

## Cultural Impact Assessment

Homestead Bay




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## Acknowledgement

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# 1. Application Overview and Proposal Context

The Homestead Bay Fast Track Application, prepared by Remarkable Planning Limited on behalf of RCL Homestead Bay Limited, represents one of the most significant master-planned development proposals currently under consideration in the Queenstown Lakes District. The application seeks approval under the Fast Track Approvals Act 2024 (FTAA) for a comprehensive, staged development at the southern end of Queenstown's Te Tapuae Southern Corridor.

## 1.1 Summary of Proposal

The proposal covers approximately 205 hectares of land, comprising two large parcels, being Lot 12 Deposited Plan 364700 and Lot 8 Deposited Plan 443832. Both parcels are currently used for pastoral farming. The site is positioned between State Highway 6 (SH6) to the east and Whakatipu Waimāori to the south and west, with the Remarkables mountain range forming a dramatic eastern backdrop. The application site is not only physically prominent but also occupies a pivotal location within the Queenstown Lakes Spatial Plan, being identified as a “future urban area” and a “priority development area” for the district's long-term growth.

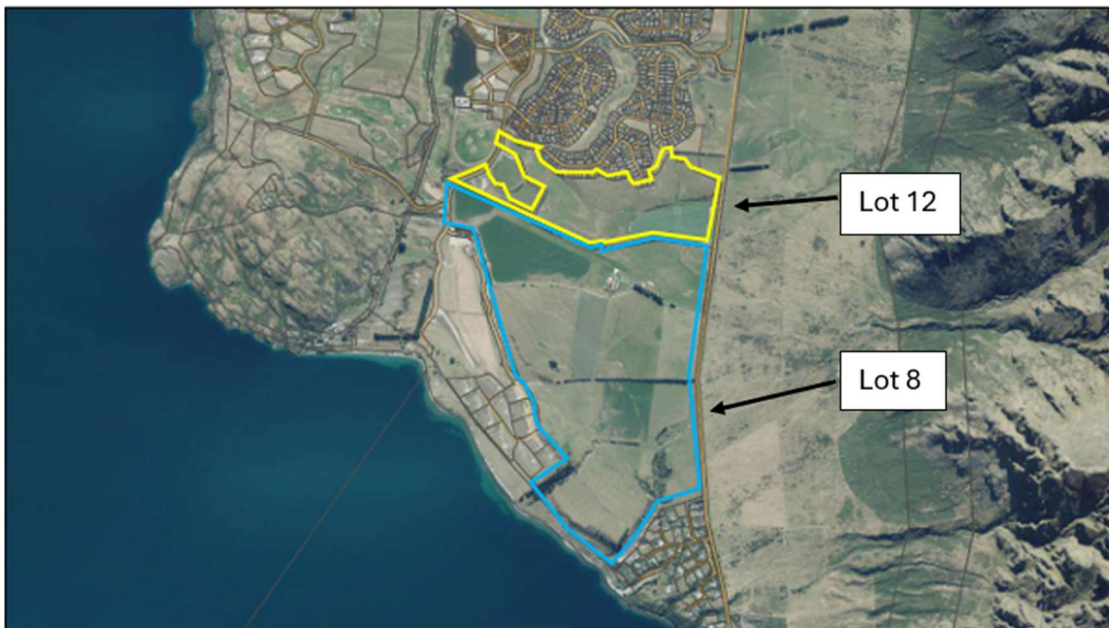


Figure 1: Location of Application Site

The Homestead Bay proposal is ambitious in both scale and vision. It is designed to address the acute need for housing supply and diversity in the Queenstown region, while also delivering substantial economic, social, and environmental benefits. The development masterplan provides for the subdivision of the land to create 1,438 standard residential lots, which are intended for single detached dwellings. In addition, the proposal includes 22 medium density superlots, which will allow for the future development of approximately 203 residential units, and fourteen high density superlots, which are anticipated to accommodate around 890 residential units. In total, the proposal is expected to deliver approximately 2,531 residential units, making it one of the largest single contributions to housing supply in the district's recent history.

The residential component is complemented by the creation of three commercial superlots, with a combined area of about 2.5 hectares, enabling the future development of approximately 11,000 square metres of retail floor space. This commercial area is envisioned as a local centre, providing essential services, retail, and community amenities not only for Homestead Bay residents but also for the wider Southern Corridor.

The proposal allows for the potential inclusion of school sites, should the Ministry of Education express interest in acquiring land for educational purposes. Two centrally located, three-hectare blocks have been identified as optimal locations for a future primary school, reflecting the applicant's commitment to supporting the district's growing population and ensuring that educational infrastructure keeps pace with residential development. The masterplan also places a strong emphasis on community and recreational amenities.

The majority of the open space outside the residential/commercial lots will be used for 3 Waters infrastructure including: water supply, water treatment and reservoirs; stormwater infrastructure; wastewater treatment infrastructure; and land disposal areas (including approximately 30 hectares for wastewater treatment areas).

The development will deliver a network of parks, reserves, and recreational trails, as well as the implementation of approximately 19 hectares of native planting, supported by comprehensive pest and weed control measures. These green spaces are designed to enhance biodiversity, provide habitat for indigenous species, and offer a range of recreational opportunities for residents and visitors alike.

Earthworks will be extensive, estimated to involve 1,239,400m<sup>3</sup> of cut (maximum depth of 8.22m) and 1,052,500m<sup>3</sup> of fill (maximum height of 8.74m), over an area of 154 hectares (i.e. approximately 75% of the site). The earthworks will be staged and may take in the order of a decade, similar to Hanley's Farm.





**Figure 2: Subdivision Plan**

## 1.2 Planning and Statutory Context

The planning and statutory framework for the proposal is comprehensive, noting that Te Tiriti o Waitangi and Statutory Acknowledgement Areas are covered in section 4.1 below.

The Resource Management Act 1991 recognises and provides for the Kāi Tahu values and interests in the Whakatipu Waimāori catchment. The relationship of Kā Rūnaka with this area is a matter of national importance that must be recognised and provided for in managing natural and physical resources<sup>1</sup>. In achieving the purpose of the Act particular regard is required to kaitiakitaka<sup>2</sup>. Kāi Tahu whānau exercise kaitiakitaka in this area. Maintaining a balance between the right to access and use natural resources, and the responsibility to care for te taiao, with a focus on providing a sustainable base for future generations is implicit in kaitiakitaka.

The Proposed Otago Regional Policy Statement (PORPS)<sup>3</sup> recognises and provides for the relationship of Kai Tahu with whenua and wai māori, including through the following policy:

*MW-P3 – Supporting Kāi Tahu hauora*

*The natural environment is managed to support Kāi Tahu hauora by:*

<sup>1</sup> Resource Management Act 1991, section 6(e)

<sup>2</sup> Resource Management Act 1991, section 7(a)

<sup>3</sup> this section refers to the PORPS as amended by decisions on submissions (30 March 2024)

- (1) *recognising that Kāi Tahu hold an ancestral and enduring relationship with all whenua, wai māori and coastal waters within their takiwā,*
- (2) *protecting customary uses, Kāi Tahu values and relationships as identified by Kāi Tahu to resources and areas of significance, and restoring these uses and values where they have been degraded by human activities,*
- (3) *safeguarding the mauri and life-supporting capacity of natural resources, recognising the whakapapa connections of Kāi Tahu with these resources as taoka, and the connections to practices such as mahika kai, and*
- (4) *working with Kāi Tahu to incorporate mātauraka into resource management processes and decision-making.*

The Queenstown Lakes Spatial Plan, adopted in 2021, identifies the application site as a “future urban area” and a “priority development area,” signalling its importance in the district’s long-term growth strategy. The Spatial Plan also identifies the need for a local centre and park-and-ride facility at Homestead Bay, both of which are incorporated into the masterplan. The Spatial Plan contains a framework of Kāi Tahu values which rūnaka wish to see promulgated as guiding principles to urban development in Queenstown Lakes. A set of mānawa or outcomes specific to and sought by Kāi Tahu are also identified in the Spatial Plan.

A Structure Plan “Te Tapuae Southern Corridor” was adopted on 4 September 2025, and covers land south of Kawerau River, including Homestead Bay, and specifically mentions the current Fast Track application. Te Ao Marama undertook a whānau hikoī to assess cultural values in Te Tapuae Southern Corridor and how these might be incorporated into the structure plan as a set of ‘Ki uta ki tai’ actions. Te Tapuae Southern Corridor also includes a number of principles which will be used to measure its success, including integration of Kāi Tahu values.

Under the Queenstown Lakes Proposed District Plan (PDP), Lot 12 is entirely zoned as Jacks Point Zone (and the structure plan identifies it as being in the Open Space Golf activity area), while Lot 8 is split between Jacks Point Zone and Rural Zone. The Jacks Point Zone includes a structure plan. For the portion of Lot 8 zoned Jacks Point Zone the structure plan identifies it as being in the Open Space Residential activity area, except for the southern gully which is within the Open Space Foreshore activity area. The portion of Lot 8 zoned Rural is outside the Urban Growth Boundary, although in the Urban Development section 4.1.2 of the PDP it is shown as being an indicative Future Expansion Area, in line with the Spatial Plan.

The PDP identifies two wāhi tupuna nearby: 33 Whakātipu-Wai-Māori (Lake Wakātipu) and 36 Kawarau (The Remarkables). The provisions of the PDP specifically control activities within the wāhi tupuna, although consideration needs to be given to effects of an activity on the wāhi tupuna. For examples listed threats to 33 Whakātipu-Wai-Māori (Lake Wakātipu) include buildings, earthworks, subdivision and development, new roads, and commercial activities, which would occur on the land surrounding the lake, not within the wāhi tupuna itself.

The proposal seeks a range of consents and approvals under the Resource Management Act 1991 (RMA), including subdivision and land use consents for residential, commercial, and infrastructure

development, as well as consents for earthworks, vegetation clearance, wetland removal or disturbance, disturbance of potentially contaminated soils, transport, and utilities. Water and discharge permits are sought for the take and use of groundwater, stormwater diversion, and wastewater discharge. The application also seeks approval under the Wildlife Act 1953 for the disturbance and salvage of lizard habitat during subdivision works, reflecting the applicant's commitment to biodiversity protection and ecological enhancement. In addition, the proposal requests the cancellation of three existing consent notices that are no longer relevant to the intended use of the land, streamlining the regulatory framework and enabling the efficient delivery of the project.



**Figure 3: Potentially Contaminated Sites**

The proposal also addresses the requirements of the National Policy Statement on Urban Development, the National Policy Statement for Freshwater Management, and other relevant statutory documents. The application includes a detailed assessment against the objectives and policies of these documents, demonstrating consistency with the sustainable management purpose of the RMA, the promotion of well-functioning urban environments, and the protection and enhancement of natural and physical resources. The proposal is also consistent with the purpose of the Fast Track Approvals Act 2024, which is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.





### 1.3.1 Water and wastewater

Water supply, treatment, and storage are addressed through the establishment of a new borefield, water treatment plant, and reservoir facilities, all located within the application site. The proposed Homestead Bay Water Supply Scheme is designed to be self-sufficient, with a sustainable yield sufficient to supply up to 1,900 residential dwellings in the initial stages, and provision for additional capacity as the development progresses.

Wastewater management comprises the construction of a new on-site wastewater treatment plant and the identification of multiple land treatment areas for the disposal of treated effluent. The wastewater system is designed to achieve high standards of treatment, with effluent disposed of via sub-surface drip irrigation in carefully selected locations, minimising the risk of adverse effects on water quality, human health, and the environment. Although onsite treatment and disposal of wastewater is proposed, the application draft conditions include an alternative of connecting to the QLDC wastewater network.

Stormwater management is addressed through the construction of diversion channels and bunds along the SH6 frontage, as well as the creation of attenuation basins, gross pollutant traps, and erosion control measures to ensure that post-development flows do not exceed pre-development levels and that water quality is maintained.

## 1.4 Masterplanning and design

The masterplan for Homestead Bay has been developed by the Applicants multidisciplinary team, including surveyors, engineers, planners, urban designers, landscape architects, and ecologists. The Applicant describes their design as one which responds to the site's unique topography, environmental values, and the need for integration with surrounding developments. The application site is characterised by a diverse range of landforms, including alluvial fans, glacial till, outwash deposits, and terrace risers, which have been carefully mapped and analysed to inform the subdivision layout, infrastructure design, and landscape strategy. The site is bounded by a range of land uses, including the Jacks Point residential development and golf course to the north, the Ōraka residential subdivision and Crown lakeside reserve to the south, Homestead Bay Peaks and the Homestead Bay Trustees land to the west, and Remarkables Station to the east. The site's location at the interface between urban and rural environments presents both opportunities and challenges, which the masterplan seeks to address through sensitive design, robust infrastructure provision, and comprehensive environmental management.

The Applicant describes their site as a subdivision layout that provides a mix of housing typologies, commercial areas, and open spaces, with a strong emphasis on connectivity, landscape integration, and infrastructure self-sufficiency. They state that the residential lots are designed to accommodate a range of dwelling types, from single detached houses to duplexes, terraced housing, and apartments, reflecting the district's need for housing diversity and affordability. The commercial superlots are strategically located along the main collector road, providing visibility, accessibility, and the potential for a vibrant local centre that will serve both the Homestead Bay community and the wider Southern Corridor. The

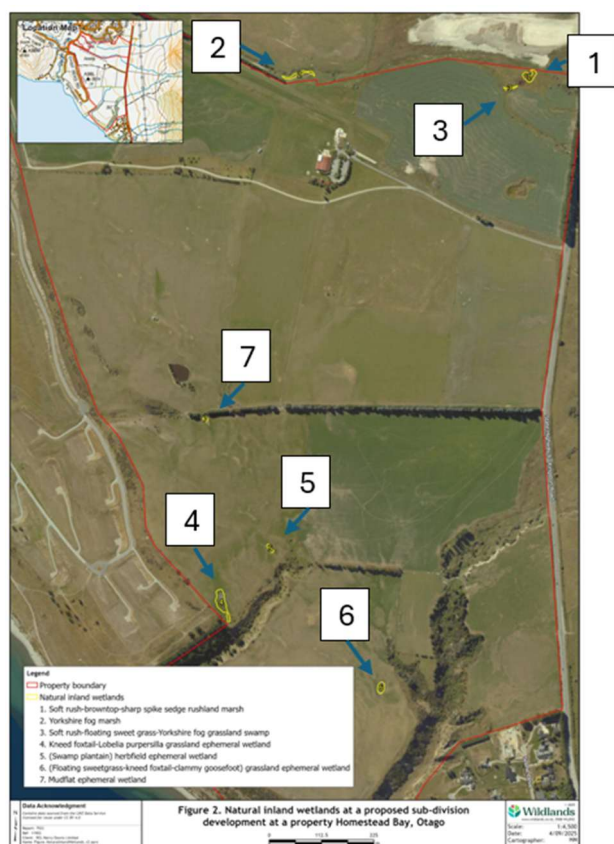
parks and reserves network is designed to maximise public access to open space, provide recreational opportunities, and enhance ecological values. The masterplan includes a series of community parks, local parks, and connection reserves, as well as the retention and enhancement of key landscape features such as the Southern and Central gullies, which will be restored with native planting and integrated into the recreational trail network.

## **1.5 Environmental and community effects**

The Applicant states that the Homestead Bay proposal is aligned with the strategic objectives of the Queenstown Lakes Spatial Plan and the National Policy Statement on Urban Development. It represents an extension of the urban form within the Southern Corridor, consolidating development in a location that is adjacent to existing urban areas, infrastructure, and amenities. The Applicant states that the proposal is designed to be resilient, sustainable, and adaptable, with the capacity to respond to changing community needs and environmental conditions over time. The application demonstrates an approach to environmental management, infrastructure provision, and community integration, with mitigation and monitoring measures in place to ensure that potential adverse effects are avoided, remedied, or mitigated.

The assessment of effects, as detailed in the application, identifies a range of actual and potential effects, both positive and adverse. The positive effects include the delivery of a regionally significant increase in housing supply, the provision of a diverse range of housing types to meet the needs of different household types and income levels, and the creation of a vibrant, well-connected community with access to commercial, recreational, and community facilities. The economic benefits are also significant, with the construction phase expected to contribute hundreds of millions of dollars to regional GDP and support thousands of full-time equivalent jobs. The Applicant considers that, once completed, the development will generate ongoing economic activity through household spending, employment in the local centre, and the operation of community facilities.

The Applicant states that the potential adverse effects have been addressed through the design of the proposal and the implementation of mitigation measures. The application includes detailed assessments of landscape and visual effects, transportation effects, ecological effects, and potential reverse sensitivity effects. The landscape and visual effects assessment concludes that, while the development will result in a change from rural to urban character, the effects are mitigated by the retention of key landscape features, the provision of extensive open space and native planting, and the careful siting of built form to minimise visual intrusion. The transportation assessment identifies the need for upgrades to the SH6 corridor and the internal road network, which are incorporated into the proposal and tied to specific development triggers. The ecological assessment identifies the presence of indigenous vegetation, lizard habitat, and wetlands within the site, and outlines measures to avoid, remedy, or mitigate adverse effects, including the retention and enhancement of key habitats, the implementation of a lizard management plan, and the enhancement of the one ephemeral wetland on the site.



**Figure 5: Wetland on the Site**

## 1.5.1 Community Effects

The proposal is expected to deliver positive community effects, including a substantial increase in housing supply and diversity, economic benefits through construction and ongoing employment, improved public and active transport options, and enhanced recreational and ecological values. The application includes some preliminary mitigation measures to address potential adverse effects, such as large setbacks and landscape buffers to neighbouring properties, stormwater and wastewater management systems, pest and weed control, lizard salvage and habitat enhancement, and ongoing monitoring and adaptive management.

The design also incorporates feedback from pre-lodgement consultation with the Queenstown Lakes District Council, Otago Regional Council, Department of Conservation, NZTA/Waka Kotahi, mana whenua, and adjacent landowners and occupiers.

The proposal does not give strong consideration to the effects on Kāi Tahu values, rights, and interests, as required by Te Tiriti o Waitangi and relevant statutory frameworks. While the application acknowledges the presence of Kāi Tahu as mana whenua, references statutory acknowledgements, and notes early consultation with Aukaha and Te Ao Marama Inc, it falls short of substantive engagement with Kāi Tahu perspectives and aspirations. The application primarily treats Māori interests as matters to



be acknowledged or consulted on, rather than as foundational to decision-making or project design. There is limited evidence that Kāi Tahu input has materially shaped the proposal, its mitigation measures, or its governance structures.

The application does not provide for co-management, delegated authority, or ongoing Kāi Tahu participation in environmental monitoring, reserve management, or infrastructure governance, nor does it embed mātauraka Māori or tikaka in its management plans. Furthermore, the mechanisms for protecting taoka, upholding tino rakatirataka, and actively safeguarding Kāi Tahu relationships with land, water, and cultural resources are weak or absent, with ecological and cultural mitigation measures framed as aspirations rather than binding commitments. The application also fails to address how the development will avoid prejudicing existing or future Treaty settlements, and does not demonstrate a robust process for redress or avoidance of harm to Kāi Tahu interests. Overall, the current application and proposal approach is procedural rather than partnership-based, and does not meet the legal or ethical standards for strong consideration of Kāi Tahu values, rights, and interests in large-scale development proposals. This report acknowledges that the above is in part due to the absence of this CIA to inform the applicant team's work to date, and recognises that a partnership agreement is in motion at the time of this report.

## **1.5.2 Environmental Effects**

The application acknowledges that the development will result in the loss of six natural inland wetlands, the clearance of 0.9 hectares of indigenous vegetation, and the destruction of lizard habitat, with potential impacts on indigenous flora and fauna, including threatened species. While mitigation measures such as the planting of 19 hectares of indigenous vegetation, pest and weed management, and the enhancement of one remaining wetland are proposed, these actions are largely framed as offsetting the adverse effects rather than preventing them. The proposal also involves substantial earthworks, modification of ephemeral streams, and the installation of new infrastructure for water supply, wastewater treatment, and stormwater management, all of which carry risks of sedimentation, changes to hydrology, and potential impacts on water quality in Lake Wakatipu and surrounding ecosystems. The ecological report (found in Appendix C of the Application) states that the residential development should consider avoiding these wetlands and incorporating them into their reserve areas. All wetlands would benefit from enhancement actions such as indigenous plantings (around the wetland margin for the ephemeral wetlands), weed control and cattle exclusion.

In addition to direct ecological impacts, the proposal will alter the landscape character and visual amenity of the area, replacing open rural vistas with dense residential and commercial built form. The application acknowledges that the change from rural to urban character will have a high degree of adverse effects on landscape values, although it argues that these are justified by the site's identification as a "future urban area" in local planning documents. The development is designed to consolidate urban form and provide for housing supply, but it will also increase traffic volumes, place pressure on local infrastructure, and potentially affect recreational values and public access to natural areas. While the application includes measures to avoid, remedy, or mitigate adverse effects, such as staged construction, erosion and sediment control plans, and monitoring regimes, the overall environmental footprint of the proposal is substantial, and the long-term consequences for biodiversity, water quality, and landscape integrity remain uncertain.



**Figure 6: Locations of the Northern Creek and Middle Creek**



**Figure 7: Location of the Southern and Central Gullies/Channels**

## 2. Kāi Tahu and Kā Rūnaka Overview

The Queenstown Lakes District is a shared tribal authority area for seven Kāi Tahu Papatipu Rūnaka. These rūnaka, Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, Hokonui Rūnaka, Waihōpai Rūnaka, Te Rūnanga o Awarua, and Te Rūnanga o Ōraka Aparima, each hold mana whenua rights and responsibilities across the district. Collectively known as Kā Rūnaka, they work together to uphold rakatirataka and kaitiakitaka over the landscapes, waterways, and resources of the region. Their shared interests mean that any development or application within the Queenstown Lakes District, including this one for Homestead Bay, must recognise and respect the collective authority, cultural values, and aspirations of all seven rūnaka. This collaborative approach ensures that the cultural, spiritual, and historical significance of the land is protected and that mana whenua voices are central in shaping the future of the district. The seven rūnaka are geographically defined as below:

- **Te Rūnanga o Moeraki:** The takiwā of Te Rūnanga o Moeraki centres on Moeraki and extends from the Waitaki to the Waihemo and inland to the Main Divide. The interests of Te Rūnanga o Moeraki are concentrated on the Moeraki Peninsula area and surrounds, including Rakahineatea Pā, Koekohe and Te Kai Hīnaki with its boulders. In addition, the interests of the rūnaka extend north and south of the Moeraki Peninsula to the boundaries of their takiwā.
- **Kāti Huirapa Rūnaka ki Puketeraki:** The takiwā of Kāti Huirapa Rūnaka ki Puketeraki centres on Karitāne and extends from the Waihemo to Purehurehu, north of Heyward Point. Their interest extends inland to the Main Divide, sharing interest in the lakes and mountains to Whakatipu Waimāori.
- **Te Rūnanga o Ōtākou:** The coastal rūnaka takiwā of Te Rūnanga o Ōtākou centres on Ōtākou on the Otago Peninsula and extends from Purehurehu to Te Mata-au. The inland reaches of their takiwā includes shared interests in the lands and mountain to the western coast with rūnaka to the north and south.
- **Hokonui Rūnanga:** The takiwā of Hokonui Rūnanga centres on the Hokonui region and includes shared interests in the lakes and mountains between Whakatipu Waitai and Tawhititarere with other Murihiku rūnaka and those located from Waihemo south.
- **Waihōpai Rūnaka:** The takiwā of Waihōpai centres on Waihopai (Invercargill) and extends northwards to Te Matau, sharing an interest in the lakes and mountains to the western coast with other Murihiku Rūnanga and those located from Waihemo southwards. This means Waihōpai Rūnaka's area of interest includes significant parts of Southland and overlaps with other rūnaka in the wider Queenstown Lakes District.
- **Te Rūnanga o Awarua:** Te Rūnanga o Awarua centres on Awarua (near Bluff in Southland) and extends to the coasts and estuaries adjoining Waihōpai. It shares an interest in the lakes and

mountains between Whakatipu-Waitai and Tawhititarere with other Murihiku rūnanga and those located from Waihemo southwards. This means Awarua Rūnanga's area of interest includes significant coastal and inland areas of Southland, overlapping with other rūnanga in the wider Queenstown Lakes District.

- **Te Rūnanga o Ōraka Aparima:** Te Rūnanga o Ōraka Aparima centres on Ōraka (Colac Bay) and extends from Waimatuku to Tawhititarere. It shares an interest in the lakes and mountains from Whakatipu-Waitai to Tawhititarere with other Murihiku rūnanga and those located from Waihemo southwards. This means Ōraka Aparima's area of interest includes significant coastal and inland regions of Southland, overlapping with other rūnanga in the wider Queenstown Lakes District.

## 2.1 Kāi Tahu Tūhokoka / Whakapapa

Kāi Tahu are descended from the whakapapa lines of Waitaha, Kāti Māmoe and Kāi Tahu. Waitaha is used to describe, collectively, all the ancient indigenous groups who lived in Te Waipounamu prior to the migrations of Kāti Māmoe from Heretaunga in the early 17th century, and later the migration of Kāi Tahu. By the time Kāi Tahu arrived, Kāti Māmoe, through a combination of inter-marriage and conquest, had largely merged with the resident hapū of Waitaha and Kāti Māmoe. Kāi Tahu are bound to the whenua, wai and mauri, which is the inherent foundation of whakapapa. The following account of Kāi Tahu whakapapa and creation stories is sourced from the words of Rāwiri Te Mamaru, a rakatira of Moeraki in the mid-1800s following the death of the famed Kāi Tahu leader Matiaha Tiramōrehu.

## 2.2 Kāi Tahu History of Loss and Settlement

Te Tiriti o Waitangi was signed by representatives of Kāi Tahu whānui in late May and early June of 1840. Subsequently, between 1844 and 1864, Kāi Tahu agreed to a series of land sales with the Crown. The Crown defaulted on key elements of these agreements, resulting in widespread land alienation and economic deprivation for mana whenua.

By the time Te Tiriti o Waitangi was signed in 1840, Ngāi Tahu was no stranger to European ways. Kāi Tahu Rakatira signed Te Tiriti at Ōnuku, Ōtākou and Ruapuke Island. At the time, it was seen as a convenient arrangement between equals.

Kāi Tahu had its first contact with Pākehā sealers and whalers from around 1795. By the 1830s Kāi Tahu had built up a thriving industry supplying whaling ships with provisions such as pigs, potatoes and wheat. Shore stations were established from 1835 under the authority of local rakatira. Many Kāi Tahu women married whalers, and the tribe was no stranger to Europeans. When seven high-ranking southern chiefs signed Te Tiriti o Waitangi in 1840, it was seen as a convenient arrangement between equals. By 1849 when the Crown began defaulting on the terms of a series of ten major land purchases from 1844, earlier suspicions of the Crown's good faith by some of the rakatira were confirmed and the Ngāi Tahu Claim 'Te Kerēme' was born. The crown undertook to set aside adequate reserves to have been approximately



10% of the 34.5 million acres sold – but this was never done. There were also disputes over boundaries, and the Crown’s failure to establish schools and hospitals, as promised. In addition, the tribe lost its access to mahika kai and other sacred places such as urupā. Kāi Tahu made its first claim against the Crown for breach of contract in 1849.

The 1848 Kemp’s Deed was the largest of the Crown land purchases, comprising of 13,551,400 acres of which £2,000 was paid. Although the deeds promised a tenth of the land would be retained as reserves for Kāi Tahu, less than 6,500 acres were allocated within the footprint of the deed. Over time ancestral whenua were surveyed, sold and settled and it was increasingly difficult to follow kā ara tawhito and to access wāhi tipuna, and wāhi mahika kai. Changes in the ancestral landscape and the loss of mahika kai resources impacted Kāi Tahu hapū, contributing to the displacement of whānau, loss of mātauraka, identity and economic hardship. The loss of connection to the whenua that took place as a result of the Deeds, coupled with the visible deterioration, degradation and modification to lakes, rivers and waterways since that time is a source of great mamae for mana whenua. This is particularly true given the obligations of mana whenua as kaitiaki whenua in their takiwā.

## **2.3 Kā Rūnaka Strategic Documents**

### **2.3.1 Kāi Tahu ki Otago Natural Resource Management Act (2005)**

The Kāi Tahu ki Otago Natural Resource Management Plan 2005 is the principal resource management planning document for Kāi Tahu in the Otago region. The kaupapa of the plan is ‘Ki Uta ki Tai’ (Mountains to the Sea), which reflects the holistic Kāi Tahu philosophy underpinning resource management in Otago.

The plan is an expression of rakatirataka and kaitiakitaka, and expresses local Kāi Tahu values, knowledge, and perspectives on natural resource and environmental management issues. While the plan is first and foremost a planning document to assist Kāi Tahu in Otago in carrying out their kaitiaki roles and responsibilities, the plan is also intended to assist others in understanding Kāi Tahu values and policy.

The 2005 plan (**NRMP**) is divided into catchments, with specific provisions for the whole Otago area and for each catchment.

Relevant provisions of the NRMP require:

- Recognition of the spiritual and cultural significance of wai māori to Kāi Tahu.
- Reduction in contaminants being discharged directly or indirectly to water.
- Restoration of the mauri of wai māori and coastal waters.
- Rehabilitation of contaminated environments.

- Protection of wetlands.
- Protection of the habitats and wider needs of mahika kai and taoka species, and restoration and enhancement of indigenous biodiversity.
- Recognition and support for the rakatirataka and kaitiakitaka of Kāi Tahu in resource management, including through:
  - involvement in the development of monitoring programmes, and
  - recognition of rakatirataka by empowering mana whenua interpretation of their histories and associations with wāhi tūpuna.

## 2.3.2 Te Taki Haruru

Te Taki Haruru is Dunedin City Council's Māori Strategic Framework. Although this strategy is Ōtepoti (Dunedin) based, it is an example of partnership with mana whenua to guide a city's journey toward collective wellbeing and genuine partnership. More than just a strategy, Te Taki Haruru is a city-wide commitment to supporting all whānau in Ōtepoti to thrive, now and for future generations. Whilst this framework is centred in Ōtepoti, it demonstrates core values of those contributing rūnaka and their interests in built environment and infrastructure development kaupapa. It therefore contributes to the knowledge and framing of strategic Kāi Tahu aspirations.

The framework is grounded in te ao Māori and Kāi Tahu values, and is shaped by four pou that reflect Kāi Tahu language, mātauraka, and correct procedures or tikaka. It provides clear direction for aligning council efforts with Māori aspirations, ensuring these are actively supported through policy, planning, and delivery. Te Taki Haruru marks a shift from symbolic gestures to tangible action, embedding Māori wellbeing at the heart of Council's work and fostering enduring, meaningful relationships between local government, mana whenua, and the wider community.

Te Taki Haruru matrix is used to guide the programme's cultural alignment with Kāi Tahu leadership helping interpret and apply concepts like mana, mauri, tapu/noa and whakapapa to environmental planning. These frameworks help ensure that adaption strategies are holistic, intergenerational and place-based, reflecting the deep connection between Kāi Tahu and the whenua.

Kāi Tahu leadership is seen as essential for restoring and protecting the mauri of te taiao, especially in the areas of water management, wetland restoration and climate resilience. Their role includes advocating for regenerative practices, sustainable land use and culturally appropriate adaption measures. The evolving nature of the programme strategy reflects ongoing input from Kāi Tahu, ensuring that new mātauraka, cultural insights and community aspirations are continuously integrated.

There are four quadrants of Te Taki Haruru which guide the programmes integration of Kāi Tahu values.

- **Autūroa / Mana (Environmental Authority & Leadership)**
  - Focuses on Kāi Tahu leadership in environmental management
  - Emphasis mana whenua authority in decision making
  - Advocates for regenerative practices, sustainability and long-term stewardship of natural resources
  
- **Auora / Mauri (Life Force & Wellbeing)**
  - Centres on the mauri of the environment and community
  - Highlights the need to restore and protect the mauri of the wai, whenua and ecosystems
  - Links environmental health to intergenerational wellbeing and resilience
  
- **Autaketake / Tapu and Noa (Sacredness & Balance)**
  - Recognises spiritual and cultural relationships with the environment
  - Applies concepts like tapu and noa to guide respectful use and protection
  - Supports tools like rāhui to safeguard resources
  
- **Autakata / Whakapapa (Geneology & Connection)**
  - Emphasis whakapapa as a connector between people, land and water
  - Values intergenerational mātauraka, identity and pūrakau
  - Encourages maintaining cultural practices and relationships with place.

These quadrants collectively shape a holistic, culturally grounded approach that ensures that Kāi Tahu values are embedded in every stage of projects.

Kāi Tahu expect to participate and demonstrate upholding cultural traditions and ahi kā within the community. Through an effective Te Tiriti partnership. Kāi Tahu can participate and represent at local, regional and national government levels where they are actively connected in the management and processes to engage with the community, enable social equity and uplift mana.

Kāi Tahu expect ongoing work to occur that supports whānau to create regulations and management tools and influence policy and practices that ensure the protection of their cultural practices and values and restore a sense of cultural identity. These values stem from understanding the interconnectedness of the whakapapa of Kāi Tahu tuwhenua and the wai. Through a values-based framework grounded in respect for the mauri of te taiao, Kāi Tahu can effectively exercise rakatirataka, manaakitaka and kaitiakitaka.

## 2.3.3 Te Tangi a Taurira – The Cry of the People

TAMI to prepare

## 2.3.4 Āpiti Hono, Tātai Hono

Āpiti Hono, Tātai Hono is a foundational mana whenua document for the Southland and Otago regions, developed by the four Murihiku rūnanga (Waihōpai, Awarua, Ōraka Aparima, and Hokonui) to articulate their shared values, aspirations, and principles for engagement with local government and other partners. The phrase “Āpiti Hono, Tātai Hono” refers to the unbroken connections between people, place, and ancestry, and the document itself is grounded in whakapapa as a framework for understanding relationships and responsibilities. It provides guidance on how mana whenua perspectives, mātauranga, and tikaka should be recognised and embedded in decision-making, planning, and environmental management across the region. Āpiti Hono, Tātai Hono is a living expression of partnership, ensuring that the voices and rights of mana whenua are central to the region’s future.

Āpiti Hono Tātai Hono provides the appropriate context on which to define a workable scale to investigate the connections within landscape, both at the place in question and with the routes to get there. It’s a unique cultural landscape assessment model developed by Ngāi Tahu ki Murihiku. It replaces Western landscape models with a six-layered framework rooted in whakapapa and mātauranga Māori.

### Ira Atua (Timeless Layers)

- Waitatanga – Origins of the universe and whakapapa
- Atuatanga – Atua and their domains, guiding tikanga
- Ngā Tipua – Ancestors and primal forces shaping the land

### Ira Tangata (Human Timeframe Layers)

- Ngā Kākano (900-1840) – Settlement, adaption and identify formation
- Te Kēreme (1840 – 1997) – Colonisation, Treaty breaches and loss
- Te Ao Marama (1998 – present) – Post-settlement revitalisation and future aspirations.

All things are part of the unfolding of whakapapa. Humans are part of the continuum of life. There is only one sound in the universe – the unfolding of creation being played in infinite ways. In 1849 Matiaha Tiramōrehu, a renowned Ngāi Tahu tōhunga, defined creation as being the process by which the world was sung into existence. Whakapapa shows how all living things are progeny of creation. Nothing is separate. Relationships are mapped so that history, mythology, philosophy, spirituality, custom and mātauranga are organised, preserved and transmitted.



Tiramōrehu's understanding of creation's unfolding begins from the state of nothingness. In his manuscript he recites:

*Kei a Te Pō te tīmatanga mai o te waiatatanga o te Atua.  
Nā te Pō, ko Te Ao  
Nā te Ao, ko Te Ao Māramama  
Nā Te Ao Mārama, ko Te Ao Tūroa  
Nā Te Ao Tūroa, ko Te Kore Te Whiwhia  
Nā Te Kore Tē Whiwhia, ko Te Kore Tē Rawea  
Nā Te Kore Tē Rawera, ko Te Kore Te Tāmua  
Nā Te Kore Te Tāmua, ko Te Kore Te Mātua  
Nā Te Kore Te Mātua, ko Te Mākū  
Nā Te Mākū, ka noho I a Mahoronuiatea,  
Ka puta ki waho ko Raki*

The above describes that, from the vast ages of darkness comes the darkness of potential, and then the first ever glimmer of light, Te Ao. Next is the longstanding light, from which eventually emerges moisture, Te Mākū. In due course Mākū emerges and couples with Mahoronuiatea, from which came Rakinui personified father of the heavens and skies.

This example is a small excerpt from the larger manuscript which explains an unfolding continuum. Tiramōrehu presents a holistic view in which the whakapapa of people, land, sky, the natural world and the supernatural world align. All are connected and all hold an energy and life essence.

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## 3. Cultural Values and Interests

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This Cultural Values and Interests Statement affirms the enduring relationship of Kāi Tahu with the lands, waters, and ecosystems surrounding Homestead Bay, Kawarau Mauka, Te Whakatipu waimāori and the wider Queenstown Lakes District. It acknowledges the whakapapa that binds Kāi Tahu to this place, and the intergenerational responsibilities to uphold mahika kai, protect wāhi tīpuna, and ensure the wellbeing of both people and environment.

The statement is grounded in a holistic worldview that sees land, water, and community as interconnected and inseparable. It seeks to embed Kāi Tahu values such as mauri, kaitiakitaka, and whakapapa into planning, development, and environmental management. This document recognises Kāi Tahu rakatirataka and the right to participate meaningfully in shaping the future of the district, calling for genuine partnership, protection of cultural heritage, and proactive inclusion of mātauraka Kāi Tahu in governance and design.

This is a living statement that supports the aspirations of mana whenua and ensures their voices, values, and rights are central to the district's growth and sustainability. It is intended to guide culturally responsive engagement and decision-making for the proposed Homestead Bay development.

Homestead Bay, as part of the Whakatipu Waimāori area, holds immense cultural and spiritual significance for mana whenua. Generations of Kāi Tahu history and ancestral knowledge are embedded in the landscape. Kāi Tahu taoka are interwoven throughout the region, including ancestral mauka, awa, roto tīpuna, wāhi mahika kai, and ara tawhito. These features not only reflect the enduring connection of Kāi Tahu to the land but also embody a richness of heritage and identity.

Historically, kāika (settlements) were located along the shores of Whakatipu Waimāori and throughout the wider region. The area is interwoven with ara tawhito (traditional travel routes) that connected coastal and inland settlements, linking people to wāhi tīpuna and mahika kai resources, including pounamu.

### 3.1 Mana Wai Māori & Te Mana o Te Whenua

In Te Ao Māori both whenua and wai are regarded as living entities, each possessing their own mauri, or life force. The relationship Kāi Tahu have with both land and water is deeply spiritual and ancestral, rooted in whakapapa that connects people, land, and water back to the atua and the creation of the world. Where land and water meet, such as at riverbanks, wetlands, lakeside and coastal margins, there is a profound intersection of mauri. This meeting point is not just a physical boundary but a dynamic space where the mauri of the land and the mauri of the water interact, intertwining to create the unique mauri of that place. Homestead Bay exists at one of these areas of intersection, and this is further enhanced by the mauri of Kawarau Mauka which can be felt across these lands. The health and vitality of these transitional zones are seen as essential to the wellbeing of the wider environment and the

people connected to it. Kāi Tahu understand that if the mauri of either land or water is diminished, the mauri of the whole place is affected, underscoring the holistic responsibility of kaitiakitaka to care for both. As expressed in the whakataukī: “Ka ora te wai, ka ora te whenua, ka ora te whenua, ka ora te takata”. If the water is healthy, the land will be nourished; if the land is nourished, the people will thrive. This interconnectedness is central to Kāi Tahu values and guides how land and water are managed, especially where they meet. This sits at the puku of Kā Rūnaka thinking regarding this proposal for Homestead Bay. The loss of six natural inland wetlands, the clearance of indigenous vegetation and the distribution of tapu and paru human wastewater, regardless of treatment levels, into these lands and waters deeply disrupts the mauri of this place.

Wai māori (freshwater) plays a significant role in Kāi Tahu spiritual beliefs and cultural traditions. It holds mauri, the life force that sustains all living things, and is central to the wellbeing of people, ecosystems, and the wider environment. The protection of wai māori is essential to uphold the mana of the natural world and ensure its vitality for future generations. Kaitiakitaka is a core responsibility of mana whenua, requiring the protection and restoration of ecosystems that support mahika kai, ensuring these practices and their mātauraka endure for future generations.

The whenua is not just a physical resource but is seen as a living entity, carrying ancestral memory and connecting people to their whakapapa, history, and identity. For Kāi Tahu, the landscape is like a book, with names, stories, and traditions embedded in the land reflecting the depth of activity and association mana whenua have with their whenua. The protection and stewardship of land are central responsibilities, guided by values that ensure that the wellbeing of both people and environment is upheld for current and future generations. The enduring connection to land is a cornerstone of cultural, spiritual, and intergenerational identity for Māori

## 3.2 Central Whenu/Threads

**Mana:** refers to the inherent authority, prestige, and spiritual power derived from whakapapa, connection to place, and the fulfilment of responsibilities. The possession of mana means that mana whenua has the inherited authority to make decisions over the whenua and waterbodies within their takiwā. Mana is expressed through kaitiakitaka and maintained through protection and restoration of wāhi tapu, wāhi tīpuna, and mahika kai.

**Mauri:** is the intrinsic life force present within all elements of the natural world. It reflects the health and vitality of ecosystems and communities. Protection of mauri is closely linked to kaitiakitaka. The mauri of the whenua is central to Kāi Tahu wellbeing and identity, as part of a sacred relationship with Papatūānuku.

**Whakapapa:** affirms the living genealogy of people and the continuity of past, present, and future. It is through whakapapa that identity, belonging, and responsibility are established. Recognising whakapapa is essential to understanding the depth of Kāi Tahu relationships with the environment and the significance of wāhi tīpuna.

**Tapu and Noa:** Tapu and noa are fundamental concepts in te ao Kāi Tahu. They guide how people, places, and resources are protected and respected. These principles ensure that procedures and protocols are culturally safe, environmentally responsible, and future-focused, particularly in relation to wāhi tapu, archaeological sites, taoka, and associated knowledge.

**Tikaka and Kawa:** Tikaka refers to the customary values, protocols, and practices that guide Kāi Tahu whānui in their relationships with people and the environment. Upholding tikaka ensures that interactions with the environment are carried out in a way that respects ancestral knowledge, sustains cultural integrity, and supports the wellbeing of current and future generations.

**Ki Uta Ki Tai:** from the mountains to the sea, is a Kāi Tahu philosophy which upholds the values and beliefs of mana whenua and recognises their role as kaitiaki. This recognises how every part of the natural system, from alpine streams to coastal waters, is connected. For the Homestead Bay development, there are crucial responsibilities that must be upheld regarding Ki Uta Ki Tai, as all actions taken here in the headwaters have flow on effects for every piece of whenua that is touched by the waters that come from this lake, and every Kāi Tahu community that interacts with those lands and waters downstream.

### 3.3 Overarching Kāi Tahu Interests in Homestead Bay

#### Cultural:

- Rakatirataka is upheld, ensuring Kāi Tahu perspectives are acknowledged and voices have influence in decision-making over their lands, waters, and resources.
- Intergenerational transmission of knowledge, values, and cultural practices is supported.
- Kāi Tahu identity, history, and values are reflected and celebrated in the environment and community.
- Developments contribute to long-term cultural sustainability, with cultural monitoring and kaitiakitaka roles embedded in projects.

#### Social:

- Kāi Tahu whānui are supported to live in ways that reflect their identity, values, and aspirations.
- Whānau have access to housing that keeps them connected to ancestral lands and communities.
- Opportunities in education and employment strengthen whānau resilience and self-determination.
- Initiatives that enable whānau to access, live, and thrive on their whenua are supported.

#### Economic:

- Kāi Tahu actively participate in and lead regional economic development, contributing to a thriving regional economy that reflects Kāi Tahu values.



- Partnerships with Kāi Tahu entities in procurement, investment, and innovation opportunities are prioritised.
- Whānau and hapū enterprises aligned with cultural and environmental values are supported.

#### **Environmental:**

- Kāi Tahu mātauraka is embedded in environmental planning, monitoring, and restoration.
- The health of wai māori and whenua is prioritised as foundational to development.
- Indigenous ecosystems are protected and restored to support biodiversity.
- Low-impact, sustainable infrastructure is encouraged, aligned with Kāi Tahu environmental ethics.
- Mauri is upheld as a measure of environmental health, with regenerative practices integrated into project design and delivery.

### **3.4 Baseline Expectations for Culturally Responsive Development**

To uphold the cultural values and responsibilities outlined in this statement, the following are provided to guide development in a way that respects and reflects Kāi Tahu expectations:

- Maintain ongoing, meaningful engagement with mana whenua throughout planning, development, and implementation.
- Embed Kā Rūnaka representatives in the project teams to support ongoing monitoring of environmental and cultural impacts and impact mitigation.
- Prevent further degradation of mauri, particularly of wai māori and whenua, through careful planning and impact mitigation in collaboration with Kā Rūnaka representatives.
- Support ecological restoration initiatives where appropriate to uphold and enhance mauri of the environment.
- Protect known and potential archaeological sites, ensuring appropriate cultural monitoring and protocols are in place.
- Incorporate cultural interpretation elements, such as signage and storytelling, to share Kāi Tahu narratives and enhance public understanding of cultural heritage.
- Ensure that all consultants and contractors working within the takiwā demonstrate cultural competency and integrate Kāi Tahu values meaningfully into their engagement.

## 4. Te Tiriti o Waitangi Impact Assessment

Te Tiriti o Waitangi, signed in 1840, is Aotearoa's founding constitutional document, establishing a relationship between Iwi Māori and the Crown. While the Treaty itself is not directly enforceable in law unless incorporated by statute, its "principles" have been developed through legislation (notably the Treaty of Waitangi Act 1975), Waitangi Tribunal findings, and judicial interpretation. Key legal terms and concepts:

- **Kāwanataka (governance):** The right of the Crown to govern.
- **Tino rakatirataka (chieftainship, self-determination):** The right of Māori to exercise authority over their own affairs.
- **Taoka (treasures):** Encompasses tangible and intangible resources, including land, waters, language, and culture.
- **Partnership:** The Crown and Māori are to act reasonably and in utmost good faith towards each other.
- **Active protection:** The Crown must actively protect Māori interests.
- **Redress:** The Crown must provide remedies for past breaches.
- **Participation:** Māori must be enabled to participate in decision-making affecting their interests.

Partnership, protection and participation are widely cited as core principles of Te Tiriti, and the Waitangi Tribunal and courts have articulated additional principles, including redress, mutual benefit, and the duty to consult. The Resource Management Act 1991 (RMA) and related statutes require decision-makers to "take into account" the principles of the Treaty. The Fast Track Approvals Act 2024 (FTAA) does not override Treaty obligations; rather, it must be interpreted consistently with them.

### 4.1 Consistency with Te Tiriti o Waitangi Principles

#### 4.1.1 Recognition of Māori Interests and Statutory Acknowledgements

The Application acknowledges that the site is within the takiwā of Kāi Tahu, with seven Papatipu Rūnaka asserting kaitiakitaka, and that Whakatipu Waimāori/Lake Wakatipu is a Statutory Acknowledgement Area under the Ngāi Tahu Claims Settlement Act 1998. The Application references the cultural,

historical, and ecological significance of the area to Kāi Tahu, including mahika kai, wāhi tapu, and traditional settlement patterns.

The Application demonstrates an awareness of the statutory context and the need to recognise Māori interests. However, legal compliance requires more than acknowledgment; it requires substantive engagement and protection of those interests.

### **4.1.2 Partnership and Consultation**

The Application states that pre-lodgement consultation was undertaken with Aukaha and Te Ao Marama Inc (representing the relevant Rūnaka), and that further engagement is ongoing. It references the intention to incorporate Kāi Tahu narratives and design elements into reserve and landscape design, and to collaborate on water quality monitoring, plant supply, and housing development.

The principle of partnership imposes a duty of good faith, reasonableness, and engagement. Engagement must be genuine, early, and capable of influencing outcomes. The Application provides evidence of preliminary consultation, not engagement, and does not specify the outcomes of that consultation or how Kāi Tahu input has materially influenced the proposal. The process agreement with Rūnaka is noted but not detailed.

The Application should provide a transparent record of consultation and engagement, including issues raised by mana whenua, responses provided, and how those have been incorporated into the design, mitigation, and monitoring frameworks. The Crown (and its agents) must ensure that engagement is not a mere formality but a substantive process.

### **4.1.3 Active Protection of Māori Interests**

Active protection requires the Crown (and, by extension, those exercising statutory powers) to take positive steps to safeguard Māori interests, including taoka and the environment. The Application's ecological and cultural mitigation measures are positive but must be assessed for adequacy and enforceability.

The Application should include binding conditions, not merely aspirations, for the protection and enhancement of taoka, including:

- Design input and co-management of ecological restoration and monitoring with mana whenua;
- Legal mechanisms for ongoing Kāi Tahu involvement in governance of reserves, water, and biodiversity;
- Explicit recognition of Kāi Tahu values in all management plans and application conditions.

#### **4.1.4 Participation and Decision-Making**

The Application proposes opportunities for Kāi Tahu participation in reserve design, place naming, and monitoring. However, it does not specify Kāi Tahu involvement in ongoing governance or decision-making for the development or its infrastructure.

The principle of participation requires that Kāi Tahu are enabled to participate in decisions affecting their interests, not merely consulted. This includes involvement in governance, management, and monitoring of resources.

The Application should provide for:

- Kā rūnaka representation on governance bodies for reserves, infrastructure, and environmental management;
- Joint decision-making or co-management arrangements where appropriate;
- Resourcing for Kā Rūnaka participation.

#### **4.1.5 Redress and Avoidance of Prejudice**

The Application does not identify any direct redress for historical or contemporary Treaty breaches, nor does it address how the development will avoid prejudicing existing or future Treaty settlements.

The Crown must not act in a manner that prejudices Kāi Tahu rights or undermines redress processes. The proposal must be consistent with existing settlements and not foreclose future claims.

The Application should include a legal assessment of potential impacts on Treaty settlements and ensure that no part of the development prejudices redress or existing rights.

#### **4.1.6 Protection of Taoka and Tino Rakatirataka**

The Application references the protection of taoka (including wetlands, indigenous flora and fauna, and water bodies) and acknowledges tino rakatirataka. However, the mechanisms for Kā Rūnaka control or shared authority over taoka are not specified.

The principle of tino rakatirataka requires Kāi Tahu authority over their resources and taoka. This may require shared or delegated management, not merely consultation.

The Application should provide for:

- Co-management or delegated authority for taoka identified by Kā Rūnaka as mana whenua;
- Recognition of Kāi Tahu environmental management frameworks (e.g., mātauraka related practices, tikaka, rāhui).

## 4.2 Te Tiriti Expectations

The Application demonstrates an awareness of Te Tiriti o Waitangi principles and makes positive commitments to ecological and cultural outcomes. However, to meet the legal standards established by New Zealand law, the Application must move beyond acknowledgment and consultation to substantive partnership, active protection, and participation. This requires binding mechanisms for Kāi Tahu involvement via Kā Rūnaka as mana whenua, in governance, management, and monitoring, and a clear demonstration that Kāi Tahu interests and rights under Te Tiriti are not only recognised but upheld.

It is recommended that the follow occur, to align the Application with best practice:

1. **Strengthen consultation and engagement records:** Provide a detailed account of engagement with mana whenua, including issues raised and how they have been addressed.
2. **Embed Kā Rūnaka participation:** Establish formal mechanisms for mana whenua involvement in governance, management, and monitoring.
3. **Ensure active protection:** Make ecological and cultural mitigation measures binding and co-designed with mana whenua.
4. **Protect redress:** Undertake a legal review to ensure no prejudice to Treaty settlements or future claims.
5. **Recognise tino rakatirataka:** Provide for co-management or delegated authority over taoka where appropriate.



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## 5. Cultural Impact Assessment

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The Homestead Bay Fast Track Application, prepared by Remarkable Planning Limited for RCL Homestead Bay Limited, proposes a large-scale, master-planned development at the southern end of Queenstown's Te Tapuae Southern Corridor. While the proposal aims to address housing shortages and deliver economic, social, and environmental benefits, it also presents significant cultural impacts, particularly for Kāi Tahu, as mana whenua in this takiwā. The development sits within a landscape of deep ancestral, spiritual, and historical significance, and its scale and nature raise complex questions about the protection of cultural values, rights, and interests. The following summary outlines key cultural impacts anticipated as a result of the proposal, drawing on the detailed assessment provided in the report.

### **Kāi Tahu Authority and Partnership**

The proposal does not currently provide for substantive Kāi Tahu partnership in decision-making, governance, or ongoing management of the development. While there is acknowledgment of Kāi Tahu as mana whenua and some consultation, the process has been largely procedural rather than partnership-based. This undermines rakatirataka and fails to meet both legal and ethical standards for upholding Te Tiriti o Waitangi, risking the marginalisation of Kāi Tahu voices in shaping the future of their ancestral lands.

### **Loss of Mauri and Disruption of Ancestral Relationships**

The development will result in the loss of six natural inland wetlands, clearance of indigenous vegetation, and the introduction of treated wastewater, urban stormwater and sedimentation from earthworks into the environment (including a sensitive lake catchment). These actions alone disrupt the mauri of the land and water, which are central to Kāi Tahu identity and wellbeing. Wider disruptions to mauri and ancestral relationship also extend beyond these specific examples. The interconnectedness of land, water, and people is a foundational value, and any diminishment of mauri is seen as a direct impact on the spiritual and physical health of both the environment and the community.

### **Insufficient Protection of Taoka and Cultural Heritage**

While the application references the protection of taoka (including wetlands, flora, fauna, and water bodies), the mechanisms for ensuring Kāi Tahu control or shared authority over these resources are weak or absent. There is limited provision for co-management, delegated authority, or ongoing Kāi Tahu participation in environmental monitoring, reserve management, or infrastructure governance, risking the erosion of cultural heritage and traditional knowledge.

### **Embedding of Mātauraka Kāi Tahu and Tikaka**

The proposal does not meaningfully embed mātauraka Kāi Tahu or tikaka into its management plans or project design. This limits the ability of Kāi Tahu to exercise kaitiakitaka and to ensure that development is aligned with cultural values, intergenerational responsibilities, and holistic environmental stewardship.

### **Potential Prejudice to Treaty Settlements and Redress**

The application does not address how the development will avoid prejudicing existing or future Treaty settlements, nor does it provide for redress in the event of harm to Kāi Tahu interests. This omission risks undermining the integrity of past and future settlements and fails to provide assurance that Kāi Tahu rights will be actively protected.

### **Loss of Access to Mahika Kai and Wāhi Tīpuna**

The transformation of the landscape from rural to urban, along with the loss of wetlands and indigenous habitats, threatens Kāi Tahu access to mahika kai and wāhi tīpuna sites. These places are central to cultural identity, knowledge transmission, and the ongoing practice of traditional customs, and their loss represents a significant cultural impact.

### **Inadequate Cultural Interpretation and Public Understanding**

Although the proposal mentions the potential for cultural interpretation elements such as signage and storytelling, there is little evidence of a robust plan to share Kāi Tahu narratives or enhance public understanding of the area's cultural heritage. Without meaningful interpretation, the opportunity to foster respect, education, and connection between new residents, visitors, and the land's history is diminished.

### **Limited Opportunities for Kāi Tahu Social and Economic Participation**

The proposal does not clearly articulate pathways for Kāi Tahu whānau to access housing, employment, or economic opportunities within the development. Nor does it prioritise partnerships with Kāi Tahu entities in procurement, investment, or innovation. This limits the potential for the development to contribute to Kāi Tahu social and economic aspirations, self-determination, and resilience.

It is essential that the social and economic interests of Kā Rūnaka are meaningfully recognised and embedded within the planning and delivery of housing outcomes in the Homestead Bay development. For Kāi Tahu and Kā Rūnaka, access to affordable housing is not merely a policy preference, it is a fundamental socio-economic priority that underpins whānau wellbeing, intergenerational equity, and the ability of mana whenua to remain connected to their ancestral landscapes.

The ongoing housing crisis in the Queenstown Lakes District has disproportionately impacted Kāi Tahu whānau, many of whom face significant barriers to securing affordable, secure, and appropriate housing within their takiwā. As such, Kā Rūnaka seek opportunities that provide mechanisms, such as exclusivity or a right of first refusal, on affordable housing allocations prior to their release to the private market or third-party providers like the Queenstown Lakes Community Housing Trust. Such arrangements would

not only support the retention and return of Kāi Tahu whānau to their whenua but also represent a tangible expression of Tiriti-based partnership and the recognition of Kā Rūnaka as Treaty partners with enduring rights and responsibilities in the region. Embedding these opportunities into the development framework would demonstrate a commitment to equitable outcomes and uphold the mana of Kā Rūnaka in shaping the future of their takiwā.

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## 6. Conclusion

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The Homestead Bay Fast Track Application represents a pivotal moment for both the Queenstown Lakes District and Kāi Tahu as mana whenua. The proposal's scale and ambition offer the potential for significant economic, social, and environmental benefits, particularly in addressing the region's acute housing needs and supporting long-term growth. However, the assessment has identified that these benefits come with substantial cultural costs, particularly for Kāi Tahu. The anticipated impacts, ranging from the loss of wetlands and indigenous habitats, and adverse effects of significant development and urbanisation in a sensitive lake catchment to the erosion of mana whenua authority and the weakening of cultural relationships with the land, underscore the need for a more robust, partnership-based approach that genuinely upholds Te Tiriti o Waitangi and Kāi Tahu values.

To move forward in a way that is both sustainable and just, it is essential that the proposal evolves beyond procedural consultation to embrace genuine partnership, active protection, and meaningful participation for Kāi Tahu. Embedding mātauraka Kāi Tahu, co-management arrangements, and binding commitments to cultural and ecological restoration will be critical to mitigating adverse impacts and ensuring that development enhances, rather than diminishes, the cultural, spiritual, and environmental wellbeing of the area. Only through such an approach can the aspirations of both the wider community and mana whenua be realised, creating a legacy of respect, resilience, and shared prosperity for generations to come.