

4 June 2026

Environmental Protection Authority
Privet Bag 63002
Wellington 6140
NEW ZEALAND

Teena koe

WAIKATO THOROUGHBRED RACING GREENFIELD RACING HUB – REFERRAL APPLICATION

1. These comments are provided on behalf of Te Whakakitenga o Waikato Incorporated (Waikato-Tainui).
2. Te Whakakitenga o Waikato Incorporated is the governing body for the 33 hapuu and 68 marae of Waikato and manages the tribal assets for the benefit of over 97,000 registered tribal members. It is also:
 - a) the trustee of the Waikato Raupatu Lands Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato Raupatu Lands Deed of Settlement 1995 and the Waikato Raupatu Claims Settlement Act 1995;
 - b) the trustee of the Waikato Raupatu River Trust, the post-settlement governance entity for Waikato-Tainui for the purposes of the Waikato-Tainui River Deed of Settlement 2009 and the Waikato Raupatu Claims (Waikato River) Settlement Act 2010 (River Settlement);
 - c) the mandated iwi organisation for Waikato-Tainui for the purposes of the Maaori Fisheries Act 2002; and
 - d) the iwi aquaculture organisation for Waikato-Tainui for the purposes of the Maaori Commercial Aquaculture Claims Settlement Act 2004.
3. Waikato-Tainui welcomes the opportunity to comment on the Waikato Thoroughbred Racing Greenfield Racing Hub Extension Fast Track application.

WAIKATO-TAINUI COMMENTS

4. The applicant identifies Maaori interests associated with the project and confirms that engagement has been undertaken with Waikato-Tainui affiliated mana whenua, including Ngaati Hauaa and Ngaati Koroki Kahukura. It is noted that Cultural Impact

Assessments are intended to be completed and provided at the substantive stage should the application be accepted into the Fast-Track process.

5. The referral material identifies a wide range of potential environmental effects relevant to Maaori values, including effects on highly productive land, indigenous biodiversity, freshwater systems, archaeological sites, and wider landscape modification. These matters are appropriately identified at a scoping level for the purposes of referral.
6. In particular, the presence of an identified archaeological site (including Maaori horticultural soils and borrow pits), and the proposed partial disturbance of this area, is noted as a matter of cultural significance. While the applicant proposes retention and covenanting of part of the site, further detail will be required at substantive stage regarding the extent of effects and long-term protection mechanisms.
7. The application also identifies potential effects on indigenous biodiversity, including a remnant Kahikatea stand with ecological and habitat value for native fauna, and proposes mitigation through ecological management plans, buffers, and staged design responses. These matters are appropriately flagged at referral stage, however their effectiveness and enforceability will require further detailed assessment.
8. It is noted that freshwater systems on the site are described as artificial watercourses, with limited ecological value, and that effects are proposed to be managed through fish and ecological management plans. This characterisation will require further testing should the application proceed, particularly in relation to downstream receiving environments and cumulative effects.
9. The proposal includes a significant change in land use over a large area of highly productive land (HPL), including LUC 1–3 soils. While the applicant provides a rationale based on regional economic benefits and the relocation of existing racing infrastructure, the loss of productive capacity remains a relevant matter of significance to Maaori interests and will require careful consideration in any substantive assessment.
10. It is also noted that a range of detailed management plans (including ecological, archaeological, contaminated land, transport, noise, and construction management plans) are not yet fully developed and are intended to be prepared at substantive stage. While this is consistent with the staged nature of the Fast-Track process, these will be critical to understanding effects and mitigation outcomes.
11. Overall, the referral material identifies the key environmental and cultural effects at a high level and provides sufficient information to understand the general nature of the proposal and its interface with Maaori interests. Engagement with mana whenua has commenced and is ongoing, however Cultural Impact Assessments and detailed cultural effect analysis are yet to be completed.

OVERALL POSITION

12. Waikato-Tainui does not take a final position on the proposal at the referral stage. However, we consider that the matters identified above are of significance to Maaori

interests and will require further detailed assessment should the project be accepted into the Fast-Track process.

13. In particular, further consideration would be required in relation to:

- effects on sites of cultural and archaeological significance, including Maaori horticultural soils and borrow pits;
- loss and modification of highly productive land and associated landscape change;
- effects on indigenous biodiversity, including long-tailed bat habitat and the Kahikatea stand;
- cumulative effects associated with large-scale land use change and infrastructure consolidation; and
- adequacy, enforceability, and long-term effectiveness of proposed mitigation and management plans.

14. Waikato reserves its position pending further information, including completion of Cultural Impact Assessments and ongoing engagement with mana whenua. While such material is not required at referral stage under the Fast-Track legislation, it is considered preferable that cultural assessments and engagement outcomes are available as early as practicable to appropriately inform decision-making.

Naaku i roto i ngaa mihi, naa

A handwritten signature in cursive script, appearing to read "T Mapu".

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI