

TO: THE EXPERT PANEL
RE: STATE HIGHWAY 1 NORTH CANTERBURY
WOODEND BYPASS PROJECT
SUBSTANTIVE APPLICATION (FTAA-2512-1157)
WRITTEN RESPONSE TO MINUTE 3
INVITATION TO COMMENT
DATE: 3 MAY 2026

INTRODUCTION

On 1 April 2026, the Expert Panel for the State Highway 1 North Canterbury – Woodend Bypass (Belfast to Pegasus) (the Project) invited written comments from relevant parties under section 53 of the Fast-Track Approvals Act 2025 (the Act). Te Ngāi Tūāhuriri Rūnanga and Whitiora Centre Ltd (Whitiora) are identified as invited parties.

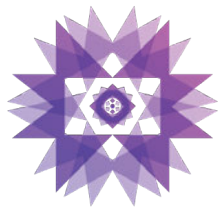
Whitiora is mandated by Ngāi Tūāhuriri Rūnanga to provide advice on its behalf in respect of all projects involving land use, water and development being processed under the Resource Management Act 1991 and the Fast-track Approvals Act 2025. Accordingly, all comments made in this document can be read as from both Whitiora and Ngāi Tūāhuriri Rūnanga.

Please find set out below our comments.

BACKGROUND

Whitiora prepared a Statement of Cultural Values, Interests and Priorities that was approved by the Substantive Application. That statement provides detail on the historical and cultural context of the area and identifies the key environmental matters of priority for Ngāi Tūāhuriri Rūnanga.

The Project will permanently alter an area of high cultural significance. Ngāi Tūāhuriri Rūnanga, Ngāi Tūhaitara, Ngāti Rakiāmoa and Ngāi Tahu, who have had continuous occupation within the area for more than 47 generations. The Project corridor crosses a cultural landscape that historically included multiple Pā, with Kai Ika Māori of national significance. Recorded archaeological sites identified within the Project boundary overwhelmingly concern Māori occupation and culture. These sites reflect a landscape that was characterised by extensive kāinga pūtea, including horticultural sites.



cultivation practises (borrow pits and modified soils), urupā and burials, trail systems, customary fisheries, fowling and other mahinga kai gathering and processing areas (middens/ovens). Accordingly, Ngāi Tūāhuriri expects that construction of the Project will involve accidental discoveries of previously unrecorded archaeological sites of Māori origin.

The approval of the Project designation in 2015 represented a further irreversible change to this cultural landscape. The activities to be authorised by this Substantive Application will also have a cumulative effect on cultural values through the permanent loss of wetlands, modifications to culturally significant waterbodies and the loss of indigenous biodiversity. The mitigation, off-setting and compensation proposed in the Substantive Application are all necessary to assist with some degree of restoration of cultural values within the landscape.

Water quality, and the health of aquatic ecosystems, are also matters of high interest and concern for Ngāi Tūāhuriri. The construction of the Project has the potential to adversely impact water quality and aquatic ecology. It is also important to acknowledge that the locality remains dominated by a complex of inter-connected water bodies that extend from inland of the Project site, to the coast - *Te Tai o Mahaanui* – which is a Statutory Acknowledgement¹, to be recognised and considered in Resource Management processes.

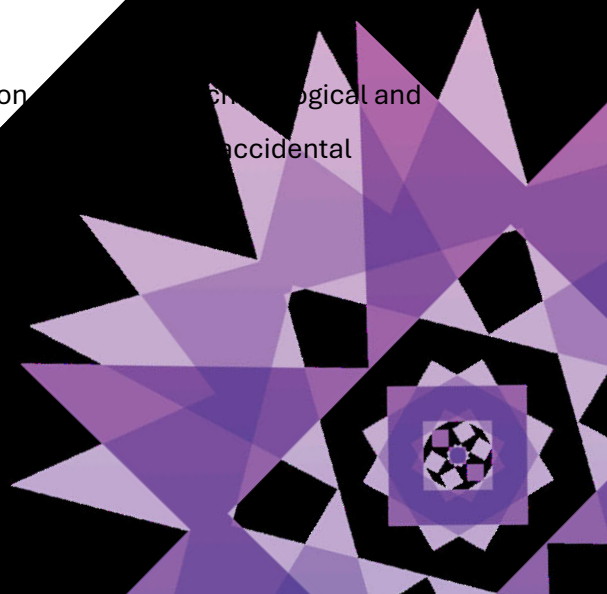
It is of utmost importance to Ngāi Tūāhuriri and Whitiora, that the Expert Panel keeps these matters at the forefront of its deliberations and ensures that the conditions imposed on the approval appropriately address and provide for these matters with a high degree of certainty, and the ability to monitor and enforce.

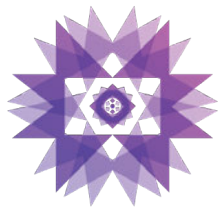
MATTERS FOR CONDITIONS

ARCHAEOLOGY AUTHORITY – PROPOSED CONDITIONS

Whitiora confirms that it has had an active role in the preparation of the Archaeological and Cultural Sites Management Plan, and that appropriate protocols for the identification, accidental discovery and recording of impacted sites have been implemented.

¹ Schedule 101, Ngāi Tahu Claims Settlement Act 1991





Whitiora is concerned that the final suite of conditions relating to archaeology appropriately identify and secure the interests and role of Ngāi Tūāhuriri. This includes respect for, and adoption of tikanga, protocols for engagement with Whitiora, the monitoring of archaeological investigations and earthworks, along with decision-making in respect of any accidental discoveries. In this context Whitiora seek two changes to the proposed conditions as follows:

- 1 Having regard to the extent and significance of the cultural landscape between the Waimakariri and the Rakahuri Rivers, Whitiora expects that requirements for cultural monitoring of earthworks should be enabled across the whole Project site. Currently, the proposed conditions (specifically Condition AA5.(b)(i)) only identifies cultural monitoring related to archaeological investigations. This falls short of expectations for such a culturally important location, and does not align with the content of the draft Archaeological and Cultural Sites Management Plan which anticipates Cultural Advisors or Monitors:
 - a. being present or taking tikanga actions based on the mandate of Ngāi Tūāhuriri; and
 - b. monitoring project works at their discretion (see Section 7.4 of the draft Archaeological and Cultural Sites Management Plan).
- 2 Proposed Condition AA.5.g requires material changes to the certified Archaeological and Cultural Sites Management Plan to be submitted in writing to HNZPT for certification. Whitiora must also be advised of any material changes to the Archaeological and Cultural Sites Management Plan.

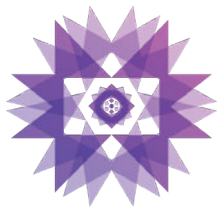
WILDLIFE APPROVAL

Whitiora has reviewed the proposed Wildlife Approval conditions.

Whitiora requests that Condition WA.2 is amended to require that any updates to the Archaeological and Cultural Sites Management Plan is advised to Whitiora, as well as DOC.

RESOURCE CONSENT CONDITIONS

Whitiora has reviewed the proposed resource consent conditions for the Resource Consent Application and is generally in agreement. In the event that the Project is subject to those conditions, Whitiora needs to be assured that conditions for monitoring are not reduced in scope or effect; and that conditions for monitoring are not reduced in scope or effect:



- Conditions enforcing the comprehensive management of earthworks, including separation from, and protection of waterbodies from the effects of earthworks and the management of dust;
- Conditions for stabilisation and revegetation of earth-worked sites;
- Conditions concerning the maintenance and/or reinstatement of the geomorphology of surface water bodies to a natural state, specifically noting the conditions for the realignment of Waihora Stream, Taranaki Stream and the Taranaki Stream tributary;
- Conditions for the provision of fish passage;
- Conditions for monitoring water quality within wetlands and surface water bodies and groundwater;
- Conditions enforcing the implementation of legally enduring ecological offset and compensation measures as proposed in the Substantive Application; and the monitoring of the success of those measures;
- Conditions requiring the mitigation of effects on the amenity values of Lees Road

MANAGEMENT PLANS

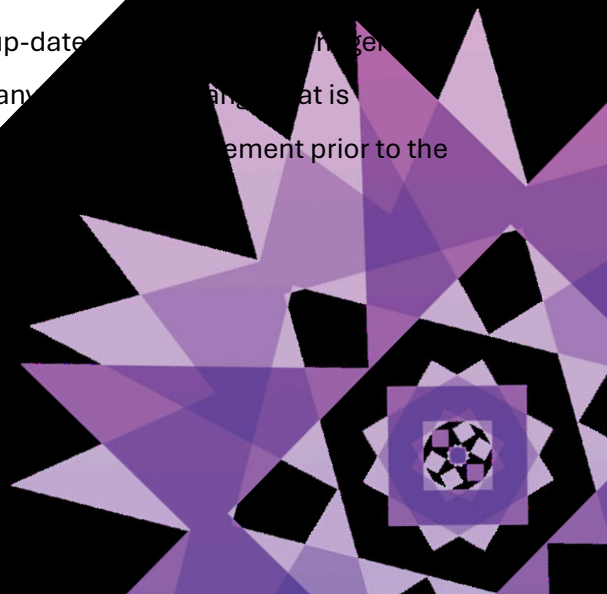
The proposed conditions require a suite of management plans to be developed.

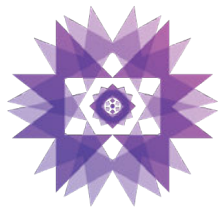
Whitiora notes that its involvement in the review and content of those management plans is fundamental to ensuring that matters relating to the cultural values, interests and priorities of Ngāi Tūāhuriri are addressed. Accordingly, Whitiora supports the retention of those conditions which require NZTA to engage with Whitiora in the development of management plans. This includes conditions requiring protocols to enable Ngāi Tūāhuriri to raise environmental issues during construction.

Whitiora also seeks an additional condition requiring that any up-date to the Management Plan is advised to Whitiora as the project progresses; and that any change that is material to matters of high importance or interest to Ngāi Tūāhuriri requires agreement prior to the change being made.

CONTACT DETAILS

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WHITIORA

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