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16 September 2026

Environmental Protection Authority
Private Bag 63002
Wellington 6140
NEW ZEALAND

Teenaa koe

STILLHAVEN – FAST-TRACK 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 Stillhaven Fast-Track application.

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WAIKATO-TAINUI COMMENTS

4. Waikato-Tainui understands that the proposal is for a residential and mixed-use development comprising approximately 700 residential dwellings, a retirement village of approximately 11 hectares with around 200 retirement units and associated aged care facilities, and two commercial nodes providing local services and amenities. The proposal also includes public open space and stormwater reserves, an integrated stormwater and flood-management network, and associated transport, wastewater, water supply, electricity and telecommunications infrastructure.

5. Waikato-Tainui notes that potable water and wastewater servicing is proposed to connect to infrastructure currently under construction to service the wider Te Kowhai area. Waikato-Tainui considers that the capacity and servicing arrangements should be confirmed to ensure they can accommodate the proposed development alongside existing and planned demand, including any interim arrangements. Waikato-Tainui would advocate for an approach that aligns with Waikato District's growth strategies and sequencing and supports the objectives sought by Te Ture Whaimana.

6. Future Proof identifies no shortfall in housing development capacity across the sub-region and notes that demand for retirement living can largely be met within existing urban areas and established settlements. Waikato-Tainui considers these findings should be considered alongside the relevant growth strategies, which identify areas to accommodate anticipated growth. Given the proposal is outside these planned growth areas and would result in the conversion of Highly Productive Land (LUC 2) to urban-scale development, there should be a clear strategic justification for the proposal.

7. The applicant has undertaken engagement with relevant Waikato-Tainui mana whenua in developing the referral application. Waikato-Tainui has considered this engagement, together with the relevant Treaty settlement and statutory context, in forming its position. Should the project progress to the substantive phase, Waikato-Tainui expects engagement with mana whenua to continue as the proposal is developed and potential effects and measures to address them are assessed in greater detail.

8. Should the project progress to the substantive phase, Waikato-Tainui expects the application to be aligned with Te Ture Whaimana and the relevant provisions of Tai Tumu, Tai Pari, Tai Ao, particularly in relation to flooding and other natural hazards, the loss of productive land, engagement with mana whenua, and protection of cultural values.

OVERALL POSITION

9. In principle, Waikato-Tainui does not support the use of an approvals process where condensed timeframes limit the opportunity for full and meaningful participation by iwi. Notwithstanding this, Waikato-Tainui considers that the referral application and

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information provided through engagement to date provide sufficient high-level understanding of the proposal, its potential effects and its interface with Waikato-Tainui interests to inform the referral decision. This position does not represent support for the proposal or its effects, which will require further assessment and engagement should the proposal advance to the substantive phase.

10. 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