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6 June 2025

Jerome Wyeth

Technical Director - Planning

SLR Consulting New Zealand Ltd

Tēnā koe Jerome,

**Re: Archaeological Evidence – Kauri Cliffs, Waiaua Bay Farm Limited**

This document provides a review of the archaeological evidence presented by Kim Tatton (Clough & Associated) on behalf of Waiaua Bay Farm Limited for the proposed plan change at Kauri Cliffs. As part of this review, aspects of the *Kauri Cliffs Development Concept and Master Plan* referred to by Tatton were also consulted. The purpose of the review is to provide advice to Far North District Council (FNDC) staff and contractors on the following matters:

- Does the supplied information reflect archaeological best practice?
- Are the conclusions supportable in relevant legislation?
- Does the reviewer support the summary of results and the recommendations?
- Are there archaeological matters that mean that re-zoning is inappropriate?

**1. Reviewer Qualifications and Experience**

I hold advanced degrees in archaeology from University College London, UK (PhD) and the University of Otago (MA). I have over fifteen years archaeological experience in New Zealand and have also worked in both commercial and research archaeology in Australia and the United Kingdom. This includes experience working in Northland and the Bay of Islands and technical expertise in remote sensing, spatial analysis, and the analysis of Māori material culture.

## 2. Review of the Tatton evidence

Tatton provides what I regard as an accurate summation of the archaeological landscape, based on the results of several technical reports she has carried out in support of previous developments at Kauri Cliffs.

I agree with Tatton that the rezoning will result in no direct impacts on recorded archaeological sites. Changing land use can result in secondary impacts to sites. For instance, the formation of desire lines or site erosion because of increased foot traffic. However, the proposed rezoning areas are removed from dense site clusters and sites with clear visible surface features, therefore secondary effects are also unlikely.

The location of recorded archaeological sites in relation to the proposed development following the plan change is clearly stated. I agree with Tatton that, based on the preliminary development scheme presented in the *Kauri Cliffs Development Concept and Master Plan*, there is a low potential for effects to recorded archaeological sites.

As Tatton says, future resource consents associated with development at Kauri Cliffs should be supported by appropriate reporting on the effects to the historic environment. In the first instance this should result in site avoidance but where this is not possible the effects to pre-1900 archaeological sites can be managed through the Heritage New Zealand Pouhere Taonga Act.

## 3. Summary

The archaeological evidence presented in support of the rezoning at Waiaua Bay Farm Limited's Kauri Cliffs development reflects archaeological best practice. The information presented is drawn from several technical reports carried out on the property since 2022 and clearly reflects the author's knowledge of the archaeological landscape.

I support the conclusions drawn in the report and do not believe there are any archaeological matters that prohibit rezoning.

The preliminary plans for development following rezoning indicate a low potential for effects to recorded archaeological sites. It is appropriate that detailed plans are reviewed by an archaeologist during the consenting phase and any effects to archaeological sites identified at this time are managed through the Heritage New Zealand authority process.

Please contact me if you have any questions about the advice provided.

Noho ora mai,




Dr Andrew Brown

Director | Principal Archaeologist

Horizon Archaeology Ltd



# Initial Ecological Advice for the Plan Change Proposal for Kauri Cliffs Special Purpose Zone

Prepared for:	Far North District Council Jerome Wyeth	Reviewed and approved for release by:  Sarah Budd Principal Ecologist, Auckland Ecology Team Leader and Coordinator
Author:	Phoebe Andrews	
Report No:	7617a	
Date:	June 2025	

## 1.0 Introduction

The Far North District Council has engaged Wildland Consultants to review the ecological components for the Private Plan Change applications relating to the Proposed District Plan. I have reviewed the Kauri Cliffs Special Purpose Zone Proposal and have the following initial feedback.

## 2.0 Review

### 2.1 Methods

It is difficult to comment on the accuracy of the mapping for streams, wetlands, and indigenous vegetation without having been to the site. Based on a review of aerial imagery, it appears that some areas that would potentially support wetland or stream features have not been mapped as such (see Plate 1). The applicant has not provided information about how they defined wetlands on the site (e.g. using the New Zealand wetland delineation protocols) and I note that the NPS-FM pasture wetland exclusion is not intended to apply to land being developed. However, it is understood that more detailed assessment of wetlands and indigenous vegetation will occur as part of the consenting process for the up to 60 lot subdivision enabled by the provisions (i.e. the future subdivision and residential development in the Golf Living sub-zone referred to in the ecological assessment).

Two streams occur on site, but these are not shown on the map. While the master plan is only indicative at this stage, it would be useful to provide a map of the vegetation, streams, and wetlands in relation to the masterplan to determine where features overlap building areas and accessways.

Overall, the methods are appropriate. The ecological constraints assessment was prepared to guide the design of the master plan which is best practice. The effects assessment is considered and follows an appropriate structure.

### 2.2 Assessment

The effects associated with the increased development and their associated recommended mitigation measures can be summarised as:

- Loss of vegetation – revegetation planting.
- Increased pests (including pets) - pest plant and animal control via management plans.
- Increased lighting effects – lighting assessments, traffic restrictions, and lighting design/controls.
- Instream/wetland works/remediation from accessways – timing of works, culvert design or bridges.
- Increased impervious surfaces – stormwater controls to maintain site hydrology.
- Wastewater effects – appropriate system treatment and design.



The assessment is satisfactory and appropriately assesses the effects and a more detailed assessment would need to be provided at the subdivision/development consent stage. It is my understanding that provisions around vegetation clearance (determined by the Ecosystems and Indigenous Biodiversity chapter) and works within or around streams or wetlands (determined by the Natural Character chapter) will remain unchanged by the alteration of the zone locations.

## 2.3 Recommendations

The streams should be added to the ecology map. A map should be provided overlaying the location of the streams, wetlands, and vegetation with the indicative master plan.

In line with the mitigation management recommendations outlined in the Ecological Evidence, a more detailed assessment should be undertaken at subdivision consent stage and should consider the following:

- Loss of vegetation and habitat values for indigenous fauna.
- The Wildlife Act.
- Increased pest plants and animals (including pets).
- Effects of light spill on existing habitats, particularly in relation to highly-mobile fauna.
- Works within or near streams and wetlands.
- Stormwater effects.
- Wastewater effects.

Mitigation should be appropriate to achieve no net loss of biodiversity values.





## TECHNICAL MEMORANDUM

27 June 2025

### HIGH LEVEL GEOTECHNICAL REVIEW TO SUPPORT S42A REPORT, PROPOSED REZONING OF KAURI CLIFFS

Far North District Council

*Geologix Ref. C0627N-TM01*

By email: [jerome.wyeth@slrconsulting.com](mailto:jerome.wyeth@slrconsulting.com), [sarah.trinder@fndc.govt.nz](mailto:sarah.trinder@fndc.govt.nz)

### INTRODUCTION

Geologix Consulting Engineers Limited (Geologix) have been engaged by Far North District Council (FNDC) as our Client in accordance with the standard short form agreement model for Consultant Engagement to provide geotechnical support to the Proposed District Plan team in regard to technical submissions on the proposed plan change.

The purpose of this technical memorandum is to provide a high level geotechnical review of the related technical submission provided to us that covers the piece of land defined as the Kauri Cliffs and Kauri Cliffs Special Purpose zone in the FNDC Proposed District Plan (PDP). The applicable supporting documents we have been asked to provide a high level review of are detailed below.

- Statement of Evidence of Mark Child (Geotechnical) on Behalf of Waiaua Bay Farm Limited.
- Tonkin & Taylor (T&T), Kauri Cliffs Plan Change and Subdivision Geotechnical Desktop Assessment, Ref. 1020815.2000, dated 3 March 2025.

In brief, it is understood from the submission that the PDP is generally supported by the author from a geotechnical position. As a result, this memorandum has been requested to provide high-level geotechnical review to determine if the proposed master plan detailed in the submission is geotechnically feasible by the means indicated in the supporting documentation and whether the proposal supports the policies and rules proposed for the zoning under the PDP.

### LIMITATIONS

This technical memorandum has been prepared to specifically review the available information provided to us, as listed above to determine the geotechnical suitability of the proposal and any mitigation measures proposed by the supporting documentation.

We note that as defined by Section 2.3 of the T&T report, there are multiple sources of existing geotechnical information pertaining to the proposed development of the site and other historic activities. These additional supporting documents have not been provided to Geologix at the time of writing and as



Natural Hazards



Environmental



Geotechnical



3 Waters



Land Development & Subdivision

such, any review and/ or assumption of the additional documentation referred to by T&T has not been undertaken.

The submission provided to us details a masterplan proposal for the area considered by this review. This masterplan was not provided to us at the time of writing. Our review pertains to the snapshots of the proposed masterplan presented within the T&T report.

This technical memorandum focuses specifically upon the information provided at the time of writing. It does not detail alternative mitigation measures or alternative geotechnical recommendations which may be available to develop the site. This high level review summarises the applicability of geotechnical recommendations provided in relation to proposed buildings, infrastructure and access/ roading and the PDP.

## **SUMMARY AND APPLICABILITY OF AVAILABLE INFORMATION**

The scope of work undertaken by T&T included a non-intrusive walkover inspection of the site, an engineering review of the proposed scheme plan and desktop review to prepare a high-level desktop geotechnical assessment letter report to include with the masterplan application.

The report was prepared by a senior engineering geologist and authorised by a project director with 15 years experience as an engineering geologist. The authoriser notes that they are currently working towards Chartered Professional Engineer status.

The scope of the submission in general satisfies the level of detailed required for a high level review of constraints and recommendations and it is appreciated that the report is not able to provide detailed recommendations above conceptual means for the proposed development. As acknowledged by the evidence, further detailed geotechnical assessment will be required to be able to provide a quantitative review of the proposed masterplan development.

The geotechnical assessment provides preliminary recommendations in relation to the following areas of development:

- A condominium type development within Part Lot 3 DP 50233.
- A 'northern cluster' of residential buildings and a standalone residential site within Part Lot 3 DP 50233.
- A 'southern cluster' of residential buildings over a clearing of Part Lot 3 DP 50233.
- A further 12 No. residential building sites over Part Lot 3 DP 50233.
- A 'village' spanning over Part Lot 3 DP 50233 and Lot 4 DP 50234, the purpose of which is understood to be for high-density residential development.
- A final 5 No. residential building sites to the south of the village within Lot 4 DP 50234.

## **GEOLOGICAL CONTEXT**

The T&T report identifies from a review of geological mapping that the site is underlain by two lithologies including Kerikeri volcanic group basalt lava flows and sedimentary volcanoclastic sandstone and argillite of the Waipapa Group. The T&T report mapping indicates that the condominium and 'northern cluster' of development will be formed over the Waipapa Group Terrane and the balance of the masterplan will be formed over the Kerikeri volcanic group.

The report identifies instability features and in turn, typical stable angles which is a typical process of desktop review when considering development feasibility.

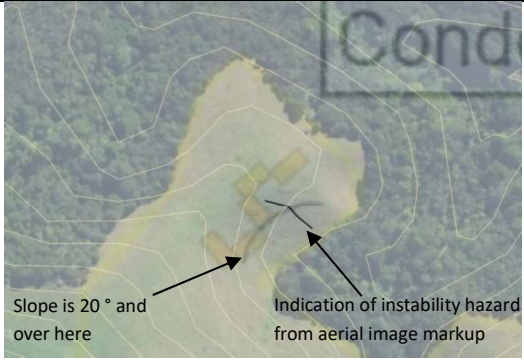
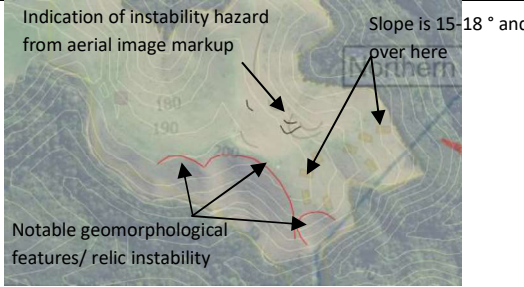
In reality, the complexity of the geological setting may be underestimated by the appraisal. The volcanic group material presents a more recent deposit which has moved over the surface of a more historic underlying strata. LiDAR contours show the areas indicated to be underlain by volcanic flows forms generally rolling terrain and the areas underlain by greywacke form moderate to steeply incised gullies and steeply dipping terrain. Areas of development around the periphery of the volcanic unit may encounter a more complex geological profile than indicated by the desktop appraisal where transitional material weathering occurs.

These areas may require a deep ground investigation to confirm the feasibility of development around the strata boundaries.

## NATURAL HAZARDS

The T&T report provides an assessment of natural hazard commensurate with a desktop appraisal and walkover survey. In brief the assessment identifies some evidence of existing instability features in particular around the northern portion of the site close to the condominium and in the gully adjacent to the northern cluster development. The report and evidence document also identifies that instability potential is expected to occur where slope grades exceed 1V:4H. In general, we are in support of this assessment that the slope gradient of 1V:4H represents a trigger for potential instability hazard to occur.

However, we note that when studying the noted instability features and recommendation of stable slope angle that a significant larger portion of the proposed master plan is likely to be subject to natural hazards than anticipated by T&T or that the means of stabilisation should be investigated at this time. See below.

Mapping	Review	Recommendations
 <p>Slope is 20 ° and over here</p> <p>Indication of instability hazard from aerial image markup</p>	<p><b>Condominium.</b> Overlay of instability features from aerial mapping places the feature through the development. LiDAR 1 m contours indicate that the Condominium development is formed on slopes of up to and marginally over 20 ° inclination. This exceeds the recommendations of the T&amp;T report detailed above and indicates the Condominium will be formed on land defined as subject to natural hazards. The development is also away from the recommended ridgeline location.</p>	<p>The Condominium development should be further assessed in terms of suitability in this location and supplemented by geotechnical assessment such as investigation and slope stability model if the proposal continues to be placed in an area that exceeds the recommendations of the T&amp;T report.</p>
 <p>Indication of instability hazard from aerial image markup</p> <p>Slope is 15-18 ° and over here</p> <p>Notable geomorphological features/ relic instability</p>	<p><b>Northern Cluster.</b> The proposed northern cluster is placed over slopes which exceed the T&amp;T recommendations and are considered subject to instability. Red lines indicate significant, notable</p>	<p>As currently proposed, the northern cluster development should be further assessed in terms of suitability in this location and supplemented by geotechnical assessment such as investigation and slope stability model if the</p>



	<p>geomorphological features which may indicate deep seated movement. The T&amp;T report is silent on these features which may indicate instability potential beyond their defined outline that encroaches within the northern cluster. Further, the proposed road alignment trends through these feature which increase to 25 to 30 degrees in slope gradient.</p>	<p>proposal continues to be placed in an area that exceeds the recommendations of the T&amp;T report. Assessment of the significant geomorphological features should be presented including potential deep seated mechanisms. A stable zone outside of these features should be established.</p>
	<p><b>Southern Cluster, Residential Sites and Village</b> This area of the development is indicated over the broad ridgeline which has shallower slopes consistent with the T&amp;T report. This area is expected to represent the volcanic flows over the top of underlying Waipapa Group. However the volcanics are indicated to stop around the edge of the bush line which drops away at significantly steeper gradients than anticipated by the T&amp;T review. Being similar geology to the northern cluster, there are also major instability and relic features noted in these areas from review of LiDAR contours.</p>	<p>The T&amp;T report is silent upon the steeper gradients through the bush and focusses upon the gradients over the building area only. The steeper sloping bush clad areas and landslide features will have a zone around them that do not meet adequate factors of safety for development. It is recommended that further analysis is undertaken to determine appropriate offset zones to meet the T&amp;T recommendations for stable land.</p>

## BUILDING DEVELOPMENT

The T&T report focuses upon future building development and providing conceptual means of enabling development. Over the entire proposed masterplan area this forms a series of conceptual recommendations including minor earthworks, retaining walls, surface water management and building restriction lines with development sites focussed upon ridgelines and away from gullies and associated wet ground.

The above measures are typical requirements of development for rural residential sites and it is appreciated that the scope of works is conceptual in nature. However, we note that there is no clear indication of where adequate factors of safety can be achieved in each development case. As such, it is noted that when comparing to council LiDAR datasets that some of the proposed building locations encroach either into areas with steeper topography that T&T indicate may be subject to instability potential or within close proximity to steeply dipping slopes and instability features.



It is therefore expected that the masterplan would be feasible with further geotechnical stability assessment than the report details or the masterplan would require adaption to be able to meet the requirements of the T&T recommendations.

## **INFRASTRUCTURE**

The T&T report is generally silent upon infrastructure requirements to enable the masterplan development. It is expected that based upon the rural nature of the proposal that the development will be serviced by on-site wastewater treatment and on site stormwater management such as ponds and large scale discharge devices.

Neither of these are detailed in the desktop appraisal and it is expected that infrastructure will be subject to some geotechnical influences. For example, a gravity feed wastewater system which disposes to steeply sloping bush below may not achieve adequate factors of safety. Further, it is expected that concentrated stormwater discharges will need to be avoided. Alternatively ponds and dams may need to be constructed to adequately control runoff.

It is recommended that as a minimum that the submission provides an assessment of areas which are conceptually feasible for infrastructure siting and if necessary, any mitigation measures expected. This would meet objectives of the PDP to appropriately manage the development of infrastructure in natural hazard areas.

## **ACCESS/ ROADING**

Similarly, a new network of access roads is proposed around the property which appear to follow existing farm track routes. The T&T report is silent upon roading and access which appear may intersect with areas of the site indicated as potentially subject to natural hazards due to slope angles and/ or transect through features which indicate large scale and potentially deep seated instability. Being located away from ridgelines and potentially stronger remnants in places it is recommended that the submission also details requirements of access routes around the property. In some cases the access routes will go over terrain which is significantly steeper than indicated by Table 4.1 of the T&T as subject to natural hazards and a more rigorous slope stability model may need to be undertaken to adequately detail conceptual requirements.

We also note that the access route between the northern and southern areas of development will transect between strata boundaries and will need to cross a low-lying gully area or wetland area. The crossing of the gully appears to be fairly significant at approximately 100 m. As such, the submission should detail natural hazards and geotechnical concepts as a minimum to be able to form this crossing in line with the PDP requirements.

## **CONCLUSIONS**

Based on a high level review of the T&T report referenced above and enclosed evidence the following conclusions can be drawn:

- The masterplan development in general is feasible to construct but at present does not fully provide consistency with the recommendations of the T&T review.
- Infrastructure has not been considered from a geotechnical perspective and should be further analysed to meet the policies of the PDP.
- Access roading is expected to be extensive over the site, trending multiple different geological conditions, terrain and geomorphological features. It is recommended that this should be further analysed to ensure that the concepts are feasible.

- Large scale geomorphological features have not been reviewed or identified by T&T and appropriate offset zones from instability hazards should be established.

Prepared by



Edward Collings,  
CPEng, CMEngNZ, CEnvP, MPhys (Hons)  
**GEOLOGIX CONSULTING ENGINEERS LTD**

# Memorandum

To Jerome Wyeth  
Technical Director - Planning, SLR

From Melean Absolum  
Landscape Architect, MALtd

Date 25 June 2025



Dear Jerome,

## **SUBMISSION 463 - WAIUAU BAY FARM LIMITED - KAURI CLIFFS**

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### **INTRODUCTION**

This memorandum records my advice prepared on behalf of Far North District Council (FNDC) in response to Submission 463 from Waiaua Bay Farm Ltd (WBF), the owners of Kauri Cliffs, on the Proposed District Plan (PDP) requesting changes to the Special Purpose zone applying to the property.

Evidence provided by the submitter's experts records that the notification of the PDP prompted a re-consideration of the special purpose zone as it currently applies to the property and, as a result, they are seeking changes to both the mapped areas of the sub-zones within the special purpose zone, as well as changes to the provisions themselves.

The Submitters evidence has provided both revised special purpose zone provisions and technical assessments to support the request, including a 'Masterplan'. I have relied on the following information in preparing this advice:

- WBF submission number 463;
- PDP provisions as notified;
- PDP maps including zones and Natural Environment Overlays;
- Proposed special purpose zone provisions;
- Evidence and attachments of Ms Amy Tapper, Messrs Steven Tuck and John Goodwin, and Dr Gary Bramley.

A site visit to the property was undertaken on the 19 June 2025.

### **MASTER PLAN**

Mr Tuck has described the Master Plan attached as Appendix 4 to his evidence as a "*feasibility assessment*"<sup>1</sup> and not a "*detailed design for a future residential subdivision and development*."<sup>2</sup> As a result, the Master Plan is not intended to be included or referenced in the proposed provisions. In contrast, Ms Tapper has stated in her evidence that the Master

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<sup>1</sup> Evidence of Steven Tuck, paragraph 80, page 19, dated 5 May 2025

<sup>2</sup> Ibid, paragraph 77, page 18, dated 5 May 2025

Plan "is set to be the foundation document for planning the future development of the property in a sustainable, responsible and commercially viable way."<sup>3</sup>

I have assumed that the role of the Master Plan is as described by Mr Tuck, for the purposes of this review. I will, nevertheless, make some brief comments on the contents of the Master Plan, but recognise that the revised provisions and maps are the means by which development of Kauri Cliffs is intended to be managed in the future.

Figure 14 of the Master Plan shows a schematic plan of housing development within the Waiaua Living Area. This includes a group of five 300m<sup>2</sup> dwellings clustered together at the northern end of the subzone labelled "condominium". There are another two groups of 300m<sup>2</sup> dwellings to the west of The Village which are not labelled "condominium" but are nevertheless touching each other in the same way as the "condominium". There are no proposed rules addressing condominiums directly in the revised provisions provided, but I note that KCZ-S1 states that the maximum building footprint of a new building in the Golf Living sub-zone is 300m<sup>2</sup>. How this standard works in relation to condominiums is not clear.

Figures 16 and 17 of the Master Plan show schematic layouts of the "Northern" and "Southern Clusters" of the "Waiaua Living Area". In each of these, an area identified as "Approximate Cluster Curtilage" is shown around the dwellings. It is not clear how and when this curtilage might be considered further.

On Figures 17, 18 and 19 of the Master Plan there are individual buildings, both 300m<sup>2</sup> and 400m<sup>2</sup> that cross the Coastal Environment (CE) boundary. As different height limits are proposed to apply inside the CE from outside, such a layout is inadvisable.

Figure 21 of the Master Plan shows an aerial of the southern part of the proposed Lodge Sub-zone. Within the southern part of the Outstanding Natural Character (ONC) shown on the plan is item 21, identified in the key as a future Totara Playground. During the site visit I was informed that this possible tree house idea is no longer being proposed. This is confirmed by the evidence of Mr Goodwin who states<sup>4</sup> that no rezoning or development is proposed in any of the ONC or HNC areas on the property.

## PROPOSED CHANGES TO MAPPED SUB-ZONES

### ***Golf Living Sub-zone***

The explanation of the reasons for the changes in sub-zone mapping provided by Mr Tuck are reasonable, from a landscape perspective. I note that the most southerly part of the existing Golf Living sub-zone is physically much closer to The Lodge than the most northerly part of the proposed sub-zone. Nevertheless, the existing sub-zone includes a number of areas that are both steep and tree covered and remote from water and power supplies. The northern extension of the sub-zone follows a series of flat-topped ridges that have been cleared of vegetation and are relatively close to either Matauri Bay Road or Tepene Tablelands Road, where water and power services are, presumably, available.

<sup>3</sup> Evidence of Ms Amy Tapper, paragraph 22, page 4, dated 5 May 2025

<sup>4</sup> Evidence of John Goodwin, paragraph 38, page 10, dated 5 May 2025

The operative Golf Living sub-zone spans areas both within the CE and outside it. The majority of the area to be removed from the sub-zone is outside the CE. Similarly, the majority of the area to be added to the sub-zone is also outside the CE, with only the "Southern Cluster" and part of the ridge between it and "The Village" inside the overlay. Despite this, the potential adverse effects on the natural character of the CE are in my view reduced by a number of factors. Firstly, the proposed sub-zone areas are elevated well above sea level and are over 1km inland from the coast. Additionally, areas of existing native vegetation, whether identified as High Natural Character (HNC) or not, have largely been avoided. Where they do exist within the CE part of the proposed sub-zone, the Master Plan has demonstrated that they can be avoided, for example in the south-west corner of the "Larger House Sites" area.<sup>5</sup>

The proximity of the new areas of the sub-zone to the public road network increases the potential for adverse visual effects to arise. Having undertaken a site visit and examined contour information, I believe the risk of development being visually intrusive in these northern areas is small. The area identified as "condominium" has the potential to be seen from Matauri Bay Road and possibly from residences along Te Tapui Road. Parts of the northern cluster may also be visible from Matauri Bay beach, although this is more than 2km away and buildings may well be difficult to discern. Also "The Village" area will be partially visible from the southern end of Tepene Tablelands Road. However, with appropriate planting and careful design being demonstrated at the time of subdivision and development consent, I anticipate that any adverse visual effects can successfully be mitigated.

Overall, this means that future development must be appropriately managed by the provisions, and these are discussed further below. That being the case, I conclude that the extension of this sub-zone northwards is acceptable, from a landscape perspective.

### ***The Lodge Sub-zone***

I am also comfortable with the extensions proposed to the existing Lodge Sub-zone. To the north, this extension will incorporate the area of the 2017 approved but unfinished subdivision. Residential development of some sort (either private homes or visitor accommodation) are already anticipated in this area, the landscape effects of which have been assessed as part of the consenting process.

To the south the enlarged area would enable the construction of additional buildings such as a Golf Pro shop, cafe etc. I agree with Mr Tuck that it is sensible to consolidate on-site facilities for visitors around the existing Lodge. During the site I deliberately assessed the potential for adverse landscape or natural character effects to arise from 9m high development in the area to the south of the existing Lodge. The land contour and vegetated ONC in the middle of the sub-zone mean that, in views from the track to Pink Beach, for example, any development to the south of the Lodge would be back-dropped by vegetation and not seen starkly on the skyline. I am satisfied that the extensions to this sub-zone are acceptable from a landscape perspective.

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<sup>5</sup> *Figure 18 of the Master Plan, Appendix 4 to Mr Steve Tuck's evidence dated 5 May 2025*

### **Golf Playing Sub-zone**

Replacing the Golf Living sub-zone areas to the west and south of the Lodge with Golf Playing sub-zone is also appropriate, in my opinion. This change means there are no longer narrow strips of Golf Playing Sub-zone fringing the Golf Living sub-zone.

## **THE PROPOSED PROVISIONS**

I have carefully considered the proposed Special Purpose zone provisions and consider that, with some improvements they will appropriately manage potential adverse landscape and natural character effects. The Improvements I refer to include ensuring that assessment criteria cover the full range of matters that need to be considered at the time of consent. These are discussed below.

### **KCZ-R1 PER-4 - Golf Living sub-zone**

In both his evidence<sup>6</sup> and the annotations included in the proposed provisions<sup>7</sup> Mr Tuck states that where compliance with PER-4 is not achieved, the activity status should be Controlled. He argues that if this change is not made, then more strict rules will inappropriately apply to the Golf Living sub-zone than apply in the CE. To support this claim he cites the activity status for new buildings and structures where CE-R1 PER-1 and PER-2 are not achieved. However, I think Mr Tuck has misunderstood the wording of CON-1 which states:

*"The building is a residential unit on a defined building platform, where the defined building platform has been identified through a professional landscape assessment and **approved as part of an existing subdivision consent.**"*

It is my understanding that the controlled activity pathway is only available for those properties where a subdivision consent, supported by an appropriate landscape assessment, has already been granted. Such an assessment often incorporates specific building heights for individual lots where these have been identified as part of the landscape assessment process. Examples include both The Landing and Matakā on the Purerua Peninsula. No landscape assessment has been prepared for identified building platforms within the Golf Living sub-zone at Kauri Cliffs and so, in my opinion, the restricted discretionary pathway is appropriate when the building height and footprint controls in KCZ-S1 are not complied with.

### **KCZ-S1 Golf Living Sub-zone**

In his commentary on the revised provisions, Mr Tuck notes<sup>8</sup> that his proposed deletion of the term "natural environment" provides wider scope to assess effects on "landscape character and visual amenity." I agree that this is appropriate for a restricted discretionary activity (RDA) consents. However, when the matters listed in the proposed provisions are examined, (a) reads:

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<sup>6</sup> Evidence of Steven Tuck, dated 5 May 2025, at paragraphs 95-96

<sup>7</sup> Comment [ST6] in Recommended Provisions, Appendix 3 to Steve Tuck's evidence dated 5 May 2025

<sup>8</sup> Comment [ST15] *ibid*

*"the extent to which mitigation measures ensure that adverse visual effects are no more than minor."*

In my opinion, the full breadth of landscape and visual matters that need to be considered are not captured by these words. For consistency with other parts of the PDP it may also be useful to use the following:

*"the extent to which mitigation measures appropriately manage potential ~~ensure that adverse effects on the characteristics, qualities and values of the special purpose zone and Golf Living sub-zone.~~ visual effects are no more than minor."*

### **SUB-R3 Golf Living Sub-zone**

There are two matters to be considered in this rule. Firstly, the minimum lot size is proposed to be reduced from 4000m<sup>2</sup> to 500m<sup>2</sup> across the sub-zone. Mr Goodwin explains<sup>9</sup> that in preparing the Master Plan it was determined that clustering some of the residential development would provide the opportunity to create a sense of place and village character. This may also enable some level of community to be established amongst the residents. Also, as Mr Tuck points out<sup>10</sup> the necessity for 4000m<sup>2</sup> lots to facilitate the disposal of treated wastewater on individual sites can be negated by the provision of shared wastewater treatment solutions.

Although 500m<sup>2</sup> is relatively small size for an extensive rural property such as Kauri Cliffs, it does mean that where buildings can be grouped together in a suitable location, this leaves a larger area around them where the rural character can be protected and enhanced.

To ensure this works well in practice, it is important that a comprehensive suite of matters are considered in the development of the proposal and subsequent consenting process. This leads me to the second matter to be considered.

RDIS-2.1.iv requires the provision of a Landscape Planting and Management Plan with the subdivision application, but little guidance is provided as to what this document should cover. Helpfully, Mr Goodwin has provided a list of matters to be considered. He states:<sup>11</sup>

*"Key landscape considerations for any future lot layout and building selection include:*

- clustering areas of development to minimise buildings being scattered across the property;*
- utilising existing flat and gently sloping areas for building platforms;*
- clustering some buildings to create a sense of place and village character;*
- identifying sites that could accommodate single family dwellings on larger lots;*
- setting the buildings off high points, major ridges and promontories to reduce the potential for adverse visual effects on the coastal environment;*

<sup>9</sup> Evidence of John Goodwin, paragraph 18, page 6, dated 5 May 2025

<sup>10</sup> Comment [ST18] in Recommended Provisions, Appendix 3 to Steve Tuck's evidence dated 5 May 2025

<sup>11</sup> Evidence of John Goodwin, paragraphs 18-20, pages 6-7, dated 5 May 2025



- *placing controls (by way of the zone provisions) on building heights, building footprints and external materials, and colours to minimise the potential for future development to dominate the rural and coastal landscape; and*
- *identifying areas where a landscape framework will be prepared alongside the developed design of any subdivision. This framework will be developed to address the location and treatment of accessways, earthworks design and reinstatement of landform cut and fill batters, planting and revegetation, and ongoing land management.*

*Future planting and revegetation will be designed to further integrate development into the surrounding property and wider landscape context. This planting framework within the Golf Living sub-zone will focus on:*

- *retiring low productivity grazing land and revegetating these areas with indigenous vegetation;*
- *planting steep and eroding slopes, watercourses and wetlands with indigenous vegetation;*
- *connecting existing areas of indigenous vegetation to enhance ecological corridors; and*
- *planting woodlots and specimen trees around proposed development areas to provide a vegetated backdrop and context to the built development and enhance the amenity for residents and visitors.*

*These measures will be further detailed in a Landscape Planting and Management Plan at the time the subdivision and development planning for the Golf Living sub-zone is prepared. This may be undertaken in stages as the development is progressively implemented in line with demand."*

In my opinion, those "key landscape considerations" that are not already addressed in the matters of discretion proposed, should be included in the provisions. In that way, both the applicant and the Council will be fully versed with the matters that must be considered in any subdivision application, at any point in the future.

## CONCLUSIONS

In my opinion, the re-allocation of the various sub-zone areas is acceptable, on condition that appropriate provisions are utilised in the assessment of future development, particularly in the Golf Living sub-zone. This includes ensuring that a RDA pathway is followed for both the subdivision consent and where new buildings and structures do not comply with S1; that all landscape and visual matters are included in the standards; and that at the time of subdivision all the key landscape considerations are included in the identification of specific building platforms and the Landscape Planting and Management Plan to be provided.



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25 June        2025