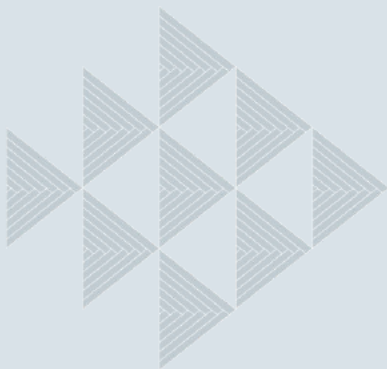




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22 June 2026

Fast Track Operations
On behalf of the Minister for Infrastructure
PO Box 10362
Wellington
Attn: Ashiley Sycamore
Email: referral@fasttrack.co.nz

Tēnā koe

REF: FTAA-2604-1223 SUBDIVISION AND DEVELOPMENT OF APPROXIMATELY 90–92 RURAL RESIDENTIAL LOTS AT 66 AND 70 MCFETRIDGE DRIVE AND 89 TAURANGA DIRECT ROAD, HAMURANA, ROTORUA

INCL. ADDENDUM ADDED 23 JUNE 20026

Te Arawa Lakes Trust (TALT) acknowledges receipt of the application and thanks the applicant for the opportunity to engage. TALT responds as an affected party holding statutory acknowledgements under the Te Arawa Lakes Settlement Act 2006. TALT is also a partner in the Rotorua Te Arawa Lakes Strategy Group and plays a leading governance and kaitiaki role in protecting and restoring the water quality of the Rotorua lakes system.

While the proposal does not involve a direct discharge to Lake Rotorua or works within the lakebed, it lies within the wider Rotorua catchment. It therefore has the potential to influence groundwater, stormwater, sediment pathways and downstream receiving environments, including Te Wai Mimi o Pekehāua / Awahou Stream. TALT assessed this proposal through a catchment-wide lens.

TALT notes the applicant's assertion that the land-use change may deliver a net reduction in nitrogen losses relative to the existing pastoral baseline, together with improved stormwater management and revegetation of gully and wetland margins. These outcomes are relevant to the lake-water-quality objectives that TALT and partners actively advances through the Rotorua Te Arawa Lakes Strategy Group and the Te Arawa Lakes Settlement framework.

Te Tūāpapa o ngā Wai o Te Arawa

TALT evaluates activity affecting wai through *Te Tūāpapa o ngā Wai o Te Arawa*, the values framework that guides protection, restoration and management of water across the rohe. The framework is grounded in te whakapapa o te wai, Te Arawa's governance role, and Te Arawas association to and action within, our wai as the lens for environmental stewardship.

The three applicable dimensions are:



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- **Wai Ora** – the health and wellbeing of water
- **Wai Rua** – the mauri and spiritual integrity of water
- **Wai Ata** – the cultural landscape, whakapapa and enduring relationship between people and – place

Wai Ora

Wai Ora requires that activities avoid degradation of water quality and ecosystem health. From this perspective, the central question is whether the proposal will protect and enhance the health of groundwater, surface water, wetlands and downstream receiving waters. TALT acknowledges the potential positive contribution the proposal may make to lake-water-quality outcomes through reduced nitrogen losses and revegetation. These matters align with the current and long-term goals of the Rotorua Te Arawa Lakes Strategy Group.

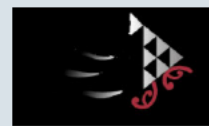
TALT considers however that environmental benefits must be robustly demonstrated over the life of the development through enforceable consent conditions. In particular, TALT supports the need for rigorous and enduring controls on sediment, stormwater and earthworks; protection of aquifer and surface-water pathways; through appropriate monitoring arrangements that include in-lake monitoring to verify that catchment-level effects are not adversely affecting lake water quality over time.

TALT notes that the proposal relies on connection to the reticulated wastewater network as a key mechanism for achieving reduced nutrient losses relative to the existing pastoral baseline. In this regard, TALT considers that the environmental benefits of the proposal are dependent on the capacity and performance of the receiving wastewater treatment system.

TALT is aware that the wastewater treatment system servicing Rotorua is currently undergoing upgrades, and that existing land application areas are subject to capacity constraints. It is therefore important that any additional loading from the proposed development is appropriately aligned with confirmed treatment and disposal capacity, to ensure that the anticipated reductions in nutrient discharge to Lake Rotorua are realised in practice.

TALT considers that staging of the development, including connection of lots to the reticulated network, should be linked to demonstrated wastewater system capacity and performance, and that monitoring should provide transparency on catchment-level outcomes.

Monitoring for consent conditions or part of a monitoring and restoration plan should include in-lake monitoring to verify that catchment-level effects are not adversely affecting lake water quality over time, and to ensure that the assumed benefits of reticulated wastewater servicing are realised in practice:



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- In-lake water monitoring, methodology and site selection is co designed with TALT and mana whenua and water quality parameters and thresholds are determined equally. Results should be reported annually to the Rotorua Te Arawa Lakes Strategy Group and TALT.
- Long-term groundwater and surface-water quality monitoring at representative bores and stream sites, with trigger levels and response protocols.
- Construction-phase sediment and turbidity monitoring, with real-time reporting and adaptive management requirements.
- Stormwater quality and quantity monitoring at discharge points, including regular sampling for contaminants of concern.

TALT supports the overall direction of the mitigation sought by Ngāti Rangiwewehi in these respects and considers that these matters should be translated into strong, long-term consent conditions. TALT also seeks input into the monitoring plan

Wai Rua

From a wairua perspective, TALT supports the overall intent of the mitigation sought by Ngāti Rangiwewehi with respect to the Awahou Stream and Pekehāua, particularly where it seeks to avoid adverse effects on tāonga waters, provide for meaningful involvement in design and monitoring, and maintain long-term kaitiaki relationships. The final design, construction and operational arrangements should clearly avoid adverse effects on these tāonga waters.

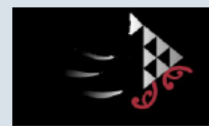
Wai Ata

Reflects whakapapa, cultural narratives, and long-term relationships with place. TALT supports progressive rehabilitation and native revegetation however any long-term restoration and monitoring should include mana whenua. TALT supports the approach of the applicant ensuring that the proposal respects these relationships and ongoing involvement of Ngāti Rangiwewehi.

Conclusion

TALT's position is that the proposal may be capable of being supported in principle, provided the final design, construction and operational arrangements give effect to strong environmental controls, culturally appropriate mitigation direct with mana whenua, and effective monitoring (including in-lake monitoring) over the life of the development. TALT remains available to discuss appropriate consent conditions that would give practical effect to the matters outlined above.

ADDENDUM: Alignment with Ngāti Rangiwewehi Position Statement (Received 23 June 2026)



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Following the finalisation of TALT's primary submission above, TALT received the formal position statement from Te Maru o Ngāti Rangiwewehi. TALT wishes to append this section to formally register our support for the matters raised by mana whenua, which inherently align with and strengthen the outcomes TALT seeks for the wider catchment.

Groundwater Abstraction and Hydrogeological Connectivity TALT shares Ngāti Rangiwewehi's concerns regarding the scale and intensity of the proposed development, specifically the proposed groundwater abstraction of up to 3.3 litres per second. Consistent with our *Wai Ora* assessment, TALT supports the requirement for a robust, precautionary assessment of hydrogeological connectivity. It must be definitively proven that this abstraction will not adversely affect the interconnected aquifer system, the flows of Pekehāua Puna, the Awahou Stream, and the wider Lake Rotorua groundwater catchment over time.

Protection of Taonga Waters and Cultural Landscapes TALT supports Ngāti Rangiwewehi's use of the ancestral name, Pekehāua Puna, and acknowledges these spring systems as living entities with their own mauri. A *ki uta ki tai* (mountains to the sea) approach dictates that effects on groundwater systems eventually impact receiving environments like Lake Rotorua. Therefore, protecting the integrity and flow of these groundwater systems is critical to achieving the in-lake outcomes and water-quality improvements TALT is seeking.

Furthermore, under *Wai Ata*, TALT supports Ngāti Rangiwewehi's position that cultural values and potential wāhi tapu remain active across this landscape despite historical pastoral modification.

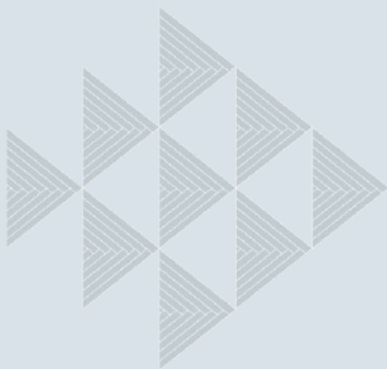
Summary of Addendum TALT's conditional support for this proposal is fundamentally tied to the applicant's ability to satisfy the concerns raised by Ngāti Rangiwewehi. The environmental benefits of the proposal (such as reduced nitrogen losses and reticulated wastewater connection) must be matched by:

1. Sustainable groundwater allocation that protects Pekehāua Puna and Awahou Stream.
2. Meaningful, ongoing involvement of Ngāti Rangiwewehi in design, construction, and monitoring to protect unrecorded cultural sites.
3. The comprehensive monitoring framework outlined in our main letter, expanded to include hydrogeological and spring-flow monitoring to ensure interconnected freshwater systems are not degraded.

Nāku noa, nā

Wallace Haumaha

Chair, Te Arawa Lakes Trust



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