

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Tahimana
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Tasman District Council		
*First name	Leif		
*Last name	Pigott		
Postal address	Tasman District Council 189 Queen Street Richmond Tasman 7040		
*Contact phone number	s 9(2)(a)	Alternative	035438529
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Rob Smith

2 March 2026

Group Manager - Environmental Service

2 March 2026

Ministry for the Environment
via fasttrack portal
Attention: Fast Track Team

Tēnā koe,

Tahimana Development – Section 17 Fast-track Referral Application

Thank you for the opportunity to provide comment on the proposed referral of the Tahimana development under section 17 of the Fast-track Approvals Act 2024.

Tasman District Council has been processing the associated resource consent applications, including RM240192, since April 2024. The proposal has been subject to extensive technical review, with multiple rounds of further information provided by the applicant. Council's comments below are informed by this detailed consent history and the substantive body of information already before Council.

While Council acknowledges that section 17 referral material is necessarily high level, the information provided must nonetheless credibly demonstrate that the proposal meets the statutory threshold for fasttrack consideration.

Significant Regional Benefit

Based on the material supplied, Council is not satisfied that the proposal clearly demonstrates significant regional or national benefit sufficient to justify referral under the Fast Track Approvals Act 2024.

The development is primarily a large-scale rural lifestyle subdivision. While it would increase dwelling supply within that market segment, the proposal does not clearly evidence outcomes that are regionally significant in scale, nature, or effect when assessed against existing growth patterns, identified housing needs, or infrastructure constraints within the Tasman District.

Tasman District Council
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PO Box 123
Motueka 7143
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Tākaka
78 Commercial Street
PO Box 74
Tākaka 7142
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Phone 03 525 9972

Council also notes that the fast-track pathway is intended for proposals where the scale of benefit is such that it justifies departure from standard processes. In this case, the benefits described do not clearly exceed those ordinarily expected from a private residential development of this nature.

Status of Existing Resource Consent Process and Potential Local Participation

Council notes that the Tahimana proposal is already being actively processed through the Resource Management Act framework. The primary subdivision consent (RM240192) and associated applications were lodged in April 2024 and remain under assessment. Since lodgement, Council has received and reviewed further information, reflecting the complexity and scale of the proposal and the need for detailed technical scrutiny. We are currently waiting for a decision on which option they choose for their proposed stormwater solution. The notification decision under S95 of the RMA is yet to be made for this application.

The existing consent process provides a structured and transparent framework for the assessment of effects, infrastructure implications, and policy consistency, including opportunities for local authority input and public participation if necessary, as required under the RMA.

Transferring the proposal to the fasttrack process at this stage may reduce local input into the decision-making process, including the ability for affected communities and stakeholders to participate in the assessment of a proposal that has generated significant local interest. Council considers this reduction in local engagement to be a relevant consideration when assessing whether fasttrack treatment is appropriate, particularly where the proposal does not clearly demonstrate benefits of a scale or nature that outweigh the loss of participatory processes.

Housing Supply and Housing Needs

The supply of housing, address housing needs are key criteria in Section 22(2)(a)(iii). Housing affordability and supply are relied upon in the referral application as key grounds supporting fast-track eligibility. Council has significant concerns regarding the consistency and evidential basis of these claims.

The referral application asserts that approximately 70 percent of the proposed dwellings will be “affordable family homes”. However, the accompanying economic assessment report:

- Identifies approximately 141 residential dwellings
- Estimates an average dwelling sale price of approximately \$1.14 million, with residential lot prices averaging around \$1.08 million
- Explicitly targets middle to higher income households, including retirees and high-income professionals, with household incomes commonly exceeding \$150,000.

Affordability is framed only in relative terms within the rural lifestyle market. It is not assessed against district median incomes, recognised housing affordability benchmarks, or identified unmet housing needs within the Tasman District.

As a result, while the proposal may increase choice within a high value niche segment, the economic assessment does not demonstrate that it addresses housing needs or affordability in the manner contemplated by section 22(2)(a)(iii) of the Fasttrack Approvals Act.

Further, neither the referral application nor the economic assessment:

- Defines “affordable housing”
- Identifies price or income thresholds
- Describes any mechanism to cap prices, tie dwellings to household incomes, secure affordability over time, or otherwise ensure delivery of affordable housing outcomes.

The two documents are therefore inconsistent on a core fast-track criterion. The referral application asserts affordability without supporting evidence, while the economic assessment provides pricing and market evidence that undermines that assertion.

In Council’s view, the claim that the proposal will deliver predominantly affordable housing is not demonstrated and cannot reasonably be relied upon to support fast-track eligibility.

Transport Effects and Infrastructure Readiness

Transport effects associated with the Tahimana proposal remain a substantive and unresolved issue within the existing resource consent process. Differences of opinion remain between Council and the applicant on several transport matters, and these issues are directly relevant to both the notification decision and the overall assessment of effects.

In this context, progressing the proposal through the fast-track process would limit the ability for transport risks and infrastructure implications to be fully tested through local authority scrutiny and community input, despite these matters being central to the safety and functionality of the surrounding road network.

Infrastructure and Servicing Considerations

Council’s planning assessment indicates that the proposal is generally capable of assessment under existing planning provisions. However, Council remains concerned about the proposed communal wastewater servicing arrangements, particularly in the context of dwellings described as affordable.

Water supply is subject to the construction of a new pipeline for the Mapua/Ruby Bay water supply scheme. The current water allocation agreement. It is unclear if the proposal will be able to meet the requirements of the agreement.

Cluster wastewater systems that effectively operate as municipal scale infrastructure can be complex and costly to manage over time. Council does not support assuming ownership or longterm responsibility for this system. Should Council be required to do so in the future, this would need to occur under the water services regulatory framework, with associated cost, governance, and risk implications.

These matters are relevant when considering whether the proposal delivers durable public benefit commensurate with fast-track treatment.

Conclusion

In summary, Council considers that:

- The proposal does not clearly demonstrate significant regional or national benefit sufficient to justify referral under section 17

- Claims regarding housing affordability are not supported by the economic evidence provided and are internally inconsistent
- The proposal is already being actively assessed through the RMA process, with further information received and under review
- Progression through the fast-track process would reduce local authority and community input without a corresponding demonstration of exceptional benefit.

For these reasons, Council considers that the proposal does not presently meet the evidential threshold required for progression through the fast-track approvals process. We acknowledge that it is the ministers decision to make, but in the event it is accepted, then we would welcome the opportunity to assist the panel by providing comment on the substantive application, including recommending conditions to manage effects and ensure public assets that are fit for purpose.

Please do not hesitate to contact Council should further clarification be required.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'L. Rae', is positioned above the printed name.

Leonie Rae

Chief Executive Officer

Hon Nicola Willis

Minister of Finance
Minister for Economic Growth
Minister for Social Investment



05 MAR 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0027430

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act (FTAA) on the following applications:

- Out of Scope [REDACTED]
- [REDACTED]
- Tahimana, FTAA-2512-1162.

I am providing comments in my capacity as Minister for Economic Growth, focusing on whether these applications are likely to have significant economic benefits under section 22(2)(a)(iv) of the FTAA, based on the information provided. I defer to you and other relevant Ministers to assess the remaining criteria.

Out of Scope

[REDACTED]

Out of Scope



Tahimana, FTAA-2512-1162

The project is to subdivide and develop land for the purpose of establishing a residential and rural lifestyle development on approximately 70 hectares of land off Stagecoach Road,

Tasman. The project will include works within the Stagecoach Road, Dicker Road and Williams Road reserves. The project will include:

- a. a subdivision to create approximately 145 allotments, including four allotments for reserve, roading and services and enable construction of approximately 141 residential units across a range of densities
- b. development of an open space network, including a public reserve and walkways and upgrades to shared pathways
- c. landscape planting and restoration and enhancement of waterways and wetlands
- d. associated infrastructure, including for three waters services and transport (including external road upgrade works).

Based on the economic assessment provided in this application, the proposed 141 dwellings would directly contribute \$17.4 million to the construction sector's GDP and support 105 full-time jobs over the development period.

The proposal provides an on-site wastewater system of a significant scale and delivers an upgrade of approximately 2.6 km of Stagecoach Road, including a separated cycleway and walkway, providing transport and amenity benefits at no additional cost to the Council or ratepayers.

The primary long-term benefit of this proposal is its provision of additional housing. Given that this application would provide a considerable boost in the housing supply, it could also be assessed under increasing the supply of housing, address housing needs or contribute to a well-functioning urban environment (s22(2)(a)(iii) of the Fast-track Approvals Act).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', written in a cursive style.

Hon Nicola Willis
Minister for Economic Growth

Hon Tama Potaka

Minister of Conservation
Minister for Māori Crown Relations
Minister for Māori Development
Minister for Whānau Ora
Associate Minister of Housing



27 FEB 2026

Hon. Chris Bishop
Minister for Infrastructure
c.bishop@ministers.govt.nz
Parliament Buildings
Private Bag 18041
WELLINGTON 6160

Tēnā koe Hon. Bishop

Thank you for the invitation to comment on the fast-track consent application for the Tahimana project, proposed by Tahimana Limited, located off Stagecoach Road, Tasman. The project proposes a 70 hectare residential and rural lifestyle development, which would enable the construction of about 141 residential units across a range of densities. The proposal also includes public open space, landscape planting, restoration and enhancement of waterways and wetlands, and associated transport and three waters infrastructure works.

While prices and rents are below the national median in Tasman district, lower incomes mean housing affordability remains a challenge for some households. Additional housing supply would help to ease local housing pressures over time.

The Nelson Tasman Future Development Strategy 2022–2052 prioritises consolidating and intensifying existing centres and directing growth to areas with good access to jobs, services and amenities. The strategy considered the Tahimana site but did not identify it as part of the preferred growth strategy. It also recorded that Te Ātiawa raised significant cultural considerations associated with the site. This would need careful consideration through later stages of the process.

Council is likely to have concerns that the site is located outside existing centres and has limited access to services and amenities, and that there is currently no public transport provision in the area.

The considerations identified above, including planning, infrastructure and cultural matters, can be examined in more detail at the next stage should the project proceed. Accordingly, I have no objection, from the perspective of the Housing Portfolio to this project being referred to the next stage. Thank you again for the opportunity to comment.

Mauriora,

A handwritten signature in blue ink, appearing to read 'Tama Potaka', with a stylized flourish at the end.

Hon Tama Potaka
Associate Minister of Housing

From: [Infrastructure Portfolio](#)
To: [Shane Jones \(MIN\)](#); [Nicola Willis \(MIN\)](#); [Penny Simmonds \(MIN\)](#); [Tama Potaka \(MIN\)](#)
Cc: [FTAreferalls](#)
Subject: CORTP-6716 Invitation to comment on Fast-track referral application for the Tahimana project
Date: Friday, 30 January 2026 8:14:30 am
Attachments: [Comments Form for Invited Ministers.docx](#)
[image001.jpg](#)

To:
Minister for Economic Growth
Minister for Regional Development
Minister for the Environment
Associate Minister of Housing

Dear Ministers,

Hon Chris Bishop, the Minister for Infrastructure (the Minister), has asked for me to write to you on his behalf.

The Minister has received an application from Tahimana Limited for referral of the Tahimana project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process (application reference FTAA-2512-1162).

The purpose of the Act is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits.

Invitation to comment on referral application

I write in accordance with section 17 of the Act to invite you to provide written comments on the referral application. I have provided summary details of the project below.

If you wish to provide written comments, these must be received by **return email** within **20 working days** of receipt of this email, being 2 March 2026. The Minister is not required to consider information received outside of this time frame. Any comments submitted will contribute to the Minister's decision on whether to accept the referral application and to refer the project.

If you do not wish to provide comments, please let us know as soon as possible so we can proceed with processing the application without delay.

If the Minister decides to accept the application and to refer the project, the Applicant will need to complete any preliminary steps required under the Act and then lodge their substantive application for the approvals needed for the project. An expert panel will be appointed to decide the substantive application.

Process

The application documents are accessible through the Fast-track portal. Please note that application documents may contain commercially sensitivity information and should not be shared widely. If you haven't used the portal before, you can request access by emailing ftareferalls@mfe.govt.nz. Once you are registered and have accepted the terms and conditions, you will receive a link to view the documents. Existing users will be able to see application documents via the request when logging into the portal. Should you need for your agency to provide any supplementary information, a nominated person can be provided access to the portal, access can be requested by emailing ftareferalls@mfe.govt.nz.

To submit your comments on the application, you can either provide a letter or complete the attached template for written comments and return it by replying to this email, infrastructure.portfolio@parliament.govt.nz.

Before the due date, if you have any queries about this email or need assistance with using the portal, please email contact@fasttrack.govt.nz. Further information is available at <https://www.fasttrack.govt.nz/>.

Important Information

Please note that all comments received from Ministers invited to comment will be subject to the Official Information Act 1982. Comments received will be proactively released at the time the Minister for Infrastructure makes a referral decision, unless the Minister providing comments advises the Minister for Infrastructure's office they are to be withheld, at the time they are submitted.

If a Conflict of Interest is identified by the Minister providing comments at any stage of providing comments, please inform my office and the Cabinet Office immediately. The Cabinet Office will provide advice and, if appropriate, initiate a request to the Prime Minister to agree to a transfer of the project/portfolio invite to another Minister (a request to transfer a COI from one Minister to another can take 1-7 days).

Project summary

Project name	Tahimana
Applicant	Tahimana Limited
Location	Tasman
Project description	<p>The project is to subdivide and develop land for the purpose of establishing a residential and rural lifestyle development on approximately 70 hectares of land off Stagecoach Road, Tasman. The project will include works within the Stagecoach Road, Dicker Road and Williams Road reserves.</p> <p>The project will include:</p> <ul style="list-style-type: none">a. subdivision to create approximately 145 allotments, including 4 allotments for reserve, roading and services, and enable construction of approximately 141 residential units across a range of densitiesb. development of an open space network including a public reserve and walkways, and upgrades to shared pathwaysc. landscape planting and restoration and enhancement of waterways and wetlandsd. associated infrastructure, including for three waters services and transport (including external road upgrade works).

Yours sincerely

Hon Chris Bishop

Minister for Infrastructure



Office of Hon Chris Bishop

Minister of Housing | Minister for Infrastructure | Minister Responsible for RMA Reform | Minister of Transport | Associate Minister of Finance | Associate Minister for Sport & Recreation | Leader of the House | MP for Hutt South

Office: 04 817 6802 | EW 6.3
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Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Tahimana
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	New Zealand Transport Agency		
*First name	Nicola		
*Last name	Foran		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	environmentalplanning@nzta.govt.nz		

2. Please provide your comments on this application
<p>NZTA thanks the Minister for the opportunity to comment on the referral of this application into the fast-track approvals process.</p> <p>NZTA has had substantial involvement with the applicant on this proposal between 2022 and 2024. NZTA provided written approval under Section 95(e) of the Resource Management Act 1991 in June 2024.</p> <p>NZTA provides the following commentary:</p> <p>The development site is adjacent to SH60, however, there is no access in existence, nor proposed, onto State Highway 60 directly from the development site.</p> <p>The area of land that immediately adjoins State Highway 60 is Section 34 SO440217. This land is administered by NZTA. The applicant intends to utilise this land to facilitate the wider wastewater disposal field. NZTA has confirmed with the applicant that they will provide a Licence to Occupy to the Applicants to facilitate this purpose. There are no structures to be placed on this land, it will be vegetated in appropriate plantings with the appropriate setbacks in place from the SH60 legal road corridor.</p>

Insert Fast-track logo

Following the provision of NZTA's written approval in June 2024 the applicant approached NZTA regarding the potential to place some walking and cycling infrastructure within Section 34 SO440217. NZTA agreed that this could be possible 'in principle' if on-going maintenance and operation obligations are held by the developer or Council through a formal agreement. If this remains part of the proposal, NZTA requires further detail to understand the full extent of the works.

The proximity of the proposed subdivision to SH60 raises potential reverse sensitivity issues for the future development on the subject site being exposed to traffic noise from SH60. The applicant previously engaged Blandon Bronka Acoustics to undertake an acoustic assessment which demonstrated that the 40dB LAeq(24hr) internal noise criterion could be achieved for all proposed sites. The applicant volunteered a condition (below in italics) to manage ventilation levels within habitable spaces located within the 55dB LAeq(24hr) noise level contour. NZTA seeks that this or similar conditions are included in any decision.

Ventilation Condition

1. All habitable spaces located within the 55dB LAeq(24hr) noise level contour (shown in Appendix B), must be provided with a ventilation and cooling system achieving the following:

a. Ventilation must be provided to meet Clause G4 of the New Zealand Building Code. At the same time the sound of the system must not exceed 30 dB LAeq(30s) when measured 1 m away from any grille or diffuser.

b. The occupant must be able to control the ventilation rate in increments up to a high air flow setting that provides at least 6 air changes per hour. At the same time the sound of the system must not exceed 35 dB LAeq(30s) when measured 1 m away from any grille or diffuser.

c. The system must provide cooling that is controllable by the occupant and can maintain the temperature at no greater than 25°C. At the same time, the sound of the system must not exceed 35 dB LAeq(30s) when measured 1 m away from any grille or diffuser.

NZTA has no concerns with the Tahimana project being referred into the fast-track approval process.

NZTA would welcome the opportunity to discuss the proposal further with the applicant and provide comments on any substantive application in due course.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

A handwritten signature in cursive script, appearing to read 'Harriet Shelton', with a long, sweeping flourish extending to the right.

Harriet Shelton

Date: 2 March 2026



02 March 2026

Tēnā koutou,

Tahimana Subdivision FastTrack Referral Application CRM:0139009794

Ngāti Kuia have been invited to provide feedback by the Fast Track Application Team under CRM:0139009794. Our response addresses the application to subdivide land at Tahimana, Stagecoach Road, for the creation of approximately 145 allotments, associated infrastructure, earthworks, stormwater, wastewater systems and restoration works.

Proposed plans indicate a blend of affordable housing and larger lifestyle allotments set within a network of protected waterways with buffers intended to have functionality as stormwater retention, amenity and ecological protection. The site is strategically planned to minimise earthworks and avoid proximity to waterways. The applicant/developer intends to provide transport connections by providing walkways and cycleways to allow access to nearby services and schools. (McNae, 2025)

The site includes multiple waterways and repo (wetlands) and is adjacent to a large privately owned wetland, 5 HA of which is remnant wetland within a predator proof fence, and 2.5HA, which is part of a revegetation project.

The 13 watercourses and 51 'natural inland wetlands' onsite cover an area of 1.25 HA, when combined with the neighbouring wetlands this accounts for 9.3% of freshwater wetlands in the northern Moutere Ecological District (Roper, 2025). The development intends to protect and restore all wetlands onsite.

Te Rūnanga o Ngāti Kuia has evaluated the documents, provided via the Fast Track Portal, against the Minister's criteria for referral. There are several criteria that the Minister may consider when making a decision under the Act, as well as any other matter the Minister deems relevant when making a decision on referral.

Our response will focus on the following.

- Te Tiriti o Waitangi obligations and effects on Māori interests and taonga
- Freshwater and coastal receiving environments
- Indigenous biodiversity and ecological connectivity
- Consistency with national direction under the RMA

- Ngā Kanohi Kārearea – Iwi Environmental Management Plan (Te Rūnanga o Ngāti Kuia, 2025)

If this project is referred to the Fast-track process, Ngāti Kuia considers it essential that matters, where potential risk exists and/or where further information is required, are explicitly identified for Expert Panel consideration.

These matters have not yet been fully assessed or supported by complete technical information. Ngāti Kuia has not yet been provided with relevant overlays, or spatial layers, to inform a final position.

The following areas therefore require further analysis and detailed assessment.

1. Te Tiriti o Waitangi and Māori Interests

Sections 6(e), 7(a), and 8 of the Resource Management Act 1991 require decisionmakers to recognise and provide for the relationship of Māori with whenua, wai, wāhi tapu and other taonga, to have particular regard to kaitiakitanga, and to take into account the principles of Te Tiriti o Waitangi.

The application site sits within an area of established Māori cultural values and wider rohe connections. Tangata whenua values must meaningfully inform the design, layout, infrastructure choice and long-term management of the development.

To date the applicant has engaged with iwi to provide Cultural Impact Statements, and has aligned much of the application with the values provided. (Te Rūnanga o Ngāti Rarua, 2023) (Bennet, 2024). Ngāti Kuia supports ongoing communication with iwi to enable the implementation of the obligations associated with holding kaitiakitanga over the area and incorporation of the suggested recommendations.

The area is known to have been a place where descendants of the Kurahaupō waka (including Ngāti Kuia) would have fled from the invading Taranaki/Tainui people. Settlement (long and short term) in this area is indicative of the large variety of resources available here. Battles were likely fought within and around the application area, repo were used for gathering resources and the transitory nature of early communities means people were walking the land continuously over generations. Ngāti Kuia kōrero indicates that accidental discovery during onsite earthworks in this area are likely.

It is recommended that:

- Engagement with tangata whenua is strengthened, showing clear evidence of how iwi input has influenced outcomes. Mauri assessment and monitoring should be incorporated into conditions, both at areas outlined as significant, and to track the health of the repo, during and post works, to ensure predicted positive outcomes are met.

- Ngāti Kuia cultural monitors to be engaged for all earthworks, and any works within or around wetlands, along with an accidental discovery protocol, including notification of all iwi with potential interest.
- Ngāti Kuia cultural values associated with waterways, wetlands and landscape are explicitly reflected in stormwater design, restoration planting and open space networks. As the plans continue to be developed, Ngāti Kuia should have continued engagement and oversight to ensure proposed methods are culturally appropriate, enabling meaningful engagement.
- A framework for continued engagement, ensuring mātauranga Māori and tikanga guidance informs the development, including indigenous species planting, on site narratives and cultural inductions for contracted kaimahi.
- The receiving environment includes downstream values, as the many waterways within the application site ultimately discharge to Ruby Bay. Any discharge or impact (negative or positive) on the quality of this flow will likely have an effect on the moana.

Particular attention should be given to ensuring Ngāti Kuia cultural value interests are appropriately identified and provided for, alongside Te Taihū iwi with overlapping interests.

2. Freshwater Management

The application proposes significant earthworks, stormwater infrastructure, wastewater disposal to land, and restoration of wetlands. These activities engage directly with the National Policy Statement for Freshwater Management (NPS-FM 2020) and the National Environmental Standards for Freshwater (NES – FM 2020).

Interactions with freshwater resources on this site are significant, with multiple streams and wetlands. It is important to understand the vital place freshwater (wai Māori) holds for Ngāti Kuia. The concepts of tapu and noa guide the way Ngāti Kuia manage and understand risk to freshwater.

Tapu is a state of restriction or heightened significance that protects people, places, or objects by safeguarding the mauri, managing spiritual or physical risk. Tapu may be inherent (such as wāhi tapu or taonga tuku iho) or applied through tikanga in response to events such as death or environmental harm. Noa is a state of balance and neutrality that removes restrictions and restores safe, everyday interaction with people, places, or objects that were previously tapu. Noa is commonly restored through processes such as karakia, wai and kai.

Key matters requiring further consideration include:

- The scale and cumulative effects of wastewater disposal to land, and the appropriateness of disposal in a rural/coastal catchment context over the long term.
- Clear, measurable outcomes for freshwater health should be established, including monitoring and reporting over time, rather than just reliance on management plans and design intent alone.

- Ongoing communication with iwi is vital to ensure tikanga is upheld regarding wai Māori, in particular ensuring tapu and noa are navigated correctly.

3. Coastal Environment Considerations

The application site forms part of a wider (ki uta ki tai) catchment that ultimately discharges to the coastal environment. Activities that increase impervious surfaces, alter hydrology, or mobilise sediment may contribute to downstream coastal adverse effects.

The application would benefit from:

- A clearer assessment of downstream receiving environment and potential sediment and contaminant pathways. Including an ongoing plan to monitor and measure the effect on the downstream environment.
- Explicit consideration of how the proposal aligns with the objectives and policies of the New Zealand Coastal Policy Statement (2010), particularly in relation to water quality and ecosystem integrity.

4. Indigenous Biodiversity and Ecological Effects

The proposal includes wetland restoration and landscape planting. It is important to note that waterways connected to this area have been used to relocate kōkopu and tuna, any restoration must not undermine the taonga already inhabiting the site.

The proposed 10 metre minimum setback for wetlands and waterways (NES-FM 2020) provides for restoration requirements. Mapping provided shows wetland rehabilitation area / reserve and walkway extending to property boundaries. Ngāti Kuia supports maximising the ecosystem benefits in line with neighbouring wetland rehabilitation efforts. Ongoing engagement to enable indigenous planting will ensure protection of habitat and resources that support taonga species, mahinga kai and cultural activities.

- Restoration success will be measured, including plant species selection, survivorship, and long term management responsibilities. The NPS-IB recognises the need to 'prioritise the mauri, intrinsic value and wellbeing of indigenous biodiversity' To align with this policy the conditions on this application should include mauri monitoring to sit alongside the western science to understand how and if the assumed benefits are resulting in the desired outcomes.

Biodiversity outcomes should be framed around net ecological gain. All perceived gain should be measured. Alongside ecological monitoring of the impacts on biodiversity, mauri monitoring should confirm the impacts on the mauri of the area, particularly of the waterways, repo / wetlands to ensure the gain provides expected cultural benefit.

5. Consistency with National Direction and Strategic Planning

The application references objectives relating to housing supply, affordability, and community development, which align with national and regional growth directions to be demonstrated in practice, particularly:

- The NPS-FM directive to prioritise freshwater health.
- Treaty obligations as a matter of national importance.
- The integration of land use planning within environmental limits.

Statements regarding employment and local economic benefit require further substantiation, particularly in relation to local workforce development and long-term community outcomes.

6. Overlays

Ngāti Kuia has not yet reviewed the relevant overlays. Accordingly, Ngāti Kuia reserves the right to provide further comment on the relevant overlays, mapping, and associated assessments to be made available for iwi review.

7. Ngā Kanohi Kārearea Ngāti Kuia Iwi Environmental Management Plan

Ngāti Kuia does not oppose referral on ecological grounds, provided that:

- Ecological matters as outlined are explicitly within the Expert Panel's scope; and
- Conditions are framed to deliver Net Enduring Restorative Outcomes in line with *Ngā Kanohi Kārearea – Te Mahere Whakahaere Taiao o Ngāti Kuia (IEMP)*.

The overarching NERO (Net Enduring Restorative Outcomes) framework, which requires that any change results in a *net, enduring uplift in mauri and ecological condition*, not simply the avoidance or mitigation of adverse effects.

From an IEMP perspective, the proposed measures represent potential to deliver a NERO type outcome. However, this potential is contingent on design detail and long term implementation. Accordingly, Ngāti Kuia identifies the following ecological issues and expectations:

7.1 Wetland and waterway buffers – from minimum to maximised

While 10 m setbacks are consistent with NESFM 2020 restoration parameters, Ngāti Kuia considers this to be a minimum. In line with IEMP Objective 1 (Te Mauri o Wai Māori) and Objective 2 (Te Mauri o te Whenua), the final design should maximise planted buffers wherever hydrology and landform allow, in order to:

- enhance temperature moderation and shading
- support taonga species such as tuna and kōkopu
- strengthen connectivity with the adjoining protected wetland.

7.2 Connectivity, mahinga kai and taonga species

Streams and wetlands within the site are hydrologically connected to the large QEII protected wetland next door and downstream coastal environments. (Nicol, 2025)

These areas are already used for the relocation and habitat of taonga species including tuna and kōkopu.

IEMP Objective 6 (Mahinga kai), Ngāti Kuia expects ecological design and conditions to:

- safeguard existing taonga populations
- maintain and enhance fish passage
- enable future customary use and cultural monitoring of mahinga kai.

7.3 Net Enduring Restorative Outcomes (NERO), not just “net gain”

The applicant’s ecologists conclude that, with mitigation, ecological effects will be negligible or positive and that no residual adverse effects remain.

Ngā Kanohi Kārearea explicitly replaces the legacy “avoid, remedy, mitigate” model with NERO, requiring that any development delivers:

- demonstrable and measurable uplift in mauri, habitat quality and ecosystem resilience
- benefits that are durable and intergenerational
- Catchment scale thinking that integrates climate, biodiversity, cultural and social indicators.

For Tahimana, this means that ecological enhancement cannot simply offset subdivision effects; it must clearly exceed them and be secured by long term conditions and iwi led cultural monitoring.

7.4 Monitoring, mauri assessment and adaptive management

Consistent with the IEMP’s Hunga Tiaki monitoring approach (cultural health indicators, environmental heritage monitoring, Te Kupenga o Kuia mauri assessment methodology), Ngāti Kuia expects:

- Baseline ecological and cultural health assessments for wetlands and streams
- Ongoing monitoring of water quality, habitat condition and taonga species
- Mauri monitoring alongside western science, to confirm whether predicted benefits to wetlands and streams are realised in practice
- Adaptive management triggers where monitoring shows ecological or cultural outcomes are not being met.

7.5 Spatial planning and cumulative effects

The IEMP emphasises that spatial planning must recognise cultural landscapes as living systems and take a catchment based approach to prevent fragmented decision making.

For Tahimana, this requires:

- Integrating this development with other Rural 3 growth (Tasman District Council) and nearby wetland systems
- Considering cumulative effects on wetlands, streams and the downstream Moutere Inlet, not just site by site impacts
- Ensuring that the panel assesses ecological effects within a ki uta ki tai framework, consistent with Ngā Kanohi Kārearea.

8. Recommendations

- Monitoring conditions to be agreed including frequency, locations sites, mauri monitoring of repo to confirm assumed benefits from stock exclusion, buffer and riparian planting to be established.
- Agreements regarding indigenous planting aligned with adjoining wetland to be formalised, iwi to be engaged to advise on indigenous species upholding mahinga kai and traditional practice.
- Workforce development and work programme to be verified.
- Wastewater requirements regarding communal systems to include further engagement.
- Tangata whenua engagement to be strengthened, with clear evidence of how Ngāti Kuia input has influenced outcomes, monitoring should be incorporated into conditions, both at areas outlined as significant, and to track the health of the repo both during and post construction to ensure predicted positive outcomes are met.
- Cultural values associated with waterways, wetlands and landscape are explicitly reflected in stormwater design, restoration planting and open space networks. As the development progress, Ngāti Kuia must have continued engagement and oversight to ensure proposed methods are culturally acceptable to enable meaningful engagement.
- A framework for continued iwi engagement, ensuring mātauranga and tikanga guidance informs the development, including species planting and on-site narratives.
- The receiving environment to be defined to include downstream values, as the many waterways within the application ultimately discharge to the moana. Any discharge or impacts (negative or positive) to the quality of this flow may have a potential adverse effect on the moana.

9. Conclusion

The Tahimana proposal presents opportunities for landscape restoration; however, further analysis is required to ensure that any potential or actual effects on the taiao, freshwater, cultural values, and long term resilience are appropriately understood and addressed.

Ngāti Kuia have not signalled opposition to the development; however, several cultural matters remain unresolved and will require enforceable conditions to ensure alignment with Treaty principles.

Strengthening ongoing iwi engagement, clarifying freshwater and biodiversity outcomes, and demonstrating clear consistency with national direction will be critical to ensuring the proposal achieves Treaty consistent outcomes over the long term.

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