

Submission on the SH1 Belfast to Pegasus Motorway and Woodend Bypass

Submitted by Te Kōhaka o Tūhaitara Trust

Managers of Tūhaitara Coastal Park, Waimakariri District

30 April 2026

1. Introduction and Organisational Background

Te Kōhaka o Tūhaitara Trust (the Trust) manages Tūhaitara Coastal Park — an 800-hectare coastal reserve spanning 10.5 kilometres of Northern Pegasus Bay coastline between the Waimakariri River and Waikuku Beach. The Trust was established as an outcome of the Ngāi Tahu Settlement with the Crown under the Treaty of Waitangi, and operates under a 200-year vision to restore the park to an indigenous ecosystem supporting mahinga kai and the cultural, spiritual, and ecological values significant to Ngāi Tahu and the wider Waimakariri community.

The park is comprised of several distinct land parcels with different legal status:

- Tūhaitara Coastal Park: gazetted as Recreation Reserve under the Reserves Act 1977, administered by the Trust.
- Tūtaepatu Lagoon: fee simple land owned outright by Te Rūnanga o Ngāi Tahu and administered by the Trust under the Ngāi Tahu (Tūtaepatu Lagoon Vesting) Act 1998. The Lagoon carries its own legislative protection as a direct outcome of the Ngāi Tahu Treaty Settlement.
- Te Kōhanga Wetlands and Kaitiritiri Ridge: conservation areas developed through the subdivision of Pegasus Town, transferred into Trust ownership in 2017 and governed under a Deed of Governance. These areas are ecologically significant and of high cultural importance to Ngāi Tūāhuriri Rūnanga.

Together these areas form a connected coastal freshwater and dune ecosystem supporting threatened and taonga species including tuna (ēēl), kōwaro (Canterbury mudfish), inaka, kōtuku, matuku-hūrepo (bittern), and a range of nationally significant wetland flora.

The Trust has been consulted by NZTA in relation to the potential translocation of Canterbury grass skinks in connection with this bypass project, and we note the proximity of the proposed motorway corridor to the park's ecosystems.

This submission is intended to serve as a formal record of the Trust's concerns and as a placeholder to allow ongoing engagement as the project design and consenting process advances. We wish to be recognised as a key stakeholder and to receive formal notification of all relevant consent applications, environmental assessment documents, and opportunities for further submission.

2. Freshwater Connectivity, Hydrology, and Impacts on Tūtaepatu Lagoon

Tūtaepatu Lagoon is a 49-hectare spring-fed freshwater lagoon owned outright by Te Rūnanga o Ngāi Tahu and vested under the Ngāi Tahu (Tūtaepatu Lagoon Vesting) Act 1998. Its protection is not merely ecological — it is a direct legislative outcome of the Ngāi Tahu Treaty Settlement. The Lagoon discharges north into the Taranaki Stream (flowing to the Ashley Rakahuri) and south into Saltwater Creek (discharging into the Waimakariri at Kairaki), forming the hydrological heart of the park and the source of a coastal freshwater system connecting the two major river systems of the region.

The Canterbury Plains are underlain by highly permeable gravel aquifers in which surface water, groundwater, and spring systems are intimately connected. Any significant earthworks, land modification, drainage alteration, or contamination event associated with the motorway corridor has the potential to affect the groundwater recharge regime that sustains Tūtaepatu Lagoon and the wider wetland network of the park.

The Trust requests that NZTA specifically address the following questions:

- Has a hydrogeological assessment been undertaken that considers the potential for construction and operational activities to affect groundwater flows feeding Tūtaepatu Lagoon and the park's freshwater network?
- Has modelling been carried out to assess whether drainage works, interception of subsurface flows, or changes to land permeability could alter the spring-fed character of Tūtaepatu Lagoon?

The lagoon and its connected wetlands support mahinga kai species including tuna (ēēl), kōwaro, inaka, and significant wetland bird populations. Any reduction in freshwater input, change in seasonal flow patterns, or decline in water quality would directly compromise the Trust's restoration programme and the mahinga kai values that the lagoon's legislative protection is intended to uphold.

We request that NZTA provide the Trust with a full copy of any environmental impact assessments, hydrogeological reports, and ecological assessments covering the project area and the wider surrounding area, including any assessments that may reference Tūhaitara Coastal Park, Tūtaepatu Lagoon, Te Kōhanga Wetlands, or the coastal freshwater network.

3. Stormwater, Contaminant Runoff, and the Mauri of the Receiving Environment

The proposed motorway will significantly increase the area of impervious surface in the Woodend and Pegasus catchment. Stormwater runoff from motorway carriageways typically carries contaminants including heavy metals (particularly zinc and copper from tyre wear), hydrocarbons, sediment, and road deicing compounds. In a gravel plain environment, these contaminants can travel rapidly through the groundwater system.

The Trust asks that NZTA demonstrate that:

- All stormwater from the motorway corridor is captured and treated to a standard that protects the mauri and ecological integrity of the receiving freshwater and coastal environments, including Tūtaepatu Lagoon and the park's wetland network.
- Treatment systems are designed for the long term, not merely for the consented design life of the highway, and include provision for maintenance and upgrade as standards evolve.
- The cultural and spiritual values (wairua and mauri) of the water bodies in and adjacent to the park have been appropriately considered in stormwater design, in consultation with mana whenua.

We note that Tūtaepatu Lagoon is owned by Te Rūnanga o Ngāi Tahu and vested under the Ngāi Tahu (Tūtaepatu Lagoon Vesting) Act 1998. It carries significant cultural importance to Ngāi Tahu as mahinga kai and an urūpā. Te Kōhanga Wetlands and Kaitiritiri Ridge are additionally recognised as being of high cultural importance to Ngāi Tūāhuriri Rūnanga under their governing Deed. The obligation to protect the mauri and cultural values of these areas must be explicitly addressed in environmental assessment and consent conditions.

4. Construction-Phase Disturbance: Wildlife and Habitat

The Trust is concerned about the effects of construction activity on wildlife in and adjacent to Tūhaitara Coastal Park. The park supports a number of threatened and nationally vulnerable species whose populations are sensitive to disturbance, including matuku-hūrepo (Australasian bittern), which are known to breed within the wetland habitats of the park.

We request clarity on the following:

- What protocols will be in place to manage dust, particularly given the proximity of the dune system and the sensitivity of dune habitat and wetland water quality to sediment deposition?
- Has a wildlife monitoring programme been designed that would detect and respond to construction-related impacts on species within the park?

5. Motorway Planting: Ecological Representativeness and Indigenous Ecosystem Design

The Trust notes that the existing Christchurch Northern Motorway planting was carried out using random groupings of the same or similar species, rather than forming a varied, ecologically representative habitat reflecting the indigenous plant communities that would naturally have occurred in this landscape.

The Trust strongly requests that the planting plan for the Pegasus Motorway be designed to reflect the indigenous coastal and lowland ecosystems native to North Canterbury, including but not limited to:

- Use of locally eco-sourced native plants to maintain genetic integrity and maximise ecological fit.
- Avoidance of species monocultures or homogeneous block plantings, in favour of mixed plantings that reflect natural species associations and provide varied habitat structure for wildlife.
- Integration of planting design with the adjacent Tūhaitara Coastal Park restoration programme, so that the motorway corridor can function as an ecological buffer and potential wildlife movement corridor rather than a barrier.

The Trust is willing to provide input into the planting plan design if appropriate.

6. Recreational Access to Tūhaitara Coastal Park

The Trust understands that the project does not currently include provision for a dedicated shared-use cycling and walking path along the new motorway corridor. The Trust is concerned that if local access routes to Tūhaitara Coastal Park are disrupted or severed by the motorway without adequate replacement, this will have a significant negative impact on public access to the park and on the Trust's ability to fulfil its community and educational functions.

Tūhaitara Coastal Park is accessed from Kairaki, The Pines Beach, Woodend Beach, Pegasus Town, and Waikuku Beach. The park provides walking, cycling, and equestrian trails of regional significance, including the accessible Tūtaepatu Trail. A significant portion of park visitors arrive by active transport, particularly from Pegasus Town and surrounding communities.

The Trust requests that NZTA:

- Confirm that all existing access connections between communities and Tūhaitara Coastal Park will be maintained or improved.
- Assess whether the motorway creates any new barriers to park access and provide for safe crossing points or alternative routes where needed.
- Engage with the Trust on active transport connections that would increase, rather than reduce, visitation to the park, noting that public access to the park supports the Trust's conservation and education mission.

The Trust notes that the level of public access and visitation to the park has a direct bearing on the Trust's fundraising capacity, community partnerships, and volunteer programme — all of which underpin the Trust's conservation work.

8. Archaeological and Cultural Heritage Considerations

Tūhaitara Coastal Park and the surrounding coastal landscape hold significant archaeological and cultural heritage values, including evidence of past Ngāi Tahu occupation and use of the coastal environment.

The Trust requests that:

- In the event that any component of the motorway alignment is adjusted or extended in a direction that brings it closer to Tūhaitara Coastal Park, a full archaeological assessment of the affected area is undertaken prior to any ground disturbance.
 - Ngāi Tahu and the Trust are formally notified and consulted if any alignment changes are proposed that reduce the buffer between the motorway and the park boundary.
 - Any archaeological monitoring protocols for the project are shared with the Trust
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9. Summary of Requests

Te Kōhaka o Tūhaitara Trust requests that NZTA:

- Recognise the Trust as a key affected stakeholder and provide formal notification of all consent applications and assessment reports related to this project.
- Provide the Trust with copies of all environmental impact assessments, hydrogeological studies, and ecological reports relevant to the project area and wider catchment, including any that reference Tūhaitara Coastal Park or Tūtaepatu Lagoon.
- Specifically assess and report on potential impacts to the groundwater and spring systems which may feed and impact Tūtaepatu Lagoon and the freshwater network of the park.
- Demonstrate that stormwater management design protects the mauri and ecological integrity of the receiving environment, including Tūtaepatu Lagoon.
- Design the motorway planting plan to reflect the indigenous ecosystems naturally occurring in this area, using eco-sourced native plants and ecologically representative species associations.
- Confirm that public access connections to Tūhaitara Coastal Park are maintained and assess opportunities to improve active transport access to the park.
- Undertake appropriate archaeological assessment and cultural monitoring if any alignment changes bring the motorway closer to the park boundary.
- Provide the Trust with ongoing opportunities to engage with the project as design and consenting progresses.

10. Placeholder for Future Feedback

The Trust reserves the right to provide further feedback on this project as design detail, consent applications, and environmental assessments are made available. This submission is intended as an opening position and a record of our interest and concerns. The Trust will engage further as information becomes available and requests that NZTA proactively share relevant information to enable meaningful and informed participation.

11. Contact Details

Te Kōhaka o Tūhaitara Trust

Tūhaitara Coastal Park

Waimakariri District, North Canterbury

For any queries regarding this submission, please contact the Trust directly.