

24 June 2026

Environmental Protection Authority
Privet Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

AWANUI LINKS – REFERRAL APPLICATION

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

WAIKATO-TAINUI COMMENTS

4. The proposal comprises a complex, large-scale mixed-use development incorporating a range of land uses, including residential, retirement, tourism, industrial, and recreational activities, across a substantial rural area.
5. The application identifies a range of potential effects relevant to Maaori values, including impacts on freshwater systems, indigenous biodiversity, soil resources, landscape character, and cultural and archaeological values. These matters are noted at referral stage and will require further detailed assessment should the project proceed to substantive consideration.
6. The presence of modified rural land with some ecological features is noted, including proposed wetland creation and ecological enhancement measures. While these mitigation approaches are supported in principle at a high level, their effectiveness, long-term management, and enforceability will require further technical and cultural assessment.
7. Freshwater management proposals, including stormwater treatment systems and wetland design, are noted. Given the significance of the Waikato River catchment to Waikato-Tainui, further assessment will be required to understand cumulative effects, downstream impacts, and alignment with Te Ture Whaimana o Te Awa o Waikato.
8. The proposal involves the development of land identified as highly productive. While the applicant has provided an assessment of constraints, the loss of productive capacity remains a matter of significance and will require careful consideration in the context of regional land use change and cumulative effect.
9. The application indicates ongoing engagement with mana whenua and proposes continued development of cultural impact assessment documentation. While engagement is noted, further detail will be required to ensure cultural values are appropriately identified, assessed, and reflected in project design and conditions.
10. The staged nature of the development is noted, including housing, retirement, tourism, and industrial components delivered over time. This staging approach will require robust integration of infrastructure provision, environmental management, and monitoring to ensure effects are appropriately managed across the full development lifecycle.
11. Waikato-Tainui notes that the proposal's consistency with relevant growth planning frameworks, including Future Proof and any applicable regional or sub-regional growth strategies, is a matter on which the relevant local authorities are best placed to provide detailed assessment.
12. The matters raised in these comments are not intended to be exhaustive. Given the preliminary nature of the referral stage and the information currently available, Waikato-Tainui may raise additional matters and provide further comments should the proposal progress beyond the referral stage and further information become available.
13. We note that the proposed site is located within the Waikato River catchment and sits within the statutory framework established by the River Settlement legislation.

OVERALL POSITION

14. Waikato-Tainui does not take a final position on the proposal at referral stage. However, the matters identified above are considered to be of significance to Waikato-Tainui interests and will require further detailed assessment should the project be accepted into the Fast-track Approvals process.
15. In particular, further consideration would be required in relation to:
 - effects on freshwater systems and alignment with Te Ture Whaimana o Te Awa o Waikato;
 - loss of highly productive land and cumulative land use change;
 - effects effects on indigenous biodiversity and effectiveness of proposed mitigation;
 - cultural and archaeological values within the project area; and
 - adequacy and enforceability of proposed management and mitigation measures.
16. Waikato-Tainui reserves its position pending further information, including completion of cultural impact assessments, ongoing engagement with mana whenua, and appropriate resourcing by the Applicant to support continued involvement.
17. The referral application provides a sufficient high-level understanding of the proposal and its potential interface with Maaori interests. However, significant matters remain to be addressed at substantive stage to enable a full assessment of effects and mitigation outcomes.
18. Waikato-Tainui looks forward to continued engagement as the proposal progresses through the Fast-track Approvals process.

Naaku i roto i ngaa mihi, naa

T Mapu

Te Maakariini Mapu
ENVIRONMENTAL PLANNER
WAIKATO-TAINUI

