

Attachment 17 - Updated Response to Mahaanui Kurataiao Limited
recommendations and feedback from Whitiara Centre Limited

Introduction

Hughes Developments Ltd (*HDL*) sought advice from Mahaanui Kurataiao Limited (*MKT*) and Whitiara Centre Limited (*Whitiara*) in respect of HDL's fast-track referral application for a new residential community located at 160 Bangor Road in Darfield (*Project*) (*Site*). MKT is the advisor to Te Taumutu Rūnanga who, along with Te Ngāi Tūāhuriri Rūnanga, hold mana whenua over the Site. Whitiara is the advisor to Te Ngāi Tūāhuriri Rūnanga.

The advice provided by MKT on 6 August 2025 (*Advice*) includes recommendations identified by Kaitiaki representatives to moderate the effects of the Project on mana whenua values. Tables 1 and 2 below include those recommendations and the Ngāi Tahu Subdivision and Development Guidelines appended to the Advice and identify how each of these recommendations has informed the Project.

The advice provided by Whitiara on 31 October 2025 includes specific further information requests and sets out Whitiara's expectations for land development undertaken as part of the Project. Those requests and expectations and HDL's responses on how they have informed the Project are set out in Table 3.

On 7 July 2026, HDL provided copies of the following documents to MKT and Whitiara:

- Proposed conditions of the SDC resource consent for the Project.
- Proposed conditions of the ECan resource consents for the Project.
- Proposed conditions of the Wildlife Approval for the Project.
- This draft document.
- Copies of the Aquatic Ecology Assessment and excerpts from the Terrestrial Impact Assessment for the Project.

As part of that correspondence, HDL invited any feedback from MKT and Whitiara in relation to the Project and confirmed that the substantive application would be provided to MKT and Whitiara once it was lodged. Both parties confirmed that they did not have any comments on the substantive application for the Project at this stage, but would be providing comments at the invitation of the expert panel once appointed. Whitiara advised that it has a particular interest in the works affecting the Waterways.

Table 1: Response to Mahaanui Kurataiao Limited Recommendations

#	Advice Recommendation	How the recommendation has informed the Project
<i>Subdivision</i>		
1	The Ngāi Tahu Subdivision and Development Guidelines should be referred to in the ongoing development of this application. The overall proposal should refer to these guidelines to the greatest practical extent, particularly with regards to stormwater controls and indigenous plantings.	HDL has carried out an updated analysis of the Project against the Guidelines, detailed below in Table 2 – Comments on the Ngāi Tahu Subdivision and Development Guidelines. Table 2 sets out how the Project has been informed by the Guidelines, specifically with respect to stormwater controls and indigenous planting. This ensures that the Project, as one component of the wider environment, reflects the principle of Ki Uta Ki Tai, as in Objective 3, Part 5.4 Papatūānuku of the Mahaanui Iwi Management Plan.

2	Any plants removed must be replaced with two equivalent species (like-for-like) at or near the site through transplantation or other methods, as an offset measure.	The existing vegetation on the Site is primarily comprised of exotic vegetation and shelterbelts. Mature trees on Site will be retained where possible. The landscape plans provided part of the Landscape Framework Report in Attachment 2 identify the extent of the proposed replacement and new landscaping and the species that will be used. Through the proposed landscaping, the quantum and variety of native vegetation on the Site will increase significantly compared to the current conditions of the Site.
3	The development and subdivision of land should not decrease stormwater capacity and should not result in cumulative effects on water quantity and quality to protect the mauri of the Te Waihora catchment.	The approach to stormwater management will ensure stormwater capacity within the Site and the wider environment is not decreased and that stormwater is appropriately managed and treated. The Project will not result in cumulative effects on quantity or quality and will therefore protect the mauri of the Te Waihora catchment. To ensure the above, stormwater will be managed as follows: • The ground conditions on the Site including the depth to ground water (between 50m and over 100m) are appropriate for accommodating the discharge of stormwater to ground from new development which will be delivered in accordance with New Zealand Building Code requirements. This approach has been discussed with Selwyn District Council (SDC) who agrees that discharge to ground is appropriate. • Stormwater from vested roads and private lanes will be directed to the roadside kerb and channel via land contour and captured by channel sumps. Sumps will be fitted with submerged outlets capable of storing up to 60 litres of floatable contaminants. • Stormwater will be conveyed from the sumps by an underground pipe network to boulder backfilled soakage pits sized to dispose of the 2% Annual Exceedance Probability (AEP) critical duration storm event, in accordance with the SDC Engineering Code of Practice. • Where the finished ground contour and the subdivision layout allows, stormwater will be discharged through a grassed swale prior to entering the boulder backfilled soakpit. These swales will be located within local purpose reserves and be designed in accordance with the Christchurch City Council Waterways, Wetland, Drainage Guide, providing an additional treatment mechanism to assist in maintaining groundwater quality in the area. • The stormwater system design will ensure that discharge from the developed site is not

		increased from pre-development flow for all events up to the 1% AEP of any duration. Stormwater will be directed away from the Waterways, which will be enhanced through riparian planting as part of the Project.
4	The site should incorporate sustainable urban design features with respect to stormwater runoff and greywater reuse including: - Greywater capture and reuse. - Rainwater capture and reuse (i.e., rainwater collection tanks). - Minimising impervious cover (e.g., using permeable paving and maintaining grass cover). - The use of rain gardens and swales (or other land-based methods) planted with appropriate native species, rather than standard curb and channel. - Avoiding the use of building material known to generate contaminants such as copper guttering and roofing.	The Project proposes to incorporate sustainable urban design features with respect to stormwater runoff. HDL intends to investigate further sustainable design measures to be implemented as part of the Project during the later stages of development. These measures will be refined through detailed design and will ensure that the Project incorporates sustainable design features wherever possible.
Earthworks		
5	An Accidental Discovery Protocol must be in place during all earthworks required to exercise this consent to deal with archaeological finds and protect the interests of mana whenua. This condition does not constitute a response under the Heritage New Zealand Pouhere Taonga Act 2014.	There are no recorded sites of historic significance within the Site (Substantive Project Assessment, paragraph 18.79). Regardless, an Accidental Discovery Protocol will be in place throughout the construction of the Project (Proposed SDC Conditions, condition 57; Attachment 7 – Proposed ECan Conditions (<i>Proposed ECan Conditions</i>), condition 14).
6	An Erosion and Sediment Control Plan for any earthworks required to give effect to this development must be prepared, inspected and maintained in accordance with Environment Canterbury's Erosion and Sediment Control Toolbox for	Appropriate erosion and sediment control methods will be in place during construction to reduce erosion and sedimentation off the Site, secured through conditions 51 and 58 of the Proposed SDC Conditions and conditions 7 to 19 of the Proposed ECan Conditions. Environment Canterbury's Erosion and Sediment Control Guidelines will be followed during periods of earthworks (Substantive Project Assessment, paragraph 3.22).

	Canterbury until such time the exposed soils have been stabilised.	
7	As per policy P11.8 in the Mahaanui Iwi Management Plan, the future subdivision must establish and maintain indigenous planting on site to mitigate the impacts of earthworks. Indigenous biodiversity is also required to enhance the cultural landscape, increase indigenous habitat, filter sediment, and sequester carbon.	As outlined in the Landscape Framework Report included as Attachment 2 (<i>Landscape Framework Report</i>) and the landscape plans included as part of that Report, the landscaping of reserves on the Site will include indigenous/native vegetation. A range of plants will be selected according to their contribution to biodiversity outcomes, ecological health, cultural wellbeing, and landscape and amenity values. Paragraph 3.10 of the Substantive Project Assessment sets out the key landscape components for the Project.
<i>Remediation works</i>		
8	Contaminated soil must not be left in situ - it must be removed from site and disposed of at an appropriate facility.	Contaminated soil that cannot be remediated and repurposed without resulting in adverse effects on human health, soil health, or the surrounding environment will be removed from the Site and disposed of at an appropriate facility (Proposed SDC Conditions, condition 50; Proposed ECan Conditions, condition 12).
9	A Site Management Plan should be devised, implemented and managed by a suitably qualified and experienced person to ensure that any contaminated material onsite is managed safely and does not migrate into the environment.	A Remediation Action Plan will be prepared by, and implemented and managed under, the supervision of a suitably qualified and experienced person to ensure that any contaminated material on the Site is managed safely and does not migrate into the environment (Proposed SDC Conditions, condition 50).
10	A Site validation report must confirm the successful remediation of contaminated material before any construction work to develop the site occurs.	This is required by condition 52 (Proposed SDC Conditions).
11	An accidental discovery protocol for contaminated soils must be developed and implemented in case unexpected contamination is identified in the soil.	This is required by condition 57 (Proposed SDC Conditions) and condition 11 (Proposed ECan Conditions).
<i>Excavation within 50m of a surface waterbody (water races)</i>		
12	No earthworks should occur within 15 metres of any water race or surface waterbody. This excludes only the area where the water race is to be realigned.	Land contouring will be required within the setback of the primary water race through the Site (<i>Waterway 1</i>) to facilitate realignment. Erosion and sediment controls will be in place throughout those works (and earthworks generally) to avoid discharges into the Waterways.

		To assist in the ongoing protection and maintenance of Waterway 1, it is intended to locate it within the road network or the recreation reserves. As such, earthworks will be required to form roading and construct infrastructure adjacent to Waterway 1. Waterway 1 and the second branch of the water race (<i>Waterway 2</i>) will be completely protected from sediment runoff during construction. Over-pumping of flow will be required during culvert installation to ensure downstream effects are fully mitigated during these construction periods.
13	No structures should be created within 15 metres of any water race or surface waterbody.	As included in the Aquatic Ecology Assessment included as Attachment 11 (<i>Aquatic Ecology Assessment</i>), a total of eight road culvert installations will be required along the length of Waterway 1, as well as approximately six driveway culverts. Two road culverts may be required across Waterway 2. All other reaches of each waterway will remain as open channel. The culverts will be designed and installed based on the recommendations in the Aquatic Ecology Assessment which have been secured as conditions of consent. Those recommendations ensure that every effort will be made in the design and construction of the culverts to ensure minimal impacts on resident fish passage and overall instream ecology. Among other matters, it is recommended that all culverts should allow for the same level of fish passage as the adjacent open channel waterway and that this is achieved by ensuring culvert diameters are approximately equal to the adjacent waterway width, and ensuring that the invert of each culvert is buried, with continuous substrate throughout and water velocity not exceeding 0.3ms^{-1}. Plans showing the indicative dimensions and design of the new culverts are included as Attachment 5.
14	All waterways, including drains and any wetland or spring encountered, must be maintained and enhanced, not capped or piped.	HDL accepts this recommendation. No waterways will be capped or piped as part of the Project and through the enhancement works proposed there will be a positive overall effect on the quality of the habitats within the Waterways.

15	Hughes Developments should plant and maintain a riparian buffer of indigenous vegetation along the water races to mitigate the impacts of the land use intensification and on-going operations. Plants that mature to a height of at least the width of the waterway should be provided.	HDL accepts this recommendation. As shown in the Landscape Framework Report, native riparian planting to the waterways is proposed, with eucalyptus trees to be removed where they are within 10m of the Waterways. Conditions 44 and 48 of the Proposed SDC Conditions requires the plans for the realignment and enhancement works for the Waterways to be prepared in general accordance with the recommendations of the Aquatic Ecology Assessment. Those recommendations include: • Native riparian planting is to be present in all reaches of the open-channel Waterways. In areas where space is limited, such as the proposed flush median reach, riparian planting can be limited to a single row of overhanging <i>Carex</i> sp. planted at the wetted margin. Where space permits, riparian planting should be consistent with the Christchurch City Council stream design guide. • Ongoing maintenance of riparian areas is required to ensure existing invasive species such as old man's beard (<i>Clematis vitalba</i>) do not regrow.
<i>Non consumptive take and diversion of surface water</i>		
16	Dewatered water should be assessed for sediments and contaminants and treated if necessary to ensure the protection of indigenous/taonga species.	No dewatering will be undertaken.
17	If the use of flocculants and/or coagulants is required, a Chemical Treatment Plan must be prepared and adhered to for the protection of taonga species in the receiving surface water bodies.	It is unlikely that flocculants and/or coagulants will be used on the Site. However, if it becomes apparent that the use of these is required, HDL accepts this recommendation.
18	The site must be surveyed for indigenous/taonga species prior to works commencing. Where indigenous/taonga species are present, works must be undertaken under the supervision of an ecologist to ensure their protection. This must include terrestrial and aquatic fauna and flora.	The Site has been surveyed for the presence of indigenous/taonga species by HDL's aquatic and terrestrial ecologists. Specific measures to protect lizards, birds and aquatic species have been proposed as part of the Project including: • The implementation of bird and lizard management plans during construction to ensure those species are not adversely affected by the works. • The construction of dedicated dryland habitat areas to support lizard species.

		The enhancement of the Waterways to support improved fish abundance and macroinvertebrate biodiversity.
19	If fish salvage is required, it must be undertaken by a suitably qualified fish expert prior to diverting the water race.	This is required by condition 22 (Proposed ECan Conditions).
20	The ecological values of the water race should be assessed prior to realignment. Any ecological values determined in the water race should be protected and enhanced.	The ecological values of the Waterways have been assessed in the Aquatic Ecology Assessment. That report concludes that the ecological values of the Waterways are considered to be low. The works proposed and recommended by the Aquatic Ecology Assessment will have an overall improvement on fish abundance and macroinvertebrate biodiversity, ultimately increasing the ecological values of the Waterways.
21	The diversion of water and realignment of the water race must not prevent fish passage or cause the stranding of fish in pools or channels.	The diversion of water and realignment of Waterway 1 will not prevent fish passage or cause stranding of fish, as set out in the Aquatic Ecology Assessment – fish passage will be maintained through considered culvert design. Follow-up surveys will also be conducted upon completion of the proposed waterway enhancements to monitor the impacts of the Project on the ecology of the Waterways (Proposed ECan Conditions, condition 21(g)).
22	Stormwater infrastructure must not be developed on contaminated land.	HDL accepts this recommendation.
23	The consent duration should not exceed 15 years.	The operational stormwater discharge consent will be transferred to SDC in accordance with its global stormwater discharge consent that expires in May 2046. To align with the duration of the SDC global consent, the operational stormwater discharge consent for the Project will seek a similar term.
24	Operational phase stormwater from roads and hardstand areas must undergo treatment for contaminants before being discharged into soak pits or the reticulated network. This must include appropriate mechanisms to capture heavy metals.	As set out in the Infrastructure Assessment included as Attachment 4 (<i>Infrastructure Assessment</i>), due to low contaminant levels anticipated in the stormwater runoff for the residential development and the depth to groundwater at the Site, no treatment requirements are expected. Submerged inlets to soakpit manholes will separate floatable contaminants and rubbish prior to entering the stormwater soakage facilities and the proposed swales will provide for stormwater conveyance and a level of additional treatment prior to discharge to ground.
25	Any swales or stormwater drainage areas should be planted with	The roadside swales are intended to be grassed. Native plantings within the swales will be concentrated in areas

	appropriate native species (not left as grass), recognising the ability of particular species to absorb water and filter contaminants.	5.0m from the soak pit inlet for each swale. Planting is not required to achieve stormwater treatment outcomes. Rather, they are an additional means of stormwater treatment to further lower the environmental impact of the development, while also contributing to character and amenity.
26	As per policy P8.1 in the Mahaanui IMP, discharge to land should be: - appropriate to the soil type and slope and the assimilative capacity of the land on which the discharge activity occurs; - avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and - accompanied by regular testing and monitoring of one or all of the following: soil, foliage, groundwater and surface water in the area.	Any discharge to land will be in accordance with the parameters set out in Proposed ECan Conditions and the Proposed SDC Conditions. Those conditions ensure: - Best practicable sediment control measures will be implemented and all practicable measures will be taken to minimise soil disturbance and minimise the potential for sediment laden stormwater runoff to be generated. - A monitoring programme for discharge of construction-phase stormwater. Further, the Erosion and Sediment Control Plan (<i>ESCP</i>) to be implemented on the Site will identify: - Soils on the Site and sensitive receptors such as the Waterways. - Drawings showing the Site, type and location of sediment control measures, on-site catchment boundaries and off-site sources of run on/runoff. - Environmental monitoring and auditing, including frequency. - Corrective action, reporting on solutions and update of the ESCP.

Table 2: Comments on the Ngāi Tahu Subdivision and Development Guidelines

Ngāi Tahu Subdivision and Development Guidelines	Compliance Comments
Cultural Landscapes	
1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites.	There are no sites of significance within the Site. As outlined above, HDL has ensured that the Project addresses the matters of cultural value identified by MKT as set out above.
1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on Wāhi tapu me wāhi taonga and Silent Files.	Appendices 2, 4, 5 and 6 of the Iwi Management Plan illustrate the sites of significance to Ngāi Tahu. There are no identified sites in relation to the Site. The Selwyn District Plan does not indicate the presence of any Silent Files on or near the Site. HDL is not aware of any Silent Files on or near the Site.
1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between Tāngata whenua and place, including but not limited to: (i) Protecting and enhancing sites of cultural value, including waterways; (ii) Using traditional Ngāi Tahu names for street and neighborhood names, or names for developments; (iii) Use of indigenous species as street trees, in open space and reserves; (iv) Landscaping design that reflects cultural perspectives, ideas and materials; (v) Inclusion of interpretation materials, communicating the history and significance of places, resources and names to tāngata whenua; and (vi) Use of tāngata whenua inspired and designed artwork and structures.	The Project appropriately recognises Ngāi Tahu culture, history and identity through the proposed enhancement of the Waterways and the use of indigenous planting. As set out in the Aquatic Ecology Assessment, the proposed waterway enhancements will have an overall positive effect on habitat quality for fish and macroinvertebrates, through native riparian planting and the maintenance of fish passage. Further, the Landscape Framework Report identifies a range of indigenous/native trees to be used as street trees, in open spaces and in reserves. HDL remains willing to investigate further opportunities to recognise Ngāi Tahu culture, history and identity through future stages of the development.
Stormwater	
2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter	See Table 1, Recommendation 3 for a description of how stormwater will be managed on the Site. This aligns with guidelines 2.1 to 2.3 as on-site

Ngāi Tahu Subdivision and Development Guidelines	Compliance Comments
and cleanse stormwater and avoids the discharge of contaminated stormwater to water.	stormwater solutions and swales will be utilised within the Project.
2.2 Stormwater swales, wetlands and retention basins are appropriate land-based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.	
2.3 Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.	
2.4 Appropriate and effective measures must be identified and implemented to manage stormwater run off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.	Appropriate erosion and sediment control methods will be in place during construction to reduce erosion and sedimentation off the Site, secured through the Proposed SDC Conditions and the Proposed ECan Conditions.
2.5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.	Stormwater will be discharged to Council's reticulated system which is managed in an integrated manner. The operational stormwater infrastructure will vest with Council along with the relevant stormwater discharge consent. Further details are set out in the Infrastructure Assessment.
2.6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.	Stormwater discharged from the Site is in accordance with current practices within Darfield. Treatment of the stormwater will be provided through the stormwater system consisting of sumps, floatable contaminant traps, submerged outlets, swales, and significant soil filtration and therefore water quality will be retained and potentially enhanced. Further details are set out in the Infrastructure Assessment.
Earthworks	
3.1 Earthworks associated with subdivision and development are subject to the general policy on Earthworks and Wāhi tapu me wāhi taonga including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.	An Accidental Discovery Protocol will be in place throughout the construction of the Project, secured through the Proposed SDC Conditions. Appropriate erosion and sediment control methods will be in place during construction to reduce erosion and sedimentation off the Site, secured

Ngāi Tahu Subdivision and Development Guidelines		Compliance Comments
		through the Proposed SDC Conditions and the Proposed ECan Conditions.
3.2 The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run-off and protect waterways from sedimentation.		Appropriate erosion and sediment control methods will be in place during construction and enhancement of the Waterways to reduce erosion and sedimentation off the Site.
3.3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.		No works will occur within the bed or margins of waterbodies other than to realign and enhance the Waterways.
3.4 Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.		Excess fill on the Site will be redistributed within the Site except where it is contaminated and cannot be remediated to acceptable levels.
Water supply and use		
4.1 New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for: (i) low water use appliances and low flush toilets; (ii) grey water recycling; and (iii) rainwater collection.		The Project will be connected to the Council's reticulated water supply, with each dwelling having its own water meter as set out in the Infrastructure Assessment. A complete water supply model for the Site will be undertaken during detailed design. Based on the Infrastructure Assessment, there is no pressure on existing water resources and there will be sufficient capacity for the development as well as other planned development areas within Darfield.
4.2 Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population prior to the granting of subdivision consent.		
4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.		
Waste treatment and disposal		
5.1 Developments should implement measures to reduce the volume of waste created within the		The development will be connected to the Council's reticulated wastewater system, as set out in the

Ngāi Tahu Subdivision and Development Guidelines	Compliance Comments
development, including but not limited to incentives or requirements for: (i) low water use appliances and low flush toilets; (ii) grey water recycling; and (iii) recycling and composting opportunities (e.g., supporting zero waste principles).	Infrastructure Assessment. Subject to utilising a low pressure sewer system as proposed, there is sufficient capacity within its reticulated system to accommodate the wastewater flows from the Project.
5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population prior to the granting of the subdivision consent.	
5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.	N/A
5.4 Where new wastewater infrastructure is required for a development: (i) The preference is for community reticulated systems with local treatment and land based discharge rather than individual septic tanks; and (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.	The Project will be connected to Council's reticulated wastewater system as set out in the Infrastructure Assessment.
Design guidelines	
6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self sufficient solutions for water, waste, energy such as: (i) position of houses to maximise passive solar gain; (ii) rainwater collection and greywater recycling; (iii) low energy and water use appliances; (iv) insulation and double glazing; and (v) use of solar energy generation for hot water.	The Project incorporates a range of sustainability measures. In particular, the Project has been carefully designed to enable dwellings to be oriented on the Site to maximise passive solar gain for both indoor and outdoor living areas. HDL intends to investigate further sustainable design measures to be implemented as part of the Project during the later stages of development. These measures will be refined through detailed design and will ensure that the Project incorporates sustainable design features wherever possible. As part of those investigations, HDL will also consider what incentives it could provide to future homeowners to adopt additional sustainability measures.

Ngāi Tahu Subdivision and Development Guidelines	Compliance Comments
6.2 Developers should provide incentives for homeowners to adopt sustainability and self sufficient solutions as per 6.1 above.	
6.3 Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.	The layout and design of the Project has been intentionally designed by HDL's urban design expert to encourage a sense of community for future residents through the considered positioning of open spaces around the Project, as well as the grouping of density to create pocket neighbourhoods within the wider Project. The Landscape Framework Report identifies the two large reserves that are proposed as part of the Project. In summary, those are: • A farm park-style reserve. This will serve as the centrepiece of the development, providing sheltered spaces with a BBQ, picnic tables, seating and other amenities to support gatherings and foster a sense of community. • A large neighbourhood park on the eastern side of the development. This park includes a central open space designed for casual neighbourhood play. Access from surrounding residential lots is encouraged, with clear sightlines from adjacent streets enabling passing surveillance and creating a safe, welcoming community space. The Urban Design Assessment included as Attachment 3 (<i>Urban Design Assessment</i>) confirms that the design and layout of the development promotes a sense of community, with housing arranged to engage with reserves and public spaces. The key concepts underpinning the design and layout of Bangor Village are summarised at section 3 of the Substantive Project Assessment.
6.4 Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.	The Project incorporates a range of sustainability measures. In particular, the Project has been carefully designed to enable dwellings to be oriented on the Site to maximise passive solar gain for both indoor and outdoor living areas. HDL intends to investigate further sustainable design measures to be implemented as part of the Project during the later stages of development. These measures will be refined through detailed design and will ensure that the Project

Ngāi Tahu Subdivision and Development Guidelines	Compliance Comments
	incorporates sustainable design features wherever possible.
Landscaping and open space	
7.1 Sufficient open space is essential to community and cultural well being, and the realization of indigenous biodiversity objectives, and effective stormwater management.	Significant open space/reserve areas are proposed as part of the Project. These spaces are further detailed in the Landscape Framework Report and the Urban Design Assessment (refer to 6.3 above for further detail).
7.2 Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.	As detailed in the Landscape Framework Report, a mix of exotic and native trees will be used throughout the development and many existing trees and shrubs will be retained to establish immediate maturity and shelter. Native vegetation will be planted in the riparian zones in accordance with the recommendations provided by the Aquatic Ecology Assessment (secured through the Proposed SDC Conditions).
7.3 Indigenous biodiversity objectives to include provisions to use indigenous species for: (i) street trees; (ii) open space and reserves; (iii) native ground cover species for swales; (iv) stormwater management network; and (v) home gardens.	
7.4 Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.	
7.5 Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g., pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long term view of having mature trees available for customary use).	
7.6 Developers should offer incentives for homeowners to use native species in gardens, including the provision of lists of recommended plants to avoid, discounts at a local nursery, and landscaping ideas using native species.	

Table 3: Response to Whitiara preliminary feedback

Whitiara feedback / information request	HDL response
Whitiara advises that its preference is to see a green, planted buffer on both sides of the water races. Whitiara is also concerned that the proposed subdivision layout appears to incorporate the water race into the boundary of individual allotments. Surface water bodies should not form site boundaries. An issue arises where future landowners seek resource consents to encroach into district plan waterway setbacks when optimising their own on-site building. It is Whitiara's view that the size, alignment and layout of sections should not give rise to this scenario. To guarantee protection from encroachment, the waterways should be planted on both sides and the setback be subject to some form of legal mechanism for protection.	The Aquatic Ecology Assessment recommends that native riparian planting is present at all reaches of open-channel Waterways. This recommendation has been incorporated in the Landscape Framework Report, ensuring that both sides of the Waterways will be planted as a green corridor (secured by the Proposed SDC Conditions). The subdivision layout ensures that Waterway 1 will be held separately in public areas (either adjoining the road reserves or in the recreation reserves) and not included within individual allotments. Waterway 2 currently extends into the Site from SH73 to the east and runs along the boundary of the Site with the neighbouring properties to the south. The extent of Waterway 2 will be included within the individual allotments which are proposed along this part of the Site, but those lots will be subject to consent notices which: • require the landowners to clean and maintain the Waterways within the boundary of their allotment; and • preclude any structures from being established within 10m of the Waterway. The lots which will accommodate Waterway 2 have been designed with sufficient length and width so as to comfortably comply with setback requirements. Specific fencing requirements for Waterway 2 are included in the Landscape Framework Report.
Whitiara would like to request further information on: • the presence of fish within the water race and any recommendations from an ecologist on the management of fish during construction; and • confirmation on the presence of any springs within the site.	As set out in the Aquatic Ecology Assessment, the only species identified during those surveys was the upland bully (<i>Gobiomorphus breviceps</i>). The upland bully is non-migratory and can therefore form inland populations in waterways with compromised upstream or downstream fish passage. This species is native to New Zealand and has a conservation status of "At Risk – Naturally Uncommon" (Dunn <i>et al.</i> 2025). Previously, the upland bully was "Not Threatened". The change in conservation status is not as a result of dropping population numbers, but rather a change in how the New Zealand Threat Classification System criteria are applied. HDL's ecologist has previously advised that the absence of eels, trout, or other migratory fish species in the Waterways suggest significant fish

	passage barriers both upstream and downstream of the Waterways. Regardless, the following recommendations are set out in the Aquatic Ecology Assessment: • All culverts, including road and driveway culverts, should allow the same level of fish passage as the adjacent open channel waterway. To achieve this, culvert diameters should be approximately equal to the adjacent waterway width, and the invert of each culvert should be buried, with continuous substrate throughout. Water velocity through culverts should not exceed 0.3 ms^{-1}. • All pedestrian Waterways crossings that are not related to a roadway, such as those within the proposed East West Linear Reserve, should consist of footbridges, to ensure minimal impacts on fish passage and overall instream ecology. • Within the proposed realignments, a variety of instream habitats should be included, such as pool, riffle and run habitats. Under baseflow conditions the waterway contains a small flow volume, and the potential for riffles will be limited by the existing waterway gradient. • Follow-up surveys of macroinvertebrate biodiversity and fish abundance should be conducted upon completion of the proposed waterway enhancements, to monitor impacts of the development. Implementation of these recommendations is secured through the Proposed SDC Conditions. There are no springs on the Site. Groundwater is encountered between approximately 50 – 100m below ground level.
The proposal intends to retain mature and healthy planting that already exists on the site, and to provide further landscape treatments throughout the development. These initiatives are supported and planting with indigenous species is encouraged.	Noted.
Whitiora otherwise expects that the land development will be undertaken in accordance with best practice and that this will be enforced through conditions of consent addressing the following matters:	HDL confirms that the land development will be undertaken in accordance with best practice measures. Those measures are secured via conditions of the Proposed SDC Conditions and/or the Proposed ECan Conditions which require:

• best practice erosion and sediment control during earthworks; • best practice measures for dust management during earthworks; • an Accidental Discovery Protocol during earthworks; • implementation of any ecological management plans for the transfer of fish; • implementation of landscape planting incorporating indigenous species where possible; • implementation of best practice methods for stormwater management; and • connection to reticulated networks for water supply and wastewater.	• The preparation and implementation of an ESCP (including a DMP) to manage erosion, sediment and dust during earthworks and construction. • Compliance with an Accidental Discovery Protocol. • Implementation of a Fish Management Plan, Bird Management Plan and Lizard Management Plan. • Preparation and implementation of landscaping plans incorporating indigenous planting in accordance with the Landscape Framework Report. • Preparation and implementation of an SMP for construction and for the operation of the stormwater system. • Connection to the reticulated networks for water supply and wastewater.
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