



NGĀTI RANGIWEWEHI POSITION STATEMENT

CALAND HOLDINGS LIMITED – Fast-track Approvals Act 2024

Applicant: Stuart Milsom, Caland Holdings Limited
Location: 66 and 70 McFetridge Drive & 89 Tauranga Direct Road, Hamurana
Date: 18 June 2026
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1. INTRODUCTION

Te Maru o Ngāti Rangiwewehi acknowledges receipt of notification and associated materials relating to Caland Holdings Limited's intention to lodge a referral application under the Fast Track Approvals Act 2024 (FTAA) for the proposed Milbrow Estate rural residential subdivision at McFetridge Drive, Hamurana.

Ngāti Rangiwewehi holds mana whenua status across the rohe within which the proposal is situated, including areas connected to the Awahou Stream, Pekehāua Puna, and the wider Lake Rotorua groundwater catchment. These environments are recognised as culturally significant and are part of an interconnected hydrological system that is fundamental to the identity, wellbeing, and ongoing responsibilities of Ngāti Rangiwewehi under tikanga and as affirmed through Treaty settlement legislation.

This position statement sets out Ngāti Rangiwewehi's preliminary views on the referral application material provided to date. It identifies key matters of concern relating to the scale and intensity of the proposed development, the associated groundwater abstraction, and the potential for cumulative effects on culturally significant freshwater systems. In particular, it highlights the need for robust assessment of hydrogeological connectivity, sustainable water allocation, and alignment with planning frameworks that seek to manage growth and protect the environmental capacity of the catchment.

Ngāti Rangiwewehi notes that while the proposal is framed as rural residential development, the scale of approximately 91–92 lots represents a level of intensification that introduces significant demand on groundwater resources within a sensitive and interconnected aquifer system. This raises important questions regarding both the sustainability of the proposed water take and the precedent such development may establish within the rohe.

This statement seeks to ensure that the relationship of Ngāti Rangiwewehi with the environment—particularly freshwater systems—is appropriately recognised, and that any future consideration of the proposal is informed by a comprehensive, precautionary, and integrated assessment of both environmental and cultural effects.

The following documents and reports were reviewed to inform this position statement:

- Fast Track Approvals Referral Application material prepared by Sigma Consultants Limited for Caland Holdings Limited (Milbrow Estate Development).
- Hydrogeological Assessment (Appendix L) and associated groundwater testing information.
- Cultural Impact Assessment and supporting correspondence prepared in relation to the proposal.
- Additional technical commentary provided by Ngāti Rangiwewehi advisors in relation to groundwater demand, hydrogeological connectivity, and environmental effects.

Please note: The applicant refers to “Taniwha Springs”; however, Ngāti Rangiwewehi recognises these springs by their original ancestral name, Pekehaua, which reflects their cultural identity, whakapapa, and associated narratives. Throughout this document, Ngāti Rangiwewehi refers to the springs as Pekehāua Puna, reflecting their original ancestral name and cultural significance.

2. THE PROPOSAL

The application seeks approval for the subdivision of approximately 83 hectares of land at McFetridge Drive, Hamurana, to enable the development of approximately 91–92 rural residential allotments, together with associated infrastructure and servicing.

The proposal includes the establishment of internal roading networks, building platforms, and supporting infrastructure, as well as the provision of stormwater management systems, potable water supply, and connection to reticulated wastewater services. Earthworks are proposed to facilitate site development, with staging anticipated over a number of years.

Water supply for the development is proposed to be achieved through groundwater abstraction from an existing deep bore on site, with a maximum take of approximately 3.3 litres per second. This supply is intended to service domestic use across the subdivision, in addition to meeting storage and system requirements associated with the development.

Stormwater management is proposed through a combination of on-site attenuation, soakage, and treatment systems designed to maintain pre-development flow characteristics. Wastewater servicing is intended to be provided via connection to the Rotorua Lakes Council reticulated network.

The proposal also incorporates landscape treatments, including vegetation planting within gullies and around wetland areas, alongside the retirement of portions of the site from active pastoral use.

3. CULTURAL NARRATIVE – HE KŌRERO TUKU IHO

The subject site at McFetridge Drive, Hamurana sits within the rohe of Ngāti Rangiwehewhi and forms part of a wider ancestral cultural landscape shaped through whakapapa, tikanga, and long-standing relationships with whenua and wai. Ngāti Rangiwehewhi descend from Rangitihi and maintain enduring responsibilities as kaitiaki for the lands and waters of this area, including the Te Wai Mimi ō Pekehāua/Awahou Stream, Pekehāua Puna/ Taniwha Springs, and the wider Lake Rotorua groundwater catchment.

The Awahou Stream and associated spring systems are not only physically interconnected, but are also understood through cultural narratives that speak to the living presence of these waters. These include the association of Pekehāua, a taniwha recognised as a kaitiaki of the spring systems. Such narratives reinforce the understanding that the puna and groundwater systems are living entities with their own mauri, requiring respect and protection. For Ngāti Rangiwehewhi, these cultural associations are not symbolic; they reflect the obligation to ensure that the integrity and flow of these waters are maintained and not diminished through activities that alter groundwater systems or flows.

These relationships are recognised through the Ngāti Rangiwehewhi Claims Settlement Act 2014, which affirms the historical association of Ngāti Rangiwehewhi with its ancestral lands and waterways and acknowledges the importance of restoring the ability to exercise rangatiratanga and kaitiakitanga. The settlement reflects the Crown's recognition that the disconnection of iwi from their whenua and wai has had enduring effects, and it reinforces the responsibility of Ngāti Rangiwehewhi to actively protect the mauri of natural resources within its rohe.

For Ngāti Rangiwehewhi, this area is not an isolated site, but part of a living cultural landscape where values are embedded across the whenua and not confined to identified or recorded locations. Cultural values are expressed through the relationships between people, place, and resources, and these relationships persist regardless of the level of modification that has occurred through pastoral or other land uses.

A defining characteristic of this landscape is its reliance on groundwater systems that sustain puna and surface waters. From a mātauranga Māori perspective, groundwater is not an unseen or disconnected resource; it is part of a continuous and interconnected system of wai flowing from upland recharge areas through to springs, streams, and ultimately to Lake Rotorua. Pekehāua Puna and Awahou Stream are taonga, valued for their mauri, their quality, and their role in sustaining cultural practices, mahinga kai, and the identity of Ngāti Rangiwehewhi.

The significance of these freshwater systems is reinforced within the Te Arawa Lakes Settlement framework, which acknowledges the cultural importance of the Rotorua lakes and associated waterways and establishes shared responsibility for their protection and restoration. Within this context, it is

understood that groundwater inputs to the lake, including those feeding puna and tributary systems, are critical to maintaining the health of the wider catchment.

Ngāti Rangiwewehi considers that the health of wai must be understood through a ki uta ki tai approach, recognising the interconnectedness of all parts of the catchment. Effects occurring within groundwater systems may not be immediate or visible, and may occur over extended timeframes. However, from a cultural perspective, such effects are no less significant simply because they are not immediately apparent. Changes to groundwater systems have the potential to influence spring flows, water quality, and the mauri of receiving environments over time.

While the site has been subject to pastoral modification, this does not diminish its cultural significance or reduce Ngāti Rangiwewehi responsibilities. Cultural values remain present and active within the landscape, including the potential for wāhi tapu and wāhi tūpuna to exist whether formally recorded or not. Reliance on the absence of mapped cultural sites is not considered an appropriate basis for assessing cultural effects, and presents a risk of inadvertent harm.

Ngāti Rangiwewehi has consistently stated through its Cultural Impact Assessments and Iwi Management Plan that the protection of freshwater mauri, recognition of interconnected systems, and consideration of cumulative and intergenerational effects are fundamental to the exercise of kaitiakitanga. Activities that introduce increased pressure on groundwater systems must therefore be carefully assessed, particularly where there is uncertainty regarding connectivity to culturally significant water bodies.

The proposed development introduces both intensification of land use and increased reliance on groundwater abstraction within a sensitive and interconnected system. From a Ngāti Rangiwewehi perspective, the combination of these factors raises concerns not only about direct effects, but also about the potential for cumulative impacts on groundwater-fed systems, including Pekehāua Puna. Where uncertainty exists, particularly within complex volcanic aquifers with long response times, a precautionary approach is required.

The obligations affirmed through Treaty settlement, together with tikanga and mātauranga Māori, require that development does not compromise the mauri of freshwater systems or the ability of Ngāti Rangiwewehi to exercise kaitiakitanga into the future. Once impacted, groundwater systems and spring environments may take generations to recover, if at all.

Accordingly, Ngāti Rangiwewehi considers that this proposal must be understood within the full context of a connected cultural, environmental, and hydrological landscape, and that any potential effects on groundwater and spring systems must be robustly assessed and resolved with certainty. The protection of Pekehāua Puna, the Awahou Stream, and the wider aquifer system remains a matter of fundamental importance.

3.1 Ngāti Rangiwarehe Principles for the Protection of the Mamaku Aquifer and Pekehāua Puna

Ngāti Rangiwarehe's approach to the protection of Pekehāua Puna and the Mamaku aquifer is grounded in long-standing principles affirmed through tikanga, mātauranga, and Treaty settlement processes. These principles include:

1. Ki uta ki tai — recognising the aquifer, puna, and Awahou Stream as a single living system. The iwi rejects artificial separation of groundwater and surface water. Any impact on the point of source is an impact on the puna and the stream.
2. Protecting the mauri of the source above all extractive or economic uses. The water emerging at Pekehāua represents the purest expression of the aquifer. Its mauri must remain strong, clear, healthy, and free.
3. Intergenerational equity — respecting the long recharge lifecycle. Water taken today affects the supply available to future generations. Extraction must never exceed the natural recharge capacity of the aquifer.
4. Honouring the spiritual integrity of the puna and the presence of Pekehāua. The puna is not merely a hydrological feature; it is a living ancestor and the home of Pekehāua. Its dignity and mana must be upheld.
5. Mana whakahaere — decisions about the source must be made by Ngāti Rangiwarehe. Governance over the puna and its waters rests with the iwi, and decisions must occur on ancestral ground at Tarimano Marae.
6. Sustainable manaakitanga — balancing community needs with protection of the source. While the iwi supports community access to water, this must occur within strict limits that ensure the long-term health of the aquifer and puna.

4. TECHNICAL REVIEW OF THE PROPOSAL

4.1 Hydrological Report

The proposed abstraction of 3.3 L/s (~285 m³/day) is materially inconsistent with expected demand for a 91–92 lot rural residential subdivision.

- Typical domestic demand: 400–800 L/lot/day
- Expected total: ~36–73 m³/day
- Proposed take: ~4–8 times higher than typical demand

The proposed abstraction volume appears significantly over-sized relative to the demonstrated demand for a development of this scale. Based on typical domestic water use, the volume sought is materially higher than what would reasonably be expected for approximately 91 lots, indicating that the level of take

may be conservative or over-estimated. In addition, the report does not provide a transparent breakdown of how demand has been calculated, with no clear differentiation between domestic use, irrigation requirements, storage allowances, or firefighting capacity.

In addition, Ngāti Rangiwewehi notes that the proposed abstraction rate has not been reconciled with the servicing strategy outlined in the referral application. The absence of a clear water demand model creates uncertainty regarding whether the take reflects actual domestic requirements, firefighting storage, irrigation allowances, or system losses. Without this information, it is not possible to determine whether the proposed take represents a reasonable and efficient use of groundwater within an already constrained catchment.

This lack of detail makes it difficult to determine whether the proposed abstraction represents an efficient and justified use of groundwater within the catchment.

It is our belief that the applicant has not demonstrated that the proposed take represents the *actual reasonable and efficient use of water*.

Outcome sought:

A clear water demand model including average vs peak demand, firefighting storage assumptions, irrigation allowances (if any) and leakage / contingency allowances. We also request a demonstration of reasonable use under NRP allocation principles

4.2 Freshwater, Hydrology and Catchment Effects

The site is located within the Rotorua caldera volcanic system, which is characterised by complex hydrogeological conditions including layered ignimbrite aquifers, strong structural controls on groundwater movement, and regionally connected flow systems. Within this setting, springs such as Pekehāua Puna are understood to function as discharge points of the wider groundwater system, with recharge originating from the Mamaku Plateau ignimbrite formations. Groundwater within this system has a mean residence time of approximately 64 years, although the presence of younger water fractions indicates that more rapid flow pathways may also occur. The application itself acknowledges the proximity of the site to culturally significant springs and the broader groundwater system, highlighting the sensitivity of the receiving environment and the need for careful consideration of potential effects.

Notwithstanding this context, the hydrogeological report concludes that there is no hydraulic connection between the proposed bore and Pekehāua Puna, relying primarily on differences in elevation and the results of a short-duration, 12-hour pump test. This conclusion is not considered robust. Groundwater flow within volcanic systems is not governed by elevation alone, but is strongly influenced by permeability contrasts, faulting, and the layered nature of ignimbrite deposits. Accordingly, differences in groundwater head do not in themselves demonstrate hydraulic separation. In addition, the depth of the proposed bore has the potential to intercept regional flow paths that contribute to spring discharge, meaning that connectivity cannot be ruled out on the basis of shallow or localised observations.

Ngāti Rangiwewehi further observes that the hydrogeological assessment does not address the potential for deeper regional flow paths to contribute to Pekehāua Puna, nor does it consider the implications of long groundwater residence times combined with younger water fractions. These characteristics indicate a dual-pathway system where both slow and fast responses may occur. In such systems, short-duration pump tests are insufficient to characterise connectivity or to rule out delayed or cumulative effects on spring discharge.

The reliance on a short-duration pumping test further limits the reliability of the conclusions drawn, as such testing primarily reflects near-well responses and does not provide sufficient information about broader system behaviour or boundary conditions. Without longer-term data, including assessment of regional responses, it is not possible to confidently determine whether abstraction will influence connected spring systems.

In this context, the assertion that the groundwater source is hydraulically disconnected from Pekehāua Puna has not been adequately demonstrated. Rather, the available information indicates that this conclusion has been assumed, despite the known complexity and interconnected nature of the Rotorua volcanic aquifer system.

Outcomes sought:

Ngāti Rangiwewehi seeks that the applicant provides a robust and defensible assessment of groundwater connectivity and effects, as the current information does not demonstrate that abstraction will avoid impacts on connected spring systems. This must include longer-duration testing and appropriate technical methods such as tracer and hydrochemical analysis to confirm whether the bore is hydraulically connected to Pekehāua Puna and the wider aquifer and whether there is mixing between bore and spring water.

In addition, the applicant must clearly justify the scale of the proposed water take, supported by transparent demand calculations, to demonstrate that the abstraction represents an efficient and sustainable use of groundwater.

Until this information is provided, Ngāti Rangiwewehi considers that there is insufficient certainty to conclude that adverse effects on culturally significant freshwater systems will be avoided, and a precautionary approach is required.

4.2 (a) Recharge Zone and Source-to-Spring Hydrology

Pekehāua Puna is fed by the Mamaku Plateau recharge zone, a vast volcanic system where rainfall infiltrates deep ignimbrite layers and travels through fractured subterranean pathways for decades before emerging at Te Waro Uri. Scientific assessments (including RLC's Catchment Risk Assessment 2016 and White et al. 2014) confirm that the recharge zone predominantly covers the Mamaku Plateau to the west, with groundwater residence times of approximately 50–64 years.

This means that the puna is directly dependent on stable recharge conditions and consistent groundwater pressures across the wider Mamaku system. Any change to groundwater abstraction, land use, or recharge patterns within this system — even at distance — has the potential to alter the volume, chemistry, or timing of spring discharge at Pekehāua.

Because the system includes both deep, slow pathways and younger, faster flow fractions, effects may be transmitted both rapidly and cumulatively over long timeframes. This dual-pathway behaviour makes the puna exceptionally sensitive to hydrological disturbance.

4.3 Risk to Pekehāua Puna

The presence of younger groundwater fractions within the system further increases sensitivity, as it indicates the existence of faster flow pathways that can transmit effects more rapidly than the mean residence time suggests. This means that changes in abstraction, land use, or recharge conditions may influence the puna sooner than expected, while deeper, slower pathways may carry longer-term cumulative effects that only become apparent decades later.

Because Pekehāua Puna is the discharge point of a deep, slow-moving volcanic aquifer, even small changes in groundwater pressure, flow direction, or recharge rates can alter spring behaviour. These changes may manifest as reduced flow, altered temperature, changes in water chemistry, or shifts in the proportion of younger groundwater. From a cultural perspective, any such change represents a direct impact on the mauri of the puna and the ability of Ngāti Rangiwewehi to maintain customary relationships with Te Wai Mimi o Pekehāua.

Given these characteristics, Pekehāua Puna must be treated as a high-risk receptor. The absence of observable short-term effects cannot be relied upon as evidence that effects are not occurring. In such systems, precaution is not optional — it is essential.

For these reasons, Ngāti Rangiwewehi considers that the current hydrogeological assessment does not provide the level of certainty required to conclude that the proposed abstraction will avoid adverse effects on Pekehāua Puna. Until robust, long-duration testing and regional-scale analysis are undertaken, the risk to the puna remains unresolved.

Pekehāua Puna is a municipal water source, a culturally significant puna, and part of a wider interconnected groundwater–surface water system. The Cultural Impact Assessment and application material acknowledge the importance of these waters and the responsibility of iwi to protect their mauri. Within this context, any reduction in spring discharge presents a potential effect of concern, as even relatively small changes in flow may influence allocation limits and the reliability of municipal supply. From a cultural perspective, reductions in flow also directly affect cultural values, including the maintenance of mauri and the ability to exercise customary relationships with the water. There is also the potential for changes in groundwater abstraction to alter the spring capture zone and contribute to cumulative effects across the broader aquifer system.

A key concern is that the hydrogeological characteristics of the system, including a mean residence time of approximately 64 years, mean that impacts may not be immediately observable. At the same time, the presence of younger groundwater fractions indicates that changes may also be transmitted more quickly through parts of the system. This creates a level of uncertainty where the absence of short-term observable effects cannot be relied upon as evidence that effects are not occurring.

4.3 (a) Sensitivity of Pekehāua Puna and Hydrological Risk

Pekehāua Puna is one of the most hydrologically sensitive freshwater features in the Rotorua caldera system. It is a spring complex fed by deep, regionally connected ignimbrite aquifers with long residence times, complex fracture networks, and multiple flow pathways. These characteristics mean that the puna is highly dependent on stable groundwater pressures and consistent recharge conditions.

Any change to groundwater levels, pressures, or flow directions within the wider system has the potential to affect the puna, even if the effects are delayed or not immediately observable. Springs of this type do not respond in simple, linear ways; they are influenced by subtle shifts in hydraulic gradients, permeability contrasts, and structural features that may not be captured in short-duration pump tests or localised assessments.

Because Pekehāua Puna functions as a discharge point for the wider Mamaku ignimbrite system, even small reductions in groundwater pressure or changes in flow pathways can translate into measurable reductions in spring discharge. These reductions may manifest as:

- lower baseflow volumes
- altered temperature or chemistry
- changes in the proportion of younger vs older groundwater
- shifts in the spring's capture zone

From a cultural perspective, any reduction in flow is a direct impact on the mauri of the puna, affecting its life-giving properties, its role in sustaining Te Wai Mimi o Pekehāua, and the ability of Ngāti Rangiwewehi to maintain customary relationships with the water.

Outcomes sought:

In recognition of the extreme sensitivity of Pekehāua Puna and the high level of uncertainty surrounding groundwater connectivity, Ngāti Rangiwewehi seeks the following outcomes:

1. A comprehensive, long-duration hydrological assessment including extended pump testing, hydrochemical and isotopic analysis, and tracer studies (where feasible) to determine whether the proposed abstraction has any potential to influence groundwater pressures, flow pathways, or spring discharge at Pekehāua Puna.
2. A regional-scale assessment of groundwater connectivity that accounts for the complex structure of the Mamaku ignimbrite aquifer, including deeper flow paths, fracture networks, and dual-pathway (fast + slow) groundwater movement.
3. A precautionary approach to any groundwater abstraction meaning no increase in abstraction volume, rate, or duration until robust evidence demonstrates that the puna and its contributing aquifer system will not be adversely affected.
4. A requirement that the applicant demonstrate zero measurable reduction in spring discharge including no change in flow, temperature, chemistry, or the proportion of younger groundwater fractions at Pekehāua Puna.
5. A cumulative effects assessment that considers existing municipal takes, permitted domestic takes, climate-driven recharge changes, and the long groundwater residence times characteristic of the system.
6. Independent peer review of all hydrological investigations by experts with demonstrated experience in volcanic aquifer systems and spring-fed environments.
7. Ongoing monitoring and iwi involvement including real-time monitoring of groundwater levels, spring discharge, and water chemistry, with Ngāti Rangiwewehi involved in the design, oversight, and interpretation of monitoring results.
8. Recognition of the Mamaku Plateau recharge zone as the primary source of Pekehāua Puna, and a requirement that any assessment of effects must consider the full source-to-spring hydrological system.
9. Preparation of a Water Management Plan, to be developed in partnership with Ngāti Rangiwewehi and requiring iwi approval prior to implementation.
10. A clear commitment that no development proceeds unless and until the above matters are resolved to the satisfaction of Ngāti Rangiwewehi and the relevant regulatory authorities.

4.4 Alignment with District and Spatial Planning Frameworks

The proposal, while framed as a rural residential subdivision, introduces a scale and density of development that is not consistent with the intent of the Rural 1 Zone or the broader spatial planning framework applying to this area. Within the Rotorua District Plan and associated regional policy context, higher-density development is generally directed toward identified urban environments where infrastructure capacity, servicing, and environmental effects can be appropriately managed. Rural zones are intended to maintain landscape character, safeguard environmental capacity, and support lower-intensity land use patterns. In this case, the application acknowledges that the site is not identified as part of any future urban growth area and that the proposal relies on discretionary provisions rather than clear alignment with planned growth strategies.

Notwithstanding this, the proposal introduces a form of development that functions as a clustered, high-density residential environment within a rural catchment. The scale of approximately 91–92 lots, combined with associated infrastructure demands, represents a level of intensification more akin to peri-urban expansion than traditional rural subdivision. This reflects a shift away from low-density rural living toward a form of development that effectively establishes urban-scale demand in a location not planned to accommodate it. As such, the proposal cannot be characterised as incremental or minor; rather, it represents a material change in land use intensity within the rohe.

A key concern arising from this is the precedent such development may establish. Approval of a subdivision of this scale and intensity within a rural zone has the potential to enable similar proposals elsewhere within the Rotorua Lakes catchment. Over time, this risks undermining the intent of rural zoning provisions, eroding landscape and environmental protections, and placing increasing pressure on catchment-based resource limits. Once this form of development is established, it becomes difficult to resist subsequent applications of a similar nature, resulting in a cumulative intensification of rural environments that is not directed or anticipated through planning frameworks.

The implications of this intensification extend directly to natural resource use, particularly groundwater. The proposal is supported by a relatively high level of abstraction from a sensitive and interconnected volcanic aquifer system, introducing additional demand within a catchment where water resources are already subject to allocation pressures. This includes potential cumulative effects on groundwater-fed systems such as Pekehāua Puna, as well as implications for municipal supply and cultural flows. In addition, increased site coverage and development intensity will generate greater stormwater volumes and reliance on long-term infrastructure performance, placing further pressure on the capacity of the receiving environment.

The proposal also introduces increased impervious surfaces and modified landforms that will alter stormwater generation and infiltration patterns. Within a groundwater-dependent catchment, these changes have the potential to influence recharge characteristics and cumulative hydrological responses. Ngāti Rangiwewehi considers that these landscape-scale modifications must be assessed not only for their

immediate effects, but for their contribution to long-term cumulative pressures on groundwater systems, spring flows, and downstream cultural values.

When considered cumulatively, these effects extend beyond the site itself. While elements of the proposal may be assessed individually as having limited or manageable effects, the broader pattern of development that this proposal represents has the potential to progressively intensify rural catchments, increase demand on groundwater systems, and erode both environmental and cultural thresholds over time. This results in a fragmentation of planning intent, where growth occurs in an ad hoc manner rather than in accordance with strategic direction and environmental capacity.

From a Ngāti Rangiwewehi perspective, the rohe is a connected cultural landscape underpinned by interconnected groundwater systems and culturally significant freshwater bodies. Within this framework, the capacity of the environment must guide development, rather than development driving increased demand on already constrained systems. The introduction of urban-scale intensity into a rural environment, without clear alignment to spatial planning frameworks and without certainty regarding resource capacity, risks compromising both environmental limits and cultural values.

Accordingly, the proposal is considered to represent a high-intensity development within a rural zone that is not clearly supported by existing planning frameworks, establishes a precedent for further intensification, and introduces ongoing and cumulative pressure on natural and cultural resources across the rohe.

Outcomes sought: Ngāti Rangiwewehi seeks that the proposal is assessed in a manner that gives full effect to the intent of the Rotorua District Plan and wider regional planning framework, particularly in relation to managing the location, scale, and intensity of development within rural environments. This includes a clear demonstration that the proposal is consistent with planned growth strategies and does not undermine the function of the Rural 1 Zone or broader spatial planning objectives.

Ngāti Rangiwewehi further seeks that the scale and intensity of the development is reconsidered, or otherwise justified, in light of its effects on natural resource capacity, including groundwater allocation, and the ability of the receiving environment to sustainably accommodate this level of development.

In addition, the potential precedent effects of the proposal must be explicitly addressed, including consideration of how similar developments may arise within the rohe and the cumulative implications of such a pattern on rural character, environmental capacity, and freshwater systems. This includes ensuring that decision-making takes into account not only the effects of this proposal in isolation, but its role in enabling further intensification across the catchment.

Finally, Ngāti Rangiwewehi seeks that a precautionary and integrated approach is applied, whereby development within the rohe is guided by environmental limits, the protection of culturally significant resources, and the long-term sustainability of groundwater and freshwater systems, rather than incremental pressure driven by unplanned intensification.

4.5 Long-Term Ownership, Governance and Intergenerational Outcomes

Ngāti Rangiwewehi notes the absence of clear commitments within the referral documentation regarding long-term project ownership, governance and accountability. Experience with large-scale infrastructure projects in Aotearoa New Zealand demonstrates that consented developments may change ownership over time, including transfer to offshore or non-local investors whose priorities may not align with mana whenua values, local community outcomes or long-term environmental stewardship.

For Ngāti Rangiwewehi, the identity of those who ultimately own, control and benefit from development on ancestral landscapes is a matter of cultural significance. Decisions made at the fast-track referral stage have the potential to enable enduring outcomes that extend well beyond the current applicant and project partners.

In the absence of transparent commitments regarding long-term ownership, iwi participation, local employment, procurement and operational decision-making, Ngāti Rangiwewehi considers that the proposal presents additional intergenerational risk. These matters are not peripheral to cultural effects; they directly influence the ability of mana whenua to exercise kaitiakitanga and to ensure that benefits derived from the use of ancestral lands are equitably shared and retained within Aotearoa.

Ngāti Rangiwewehi also notes that the referral documentation does not address cultural monitoring requirements or the adoption of iwi-mandated accidental discovery protocols. Given the potential for wāhi tapu and wāhi tūpuna to exist within the landscape, and the scale of earthworks proposed, Ngāti Rangiwewehi seeks clear commitments to cultural monitoring, iwi-approved archaeological oversight, and adherence to Ngāti Rangiwewehi's Accidental Discovery Protocol to ensure intergenerational protection of cultural heritage.

5. ALIGNMENT WITH THE NGĀTI RANGIWEWEHI IWI CULTURAL IMPACT ASSESMENT

The proposal has been considered in the context of the Cultural Impact Assessment previously prepared for this site, which clearly articulates the values, concerns, and expectations of Ngāti Rangiwewehi in relation to development within this part of the rohe. The CIA emphasises the interconnected nature of groundwater and surface water systems, the cultural significance of Pekehāua Puna and the Awahou Stream, and the importance of protecting the mauri of these waterways through a precautionary and integrated approach.

Based on the information provided to date, it is not evident that the proposal fully aligns with the intent or recommendations of the CIA. In particular, key matters raised within the CIA regarding groundwater connectivity, protection of culturally significant freshwater systems, and the need to avoid cumulative effects have not been sufficiently resolved. The level of uncertainty associated with the proposed groundwater abstraction, combined with the scale and intensity of development, does not provide confidence that adverse effects on culturally significant waters can be avoided or adequately mitigated.

The CIA also signals the importance of ensuring that development is consistent with the capacity of the environment, and that where uncertainty exists, a precautionary approach is adopted. At present, the reliance on limited hydrogeological assessment and the absence of robust evidence confirming hydraulic separation from Pekehāua Puna is not consistent with this approach. Similarly, the scale of development and associated demand on natural resources raises concerns regarding cumulative effects that were specifically identified within the CIA as requiring careful management.

Accordingly, it is considered that the proposal, in its current form, does not adequately give effect to the findings and recommendations of the Cultural Impact Assessment.

In particular, the CIA requires that any development within this part of the rohe demonstrate:

- certainty regarding groundwater connectivity and effects
- protection of Pekehāua Puna and the Awahou Stream
- avoidance of cumulative and intergenerational impacts
- alignment with environmental limits and cultural values
- adoption of a precautionary approach where uncertainty exists

Based on the information provided to date, these requirements have not been met.

Outcome Sought: Ngāti Rangiwhewehi seeks that the applicant demonstrates clear alignment with the CIA by addressing outstanding uncertainties, particularly in relation to groundwater effects, and by ensuring that cultural values, freshwater mauri, and the long-term integrity of interconnected systems are fully protected.

6. STATUTORY CONSIDERATIONS

The proposal must be assessed having regard to the statutory framework that recognises and provides for the relationship of Māori with their ancestral lands, water, sites, wāhi tapu, and other taonga. This includes the requirements of the Resource Management Act 1991 (RMA), the Fast-track Approvals Act 2024 (FTAA), and relevant Treaty settlement legislation.

Under section 6(e) of the RMA, particular regard must be given to the relationship of Māori and their culture and traditions with their ancestral lands and waters. Sections 7(a) and 8 further require decision-makers to have particular regard to kaitiakitanga and to take into account the principles of Te Tiriti o Waitangi. These provisions collectively establish a clear obligation to recognise and protect cultural values associated with freshwater systems, including groundwater-fed springs such as Pekehāua Puna.

The National Policy Statement for Freshwater Management (NPS-FM) also provides direction through Te Mana o te Wai, which prioritises the health and wellbeing of water bodies and freshwater ecosystems above all other uses, followed by the health needs of people, and then other uses of water. This

framework reinforces the need to ensure that activities do not compromise the mauri of freshwater systems and that any allocation or use of water occurs within environmental limits.

In addition, the Ngāti Rangiwewehi Claims Settlement Act 2014 recognises the historical and ongoing relationship of Ngāti Rangiwewehi with its rohe and affirms the importance of enabling the exercise of rangatiratanga and kaitiakitanga. The proposal must be considered in a manner consistent with these recognised interests and responsibilities, particularly where it has the potential to affect culturally significant water bodies and interconnected groundwater systems.

The Fast-track Approvals Act 2024 does not remove or diminish these considerations. Rather, it requires that projects are assessed in an integrated manner, including the identification and appropriate consideration of effects on Māori and Treaty settlement interests. Where uncertainty exists, particularly in relation to environmental effects with cultural implications, a precautionary approach remains appropriate.

In applying Te Mana o te Wai, Ngāti Rangiwewehi emphasises that the health and wellbeing of Pekehāua Puna, the Awahou Stream, and the wider groundwater system must be prioritised above the needs of the proposed development. Until robust evidence demonstrates that the proposed abstraction and land use intensification will not compromise these water bodies, Ngāti Rangiwewehi considers that the statutory requirements of the NPS-FM, the RMA, and Treaty settlement legislation have not been satisfied.

In this context, Ngāti Rangiwewehi considers that the proposal must clearly demonstrate that it recognises and provides for these statutory obligations. This includes ensuring that cultural values are not compromised, that freshwater systems are protected in accordance with Te Mana o te Wai, and that the ability of Ngāti Rangiwewehi to exercise kaitiakitanga over its rohe is maintained.

Outcome sought: Ngāti Rangiwewehi seeks representation within any Fast-Track Expert Consenting Panel or associated technical advisory processes established for this proposal. The iwi holds significant in-house expertise across hydrology, freshwater science, wastewater engineering, planning, and tikanga Māori, and has members who are formally qualified to serve on fast-track panels. Given the cultural significance of Pekehāua Puna, the sensitivity of the Mamaku aquifer system, and the statutory obligations to recognise mana whenua interests, Ngāti Rangiwewehi considers that iwi representation is essential to ensure that decisions are informed by both technical knowledge and mātauranga Māori. This will support robust, culturally grounded, and environmentally sound decision-making throughout the fast-track process.

7. SUMMARY POSITION

Ngāti Rangiwhewehi considers that the proposal, in its current form, raises significant cultural, environmental, and planning concerns that have not been adequately resolved through the information provided to date. While presented as a rural residential subdivision, the scale and intensity of development, together with the level of groundwater abstraction proposed, represents a form of unplanned intensification within a sensitive and interconnected catchment. This is not clearly aligned with the intent of the Rotorua District Plan or broader spatial planning frameworks, and risks establishing a precedent for further similar development across the rohe.

Of particular concern is the reliance on a hydrogeological assessment that does not robustly demonstrate the absence of connectivity between the proposed groundwater take and Pekehāua Puna. Given the known complexity of the Rotorua volcanic aquifer system, and the cultural and municipal significance of these springs, the current level of uncertainty is not acceptable. The potential for cumulative effects on groundwater systems, including changes to spring discharge, cultural flows, and the wider mauri of freshwater, has not been adequately addressed.

The proposal also does not demonstrate clear alignment with the findings and recommendations of the Cultural Impact Assessment, nor does it give sufficient confidence that statutory obligations in relation to Māori values, Te Mana o te Wai, and Treaty settlement commitments will be met. In particular, the absence of a precautionary, evidence-based approach to groundwater assessment and resource use is inconsistent with the expectations of Ngāti Rangiwhewehi as kaitiaki.

Ngāti Rangiwhewehi's position is that development within the rohe must be guided by the capacity of the environment, recognising the interconnectedness of whenua and wai through a ki uta ki tai framework. Where uncertainty exists, particularly in relation to groundwater systems with long response times and cultural significance, that uncertainty must be resolved in favour of protecting the mauri of the environment and the ability of Ngāti Rangiwhewehi to exercise kaitiakitanga.

Accordingly, Ngāti Rangiwhewehi does not support the proposal as currently presented. It is considered that further work is required to demonstrate alignment with planning frameworks, to substantiate water demand and groundwater effects, and to ensure that cultural values and freshwater systems can be protected. In the absence of this, a precautionary approach must be applied.

Ngāti Rangiwhewehi remains open to ongoing dialogue and partnership-based approaches that reflect shared objectives for sustainable development. The iwi reserves the right to further refine its position as additional information becomes available and as iwi-led assessments and engagement processes progress.



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