

Comment on Draft Conditions and Draft Decision

State Highway 1 North Canterbury Woodend Bypass (Belfast to Pegasus) — FTAA-2512-1157

Covering submission by Te Kōhaka o Tūhaitara Trust

Managers of Tūhaitara Coastal Park, Waimakariri District

20 July 2026

1. Introduction

Te Kōhaka o Tūhaitara Trust (the Trust) thanks the Expert Panel for the opportunity to comment on the draft decision and draft conditions for the State Highway 1 North Canterbury Woodend Bypass (Belfast to Pegasus), released on 26 June 2026, and for the Panel's correction in Minute 12 (16 July 2026) inviting the Trust's comments by 22 July 2026. The Trust previously made a submission on this project on 30 April 2026, setting out its role, its interests, and its concerns regarding freshwater connectivity, stormwater effects, and mahinga kai values within Tūhaitara Coastal Park.

This comment focuses specifically on the draft conditions relevant to freshwater, hydrology, and aquatic mahinga kai species, in particular the conditions governing construction and operational stormwater discharge, groundwater effects and flood level change. The Trust's precise amendments sought, with reasons, are set out in the accompanying tabulated document, prepared in the format requested in Minute 12. This covering submission sets out the context for those amendments.

The Trust considers that Tūtaepatu Lagoon and the Te Kōhanga Wetlands are likely to be affected by, or to form part of the final receiving environment for, stormwater and other effects associated with the Project, given the hydrological connectivity of the Canterbury Plains gravel aquifer system and the position of Taranaki Stream within the Project works. The Trust notes that neither Tūtaepatu Lagoon nor the Te Kōhanga Wetlands are named or specifically addressed anywhere in the 3k Hydrological Assessment or draft resource consent conditions. Taranaki Stream and the Taranaki Stream tributary are hydrologically connected to areas within the Coastal Park. This gap, and its wider implications for the Park's wetland systems, is addressed further below.

2. Tūtaepatu Lagoon and Te Kōhanga Wetlands as Receiving Environment

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 — a direct legislative outcome of the Ngāi Tahu Treaty Settlement. It is a significant mahinga kai site and urupā, supporting tuna (eel), kōwaro (Canterbury mudfish), inanga, and matuku-hūrepo (Australasian bittern), among other taonga species. Te Kōhanga Wetlands and Kaitiritiri Ridge, transferred to the Trust in 2017, are recognised as of high cultural importance to Ngāi Tūāhuriri Rūnanga.

These water bodies are part of a connected coastal freshwater and dune ecosystem, underlain by highly permeable gravel aquifers in which surface water, groundwater, and spring systems are intimately connected. Given this connectivity, effects on water quality, flow, sediment, and flood levels in Taranaki Stream have real potential to be transmitted — via surface flow and/or groundwater — to Tūtaepatu Lagoon and the Te Kōhanga Wetlands. The Trust requests that the Expert Panel and NZTA explicitly confirm whether Tūtaepatu Lagoon and the Te Kōhanga Wetlands catchment are included within the scope of the receiving environment considered under the stormwater, hydrology, and ecology conditions, and if not, that they be added.

This gap extends to wetlands further afield. Waihora Stream flows south, broadly parallel to the proposed road alignment, before turning east south of Woodend Beach Road and discharging to the broad interdunal area west of Woodend Beach — an area which connects to Tūtaepatu Lagoon and Tūhaitara Coastal Park. This pathway is not shown on the Project's hydrological maps or referenced in the hydrological assessment, and the Trust asks that it be included and assessed accordingly, with Tūhaitara Coastal Park specifically named given its recognised cultural and ecological significance.

3. Request to Be Recognised as a Consulted Party

On this point, the Trust supports Whitiōra's submission, including Whitiōra's Additional Document 1E — Statement of Cultural Values, Interests and Priorities, in particular the matters raised under the Principle of Mahinga Kai (tribal and local economies) at paragraphs 49 and 50. The Trust seeks conditions that protect natural inland wetlands from potentially contaminated stormwater during both construction and operation of the Project, that ensure the Trust is made aware of any monitoring results, and that establish a protocol for consultation with the Trust — including the potential for mitigation where required.

The Trust requests that it be formally added as a party to be notified and consulted under the relevant management plan conditions on the same basis as Whitiōra, in relation to any matters affecting water quality, hydrology, or ecological values likely to affect Tūtaepatu Lagoon, the Te Kōhanga Wetlands, or the wider Tūhaitara Coastal Park.

The Trust's detailed comments, including the specific condition numbers, the precise wording of the amendments sought, and the reasons for each, are set out in full in the accompanying document. The Trust asks that this covering submission be read together with that document.

4. Contact Details

Te Kōhaka o Tūhaitara Trust

Kelli Patterson, General Manager

[REDACTED]

[REDACTED]

The Trust is able to receive further communications on this matter by email