. require operators of ports, marinas and other relevant marine facilities to provide for the collection of sewage and waste from vessels, and for residues from vessel maintenance to be safely contained and disposed of; and	

	d. consider the need for facilities for the collection of sewage and other wastes for recreational and commercial boating.	
Policy 24 Identification of coastal hazards	1. Identify areas in the coastal environment that are potentially affected by coastal hazards (including tsunami), giving priority to the identification of areas at high risk of being affected. Hazard risks, over at least 100 years, are to be assessed having regard to: a. physical drivers and processes that cause coastal change including sea level rise; b. short-term and long-term natural dynamic fluctuations of erosion and accretion; c. geomorphological character; d. the potential for inundation of the coastal environment, taking into account potential sources, inundation pathways and overland extent; e. cumulative effects of sea level rise, storm surge and wave height under storm conditions; f. influences that humans have had or are having on the coast; g. the extent and permanence of built development; and	Small parts of the site along the Ōhau River have been identified as being susceptible to flooding. No significant activity will occur in this area. The flood management capabilities of the river plain, including the identified saltmarsh wetland on the northern side of the Ōhau River, will be maintained and protected during and after the proposed development of the golf course.

	h. the effects of climate change on: i. matters (a) to (g) above; ii. storm frequency, intensity and surges; and iii. coastal sediment dynamics; taking into account national guidance and the best available information on the likely effects of climate change on the region or district.	
Policy 25 Subdivision, use, and development in areas of coastal hazard risk	In areas potentially affected by coastal hazards over at least the next 100 years: a. avoid increasing the risk of social, environmental and economic harm from coastal hazards; b. avoid redevelopment, or change in land use, that would increase the risk of adverse effects from coastal hazards; c. encourage redevelopment, or change in land use, where that would reduce the risk of adverse effects from coastal hazards, including managed retreat by relocation or removal of existing structures or their abandonment in extreme circumstances, and designing for relocatability or recoverability from hazard events; d. encourage the location of infrastructure away from areas of hazard risk where practicable; e. discourage hard protection structures and promote the use	No sensitive activity will take place in any area identified as being susceptible to coastal hazards. The only activities in close proximity to identified hazard areas are golf holes which can be easily relocated away from hazard areas should the management level for coastal hazard require movement from these areas. There will be no critical infrastructure near any area identified as being at risk from coastal hazards.

	of alternatives to them, including natural defences; and f. consider the potential effects of tsunami and how to avoid or mitigate them.	
Policy 26 Natural defences against coastal hazards	1. Provide where appropriate for the protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards. 2. Recognise that such natural defences include beaches, estuaries, wetlands, intertidal areas, coastal vegetation, dunes and barrier islands.	Existing natural defences against coastal hazards (including beaches, wetlands and dunes) in the coastal area will be retained and protected during and after construction of the proposed development. Additional revegetation of the dunes with appropriate native vegetation species will ensure the dunes are stabilised in the longer term and will continue to provide natural defence to the coastal environment against coastal hazards.

National Policy Statement for Freshwater Management 2020[4]		
Reference	**Text**	**Comment**
Objective 2.1	The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises: (a) first, the health and well-being of water bodies and freshwater ecosystems (b) second, the health needs of people (such as drinking water) (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.	Consistency with the objective of the National Policy Statement for Freshwater Management (**NPS-FM**), including the well-being of water bodies and freshwater ecosystems, health needs and ability for communities to provide for their well-being, is considered in relation to the underlying policies below.
Policy 1	Freshwater is managed in a way that gives effect to Te Mana o te Wai.	Te Mana o te Wai refers to the importance of water for the health and well-being of our environment and our communities.

[4] *GWRC S.88 letter – Point 8*

		The proposed development has been designed and assessed in full consideration of the importance of water, as detailed in the reports accompanying this application, in particular the Boffa Miskell Ecological Survey report and the Bay Geological Services Limited Well Aquifer report.
Policy 2	Tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori freshwater values are identified and provided for.	The Applicant has engaged, and will continue to engage, with tangata whenua on the full range of issues relating to the proposed development, including those relating to freshwater values.
Policy 6	There is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted.	As detailed in the Boffa Miskell Ecological Survey report, no natural inland wetlands will be adversely affected by the proposal. There will be no loss of extent or degradation of their values.
Policy 8	The significant values of outstanding water bodies are protected.	There are no outstanding water bodies within the vicinity of the proposed development. Furthermore, the existing values of nearby water bodies, including the Ōhau River, will be protected.
Policy 9	The habitats of indigenous freshwater species are protected.	As detailed above and in the Ecological Survey report, indigenous freshwater habitats will not be adversely affected by the proposed development.
Policy 11	Freshwater is allocated and used efficiently, all existing over-allocation is phased out, and future over-allocation is avoided.	The Bay Geological Services Limited report included with this application confirms the proposed level of water take for the development is at a sustainable level and will not result in any further over-allocation of any water resource.
Policy 15	Communities are enabled to provide for their social, economic, and cultural well-being in a way that is consistent with this National Policy Statement.	The proposed development will provide the opportunity for the local community, including tangata whenua through a Memorandum of Understanding with the Applicant, to provide for their social, economic and cultural well-being whilst remaining consistent with the NPS-FM.

Regional policy documents

Regional Policy Statement		
Chapter 2: Te Ao Māori		
Reference	**Text**	**Comment**
Objective 2-1 Resource management	a. To have regard to the mauri of natural and physical resources to enable hapū and iwi to provide for their social, economic and cultural wellbeing. b. Kaitiakitanga must be given particular regard and the relationship of hapū and iwi with their ancestral lands, water, sites, wāhi tapu and other taonga (including wāhi tūpuna) must be recognised and provided for through resource management processes.	As discussed elsewhere in this application, the applicant has been in discussions, and will continue to establish a relationship, with hapū and iwi to ensure the relationship they have with their ancestral lands and resources is recognised and protected.
Policy 2-1 Hapū and iwi involvement in resource management	The Regional Council must enable and foster kaitiakitanga and the relationship between hapū and iwi and their ancestral lands, water, sites, wāhi tapu and other taonga (including wāhi tūpuna) through increased involvement of hapū and iwi in resource management processes including: a. memoranda of partnership between the Regional Council and hapū or iwi which set clear relationship and communication parameters to address resource management objectives, b. recognition of existing arrangements and agreements between resource users, local authorities and hapū or iwi, c. development of catchment-based forums, involving the Regional Council, hapū, iwi, and other interested groups including resource users, for information sharing, planning and research, d. development, where appropriate, of hapū and iwi cultural indicator monitoring programmes by the Regional Council, e. assistance from the Regional Council to hapū or iwi to facilitate research, projects, seminars and training, f. development of joint management agreements between the Regional Council and hapū or iwi where appropriate,	The applicant is keen to involve hapū and iwi in the on-going development decisions, including those made during the resource management process in recognition of the role hapū and iwi play in the management of land and resources.

	g. the Regional Council having regard to iwi management plans lodged with Council, h. involvement of hapū or iwi in resource consent decision-making and planning processes in the ways agreed in the memoranda of partnership and joint management agreements developed under (a) and (f) above, and i. the Regional Council advising and encouraging resource consent applicants to consult directly with hapū or iwi where it is necessary to identify: i. the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga (including wāhi tūpuna), and ii. the actual and potential adverse effects of proposed activities on those relationships.	
Policy 2-2 Wāhi tapu, wāhi tūpuna and other sites of significance	a. Wāhi tapu, wāhi tūpuna and other sites of significance to Māori identified: … must be protected from inappropriate subdivision, use or development that would cause adverse effects on the qualities and features which contribute to the values of these sites. b. The Regional Council must facilitate hapū and iwi recording the locations of wāhi tapu, wāhi tūpuna and other sites of significance to Māori in an appropriate publicly-available database. c. Potential damage or disturbance (including that caused by inappropriate subdivision, use or development) to wāhi tapu, wāhi tūpuna and other sites of significance to Māori not identified (for confidentiality and sensitivity reasons) by hapū or iwi under (a), above, must be minimised by the Regional Council facilitating the compilation of databases by hapū and iwi to record locations which need to remain confidential.	No identified wāhi tapu, wāhi tūpuna or other sites of significance to Māori will be affected by the proposal.

	d. The Regional Council must ensure that resource users and contractors have clear procedures in the event wāhi tapu or wāhi tūpuna are discovered.	
Policy 2-4 Other resource management issues	The specific issues listed in 2.2 which were raised by *hapū* and *iwi* must be addressed in the manner set out in Table 2.1 below.	We consider all matters have been addressed appropriately.
Chapter 4: Land		
Reference	**Text**	**Comment**
Objective 4-2 Regulating potential causes of accelerated erosion	Land is used in a manner that ensures: a. accelerated erosion and increased sedimentation in water bodies (with resultant adverse effects on people, buildings and infrastructure) caused by vegetation clearance, land disturbance, forestry, or cultivation are avoided as far as reasonably practicable, or otherwise remedied or mitigated, and b. sediment loads entering water bodies as a result of accelerated erosion are reduced to the extent required to be consistent with the water management objectives and policies for water quality set out in Chapter 5 of this Plan.	All vegetation clearance and earthworks will be managed in accordance with appropriate sediment and erosion control best practice to ensure no activity will accelerate erosion or cause sediment loads to enter water bodies.
Policy 4-2 Regulation of land use activities	a. In order to achieve Objective 4-2 the Regional Council must regulate vegetation clearance, land disturbance, forestry and cultivation through rules in this Plan and decisions on resource consents, so as to minimise the risk of accelerated erosion, minimise discharges of sediment to water, and maintain the benefits of riparian vegetation for water bodies. b. Territorial Authorities may regulate, through rules in district plans and decisions on resource consents, the actual or potential effects of the use, development, or protection of land, in order to achieve Objective 4-2. However, Territorial Authorities must not have rules that are contradictory to the rules in this Plan that control the use of land.	Vegetation clearance and earthworks will be controlled in accordance with the regional plan and district plan requirements and appropriate erosion and sediment controls to ensure the proposal is consistent with Objective 4-2. The vegetation cleared will be replaced by suitable native species over much of the property resulting in positive effects from the proposed works.

	c. The Regional Council will generally allow small scale vegetation clearance, land disturbance, forestry and cultivation to be undertaken without the need for a resource consent if conditions are met. Vegetation clearance and land disturbance require a resource consent if they are undertaken adjacent to some water bodies (including certain wetlands) in Hill Country Erosion Management Areas or in coastal foredune areas. Any other large scale land disturbance will also require a resource consent.	
Chapter 5: Water		
Reference	**Text**	**Comment**
Objective 5-1 Water management Values	Surface water bodies and their beds are managed in a manner which safeguards their life supporting capacity and recognises and provides for the Values in Schedule B1.	The proposal will have no effect on the life supporting of surface water bodies.
Objective 5-2 Water quality	a. Surface water quality is managed to ensure that: i. water quality is maintained in those rivers and lakes where the existing water quality is at a level sufficient to support the Values in Schedule B ii. water quality is enhanced in those rivers and lakes where the existing water quality is not at a level sufficient to support the Values in Schedule B iii. accelerated eutrophication and sedimentation of lakes in the Region is prevented or minimised iv. the special values of rivers protected by water conservation orders are maintained. b. Groundwater quality is managed to ensure that existing groundwater quality is maintained or where it is degraded/over allocated as a result of human activity, groundwater quality is enhanced.	The proposal will have no effect on surface water. There will be no discharge of either sediment from earthworks or from discharge of treated domestic wastewater to surface water. Activities are well separated from all surface water to ensure no uncontrolled or accidental discharge occurs. Groundwater recharge rates from the exploratory well are considered to be adequate and based on the information available, saltwater intrusion is not considered likely.
Objective 5-3 Water quantity and allocation	*Water* quantity is managed to enable people, industry and agriculture to take and use *water* to meet their reasonable needs while ensuring that:	No surface water take is proposed. Groundwater recharge rates from the exploratory well are considered to be adequate.

	a. … b. For groundwater: i. takes do not cause a significant adverse effect on the long-term groundwater yield ii. groundwater takes that are hydrologically connected to rivers, are managed within the minimum flow and allocation regimes established for rivers iii. groundwater takes that are hydrologically connected to lakes or wetlands are managed to protect the life-supporting capacity of the lakes or wetlands iv. the significant adverse effects of a groundwater take on other groundwater and surface water takes are avoided v. saltwater intrusion into coastal aquifers, induced by groundwater takes, is avoided. c. In all cases, water is used efficiently.	Potable water supply to the property will be supplemented by rainwater collection from roofs to reduced demand from groundwater. The proposal will have less than minor effects on water quantity.
Objective 5-4 Beds of rivers and lakes	The beds of rivers and lakes will be managed in a manner which: a. sustains their life supporting capacity b. provides for the instream morphological components of natural character c. recognises and provides for the Schedule B Values d. provides for infrastructure and flood mitigation purposes. The land adjacent to the bed of reaches with a Schedule B Value of Flood Control and Drainage will be managed in a manner which provides for flood mitigation purposes.	The proposal will have no effect on the bed of any river of lake.
Policy 5-10 Point source discharges to land	Discharges of contaminants onto or into land must be managed in a manner which: a. does not result in pathogens or other toxic substances accumulating in soil or pasture to levels that would render the soil unsafe for agricultural, domestic or recreational use b. has regard to the strategies for surface water quality management set out in	The Engineering Services Report included with the application document provides detailed wastewater calculations to determine the requirements for a suitable on-site wastewater system that meet the Horizons Regional Council manual for On-site

	Policies 5-3, 5-4 and 5-5, and the strategy for groundwater management set out in Policy 5-6 c. maximises the reuse of nutrients and water contained in the discharge to the extent reasonably practicable d. results in any discharge of liquid to land generally not exceeding the available water storage capacity of the soil (deferred irrigation) e. ensures that adverse effects on rare habitats, threatened habitats and at-risk habitats are avoided, remedied or mitigated.	wastewater systems design and management. The disposal fields will be located in areas away from the Ōhau River and identified areas of freshwater to be protected. The discharge fields will be integrated into the site development.
Policy 5-11 Human sewage discharge	Notwithstanding other policies in this chapter: a. before entering a surface water body all new discharges of treated human sewage must: i. be applied onto or into land, or ii. flow overland, or iii. pass through an alternative system that mitigates the adverse effects on the mauri of the receiving water body, and b. all existing direct discharges of treated human sewage into a surface water body must change to a treatment system described under (a) by the year 2020 or on renewal of an existing consent, whichever is the earlier date.	The on-site wastewater system to be used for the proposed development will meet the standards for treated domestic wastewater set out in the Horizons One Plan and the manual for On-site wastewater systems design and management.[5]
Policy 5-20 Overall approach for bore management and groundwater allocation	a. New bores must be constructed and managed in accordance with Policy 16-4. b. Groundwater Management Zones are mapped in Schedule D. c. Total groundwater allocations must comply with the annual allocable volumes for Groundwater Management Zones set out in Policy 5-21. d. The measured or modelled effects of a proposed groundwater take on other groundwater users, surface water bodies and saltwater intrusion must be managed	All proposed bores have already been consented. In all cases construction will be managed in accordance with relevant policy and the existing consents.

[5] *GWRC S.88 letter – Point 9*

	in accordance with Policies 16-1, 16-5, 16-6 and 16-7.	
Policy 5-21 Groundwater Management Zones	The total amount of consented groundwater allocated from each Groundwater Management Zone mapped in Schedule D must not exceed the annual allocable volume for the GWMZ specified in Schedule D.	The proposed groundwater take will not exceed the allocation.
Policy 5-22 General management of the beds of rivers and lakes	Activities in, on, under or over the beds of rivers and lakes must generally be managed in a manner which: a. recognises and provides for the Schedule B Values for the Water Management Sub-zones in which the activity takes place, in the manner described in Policies 5-23, 5-24 and 5-25 b. avoids any significant reduction in the ability of a river and its bed to convey flood flows, or significant impedance to the passage of floating debris c. avoids, remedies or mitigates any significant adverse effects on the stability and function of the beds of rivers and lakes, and existing structures including flood and erosion control structures d. avoids, remedies or mitigates any significant reduction in the habitat diversity, including the morphological diversity, of the river or lake or its bed e. manages effects on natural character and public access in accordance with the relevant policies in Chapter 6. Natural character can include the natural style and dynamic processes of the river, such as bed style and width and the quality and quantity of bed habitat f. provides for the safe passage of fish both upstream and downstream g. ensures that the existing nature and extent of navigation of the river or lake are not obstructed h. ensures that access required for the operation, maintenance, and upgrade of infrastructure and other physical resources of regional or national importance is not obstructed	There are no activities proposed in, on, under or over the beds of rivers and lakes.

	i. provides for continued public access in accordance with Policy 6-10.	
Policy 5-23 Activities in sites with a Value of Natural State, Sites of Significance - Cultural, or Sites of Significance - Aquatic	In sites with a Schedule B Value of Natural State, Sites of Significance - Cultural or Sites of Significance - Aquatic, activities in, on, under or over the beds of rivers and lakes must be managed in a manner which: a. avoids adverse effects on these Values in the first instance, or b. for infrastructure and other resources of regional and national importance, or activities that result in an environmental benefit, remedies or mitigates those effects where it is not practicable to avoid them, and c. maintains the habitat and spawning requirements of the species identified.	The Ōhau River is identified as having Schedule B values. The proposal will have no effect on any identified Schedule B value or water quality and quantity in the river itself.
Policy 5-24 Activities in rivers or lakes and their beds with a Value of Flood Control and Drainage	In reaches of rivers or lakes and their beds with a Schedule B Value of Flood Control and Drainage, activities in, on, under or over the beds of rivers and lakes and on land adjacent to the bed where the Value is located must be managed in a manner which: a. enables the degree of flood hazard and erosion protection existing at the time of Plan notification (31 May 2007) to be maintained or enhanced b. addresses adverse effects by: i. in the first instance, avoiding, remedying or mitigating adverse effects on the instream morphological components of natural character and other Schedule B Values ii. providing consent applicants with the option of making an offset iii. allowing compensation by way of a financial contribution in accordance with the policies in Chapter 19.	The proposed activity will have no effect on the Ōhau River's identified flood control and drainage values. The form and function of the river will be retained throughout development and operation of the proposed activities.
Policy 5-25 Activities in rivers or lakes and their beds with other	In sites with Schedule B Values other than Natural State, Sites of Significance - Cultural, Sites of Significance - Aquatic, or Flood Control and Drainage, activities in, on, under or over the beds of rivers and lakes must be managed in a manner which:	The Ōhau River is identified as having Schedule B values. The proposal will have no effect on any identified Schedule B value or water quality and quantity in the river itself.

Schedule B Values	a. in the first instance avoids, remedies or mitigates significant adverse effects on the instream morphological components of natural character and Schedule B Values b. provides consent applicants with the option of making an offset c. allows compensation by way of a financial contribution in accordance with the policies in Chapter 19.	There are no activities proposed in, on, under or over the bed of the river.
Chapter 6: Indigenous Biological Diversity, Landscape and Historic Heritage		
Reference	**Text**	**Comment**
Objective 6-1 Indigenous *biological diversity*	Protect areas of significant indigenous vegetation and significant habitats of indigenous fauna and maintain indigenous *biological diversity*, including enhancement where appropriate.	The applicant requested HRC ecologist to undertake a site visit, report on and map areas of significant indigenous vegetation on the property. A copy of that report is in **Volume 2** of this application. The findings of that report and the mapping of significant areas has informed and led the design of the golf course and the revegetation management plan for the property.
Objective 6-2 Outstanding natural features and landscapes, and natural character	a. The characteristics and values of: i. the Region's outstanding natural features and landscapes, including those identified in Schedule G, and ii. the natural character of the coastal environment, wetlands, rivers and lakes and their margins are protected from inappropriate subdivision, use and development. b. Adverse effects, including cumulative adverse effects, on the natural character of the coastal environment, wetlands, rivers and lakes and their margins, are: i. avoided in areas with outstanding natural character, and ii. avoided where they would significantly diminish the attributes	The landscape assessment at **Volume 2** states: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* *That in terms of visual effects considerations, the proposed development –*

	and qualities of areas that have high natural character, and iii. avoided, remedied or mitigated in other areas. c. Promote the rehabilitation or restoration of the natural character of the coastal environment, *wetlands*, *rivers* and *lakes* and their margins.	• *Will not create adverse visual or amenity effects from locations within or beyond the site.* • *Will enhance the visual amenity of the landscape in the context of its coastal setting.*
Policy 6-2 Regulation of activities affecting indigenous *biological diversity*	For the purpose of managing indigenous *biological diversity* in the Region: a. Habitats determined to be rare habitats and threatened habitats under Schedule F must be recognised as areas of significant indigenous vegetation or significant habitats of indigenous fauna. b. At-risk habitats that are assessed to be significant under Policy 13-5 must be recognised as significant indigenous vegetation or significant habitats of indigenous fauna. c. The Regional Council must protect rare habitats, threatened habitats and at-risk habitats identified in (a) and (b), and maintain and enhance other at-risk habitats by regulating activities through its regional plan and through decisions on resource consents. d. Potential adverse effects on any rare habitat, threatened habitat or at-risk habitat located within or adjacent to an area of forestry must be minimised. e. When regulating the activities described in (c) and (d), the Regional Council must, and when exercising functions and powers described in Policy 6-1, Territorial *Authorities* must: i. allow activities undertaken for the purpose of pest plant and	The applicant requested HRC ecologist to undertake a site visit, report on and map areas of significant indigenous vegetation on the property. A copy of that report is in **Volume 2** of this application. Boffa Miskell has also undertaken a Schedule F significance assessment as part of its Ecological Survey (also at **Volume 2**). The findings of those reports and the mapping of significant areas has informed and led the design of the golf course and the revegetation management plan for the property. No rare, threatened or at-risk habitats will be affected by the proposal and, as set out in the Eco Nomos report at **Volume 2** the golf course activities provide opportunities for coastal and estuarine vegetation restoration in other areas of the property.

	pest animal control or habitat maintenance or enhancement, ii. consider indigenous *biological diversity* offsets in appropriate circumstances as defined in Policy 13-4, iii. allow the maintenance, operation and upgrade of existing structures, including infrastructure and other physical resources of regional or national importance as identified in Policy 3-1, and iv. not unreasonably restrict the existing use of production land where the effects of such land use on rare habitat, threatened habitat or at-risk habitat remain the same or similar in character, intensity and scale.	
Policy 6-3 Proactive management of indigenous *biological diversity*	a. The Regional Council will aim to maintain or enhance indigenous *biological diversity* by working in partnership with relevant landowners, other parties with a legal interest in the *land*, and relevant consent holders to establish a management plan and incentive programme for the voluntary proactive management of identified sites by 2016. b. For the purposes of (a), separate programmes will be established for *wetlands*, bush remnants, native fish communities and coastal ecosystems. c. The management plans under (a) will generally address the following matters as a minimum: i. fencing and prevention of stock access ii. pest plant and pest animal control	The applicant is willing to continue to work with Horizons Regional Council to investigate opportunities to maintain and/or enhance indigenous biological diversity.

	iii. planting iv. agreed land uses v. work and materials to be provided by the Regional Council or a third party vi. financial assistance to be provided by the Regional Council or a third party vii. monitoring viii. legal options for ensuring longevity of the measures implemented.	
Policy 6-4 Fostering an ethic of stewardship	The Regional Council will equip landowners and others with the information they need to act as good stewards for indigenous biodiversity, and to act responsibly and proactively. These initiatives will be additional to the Council-led programmes under Policy 6-3.	We consider the proposed development and on-going management of the land represents good indigenous biodiversity stewardship through the protection and addition of native vegetation on the property.
Policy 6-5 Pest plants and pest animals	a. To the extent that they relate to the maintenance of indigenous biodiversity, the pest plant and pest animal management functions of the Regional Council will primarily target pests threatening rare habitats, threatened habitats and at-risk habitats b. When exercising functions and powers as set out in Policy 6-1, Territorial Authorities must take into account the risks of introducing pest plants or pest animals into rare habitats, threatened habitats, at-risk habitats and nearby areas.	The proposed activities will assist with the removal of pest, exotic and invasive species within the property.
Policy 6-6 Regionally outstanding natural features and landscapes	The natural features and landscapes listed in Schedule G Table G.1 must be recognised as regionally outstanding and must be spatially defined in the review and development of district plans. All subdivision, use and development directly affecting these areas must be managed in a manner which: a. avoids significant adverse cumulative *effects* on the characteristics and values of	As stated in the landscape assessment at **Volume 2**: ***Coastal Outstanding Natural Features and Landscape*** *Relative to the Douglas Links site, the Coastal ONFL identified in the District Plan generally incorporates both the coastal foredune and the more detailed stable secondary*

	those outstanding natural features and landscapes, and b. except as required under (a), avoids adverse *effects* as far as reasonably practicable and, where avoidance is not reasonably practicable, remedies or mitigates adverse *effects* on the characteristics and values of those outstanding natural features and landscapes.	*dunes that extend from the mean high water through and into the exotic tree plantings associated with the stable secondary dunes. As the original mapping of the ONFL was based on 1:50,000 contour mapping, the identified area generally appears to follow a line some 300-350m inland from mean high water.* *Following several site visits and a review of more recent and more detailed topographic and aerial photography, a refined ONFL boundary has been prepared. The purpose of reviewing the ONFL boundary was not to dispute the District Plan line, it was simply reviewed in order to update the line based on more detailed and recent data, and an acknowledgment that landscape change has occurred subsequent to what was identified in 2012.*
Policy 6-7 Assessing outstanding natural features and landscapes	The Regional Council and *Territorial Authorities* must take into account but not be limited to the criteria in Table 6.1 when: a. identifying outstanding natural features and landscapes, and consider whether the natural feature or landscape is conspicuous, eminent, remarkable or otherwise outstanding, and b. considering adding to, deleting from, or otherwise altering, redefining or modifying the list of outstanding natural features or landscapes listed in Table G.1 of Schedule G, or c. considering the inclusion of outstanding natural features or landscapes into any *district plan*, or d. establishing the relevant values to be considered when assessing *effects* of an activity on:	Design of the proposed golf course and ancillary buildings and activities used a first principles approach to the protection of natural character (including the coastal environment, wetlands and the Ōhau River) natural features and landscapes considered to be outstanding or of significant value. This included use of the existing district-level maps of features and landscapes and fine-tuning the definition of those features and landscapes with aerial mapping and on-site walkovers. The Applicant invited Horizons Regional Council ecologists to map and assess on sites and habitats of ecological value on the site prior to development of the course design. The report of that assessment process is provided in **Volume 2** of this application.

i. outstanding natural features and landscapes listed in Table G.1 of Schedule G, or
ii. any other outstanding natural feature or landscape.

Table 6.1 Natural Feature and Landscape Assessment Factors

Assessment factor	Scope
(a) Natural science factors	These factors relate to the geological, ecological, topographical and natural process components of the natural feature or landscape: i. Representative: the combination of natural components that form the feature or landscape strongly typifies the character of an area. ii. Research and education: all or parts of the feature or landscape are important for natural science research and education. iii. Rarity: the feature or landscape is unique or rare within the district or Region, and few comparable examples exist. Ecosystem functioning: the presence of healthy ecosystems is clearly evident in the feature or landscape.

Development of the golf course layout and design followed on from this fine-grained site assessment and has taken full account of the natural character, features and landscapes of significant value and measures have been put in place to ensure those areas are protected from inappropriate use and development. In some cases, as described in Section 7 of this report and in the supporting reports appended to this application, some enhancement of those features will be generated by the proposal through the removal of weed and exotic vegetation species within some of those features, replanting with native and more suitable species (as shown in the RBT Design drawings in **Volume 3** of this application) and some augmentation of those areas through additional native plantings around the edges of the existing features of significant value on the property.

	(b) Aesthetic values	The aesthetic values of a feature or landscape may be associated with: i. Coherence: the patterns of land cover and land use are largely in harmony with the underlying natural pattern of landform and there are no, or few, discordant elements of land cover or land use. ii. Vividness: the feature or landscape is visually striking, widely recognised within the local and wider community, and may be regarded as iconic. iii. Naturalness: the feature or landscape appears largely unmodified by human activity and the patterns of landform and land cover are an expression of natural processes and intact healthy ecosystems. iv. Memorability: the natural feature or landscape makes such an impact on the senses that it becomes unforgettable.	

	(c) Expressiveness (legibility)	The feature or landscape clearly shows the formative natural processes or historic influences that led to its existing character.	
	(d) Transient values	The consistent and noticeable occurrence of transient natural events, such as daily or seasonal changes in weather, vegetation or wildlife movement, contributes to the character of the feature or landscape.	
	(e) Shared and recognised values	The feature or landscape is widely known and is highly valued for its contribution to local identity within its immediate and wider community.	
	(f) Cultural and spiritual values for *tangata whenua*	Māori values inherent in the feature or landscape add to the feature or landscape being recognised as a special place.	
	(g) Historic Heritage values	Knowledge of historic events that occurred in and around the feature or landscape is widely held and substantially influences and adds to the value the community attaches to the natural feature or landscape. Heritage features, *sites* or structures that are present and add to the enjoyment and understanding of the feature or landscape.	
Policy 6-8 Natural character	a. The natural character of the coastal environment, *wetlands, rivers* and *lakes* and their margins must be preserved and these areas must be protected from inappropriate subdivision, use and development.		The proposal will have no effect on the natural character of the coastal environment, wetlands, rivers or lakes. The Ōhau River and saltmarsh wetland will be protected

	b. The natural character of these areas must be restored and rehabilitated where this is appropriate and practicable. c. Natural character of these areas may include such attributes and characteristics as: i. Natural elements, processes and patterns, ii. Biophysical, ecological, geological, geomorphological and morphological aspects, iii. Natural landforms such as headlands, peninsulas, cliffs, dunes, wetlands, reefs, freshwater springs and surf breaks, iv. The natural movement of water and sediment including hydrological and fluvial processes, v. The natural darkness of the night sky, vi. Places or areas that are wild and scenic, vii. A range of natural character from pristine to modified, and viii. Experiential attributes, including the sounds and smell of the sea; and their content or setting.	throughout the development proposed. The coastal environment assessment in the landscape and visual impact assessment states: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.*
Policy 6-9 Managing natural character	In relation to the natural character of: a. the component of the coastal environment which is not coastal marine *area* (CMA), and b. *wetlands, rivers* and lakes and their margins subdivision, use or development must generally (but without limitation) be considered appropriate if it: c. is compatible with the existing level of modification to the environment, d. has a functional necessity to be located in or near the component of the coastal environment which is not coastal *marine area* (CMA), *wetland, river or lake* and no	The coastal environment assessment in the landscape and visual impact assessment states: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.*

	reasonably practicable alternative locations exist, e. is of an appropriate form, scale and design to be compatible with the existing landforms, geological features and vegetation, f. will not, by itself or in combination with *effects* of other activities, significantly disrupt natural processes or existing ecosystems, and g. will provide for the restoration and rehabilitation of natural character where that is appropriate and practicable.	• *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* It goes on: *The proposed Douglas Links Golf Course will –* • *Have no adverse effects on the environment that cannot be readily mitigated, and will in fact enhance the landscape character, biodiversity habitat and the amenity values of the coastal landscape.* • *Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin.* • *Will protect and enhance natural character values throughout the site.*
Chapter 9: Natural Hazards		
Reference	**Text**	**Comment**
Objective 9-1 Effects of natural hazard events	The adverse effects of natural hazard events on people, property, infrastructure and the wellbeing of communities are avoided or mitigated.	The adverse effects of natural hazard events on people, property, infrastructure and the wellbeing of communities has been considered in the design of the proposed development and is considered against the relevant policies below.
Policy 9-2 Development in areas prone to flooding	a. ... b. Outside of a floodway mapped in Schedule J the Regional Council and Territorial Authorities must not allow the establishment of any new structure or activity, or an increase in the scale of any existing structure or activity, within an area which would be inundated in a 0.5% AEP (1 in 200 year) flood event unless: i. flood hazard avoidance is achieved or the 0.5% AEP (1 in 200 year) flood hazard is mitigated, or	No structures or activity, or increase in the scale of any existing structure or activity, will be located in an area that would be inundated in a 0.5% AEP (1 in 200 year) flood event. The design of the development has avoided areas identified as being susceptible to flooding to remove the requirement for mitigation. No additional flood hazard mitigation is considered necessary

	ii. the non-habitable structure or activity is on production land, or iii. there is a functional necessity to locate the structure or activity within such an area, in any of which cases the structure or activity may be allowed. c. Flood hazard avoidance must be preferred to flood hazard mitigation. d. When making decisions under Policies 9-2(a) and b(i) regarding the appropriateness of proposed flood hazard mitigation measures, the Regional Council and Territorial Authorities must: i. ensure that occupied structures have a finished floor or ground level, which includes reasonable freeboard, above the 0.5% AEP (1 in 200 year) flood level. ii. ensure that in a 0.5% AEP (1 in 200 year) flood event2 the inundation of access between occupied structures and a safe area where evacuation may be carried out (preferably ground that will not be flooded) must be no greater than 0.5 m above finished ground level with a maximum water velocity of 1.0 m/s, or some other combination of water depth and velocity that can be shown to result in no greater risk to human life, infrastructure or property, iii. ensure that any more than minor adverse effects on the effectiveness of existing flood hazard avoidance or mitigation measures, including works and structures within River and Drainage Schemes, natural landforms that protect against inundation, and overland stormwater flow paths, are avoided,	in relation to the proposed development and the proposal is therefore considered to be consistent with Policy 9-2.

	iv. ensure that adverse effects on existing structures and activities are avoided or mitigated, v. have regard to the likelihood and consequences of the proposed flood hazard mitigation measures failing, vi. have regard to the consequential effects of meeting the requirements of (d)(ii), including but not limited to landscape and natural character, urban design, and the displacement of floodwaters onto adjoining properties, and vii. have regard to the proposed ownership of, and responsibility for maintenance of, the flood hazard mitigation measures including the appropriateness and certainty of the maintenance regime. e. … f. … g. This policy does not apply to new critical infrastructure.	
Policy 9-4 Other types of natural hazards	The Regional Council and Territorial Authorities must manage future development and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which: a. ensures that any increase in risk to human life, property or infrastructure from natural hazard events is avoided where practicable, or mitigated where the risk cannot be practicably avoided, b. is unlikely to reduce the effectiveness of existing works, structures, natural landforms or other measures which serve to mitigate the effects of natural hazard events, and c. is unlikely to cause a significant increase in the scale or intensity of natural hazard events.	The property is not considered to be particularly susceptible to any other types of natural hazard (excluding flooding). There will be no increase in risk to human life, property or infrastructure. No existing works, structures or landforms that act as mitigation measures will be affected by the proposal. There will be no increase in the scale or intensity of natural hazard events as a result of the proposed development.
Policy 9-5 Climate change	The Regional Council and Territorial Authorities must take a precautionary approach when assessing the effects of climate change and sea	The precautionary approach to managing potential effects from the coastal location has been

	level rise on the scale and frequency of natural hazards with regard to decisions on: a. stormwater discharges and effluent disposal, b. coastal development and coastal land use, c. activities adjacent to rivers, d. water allocation and water takes, e. activities in a Hill Country Erosion Management Area, f. flood mitigation activities, and g. managing storm surge.	integral to the project design throughout development of the project. The coastline in this location is not particularly susceptible to coastal erosion and the potential effects of climate change have been taken into account and assessed as part of the project design. In particular the Eco Nomos report considers in full the potential effect of climate change in combination with other contributing factors, including accretion along this stretch of the coast, to provide a comprehensive indication of the likely effects.

Regional Plan		
Chapter 12: General Objectives and Policies		
Reference	**Text**	**Comment**
Objective 12-1 Resource management in the Region	a. The regulation of activities in a manner which maximises certainty and avoids unnecessary costs on resource users and other parties. b. The regulation of activities in a manner which gives effect to the provisions of Part I of this Plan, the Regional Policy Statement.	The Applicant expects and anticipates the resource consent process to be undertaken with as much certainty as is possible in the circumstances and with the avoidance of unnecessary costs for all parties involved.
Objective 12-2 Consent duration, review and enforcement	a. The provisions of the RMA dealing with the duration of resource consents, review of consent conditions, and enforcement procedures must be implemented in a manner that provides the maximum reasonable certainty to resource users, affected parties and submitters. b. The Regional Council will provide user-friendly consents of appropriate duration and will carefully monitor and manage compliance.	For security of investment, discharge and water abstraction consents are sought for the maximum possible duration.
Chapter 13: Land Use Activities and Indigenous Biological Diversity		

Reference	Text	Comment
Objective 13-1 Accelerated erosion - regulation of vegetation clearance, land disturbance, forestry and cultivation	The regulation of vegetation clearance, land disturbance, forestry and cultivation in a manner that ensures: a. accelerated erosion and any associated damage to people, buildings and infrastructure and other physical resources of regional or national importance are avoided as far as reasonably practicable or otherwise remedied or mitigated, and b. increased sedimentation in water bodies as a result of human activity is avoided as far as reasonably practicable, or otherwise mitigated.	The proposed land disturbance will be undertaken in accordance with an approved Erosion & Sediment Control Plan (**ESCP**) which will ensure works do not contribute to accelerated erosion or uncontrolled discharge of sediment. Following construction the site will be stabilised through planting and other appropriate means.
Policy 13-1 Regional rules for vegetation clearance, land disturbance, forestry and cultivation	The Regional Council must: a. regulate vegetation clearance, land disturbance, forestry and cultivation through regional rules in accordance with Objectives 12-1, 12-2 and 13-1 and Policies 12-1 to 12-8, and b. manage the effects of vegetation clearance, land disturbance and cultivation by requiring resource consents for those activities: i. adjacent to some water bodies, ii. involving the removal of some woody vegetation in Hill Country Erosion Management Areas, iii. involving land disturbance or cultivation in Hill Country Erosion Management Areas, iv. involving large-scale land disturbance, or v. within the coastal foredune	The proposed land disturbance will be regulated appropriately through the resource consent process for earthworks and the application of an approved ESCP. The effects of the proposed land disturbance are assessed in this AEE. Care has been taken in particular to protect sensitive receiving environments including the Ōhau River and valued ecosystems. The subject property is not within a Hill Country Erosion Management Area and will protect the coastal foredune during and following works through appropriate erosion and sediment controls and revegetation.
Policy 13-2 Consent decision-making for vegetation clearance, land disturbance, forestry and cultivation	For vegetation clearance, land disturbance, forestry or cultivation and ancillary discharges to and diversions of surface water that requires resource consent under Rule 13-2, Rule 13-6 or Rule 13-7, the Regional Council must make decisions on consent applications and set consent conditions on a case-by-case basis, having regard to: a. the Regional Policy Statement, particularly Objective 4-2 and Policies 4-2 and 4-3,	Consent is sought for land disturbance and vegetation clearance within the coastal foredune but outside any identified at-risk or rare habitats under Rule 13-7. The application is accompanied by an ESCP which will be implemented as part of the construction works in accordance with Policy 13-2(b). Implementation of the ESCP during construction, together with general

	b. managing the effects of land disturbance, including large-scale earthworks, by requiring Erosion and Sediment Control Plans or other appropriate plans to be prepared, c. managing the effects of forestry by requiring sustainable forestry management practices to be adopted and Erosion and Sediment Control Plans or other appropriate plans to be prepared, d. managing the effects of cultivation on water bodies through the use of sediment run-off control methods and setbacks from water bodies, e. the appropriateness of establishing infrastructure and other physical resources of regional or national importance as identified in Policy 3-1, f. generally allowing the clearance of woody vegetation on established pasture if that clearance will not lead to accelerated erosion or the increased sedimentation of water bodies, g. generally allowing activities that are for the purpose of managing natural hazards, including the reduction of flood risk, h. generally allowing forestry for soil conservation purposes, i. generally allowing activities that result in improved land stability or enhanced surface water quality, j. any relevant codes of practice, standards, guidelines, or environmental management plans and accepting compliance with them to the extent that they can be used as conditions on resource consents, k. sediment and erosion control measures required to reasonably minimise adverse effects, including those caused by rainfall and storm events,	best practice construction methods, will ensure the effects of land disturbance are appropriately managed.[6]

[6] *GWRC S.88 letter – Point 10*

	l. achieving integrated management through consents that are Region-wide or cover large areas for activities that are widespread and undertaken by or on behalf of a single consent holder including, but not limited to, infrastructure and other physical resources of regional or national importance, or forestry, provided any such consents are subject to conditions, including review provisions, enabling site-specific matters to be addressed as necessary, and m. for activities involving an ancillary discharge to surface water, the matters in Policy 14-9.	
Objective 13-2 Regulation of activities affecting indigenous biological diversity	The regulation of resource use activities to protect areas of significant indigenous vegetation and significant habitats of indigenous fauna or to maintain indigenous biological diversity, including enhancement where appropriate.	The design of the proposed activities has taken into account significant indigenous vegetation and the need to maintain indigenous biological diversity and has incorporated protection of these in the overall design for the golf course and associated accessories.
Policy 13-3 Regional rules for activities affecting indigenous biological diversity	The Regional Council must require resource consents to be obtained for vegetation clearance, land disturbance, cultivation, bores, discharges of contaminants into or onto land or water, taking, use, damming or diversion of water and activities in the beds of rivers or lakes within rare habitats, threatened habitats and at-risk habitats, and for forestry that does not minimise potential adverse effects on those habitats, through regional rules in accordance with Objectives 12-1, 12-2 and 13-2 and Policies 12-1 to 12-8.	This application includes applications for resource consent for vegetation clearance, land disturbance, discharge to land and water take and includes a comprehensive assessment of the effects, including on any rare, threatened and at-risk habitats.
Policy 13-4 Consent decision-making for activities in rare habitats, threatened habitats and at-risk habitats	a. For activities regulated under Rule 13-8 and 13-9, the Regional Council must make decisions on consent applications and set consent *conditions* on a case-by-case basis: i. For all activities, having regard to:	The applications under Rules 13-8 and 13-9 contain a full assessment against the relevant policy and an assessment of the environmental effects of the proposed land disturbance and vegetation clearance.

	a. the Regional Policy Statement, particularly Objective 6-1 and Policy 6-2, b. a rare habitat or threatened habitat is an area of significant indigenous vegetation or a significant habitat of indigenous fauna, c. the significance of the area of habitat, in terms of its representativeness, rarity and distinctiveness, and ecological context, as assessed under Policy 13-5, d. the potential adverse effects of the proposed activity on significance, e. for activities regulated under ss13, 14 and 15 RMA, the matters set out in Policy 13-2(k) and relevant objectives and policies in Chapters 5, 14, 16 and 17, and f. for activities involving a discharge, the matters in Policy 14-9. ii. For electricity transmission and renewable energy generation activities, providing for any national, regional or local benefits arising from the proposed activity. b. Consent must generally not be granted for resource use activities in a rare habitat, threatened habitat or at-risk habitat assessed to be an area of	The significance of the habitats on site has been clearly assessed by Horizons Regional Council and the need for the protection of significant habitats has guided the development design for the golf course.

	significant indigenous vegetation or a significant habitat of indigenous fauna under Policy 13-5, unless: i. any more than minor adverse effects on that habitat's representativeness, rarity and distinctiveness, or ecological context assessed under Policy 13-5 are avoided. ii. where any more than minor *adverse effects* cannot reasonably be avoided, they are remedied or mitigated at the point where the adverse *effect* occurs. iii. where any more than minor *adverse effects* cannot reasonably be avoided, remedied or mitigated in accordance with (b)(i) and (ii), they are offset to result in a net indigenous *biological diversity* gain. c. Consent may be granted for resource use activities in an at-risk habitat assessed not to be an area of significant indigenous vegetation or a significant habitat of indigenous fauna under Policy 13-5 when: i. there will be no significant *adverse effects* on that habitat's representativeness, rarity and distinctiveness, or ecological context as assessed in accordance with Policy 13-5, or ii. any significant adverse *effects* are avoided. iii. where any significant *adverse effects* cannot reasonably be avoided, they are remedied or mitigated at the point where the adverse effect occurs. iv. where significant *adverse effects* cannot reasonably be	

	avoided, remedied or mitigated in accordance with (c)(ii) and (iii), they are offset to result in a net indigenous *biological diversity* gain. d. An offset assessed in accordance with b(iii) or (c)(iv), must: i. provide for a net indigenous *biological diversity* gain within the same habitat type, or where that habitat is not an area of significant indigenous vegetation or a significant habitat of indigenous fauna, provide for that gain in a rare habitat or threatened habitat type, and ii. reasonably demonstrate that a net indigenous biological diversity gain has been achieved using methodology that is appropriate and commensurate to the scale and intensity of the residual adverse *effect*, and iii. generally be in the same ecologically relevant locality as the affected habitat, and iv. not be allowed where inappropriate for the ecosystem or habitat type by reason of its rarity, vulnerability or irreplaceability, and v. have a significant likelihood of being achieved and maintained in the long term and preferably in perpetuity, and vi. achieve conservation outcomes above and beyond that which would have been achieved if the offset had not taken place.	

Policy 13-5 Criteria for assessing the significance of, and the effects of activities on, an area of habitat	a. Rare habitats are areas of significant indigenous vegetation or significant habitats of indigenous fauna under criterion (ii)(E) below. Threatened habitats are areas of significant indigenous vegetation or significant habitats of indigenous fauna under criterion (i)(A) below. An area of rare habitat or threatened habitat may also be an area of significant indigenous vegetation or significant habitat of indigenous fauna under one or more of the other criteria below. An at-risk habitat may be recognised as being an area of significant indigenous vegetation or a significant habitat of indigenous fauna if one or more of the following criteria are met: i. in terms of representativeness, that habitat: a. comprises indigenous habitat type that is under-represented (20% or less of known or likely former cover), or b. is an area of indigenous vegetation that is typical of the habitat type in terms of species composition, structure and diversity, or that is large relative to other areas of the same habitat type in the Ecological District or Ecological Region, or has functioning ecosystem processes. or ii. in terms of rarity and distinctiveness, that habitat	Areas of significant indigenous vegetation, in particular those identified in the *Schedule F* report prepared by Horizons Regional Council and the Schedule F significance assessment prepared by Boffa Miskell, will be protected throughout the development and operation of the golf course.

		supports an indigenous species or community that: a. is classified as threatened (as determined by the New Zealand Threat Classification System and Lists), or b. is distinctive to the Region, or c. is at a natural distributional limit, or d. has a naturally disjunct distribution that defines a floristic gap, or e. was originally (ie., prehuman) uncommon within New Zealand, and supports an indigenous species or community of indigenous species. or	
	iii.	in terms of ecological context, that habitat provides: a. connectivity (physical or process connections) between two or more areas of indigenous habitat, or b. an ecological buffer (provides protection) to an adjacent area of indigenous habitat (terrestrial or aquatic) that is ecologically significant, or c. part of an indigenous ecological sequence or connectivity between different habitat types across a gradient (eg.,	

	altitudinal or hydrological), or d. important breeding areas, seasonal food sources, or an important component of a migration path for indigenous species, or e. habitat for indigenous species that are dependent on large and contiguous habitats. b. The potential *adverse effects* of an activity on a rare habitat, threatened habitat or at-risk habitat must be determined by the degree to which the proposed activity will diminish any of the above characteristics of the habitat that make it significant, while also having regard to any additional ecological values and to the ecological sustainability of that habitat.	
Chapter 14: Discharges to Land and Water		
Reference	**Text**	**Comment**
Objective 14-1 Management of discharges to land and water and land uses affecting groundwater and surface water quality	The management of discharges onto or into land (including those that enter water) or directly into water and land use activities affecting groundwater and surface water quality in a manner that: a. safeguards the life supporting capacity of water and recognises and provides for the Values and management objectives in Schedule B, b. provides for the objectives and policies of Chapter 5 as they relate to surface water and groundwater quality, and c. where a discharge is onto or into land, avoids, remedies or mitigates adverse effects on surface water or groundwater.	In all cases, discharges to surface water will be avoided and the life supporting capacity of water will be protected.

Policy 14-2 Consent decision-making for discharges to land	When making decisions on resource consent applications, and setting consent conditions, for discharges of contaminants onto or into land the Regional Council must have regard to: a. the objectives and policies of Chapter 5 regarding the management of groundwater quality and discharges, b. where the discharge may enter surface water or have an adverse effect on surface water quality, the degree of compliance with the approach for managing surface water quality set out in Chapter 5, c. avoiding as far as reasonably practicable any adverse effects on any sensitive receiving environment or potentially incompatible land uses, in particular any residential buildings, educational facilities, churches, marae, public areas, infrastructure and other physical resources of regional or national importance identified in Policy 3-1, wetlands, surface water bodies and the coastal marine area, d. the appropriateness of adopting the best practicable option to prevent or minimise adverse effects in circumstances where: i. it is difficult to establish discharge parameters for a particular discharge that give effect to the management approaches for water quality and discharges set out in Chapter 5, ii. the potential adverse effects are likely to be minor, and the costs associated with adopting the best practicable option are small in comparison to the costs of investigating the likely effects on land and water,	No discharge to surface water is proposed. The proposed discharge area is well separated from any sensitive receiving environment or potentially incompatible land uses, such as residential buildings, educational facilities, churches, marae, public areas and infrastructure.

	e. avoiding discharges which contain any persistent contaminants that are likely to accumulate in the soil or groundwater, and f. the objectives and policies of Chapters 2, 3, 6, 9 and 12, extent that they are relevant to the discharge.	
Policy 14-4 Options for discharges to surface water and land	When applying for consents and making decisions on consent applications for discharges of contaminants into water or onto or into land, the opportunity to utilise alternative discharge options, or a mix of discharge regimes, for the purpose of mitigating adverse effects, applying the best practicable option, must be considered, including but not limited to: a. discharging contaminants onto or into land as an alternative to discharging contaminants into water, b. withholding from discharging contaminants into surface water at times of low flow, and c. adopting different treatment and discharge options for different receiving environments or at different times (including different flow regimes or levels in surface water bodies).	Discharges will be to land and will be treated prior to discharge. No discharge to water is proposed.
Policy 14-7 Management of discharges of domestic wastewater	When making decisions on resource consent applications, and setting consent conditions, for on-site discharges of domestic wastewater, the Regional Council must generally ensure that the discharge is in accordance with the Manual for On-site Wastewater Systems Design and Management (Horizons Regional Council 2010). For discharges that are not in accordance with the Manual for On-site Wastewater Systems Design and Management (Horizons Regional Council 2010) the Regional Council must make decisions on resource consent applications, and set consent conditions, for on-site discharges of domestic wastewater, to ensure that:	Domestic wastewater will be treated prior to discharge and will be managed in accordance with the Manual for On-site Wastewater Systems Design and Management (Horizons Regional Council 2010).

	a. the site is suitable for the intended on-site wastewater management system, b. the discharge does not result in actual or potential contamination of: i. groundwater at any point of abstraction utilised for irrigation, stock or domestic drinking water, ii. surface water bodies, iii. stormwater drains, iv. artificial watercourses, or v. neighbouring property, c. the discharge does not constitute a public health threat, d. the discharge does not cause any offensive or objectionable odour beyond the property boundary, and e. a sufficient area of land is set aside as a reserve disposal area.	
Chapter 16: Takes, Uses and Diversions of Water, and Bores		
Reference	**Text**	**Comment**
Objective 16-1 Regulation of takes, uses and diversions of water	The regulation of takes, uses and diversions of water in a manner that: a. recognises and provides for the Values and management objectives in Schedule B, and b. provides for the objectives and policies of Chapter 5 as they relate to surface water and groundwater use and allocation.	The proposed water takes (for irrigation and potable supply) will be regulated and managed to ensure the values in Schedule B are recognised and provided for. An assessment against the relevant Chapter 5 objectives and policies is provided above.
Policy 16-1 Consent decision-making for takes and uses of surface water and groundwater	When making decisions on resource consent applications under s104-104D RMA, and setting consent conditions, for takes and uses of surface water or groundwater the Regional Council must: a. seek to avoid any adverse effects on other lawful activities, particularly on other surface water takes, including takes allowed by s14(3)(b) of the RMA, and groundwater takes from properly-constructed, efficient and fully-functioning bores (as described in Policies 16-4 and 16-5),	No surface water take is proposed (other than the collection of roof water, for which no consent is required). The collection of roof water is considered to be a sustainable source of potable water for buildings on the property and will minimise the required volume from groundwater. Based on the information available, it is considered the proposed the proposed groundwater abstraction will have minor or less than minor effects.

	b. enable non-consumptive uses of water including the use and recycling of water, and c. have regard to the objectives and policies of Chapters 2, 3, 5, 6, 9 and 12, extent that they are relevant to the activity.	
Policy 16-2 Consideration of alternative water sources	When making decisions on consent applications to take surface water, the opportunity to utilise alternative sources such as groundwater, water storage, water harvesting (including during periods of high flow in a river) and the recycling of water must be considered.	No surface water take is proposed. Water takes will be from groundwater (and rainwater collection) only.
Policy 16-5 Effects of groundwater takes on other groundwater takes	a. Consent applications to take groundwater must include pumping tests and hydrogeological assessments in order to determine the likely impact on existing groundwater takes in the vicinity. b. Consent conditions restricting the rate and duration of pumping must be imposed on new takes of groundwater where this is necessary to avoid significant drawdown impacts on existing groundwater takes from properly-constructed, efficient and fully-functioning bores in the vicinity. A groundwater take is considered to be from a properly-constructed, efficient and fully-functioning bore in circumstances where the bore penetrates the aquifer from which water is being drawn at a depth sufficient to enable water to be drawn all year (ie., the bore depth is below the range of seasonal fluctuations in groundwater level), the pump and bore are adequately maintained, the bore is of sufficient diameter and is screened to reasonably minimise drawdown, and the bore has a pump capable of drawing water from its base to the land surface.	Pumping tests have been undertaken and a hydrological assessment is being prepared (a preliminary discussion document and feasibility report have been prepared and are included at **Volume 2**). The bore will be drilled and constructed properly and will be cased and screened appropriately. At the rate of take required, it is considered the proposal will have no effects on any other groundwater takes in the vicinity.

	c. Consent conditions specifying short-term restrictions on the rate and duration of pumping may also be imposed on new takes of groundwater where this is necessary to avoid significant drawdown impacts on existing bores that are not properly-constructed, efficient and fully-functioning, in order to allow sufficient time for such bores to be upgraded or replaced. d. The Regional Council may encourage consent applicants to consider the option of providing water to neighbouring properties in circumstances where this would be more practical than meeting the requirements of (b) or (c).	
Policy 16-6 Effects of groundwater takes on surface water bodies	The effects of groundwater takes on surface water bodies, including wetlands, must be managed in the following manner: a. An appropriate scientific method must be used to calculate the likely degree of connection between the groundwater and surface water at the location of the groundwater take. b. Subject to (a), the potential adverse effects of groundwater takes on surface water depletion must be managed in accordance with Table 16.1.	Methods of assessing the potential effect on surface water are discussed in the Lattey feasibility report and the Bay Geological Services discussion document at **Volume 2**. It is considered the proposed groundwater take will not deplete or otherwise affect surface water.
Policy 16-7 Saltwater intrusion	Saltwater intrusion along the coastal margins of the Region arising from groundwater takes must be managed by the following measures: a. Consent applicants wishing to take groundwater within 5 km of the coastal mean high water springs line must be required to carry out pumping tests and hydrogeological assessments in order to determine the level of drawdown at the coast and the likelihood of inducing saltwater intrusion.	The potential for saltwater intrusion in the groundwater supply is considered in the Lattey feasibility report and the Bay Geological Services discussion document at **Volume 2**. Based on the information available, it is considered the potential for saltwater intrusion is low and the effects of the proposal will be less than minor.

	b. In cases where saltwater intrusion might occur, the consent application may be declined or the amount of water that can be taken must be limited to an amount that restricts the likelihood of saltwater intrusion. c. In addition, consents to take groundwater within 5 km of the coastal mean high water springs line must contain conditions relating to the monitoring of electrical conductivity and the restriction or suspension of takes if specified electrical conductivity thresholds are reached or exceeded. These monitoring requirements and electrical conductivity thresholds will be determined on a case-by-case basis.	

District policy documents

District Plan		
Chapter 2: Rural Environment		
Reference	**Text**	**Comment**
Objective 2.1.1 Effects of Subdivision and Subsequent Use and Development	To ensure that subdivision and land development maintains and enhances the character and amenity values of the rural environment, and that the subsequent development resulting from subdivision such as on-site servicing and other infrastructure provision does not adversely affect the environment including the efficient and effective operation of existing transportation and infrastructure networks.	No subdivision is proposed as part of this proposal. The land development proposed incorporates a high degree of natural coastal character through reinstatement of a significant part of the coastal margin with native coastal vegetation and through the retention of a sparsely-developed rural area. Infrastructure and servicing will be on-site and will not adversely affect the environment (including the functioning of the transport and infrastructure networks).
Policy 2.1.3	Manage subdivision and land development based on the landscape domains through subdivision controls that reflect the different characteristics and qualities of the landscape domains.	No subdivision is proposed. Development plans for the land have taken into consideration the characteristics and qualities of the coastal environment, as detailed in the assessment against the specific coastal environment policies below.

Policy 2.1.6	Retention of an open and spacious character to the rural areas of the District, with a dominance of open space and plantings over buildings, and within which the potential for conflict between rural and residential activities is minimised.	The open and spacious character of the rural environment will be retained. Open space and revegetation plantings will dominate significantly over buildings. Conflict between different activities will be avoided through the use of significant spatial buffers between accommodation activities and existing rural activities on surrounding properties.
Policy 2.1.7	Minimise obtrusive built elements in the rural environment by integrating building location and design with the surrounding landform and landscape qualities and recognise that farm building location is influenced by their function.	Wherever possible, proposed built form has been integrated into the existing landform. The proposed accommodation units are recessed into the topography of the inland dunes. The proposed clubhouse has been sited to take advantage of the panoramic views surrounding the property while being setback sufficiently from the higher value landscapes and areas of natural character along the coastal and river edge.
Policy 2.1.9	Avoid, remedy or mitigate adverse effects of subdivision, use and development of land on areas or features of landscape, biodiversity, historic heritage or cultural value.	The proposed development's adverse effects on areas or features of landscape, biodiversity, historic heritage or cultural value have been assessed in full elsewhere in this document. It has been determined that with the design of the proposal, with the integrated mitigation measures incorporated, the adverse effects will be less than minor.
Policy 2.1.15	Manage the scale, intensity, size and design of subdivision and land development to ensure the on-site wastewater treatment and disposal systems do not result in contamination of soil, groundwater or other natural resources.	There is sufficient land area within the site to ensure the on-site wastewater treatment and disposal systems do not result in contamination of soil, groundwater or other natural resources. Design of the location and size of the on-site wastewater treatment system has taken the existing features on site (soil, surface and groundwater) into account.
Policy 2.1.18	Avoid, remedy or mitigate adverse effects on the operation, maintenance and protection of existing or designated infrastructure of district significance from the subdivision and development of land.	The proposed development will have no adverse effects on the operation, maintenance or protection of existing or designated infrastructure, nor will it place unsustainable pressure on any district infrastructure (including the road network).
Policy 2.1.19	Having regard to the Explanation and Principal Reasons in respect of the elements of rural character ensure that new activities locating in the rural area are of a nature,	The *Explanation and Principal Reasons* refer to the protection of the character and amenity of the rural environment as they contribute towards the district's identity and well-being. This character and amenity are represented by

	scale, intensity and location consistent with maintaining the character of the rural area and to be undertaken in a manner which avoids, remedies or mitigates adverse effects on rural character, including rural productive values.	"*a diverse range of primary production activities resulting in an open and working landscape; predominance of vegetation (including indigenous and exotic vegetation), and a low level of built development with a few large utilitarian buildings.*" The key rural elements include: • Dominance of natural features, vegetation and dynamic primary production regimes; • Presence of structures in cases where a rural location is required or most appropriate; • High ratio of open space to built form; • Significant areas of land in pasture, crops forestry and/or indigenous vegetation; • A working, productive environment; • A wide range of productive land uses and effects; • Low population densities; and • Lack of urban infrastructure. The proposal is consistent, and protects, those key elements of the rural environment present on the site and surrounding area. The dominance (and in some cases reinstatement) of natural features will prevail, natural vegetation will be retained and replanted, a low-density built form with prevalence of open space will be maintained following the development. Low population density will be retained and on-site 'rural-style' infrastructure will avoid the proliferation of the urban infrastructure in the rural area. The proposal is therefore considered to be consistent with Policy 2.1.19.
Policy 2.1.20	Ensure that new activities locating in the rural area are of a nature, scale, intensity and location consistent with maintaining the character of the rural area and to be undertaken in a manner which avoids, remedies or mitigates adverse effects on rural character,	The proposed golf course and ancillary accommodation etc are new activities to be located in the rural area. As already detailed, the nature, scale, intensity and location of all activities will be consistent with the existing rural character of the site and the surrounding area.

	including rural productive values and potential reverse sensitivity effects.	The open-space grass and duneland of the property will largely be retained with areas of the property returned to native coastal dune vegetation in accordance with a detailed comprehensive masterplan. Low-density and low-profile built form will continue the sparsely populated nature of the rural environment. Existing productive activities can continue on neighbouring properties without hinderance from the proposed activities on the application property. It is therefore considered the proposal is consistent with Policy 2.1.20.
Policy CE.1	Protect the sensitive, distinctive and dynamic nature of the Coastal Environment landscape from inappropriate subdivision and land development.	As set out in the Eco Nomos report, the sensitive, distinctive and dynamic nature of the coastal environment will be protected from harm through the incorporated mitigation in the design. The proposed development is not considered to be inappropriate.
Policy CE.2	Protect the natural character of the coastal environment by avoiding inappropriate subdivision and land development.	Existing natural character, and the protection of the features that contribute to that natural character, was a key component of the design approach for the proposed development. As set out in the landscape assessment in **Volume 2**, the proposed development will not adversely affect the natural character of the coastal environment and the proposal is not considered to be inappropriate.
Policy CE.5	Avoid subdivision and land development of the coastal environment that results in unplanned expansions to existing coastal urban areas or new coastal urban areas.	There will be no urban expansion as a result of the proposed development.
Policy CE.9	Minimise obtrusive built elements in the dune country landscape by integrating building location and design with the surrounding landform and landscape qualities, including by avoiding buildings on dune ridgelines and elevated sites.	Building location and design for the proposed development has considered the principals of the Horowhenua Rural Subdivision and Development Design Guide, in particular the *Building Design and Appearance in Outstanding Natural Landscapes and Landscape Domains of High Amenity* section.

		All buildings are single-storey, low profile and recessed into the landscape. Building cladding and colours use natural tones to integrate the proposed built form into the surrounding rural environment.
Policy CE.10	Ensure that the coastal edge and margins of rivers, streams, estuaries and wetlands are identified and protected from inappropriate subdivision and development.	As already detailed, measures have been incorporated into the design of the proposed activities to ensure the coastal edge and river margins are protected. Adequate separation will be provided between the activities and the coast/river margins. Earthworks will be managed in accordance with an approved erosion and sediment control plan to ensure no uncontrolled discharge occurs during the construction phase of the project.
Policy CE.11	Ensure that the natural habitats of the parabolic dunefields and inter-dunal areas, particularly dune habitats, coastal lakes and wetland areas, are identified and protected from inappropriate subdivision and development.	The coastal foredunes will be protected throughout the development proposed. Some vegetation clearance, earthworks and native revegetation will occur on the inland dunes. These works are considered to be appropriate for the subject property and will not adversely affect the natural habitats of the parabolic dunefields.
Policy CE.12	Maintain and enhance public access to the coast in strategic locations, in conjunction with environmental protection, enhancement or restoration and in a way that does not adversely affect coastal processes and natural character and natural habitats.	The proposal will not remove any existing public access to the coast. The project team is exploring ways to provide for greater public access to the coast.
Policy CE.13	Protect identified historic heritage and cultural values within the Coastal Environment Domain by avoiding the adverse effects of inappropriate subdivision and land development.	Measures have been taken, as detailed elsewhere in this report, including the protection of identified sites of historic value and the preparation of an archaeological authority application, to ensure historic heritage is protected during and after the proposed development. The Applicant is working with Ngāti Kikopiri regarding appropriate methods to recognise and interpret features of historic heritage value.

Objective 2.2.1 Fragmentation and Soil Resource	To safeguard the life supporting capacity of soils to enable a wide range of primary production activities and provide a resource for future generations while recognising the finite nature of the versatile land resource.	The quality of the soil resource on the property is currently degraded and previous attempts to cultivate growth of productive vegetation have been unsuccessful dure to the sandy and saline nature of the environment. The proposal will result in a return of large parts of the application site to forms of native coastal vegetation that are known to succeed in this type of environment with other areas maintained for golf course activities.
Policy 2.2.5	Ensure that land use activities on versatile land are undertaken in a manner that safeguards the life-supporting capacity of the soil and recognises the finite nature of the land resource.	The soils on the application site are sandy and not considered to be versatile soils. The proposed activities on site are considered to be appropriate for the soil type(s) present on the property.
Policy 2.2.6	Subdivision, use and development of the versatile rural land resource should occur in a way which retains its potential to be used for a range of productive rural purposes and which maximises the likelihood of it actually being used for such purposes.	The subject property is not versatile land and previous attempts to use the land for pasture have not been successful. Potential alternative uses of this type of soil (pine forest for example) would be likely to have a greater impact on the rural character of the site and surrounding area.
Policy 2.2.9	Subdivision, use and development which has the potential to inhibit the efficient use and development of versatile land for primary production should minimised and, where possible avoided.	As already stated, the proposal will not inhibit the use of any versatile land.
Objective 2.4.1 Land Use Activities – Nature, Character, Amenity Values and Servicing	To enable primary production activities and other rural based land uses to function efficiently and effectively in the Rural Zone, while avoiding, remedying or mitigating the adverse effects of activities, including reverse sensitivity effects caused by new activities on existing activities, in a way that maintains and enhances the character and amenity values of the rural environment.	Existing primary production activities will continue to be enabled on surrounding land. The proposed activity will not create any reverse sensitivity issues for existing or future legitimate rural activities on surrounding land. The application property has been used for a range of rural activities in the past but none have proved to be productive uses and the proposed activity is considered to be an appropriate use for the property.
Policy 2.4.3	Provide for the establishment and operation of new non-primary production activities and the ongoing operation of existing lawfully established activities	The proposed use is a new non-primary production activity in the rural environment. The use of the land as a golf course with associated accommodation activity is considered to be compatible with surrounding

	which are compatible and/or associated with primary production activities in the rural environment provided they meet minimum environmental standards to avoid, remedy or mitigate any adverse effects.	primary production activities. The golf course use will not hinder the ongoing operation of those established and potential future rural activities in the surrounding area. The proposed activity meets the relevant minimum standards in the District Plan and is considered to avoid adverse effects on primary production activities in the surrounding environment.
Policy 2.4.4	Control and manage the establishment and operation of a range of other land use activities, including sensitive activities, in the rural environment to ensure their adverse effects on the environment (including reverse sensitivity effects on existing lawfully established activities) are avoided, remedied or mitigated.	The establishment of a golf course in this location, with associated built form, is considered to be an appropriate use of the land. The application site has not proved to be viable for farming activity. The proposed use is compatible with surrounding rural activities, including farming activities to the east and south (across the Ōhau River) and will not impact the ongoing viability of neighbouring lawfully established activities.
Policy 2.4.5	Manage any activity which does not meet minimum standards by assessing on a case-by-case basis to ensure the adverse effects on the environment are avoided, remedied or mitigated.	An assessment of the proposed activity's effects on the environment has been provided in Section 7 of this application report. That assessment concludes that the adverse effects can be avoided, remedied and/or mitigated so as to be minor.
Policy 2.4.6	Ensure that all activities within the rural environment manage and dispose of wastes in a manner that does not create a nuisance and that avoids, remedies or mitigates adverse effects on amenity values.	All waste from the proposed activity will be managed and disposed in a manner that avoids adverse effects on the environment and in accordance with all relevant regulations and waste management requirements in force at the time.
Policy 2.4.7	Avoid, remedy or mitigate the impact of buildings on the rural landscape and maintain overall low building density and building height throughout the rural environment.	The overall low building density of the rural landscape will be maintained by the proposed development. Built form over the site will be sparse and well-integrated into the landscape to minimise any potential adverse effect of the additional buildings.
Policy 2.4.10	Avoid, remedy or mitigate adverse effects on rural privacy and rural character in the Rural Zone by maintaining road and site boundary setbacks for all buildings, while recognising the degree of privacy and rural spaciousness is different in areas	All built form and areas of proposed activity will be internal to the site and orientated away from any neighbouring activities requiring privacy. Site boundary setback standards in the District Plan will be observed on all boundaries and the overall feeling of rural spaciousness and privacy will be retained for all surrounding land uses.

	comprising existing smaller rural-residential lots.	
Policy 2.4.11	Manage potential reverse sensitivity conflict between primary production activities and sensitive activities through appropriate separation distances or other measures, while giving priority to existing lawfully established activities.	Appropriate setbacks between built form and neighbouring primary production activities will ensure potential reverse sensitivity effects are managed. The proposed activity will benefit from being surrounded by rural character in terms of amenity benefits and is therefore not considered to generate adverse reverse sensitivity effects.
Policy 2.4.13	Avoid, remedy or mitigate any adverse effects upon residential properties or road safety caused by lighting or glare from any source.	External lighting will be kept to a minimum in all parts of the site and will have no effect on residential properties or road safety.
Policy 2.4.17	Maintain overall day and night time noise conditions at levels compatible with the amenity and activity present in the rural environment.	The proposed activity will not generate excessive levels of noise during day or night time. No noise from the proposed activity will adversely affect rural amenity.
Policy 2.4.18	Ensure that effects of increased traffic or changed traffic type or change to road access do not compromise the safe and efficient operation of any road or adversely affect the safe and convenient movement of people on public roads.	The Tim Kelly Transportation Planning Limited report at **Appendix #** to this report has confirmed that the potential increase in traffic volumes as a result of the proposed development will not compromise the safe and efficient operation of Muhunoa West Road , State Highway 1 or the wider road network, nor will it adversely affect the safe and convenient movement of people on public roads.
Policy 2.4.19	Provide for a limited amount of signage located on the site to which the activity relates to minimise the effects on the rural environment.	Signage associated with the proposed activity will be limited in accordance with Policy 2.4.19.
Chapter 3: Natural Features and Values		
Reference	**Text**	**Comment**
Objective 3.1.1 Outstanding Natural Features and Landscapes and Domains with High Landscape Amenity	Ensure that the District's Outstanding Natural Features and Landscapes are protected from inappropriate subdivision, use and development and that regard is had to other landscapes having high amenity.	As part of the development process for the proposed activity, the project team has reviewed the coastal environment provisions in the relevant policy documents, in particular the Horowhenua District Plan. Following the review of the policy documents, the project team undertook a more fine-grained analysis of the coastal features,

		vegetation areas and hazard areas on the application site and surrounding area. This approach has provided a site-specific analysis of the coastal environment and features in the local area from which development of the proposed activity could commence. This has placed the coastal environment of the application property at the forefront of the design and assessment process and has resulted in the features of significance being protected and enhanced by the proposed activities.
Policy 3.1.2	Protect the character and values of Outstanding Natural Features and Landscapes from inappropriate subdivision, use and development by controlling the level and extent of activities including earthworks and the scale of buildings and network utilities.	The landscape assessment at **Volume 2** states: *That in terms of landscape considerations the proposed development –* • *Has taken into account the Coastal ONFL classification and provisions, and has had regard to other landscapes having high amenity.* • *Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.* • *Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.* • *Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.* • *Will protect, expand and manage areas of significant indigenous vegetation and habitat.* *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.*
Policy 3.1.3	Subdivision, use and development affecting domains with high landscape amenity shall be controlled to specified levels and enabled beyond this where undertaken in a manner that gives particular regard to the maintenance and enhancement of the amenity values of that landscape.	

		• *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* *That in terms of visual effects considerations, the proposed development –* • *Will not create adverse visual or amenity effects from locations within or beyond the site.* *Will enhance the visual amenity of the landscape in the context of its coastal setting.*
Policy 3.1.4	Avoid the development of buildings where they will adversely affect the values of Outstanding Natural Features and Landscapes.	The assessment of environmental effects in the application documents confirms that the values of the identified natural features and landscapes on the property will not be adversely affected by the proposed buildings on the property. No buildings are proposed on, or in close proximity to, those identified features and landscapes.
Policy 3.1.5	Ensure that buildings within domains with high landscape amenity achieve low impact by having particular regard to the Horowhenua Rural Subdivision and Development Design Guide.	Building location and design for the proposed development has considered the principals of the Horowhenua Rural Subdivision and Development Design Guide, in particular the *Building Design and Appearance in Outstanding Natural Landscapes and Landscape Domains of High Amenity* section. All buildings are single-storey, low profile and recessed into the landscape. Building cladding and colours use natural tones to integrate the proposed built form into the surrounding rural environment.
Policy 3.1.6	Have regard to any positive effects associated with landscape and biodiversity restoration.	As detailed elsewhere in this report, significant areas of the property will be revegetated with suitable native vegetation in accordance with the comprehensive management plan. These areas of revegetation are currently either pasture grass or degraded dunes with significant spread of weed and exotic species. The proposal will result in positive effects from native revegetation of these areas and is therefore considered to be consistent with Policy 3.1.6.
Policy 3.1.7	Have regard to the ability of existing landscapes to absorb appropriate subdivision, use and development, which includes	The landscape assessment at **Volume 2** states: *That in terms of landscape considerations the proposed development –*

	existing land uses, and also topography and vegetation.	• *Has taken into account the Coastal ONFL classification and provisions, and has had regard to other landscapes having high amenity.* • *Has proposed to initiate, implement and maintain landscape restoration and biodiversity values throughout the site.* • *Has respected the landscape's ability to absorb and accommodate appropriate activities and development within the site.* • *Has ensured and demonstrated that adverse effects on significant dune landforms have been avoided, remedied or mitigated.* • *Will protect, expand and manage areas of significant indigenous vegetation and habitat.* *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* *That in terms of visual effects considerations, the proposed development –* • *Will not create adverse visual or amenity effects from locations within or beyond the site.* *Will enhance the visual amenity of the landscape in the context of its coastal setting.* We therefore consider the proposal to be consistent with Policies 3.17, 3.1.8 and 3.1.9.
Policy 3.1.8	Have regard to the potential adverse effects on the landscape values of an Outstanding Natural Feature or Landscape from development on a nearby landscape with high amenity.	
Policy 3.1.9	Ensure that any adverse effects on significant dune landforms are avoided, remedied or mitigated having regard to the needs of primary production activities.	
Objective 3.2.1 Indigenous Biological Diversity	To protect the areas of significant indigenous vegetation and significant habitats of indigenous fauna.	Areas of significant indigenous vegetation, in particular those identified in the *Schedule F* report prepared by Horizons Regional Council and the Schedule F significance assessment prepared by Boffa Miskell, will be protected throughout the development and operation of the golf course.

Policy 3.2.2	Manage the effects of subdivision, use and development to avoid, remedy or mitigate the adverse effects on areas of significant indigenous vegetation and significant habitats of indigenous fauna and the intrinsic values of ecosystems.	It is considered the proposal will result in some positive impacts on indigenous biological diversity in the coastal environment. The proposal includes a comprehensive revegetation programme and the protection (and augmentation) of existing areas of native vegetation, including the isolated kanuka remnants on the property.
Policy 3.2.3	Encourage subdivision, land use and development that maintains and enhances indigenous biological diversity through the protection and enhancement of areas of significant indigenous vegetation and significant habitats of indigenous fauna.	
Objective 3.3.1 Lakes, Rivers and Other Water Bodies	To protect the natural character of lakes, rivers and other waterbodies and their margins, from inappropriate use, and development.	Natural character preservation and protection is integral to the success of a links golf course and have been at the forefront of the design process throughout.
Policy 3.3.2	Identify priority lakes, rivers, wetlands and other waterbodies with high natural character and conservation, recreation, cultural, amenity and intrinsic values.	The coastal environment assessment in the landscape and visual impact assessment states: *That in terms of Coastal Environment considerations, the proposed development –* • *Will preserve the natural character of the Coastal Environment.* • *Will increase and enhance the levels of natural character throughout the site.* • *Recognises and respects the sensitivities and dynamics of the coastal dune landscape.* • *Embraces opportunities to restore and rehabilitate the natural character of the site and its adjacent coastal edge.* It goes on: *The proposed Douglas Links Golf Course will –* • *Have no adverse effects on the environment that cannot be readily mitigated, and will in fact enhance the landscape character, biodiversity habitat*
Policy 3.3.3	Manage the design, location and scale of subdivision and/or land development and use adjoining lakes, rivers, wetlands and other waterbodies so they retain their special values and natural character.	
Policy 3.3.4	Ensure subdivision, use and development protects the natural character of lakes, rivers, wetlands and other waterbodies and maintain and enhance their special values by having regard to the following matters in assessing proposals: • extent to which natural processes, elements and patterns that determine the area's natural character are sustained,	

	and/or restored and rehabilitated; • degree of change to landform and relief; • degree of protection of vegetation cover and patterns, including use of a buffer; • compatibility with existing level of modification to the environment; • functional necessity to be located in or near the waterbody and no reasonably practicable alternative locations exist; • ability to mitigate any potential adverse effects of subdivision, use, and development; and • provision of public amenity and access to land acquired by Council for reserve purposes.	*and the amenity values of the coastal landscape.* • *Will restore and rehabilitate degraded and vulnerable landscapes and vegetation, particularly along the coastal margin.* • *Will protect and enhance natural character values throughout the site.* We therefore consider the proposal is consistent with Policies 3.3.2, 3.3.3 and 3.3.4.
Policy 3.3.5	Ensure the adverse effects on the natural character and special values of lakes, rivers, wetlands and other waterbodies are avoided or mitigated through establishing setbacks for activities and buildings that may cause adverse effects.	All built form and areas of proposed activity will be internal to the site and located away from rivers, wetlands and other waterbodies. Site boundary setback standards in the District Plan will be observed on all boundaries.
Policy 3.3.6	Promote and encourage the development or maintenance of riparian planting along waterbody margins.	Coastal plantings are incorporated into the comprehensive management and revegetation plan for the property which forms an integral part of the development proposal.
Policy 3.3.7	Enable customary activities to be undertaken within and adjacent to lakes, rivers and other waterbodies.	The proposal will have no effect on any existing customary activities being undertaken in proximity of the property.
Policy 3.3.8	Promote a strategic approach to the management of lakes, rivers, wetlands and other waterbodies and their margins and catchments, particularly by using management	The Applicant supports the strategic approach to the management of lakes, rivers, wetlands and other waterbodies and their margins and catchments.

	plans for areas with significant environmental issues that require a collaborative approach with other groups or organisations.	
Policy 3.3.9	Provide for the maintenance of the natural character of lakes, rivers and other waterbodies and their margins, whilst balancing the need to provide public access to and along these water bodies by way of an esplanade network.	The natural character of rivers and other waterbodies will not be affected by the proposed development. Options for public access to the coast have the potential to be improved following the proposed development.
Chapter 4: Open Space and Access to Water Bodies		
Reference	**Text**	**Comment**
Objective 4.2.1 Public Access to Water Bodies	Maintain and enhance public access to and along the coast, rivers, lakes and streams, at appropriate locations while preserving the natural character, cultural values and other values of these waterbodies and their margins, and where the need for the protection of sites and areas of significance to Tangata Whenua is taken into account.	The proposal will facilitate improved access to the Horowhenua coast through enabling the construction of a public footpath from the end of Muhunoa West Road to the coast and through a proposed use on the property that will facilitate greater access to the district's coastal area. As detailed elsewhere in this application, this will be done while preserving the natural character, cultural values and other values of the coast and the Ōhau River (and their margins) and while taking into account the need for the protection of sites and areas of significance to Tangata Whenua.
Policy 4.2.2	Prioritise the needs for public access to waterbodies with significant natural/ecological, natural hazards, recreational/ access values.	Public access to the Horowhenua coast will be improved as a direct result of the proposed use of the application property.
Policy 4.2.3	Require esplanade reserves or strips along the coast and identified rivers, lakes and streams that are considered of significant value in the District.	No subdivision is proposed. However, public access options to the coast will be improved.
Policy 4.2.4	Consider esplanade strips as appropriate along the margins of other waterbodies not identified for their significant values where they would achieve the purpose of: • Contributing to the protection of conservation values; • Enabling public access; and/or	No subdivision is proposed. However, public access options to the coast will be improved.

	• Enabling public recreational use, where the use is compatible with conservation values.	
Policy 4.2.5	Recognise the creation of a network of esplanade reserves along waterbodies of significant value is a long-term objective, and short-term arrangements may need to be made to manage esplanade reserves in isolated areas.	No subdivision is proposed. However, public access options to the coast will be improved.
Policy 4.2.7	Support landowners seeking to create esplanade areas and other open space connections between existing public recreation or conservation reserves, or any isolated areas, by developing partnerships and assisting with information and technical advice.	No subdivision is proposed. However, public access options to the coast will be improved.
Chapter 5: Coastal Environment		
Reference	**Text**	**Comment**
Objective 5.1.1 Natural Character of the Coastal Environment	To preserve natural character of the Coastal Environment and avoid, remedy or mitigate the adverse environmental effects from inappropriate subdivision, use and development.	The natural character of the Coastal Environment will be preserved in the manner described below and in the Assessment of Environment Effects (**AEE**) in the main application report.
Policy 5.1.4	Identify in the District Plan Outstanding Natural Features and Landscapes within the Coastal Environment and protect these from inappropriate subdivision, use and development.	Part of the application site has been identified as Coastal Outstanding Natural Feature and Landscape (**ONFL**). As described elsewhere in this report, the identification of this ONFL, and the need to protect it, has been of paramount importance throughout the design process and has resulted in a range of measures incorporated into the project that will ensure the Coastal ONFL, and the values it displays, will be protected.
Policy 5.1.5	Avoid significant adverse effects and avoid, remedy, mitigate other adverse effects of subdivision, use and development on the natural character of the Coastal Environment	The AEE confirms the proposal will not result in any significant adverse effects on the natural character of the Coastal Environment. Other potential effects have been avoided, remedied and/or mitigated so as to be minor. In particular, the proposal will remove significant areas of weed species and revegetate large areas of the property with appropriate native coastal species. The

		proposal will also recontour areas of duneland which have been degraded or removed through previous land use on the property.
Policy 5.1.6	In areas of high and very high natural character within the Coastal Environment, avoid subdivision and development where the level of natural character is reduced, except where there is a significant public benefit and the development has a functional need to be located within the Coastal Environment. Such development should avoid, as far as practicable, adverse effects on the natural character, and where avoidance is not achievable, adverse effects are to be remedied or mitigated.	The development of a links golf course, by definition requires a coastal location. Links golf courses are named for the coastal hinterland in which they are located. The design of the course will complement, and in some regards, enhance the natural character of the coastal environment through revegetation and on-going management of the dunelands in accordance with a comprehensive management plan for the coastal dunes. Benefits will be derived through facilitating options for better public access to the coast and comprehensive revegetation of the coastal environment.
Policy 5.1.8	Ensure development within the Coastal Environment recognises and respects the sensitive and dynamic landscape, particularly the coastal foredunes in which natural coastal processes dominate.	Particular regard has been had to the sensitive and dynamic nature of the coastal foredunes. The removal of macrocarpa trees from the foredune has the potential to destabilise the dynamic dune system. However, the comprehensive management plan will ensure revegetation occurs in a manner that ensures the stability of the dune system will be maintained throughout the transition from weed and exotic species to native species as part of the development plans for the property.
Policy 5.1.9	Promote and encourage opportunities to restore or rehabilitate the natural character of the Coastal Environment, particularly at the time of subdivision and development.	As already detailed, the intent for the land following development of the golf course will be a significant change to return large parts of the coastal environment to natural vegetation and landforms, with golf holes embedded within that natural topography and vegetation.
Objective 5.2.1 Public Access to and Along the Coast	To maintain the existing level of public access to and along the coast and ensure that any new access is provided in a way that does not adversely affect the recognised values of the Coastal Environment.	The proposal will facilitate improved access to the Horowhenua coast through enabling the construction of a public footpath from the end of Muhunoa West Road to the coast and through a proposed use on the property that will facilitate greater access to the district's coastal area. This will be achieved without adversely affecting the recognised values of the coastal environment. In some instances, the values of the coastal environment will be

		enhanced through revegetation with appropriate native coastal vegetation.
Policy 5.2.2	Provide for the maintenance and creation of esplanade reserves, esplanade strips and public access strips to and along the coast.	No subdivision is proposed. However, public access options to the coast will be improved.
Policy 5.2.3	Ensure that private development does not preclude the use of the coast by the general public.	The proposal will result in greater access to the coast by the general public and users of the golf course.
Policy 5.2.4	Develop, improve and maintain existing forms of access to the coast that do not adversely affect the recognised values of the Coastal Environment.	There are no existing forms of public access to the coast in the vicinity of the application property. The proposal will enhance public access to the coast.
Policy 5.2.5	Ensure that adverse effects arising from the provision of existing, new or upgraded public access are avoided, remedied or mitigated particularly on areas with high natural character and areas subject to coastal hazards.	All parts of the proposal, including the facilitation of improved public access to the coast, have been developed with full regard to the existing areas of high natural character and the need to avoid, remedy and/or mitigate adverse effects on those areas. The proposal ensures areas of high natural character will be protected from adverse environmental effects that are more than minor.
Policy 5.2.6	Where new access to the coast is provided, ensure it is located and constructed so that disturbance to foredunes and adjacent coastal marine area is minimised.	In all aspects of the proposal, disturbance to the foredune and adjacent coastal marine area will be minimised. Protection of the character and natural value of the foredune is of paramount importance to the success of the proposed activity.
Chapter 8: Natural Hazards		
Reference	**Text**	**Comment**
Objective 8.1.1 Risks and Adverse Effects of Natural Hazards	The adverse effects of natural hazards on people, property, the environment and the well-being of communities are avoided or mitigated.	Potential natural hazard risks in relation to this property and proposed development relate mainly to river flooding, coastal flooding and coastal erosion. These potential risks are considered below.
Policy 8.1.4	Control the location and design of land use, structures and subdivision in identified areas at significant risk from flood events, as identified in Policy 8.1.3, to avoid or mitigate the adverse effects on people, property and the environment.	No new structure or activity is proposed in any area at significant risk from flood events. Buildings and structures will all be located away from the Ōhau River to ensure they are not at risk from flooding. Activities located closer to the river will be transient in nature to avoid flood risk.
Policy 8.1.5	Avoid the establishment of any new structure or activity, or any increase in the scale of any existing structure or activity, within the	

	identified areas at significant risk from flood events, as identified in Policy 8.1.3, unless: • flood hazard avoidance is achieved or the 0.5% AEP (1 in 200 years) flood hazard is mitigated, or • the non-habitable structure or activity is on production land, or • there is a functional necessity to locate the structure or activity within such an area, in which case the structure or activity may be allowed.	
Policy 8.1.6	Flood hazard avoidance must be preferred to flood hazard mitigation.	No activity proposed will increase the flood risk to the property or surrounding area. Flood hazard avoidance will be achieved through appropriate location of buildings and other infrastructure.
Policy 8.1.7	Ensure any development undertaken within identified flood areas, as identified in Policy 8.1.3, adopts specifically designed measures to avoid or mitigate the hazard risks by ensuring: • Occupied structures have a finished floor or ground level, which includes a reasonable freeboard above the 0.5% AEP (1 in 200 years) flood level. • In a 0.5% AEP(1 in 200 years) flood event, the inundation of access between habitable structures and a safe area where evacuation may be carried out (preferably that will not be flooded) must be no greater than 0.5metres above finished ground level with a maximum water velocity of 1.0 m/s, or some other combination of water depth and velocity that can be shown to result in no greater	No structures are proposed in identified areas of flood risk. Any activity in the identified flood hazard area on the property (limited to minimal vegetation clearance, earthworks and revegetation planting to achieve the final golf course landform will not be affected by the identified flood risk given no infrastructure or flood-sensitive activities are proposed in this area. Works in this area will also not result in any consequent increase in flood risk elsewhere up- or downstream of the application property. The proposal is therefore considered to be consistent with Policy 8.1.7.

	risk to human life, infrastructure or property. • Adverse effects on the effectiveness of existing flood hazard avoidance or mitigation measures, including works and structures within River and Drainage Schemes, natural landforms that protect against inundation, and overland stormwater flow paths, are avoided. • Adverse effects on existing structures and activities are avoided or mitigated. • Regard is had to the likelihood and consequences of the proposed flood hazard mitigation measures failing. • Regard is had to the consequential effects of ensuring occupied structures have a finished floor or ground level, including but not limited to landscape and natural character, urban design, and the displacement of floodwaters onto adjoining properties. • Regard is had to the proposed ownership of, and responsibility for maintenance of, the flood hazard mitigation measures including the appropriateness and certainty of the maintenance regime.	
Policy 8.1.9	Ensure that all structures and activities are constructed so as to minimise material damage from seismic events.	All buildings, other structures and on-site facilities will be designed and constructed in accordance with best practice guidance for seismic events and fire risk.
Policy 8.1.10	Ensure that all structures and activities incorporate measures to minimise risk of, and damage caused by, fire.	

Policy 8.1.11	Manage subdivision, development of buildings, and structures on areas which may be prone to coastal erosion or the effect of sea level rise unless the activities, buildings or structures: • have a significant community benefit and have a functional requirement to be located in the coastal environment; • do not adversely affect the natural character of the coastal environment; or • are relocatable.	All buildings and structures are proposed with an adequate setback from the coast to ensure they are not at risk from coastal erosion or sea level rise. Coastal erosion and climate change are considered in the Eco Nomos Limited report in **Volume 2** of this application.
Policy 8.1.13	Manage the effects of natural hazards caused by long-term shifts in climate and changes in sea-level insetting minimum floor levels, designing flood avoidance or mitigation measures.	As detailed above, all buildings are adequately set back from the coast to ensure the potential effects from long term climate change will not adversely affect built form or increase risk from coastal inundation.
Objective 8.2.1 Worsening the Risks or Severity of Natural Hazards	Land use and development that does not significantly worsen the risk of occurrence or the severity of natural hazards or compromise the effective functioning or integrity of natural hazard protection or mitigation works.	The proposal will have no impact on the risk of occurrence or severity of natural hazards either to the property or to the surrounding area. No development is proposed in any area of particular susceptibility to significant natural hazards and none of the works proposed will increase the risk of natural hazards or compromise any existing protection or mitigation works.
Policy 8.2.2	Ensure that the use and development of land does not accelerate or worsen any material damage to that land, or displacing to other land or structure resulting from erosion, subsidence, slippage, debris flow, or surface water flooding.	Any earthworks undertaken will be stabilised on completion. No site will be left exposed and there will therefore be no increase in risk of erosion, subsidence, debris flow or surface water flooding.
Policy 8.2.3	Avoid structures and activities that are likely to reduce the effectiveness of existing works, structures, natural landforms or other measures which serve to mitigate the effects of natural hazard events.	There is no proposal to modify or compromise any existing works, structures, natural landforms or other measures that currently mitigate the effects of natural hazard events.
Chapter 10: Land Transport		

Reference	Text	Comment
Objective 10.1.1 Maintaining and Developing Land Transport Network	Maintenance of land transport networks to efficiently and safely move people and goods through and within the District to meet the current and future needs of the District.	The Tim Kelly Transportation Planning Ltd (**TKTPL**) assessment in **Volume 2** of this application confirms that existing and proposed additional traffic volumes on the road network surrounding the application site are low enough that there will be no more than minor effect on the safety and efficiency of network.
Policy 10.1.4	Encourage the development of pedestrian paths and cycleways, as well as convenient and accessible cycle parking, to support the opportunity to use non-vehicular transportation modes throughout the District.	The property does not particularly lend itself to the use of non-vehicular transportation modes, given the location in relation to other services. However, the golf course operation will explore the potential for utilising shared transport options for golfers travelling to and from the golf course.
Policy 10.1.6	Require all new public and private roads to be designed and constructed to meet consistent minimum standards relating to safety and efficiency of vehicle movement and particularly in respect of: • Road width and alignment which should be sufficient for two vehicle lanes except where traffic volumes are insufficient; • The formation and surface sealing of all roads, access ways, and private ways to standards appropriate to the volume of vehicle traffic expected to be carried; • Provision for necessary public utility facilities within roads; and • Safe design and construction of roads, road access points, including alignment, gradient, vehicle parking, manoeuvring, and turning requirements.	No new public roads are proposed. Internal (private) tracks will be designed and constructed in accordance with the relevant standards in terms of gradients, widths and surfacing to ensure the safe and efficient movement of vehicles on site.
Policy 10.1.12	Ensure that the cost of new or upgraded roading, which is needed to provide access to new	As detailed in the TKTPL assessment, the existing road network, including the intersection of Muhunoa West Road with State Highway (**SH**) 1, is already of an adequate

	subdivision or development, is met by the subdivider or developer.	standard to accommodate the potential additional movements from the proposed activity without causing safety or efficiency effects on the network. As such, no upgrades are considered necessary to accommodate the proposal.
Policy 10.1.13	Ensure that convenient and accessible car parking is available for both staff and visitors and loading space for all activities within their site without creating congestion or conflicts with moving vehicles or with pedestrians on adjacent roads.	On-site parking provision has been calculated based on the anticipated combined needs of the various activities on the property. Car parking is provided adjacent to the club house and in the maintenance shed area. The provision of parking areas in different locations within the site will avoid conflict and congestion within the site, as will the addition of a service entrance into the maintenance shed area.
Policy 10.1.14	To ensure that State Highways are a safe and efficient network.	The TKTPL report confirms that the safety improvements to SH1 at Ōhau will ensure the state highway network remains a safe and efficient network during and following development of the proposed activity.
Objective 10.2.1 Managing Effects of Transport Infrastructure	To provide for a land transport network that is safe, convenient and efficient, and which avoids, remedies or mitigates the adverse effects to maintain the health and safety of people and communities, and the amenity and character of the environment.	As detailed above, the land transport network will not be adversely affected by the proposed activity and existing levels of safety, convenience and efficiency will remain during construction and operation of the proposed golf course.
Policy 10.2.2	Require all extensions and upgrades to the land transport infrastructure, including roads, to avoid, remedy, or mitigate any adverse effects on the natural and physical resources, sensitive areas, and amenity and landscape values of the District.	No extension or upgrade to the existing land transport infrastructure in the local network is required.
Policy 10.2.4	Adopt techniques to discourage high volume and heavy traffic use in areas where it would have adverse environmental effects on the local community.	The proposed activity will not generate high volume or heavy traffic use of the local transport network.
Objective 10.3.1 Adverse Effects of Land Use Activities, Subdivision and	Protection of the safety and efficiency of the land transport network from the adverse effects of land use activities, subdivision and development.	As detailed above, the land transport network will not be adversely affected by the proposed activity and existing levels of safety and efficiency will remain during construction and operation of the proposed golf course.

Development on Land Transport Infrastructure		
Policy 10.3.2	Avoid, remedy, or mitigate the adverse effects of increased traffic or changed traffic type, which could compromise the safe and efficient operation of any road, or the safe and convenient movement of pedestrians and cyclists on public roads.	The TKTPL report confirms that the proposed activity will avoid the adverse effects of increased traffic or changed traffic type. As such the safe and efficient operation of any road will not be compromised. The safe and convenient movement of pedestrians and cyclists on public roads will be maintained. No remediation or mitigation is therefore required in relation to traffic effects.
Policy 10.3.3	Require vehicle crossing places and vehicle entrances from public roads to be located, constructed, and maintained to standards appropriate to the circumstances of traffic volume, pedestrian movement, and speed environment of each road.	The site is accessed from the western end of Muhunoa West Road close to the road end. The existing vehicle crossing will be upgraded as required to provide suitable road surface and formed and legal width. It has been demonstrated in the traffic assessment included with the application documents that the existing and proposed location for the accesses into the property are appropriate in terms of visibility and separation and in relation to the traffic volumes and speed environment in this location.
Policy 10.3.5	Ensure that adequate on-site parking and manoeuvring space is provided for each type of activity in a safe and visually attractive manner.	Adequate on-site parking, based on calculations of intended use, will be provided within the site in a manner than will be both safe and visually attractive. The site plans appended to the application demonstrate how the internal parking will be laid out within the property.
Policy 10.3.6	Ensure that adequate and safe on-site loading and unloading provision be made.	Loading and unloading can be undertaken within the site in a safe manner and in a way that will not adversely affect the efficient functioning of the existing road network.
Chapter 12: Network Utilities		
Reference	**Text**	**Comment**
Objective 12.2.1 Energy	To recognise and provide for the efficient use of energy and the development and use of renewable electricity generation infrastructure, where the adverse effects on the environment can be avoided, remedied or mitigated.	Energy efficiency will be incorporated into all parts of the proposed activity as detailed below.
Policy 12.2.13	Encourage energy efficiency and conservation practices, including use of energy efficient materials	Appropriate energy efficiency and energy conservation practices will be incorporated into the buildings proposed as part of the

	and renewable energy in development.	activity, including suitable ratings of insulation, solar panels incorporated in to buildings and building orientation and window location to take advantage of passive solar heating wherever possible.
Policy 12.2.14	Encourage subdivision and development to be designed so that buildings can utilise energy efficiency and conservation measures, including by orientation to the sun and through other natural elements, to assist in reducing energy consumption.	
Chapter 13: Historic Heritage		
Reference	**Text**	**Comment**
Objective 13.2.1 Protection of Historic Heritage	To protect significant historic heritage that reflects the culture and history of the Horowhenua District from inappropriate subdivision, use and development.	An archaeological assessment was undertaken in support of the resource consent application (and to accompany the application for an archaeological authority for the proposed works). The assessment summarises that: "*Based on information of site nature and occurrence inferred from archaeological work on the Kapiti and Horowhenua area, the most likely site type is middens. Midden sites are not so archaeologically significant as to preclude their destruction by the proposed work. However, they are very likely to contain valuable scientific information on subsistence activities and wider environment factors, so analysis of these sites will be required during and after their destruction.*"
Policy 13.2.5	Avoid or appropriately mitigate any adverse effects of activities that could destroy or diminish the heritage values associated with buildings and sites included in the Historic Heritage Schedule.	The archaeological assessment states that sites that may have been present in the area where commercial forestry occurred are very likely to have been destroyed by harvesting activities. Archaeological sites "*have been recorded in the intact coastal dunes in the south-west corner of the proposed area of work. The dunes in the area of proposed work are largely intact, so there is a high probability of sites in them…*". Many of the dunes in this area are not being modified for the proposed course construction. Where modification does occur, "*the loss of the archaeological sites can be mitigated through analysis of them to extract their scientific information*".
Chapter 14: Cross Boundary Issues		
Reference	**Text**	**Comment**

Objective 14.1.1 Cross Boundaries Issues	To address resource management issues which cross administrative boundaries in a coordinated and integrated manner.	All matters the subject of the proposed activity have been considered in a comprehensive and integrated manner and the application is made in such a way as to enable the resource management issues to be reviewed, assessed and managed in a coordinated response.
Policy 14.1.2	Cooperate with other neighbouring territorial authorities and the Regional Council to address resource management issues in an integrated manner.	This application for the proposed activity has been presented in a manner that enables and encourages a cooperative resource management approach between Horizons Regional Council and Horowhenua District Council.

9.2. Other relevant matters 104(1)(c)

We do not consider there to be any other matters (*i.e.* matters not given consideration elsewhere in this report) of particular relevance, or reasonably necessary for the consent authorities to consider, in determining the consent application for the proposed subdivision.

10. CONSULTATION

As part of the best practice project development being pursued, the Applicant has undertaken a range of consultation activities with interested parties to ensure the development team takes account of the relevant views, knowledge and expertise from those parties in the preparation and design of the project. A summary of the main consultation activities undertaken is provided below.

10.1. Ngāti Kikopiri

A Zoom meeting was held between the Applicant and the Ngāti Kikopiri Board in September 2020. A further meeting was held on 12 November 2020 to explore options to record the ongoing relationship between Ngāti Kikopiri and the applicant and methods for communicating effectively both before, during and after the resource consent process.

A letter of support was received along with a signed Memorandum of Understanding on 15 December 2020 (copies at **Volume 2**).

10.2. Te Runanga o Raukawa Incorporated

Members of Te Runanga o Raukawa have been consulted about this proposal. This includes early engagement with members including a site meeting with Mr. Royal on site.

10.3. Horizons Regional Council

The Applicant has engaged with Horizons Regional Council at a range of levels during the development of this proposal.

- **Meeting with Chief Executive –** Members of the project team met with Michael McCartney, Horizons Regional Council Chief Executive on 11 November 2020. Nic Peet (Strategy and Regulation Lead) was also in attendance. The meeting was to introduce the project to Horizons management team.
- **Ecological site visit report –** At the request of the Applicant, Horizons Regional Council ecologists visited the property on 22 June 2020 to undertake an assessment of areas of rare, threatened and at-risk habitats (as outlined in Schedule F of the One Plan) on the property.

The report of that site visit was provided to the project team in August 2020 and has been instrumental in the routing of the golf course, the development of the planting plan for the proposal and intended areas of environmental and ecological enhancement proposed as part of this development.

- **Meeting with planning and ecological staff** – The Applicant has also had 2 separate pre-application meetings with a Senior Consents Planner and a Senior Ecologist at Horizons.
- **Wastewater discussion** – The project team has had telephone correspondence with Harold Barnett, Horizon Regional Council Environmental Scientist regarding the types of wastewater treatment and disposal options that may be appropriate for a development of this nature in this location.

  The outcome of this discussion has informed the concept design for wastewater management proposed and detailed in this application.

10.4. Horowhenua District Council

- **Mayor and CEO** – The Applicant met with Mayor Wanden and Council's Chief Executive Officer to introduce the project and members of the project team.
- **Engineers** – the Applicant has had a number of meetings with Council's Infrastructure Manager.
- **Site visit** – A site visit was held on the 10 September 2020 with a number of HDC officers. Key areas visited included holes 10, 13, 14 and 16.
- **Meeting** – A pre-application meeting was attended by the Applicant's Project Manager and Planning Consultant on 9 December 2020.

10.5. Neighbours

The applicant has consulted with owners of surrounding properties regarding the proposed development. This included a number of meetings with neighbouring landowners and provision of plans and copies of the draft application documents for those neighbours to fully understand what is proposed on the property.

Through this process, the applicant took on feedback from those neighbours and written approvals from surrounding landowners has been provided (as set out in Section 11 below).

10.6. Summary

The applicant has fully embraced the principle of early and full engagement with relevant stakeholders in the development of the project proposal. This has resulted in positive dialogue with a number of parties and written approval from neighbouring landowners.

We consider the development project has undertaken good practice consultation up to this point and the applicant intents to continue engaging with relevant stakeholders throughout the process.

11. NON-NOTIFICATION

Section 95A of the RMA sets out the circumstances in which public notification of an application is either mandatory or precluded. None of these circumstances apply to the proposed activity.

Section 95D of the RMA provides that, in forming an opinion on whether an activity is likely to have more

than minor adverse effects (for the purposes of a public notification decision), the effects on owners and occupiers of adjoining land must be disregarded.

As detailed above and elsewhere in this report, any actual or potential adverse environmental effects of the proposal will be avoided, remedied or mitigated to ensure they are less than minor. Therefore, there is no statutory requirement to notify the application under Section 95A(8)(b) of the RMA.

The amenity values of the surrounding area and of neighbouring properties will not be adversely affected by the proposal.

Written approval to the proposed activities has been provided from the following:

Party	Property
Christopher and Gwendoline Bossley	617 Muhunoa West Road, Ōhau
Andrew and Mavis Porteous	723 Muhunoa West Road, Ōhau
Vincero Holdings Limited	Ōhau Sands, Muhunoa West Road, Ōhau

Copies of these written approvals are provided in **Volume 2** of this application. The existing landowner has also provided their approval to the resource consent applications by e-mail dated 16 December 2020. A copy of that e-mail is also at **Volume 2**.

As such, we consider limited notification of the application under Section 95B of the RMA is not required.

These application documents demonstrate that the proposal will result in less than minor adverse environmental effects (as well as positive effects) and the activity is of a scale and nature appropriate for the subject site. We therefore consider the application should be processed on a non-notified basis.

12. CONCLUSION

It is proposed to develop an eighteen-hole links golf course on the subject property together with ancillary buildings (clubhouse, accommodation units etc), earthworks and infrastructure. The development proposal has been designed to protect the existing features and landscapes of significant natural and coastal character and valuable native vegetation to ensure the values are retained during and following the development of the golf course.

As detailed elsewhere in this report, the proposal is considered to be consistent with all relevant objectives and policies found in the national, regional and district planning documents and the actual and potential effects of the proposal can be managed to ensure they will be less than minor. In addition, the site constraints are considered to be addressed appropriately through the proposed development design.

Overall, the proposed activity is consistent with the purpose of the RMA and therefore resource consent can be granted.

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