

APPENDIX 6 – CONSULTATION RECORD WITH RELEVANT IWI AUTHORITIES, HAPŪ, AND TREATY SETTLEMENT ENTITIES

Relevant iwi authorities, hapū, and Treaty settlement entities			
Te Rūnanga o Ngāi Tahu			
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1.	EM from Jo Appleyard to Chris Ford - Carter Group - Ōhoka Residential Development - fast-track consultation	8 May 2026	1-2
2.	EM from Chris Ford to Jo Appleyard confirming support of letter dated 13 May 2025 (Tab 5)	22 May 2026	3-4
Te Ngāi Tūāhuriri Rūnanga			
Mahaanui Kurataiao Limited			
3.	Letter from Jono Begg (Inovo) to Mahaanui Kurataiao Ltd	17 January 2025	5-24
4.	Mahaanui Kurataiao Ltd Mana Whenua Advice J7201 – Carter Group - Ohoka Fast Track Application	31 January 2025	25-32
Whitiora			
5.	Letter from Tania Wati (Chair -Te Rūnanga o Ngāi Tūāhuriri Rūnanga) to Jo Appleyard	13 May 2025	33-34
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7.	Letter from Tania Wati (Chair -Te Rūnanga o Ngāi Tūāhuriri Rūnanga) to Jo Appleyard	30 June 2025	39-40
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Meg Davidson

Subject: FW: Carter Group - Ōhoka Residential Development - fast-track consultation

From: Jo Appleyard <Jo.Appleyard@chapmantripp.com>

Sent: Thursday, 8 May 2025 9:18 a.m.

To: Chris Ford [REDACTED]

Cc: Ben Williams [REDACTED] Tallulah Parker [REDACTED]

Subject: Carter Group - Ōhoka Residential Development - fast-track consultation

Caution: This is an EXTERNAL email. Please consider safe cyber security practices.

Kia Ora Chris,

We are working with Carter Group Limited (*Carter Group*) on the submission of their fast-track substantive application for the Ōhoka Residential Development. The project is listed under Schedule 2 of the Fast-track Approvals Act 2024 (FTAA).

The project is for approximately 850 residential dwellings, a commercial or mixed-use centre, and a polo field, and enable the potential development of a retirement village at 511, 531 Mill Road, Ohoka, Waimakariri.

As part of its consultation requirements under the FTAA, Carter Group is required to consult with those parties identified under s 11 of the FTAA (**attached**).

Carter Group has already started / intends to consult further with Mahaanui Kurataiao (consultation to-date **attached**) and we have also this week contacted Whitiara too and requested clarify as to who we should be talking to over the next few weeks leading up to lodgement . This contact in their capacity as 'relevant iwi authorities under the FTAA.

Separately from that we understand that that consultation may also be required with TRONT under the FTAA in its capacity as a 'treaty settlement entity'.

Please let us know if TRONT has come to any position on consultation on applications under the FTAA that are listed in Schedule 2?

We would be happy to provide any further information you require. In terms of timing we expect to lodge in the next few weeks.

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Meg Davidson

From: Chris Ford [REDACTED]
Sent: Thursday, 22 May 2025 8:45 PM
To: Kyle Davis; Jo.Appleyard@chapmantripp.com
Subject: RE: Ngāi Tūāhuriri to Carter Group re fast-track consent application

Kia ora Jo

On behalf of Te Rūnanga o Ngāi Tahu, I confirm we support this letter.

Ngā mihi

Chris

Ngā mihi
Chris

Chris Ford - Group General Counsel - Te Runanga Group, PO Box 13-046, CHRISTCHURCH
Ph [REDACTED]

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From: Kyle Davis [REDACTED]
Sent: Thursday, 22 May 2025 5:08 p.m.
To: Jo.Appleyard@chapmantripp.com
Cc: Chris Ford [REDACTED]
Subject: Ngāi Tūāhuriri to Carter Group re fast-track consent application

Caution: This is an EXTERNAL email. Please consider safe cyber security practices.

Tēnā koe Jo,

As attached, and we look forward to hearing from Carter Groups nominated project convenors, etc.
Thank you.

Ngā mihi,

Kyle Davis

Principal Advisor
Whitiora Centre



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17 January 2025

Mahaanui Kurataiao Ltd

226 Antigua Street

Central City

Christchurch 8011

By Email: Mahaanui.admin@ngaitahu.iwi.nz

Tēnā koutou,

RE: FAST TRACK APPLICATION CONSULTATION – ŌHOKA RESIDENTIAL DEVELOPMENT

I trust this letter finds you well. My name is Jono Begg, and I am a planning consultant with Inovo Projects Limited. I am writing to engage with Mahaanui Kurataiao regarding a proposal by Carter Group to develop a residential area within Ōhoka. The current proposal will form part of an application for fast-track approval under the recently approved Fast Track Approvals Act. The proposal is very similar to the Ōhoka Private Plan Change request (RCP031), which was previously reviewed by your organisation in February 2022.

We acknowledge and appreciate the valuable insights and guidance Mahaanui Kurataiao (MKT) and specifically Te Ngāi Tūāhuriri Rūnanga provided during the plan change process. Your contribution has helped shape our understanding and approach to this project's development thus far.

We are now progressing through design at a greater level of detail through the fast-track application process. The fast-track approval will include a complete set of consents covering District, Regional and National Environmental Standard requirements. These consents will enable the construction, subdivision, land use, and operation of infrastructure services for the site. Specific expert consultant reports and the full fast-track application are currently still being collated over the next few weeks leading up to the lodgement date.

Given your organization's previous involvement and cultural expertise, we would welcome the opportunity to continue working together to ensure the project appropriately reflects and respects cultural values and considerations.

We are happy to arrange a meeting at a time and location at a mutually agreeable time in the next week, noting our intended lodgement date of 7th of February 2025.

Please let me know if you would like any additional information about the proposal before we meet, or if you have any questions about this consultation process.

This letter will provide the following information in relation to this project:

- Summary of the Proposal
- Summary of Changes from the previous Plan Change Application
- Response to the Previous Correspondence
- Next Steps

Summary of the Existing Proposal

When MKT were consulted through the plan change process the key features of the Outline Development Plan (ODP) were identified as:

- Subdivision Design including
 - Two commercial centres, educational facilities or a retirement village in the area immediately adjoining the larger of the two commercial zones on Whites Road,
 - A small village square for community events/gatherings,
 - 800 residential units and a school or retirement village,
 - Provision for native riparian planting, naturalisation, and instream enhancement,
- Water Reticulation to be provided from the establishment of a new source.
- Wastewater reticulation to be extended to discharge at the Rangiora Wastewater Treatment Plant.
- Stormwater runoff discharged via Stormwater management (and treatment) areas to the Ōhoka Stream and Ōhoka South Branch.
- Road corridor to be used as overland flow paths (OLFP) to direct stormwater when the drainage network is at capacity.
- Proposed minimum waterbody setbacks for earthworks and buildings including
 - 10 metres from the Ōhoka Stream tributary, Groundwater Seep, Northern and Southern Spring Channel and South Ōhoka Branch.
 - 20 metres from the northern springhead.
 - 30 metres from the large southern springhead.
 - 5 metres from the un-named waterway along the furthestmost southwest boundary of the ODP area.

Summary of Changes and the Current Proposal

Additional investigations and design have assisted in further developing the proposal to the current form. Generally, a similar pattern of development is proposed however the following key changes are noted:

- One of the commercial centres (located on Mill Road) has been removed and replaced with residential lots.
- The total number of Residential units is approximately 860.
- Native riparian planting, naturalisation, and instream enhancement is proposed, with more specific information on location of the areas to be ecologically enhanced.

Critical waterways have been identified through the plan change process as including the Ōhoka Stream tributary, Groundwater Seep, Northern and Southern Spring Channel, South Ōhoka Branch, northern springhead, large southern springhead (often referred to as the central springhead), and the un-named waterway along the furthestmost southwest. Generally, the detailed design remains consistent with the general layout of the outline development plan which was presented in 2022, however further detail is now provided on these waterways:

- A minor realignment of the northern spring channel is proposed. This will also include riparian planting and enhancement. A minor realignment of the South Ōhoka Branch, including riparian enhancement.
- The groundwater seep area will generally be retained with additional planting and enhancement proposed in the adjacent SMA shown on the scheme plan
- Other artificial and artificially induced waterbodies or wet areas to be removed and offset planting provided.

In addition to these updates, further information is known around the construction activities required to complete the development and the proposed servicing of the development. Servicing is proposed via:

- Establishment of Stormwater Management Areas which will be designed to improve ecological outcomes as well as managing stormwater discharge across the site.
- Wastewater disposal is proposed to occur via an extension to the existing reticulated network.
- Potable water is proposed to be supplied via a new community drinking water scheme which involves transferring existing irrigation water take consents to supply domestic purposes.

Consents will be sought for construction of the development, Subdivision, Land use, and operation of servicing infrastructure. Construction consents will include typical land development activities such as

earthworks, construction phase discharge, dewatering and works in waterways. Operational consents will include water takes, discharge of operational stormwater, and other ancillary consents which will be described in full detail in the application. Prior to lodgement, we will be meeting with ECAN to discuss our proposal and seek their feedback and advice.

Response to the previous correspondence

As mentioned, we are in the fortunate position to have received advice from MKT already. This has been attached to the letter and much of this guidance has been used to inform the subsequent design process. MKT provided a number of recommendations on behalf of Te Ngāi Tūāhuriri rūnanga. These are addressed individually below.

Recommendation 1

Where practicable, there should be a 20m setback between the proposed subdivision development and waterways that flow through the site. Additionally, there should be a 10 buffer within the setback which should be planted with locally sourced indigenous plants to assist with nutrient uptake and to enhance biodiversity values.

This requirement is generally being complied with. Covenants will be recommended on certain sites which are located within buffer distances to ensure these are achieved.

It is noted some temporary works may be required near/in waterways on the site. These will be managed to ensure significant ecological areas and water bodies are protected through the works. Best practice site management including erosion and sediment controls plans should effectively mitigate any potential impact on the value of these waterbodies.

It is also noted several waterbodies with low ecological values are proposed to be replaced through the development of the site. Several additional areas have been identified as wetlands, however most are low quality, artificial and or ephemeral and have little ecological value. Where the subdivision result in the removal of these areas, additional areas are proposed to be enhanced to offset their loss. The design of these areas has been determined through consultation with a freshwater ecologist specialist and other specialists.

Riparian planting areas, and ecological enhancement areas are proposed throughout the site and adjacent to waterways. Landscape plans are being prepared with a mixture of plant species which aim to improve ecology and amenity of these areas. We invite MKT to provide their recommendation on options for locally sourced indigenous plants which may be appropriate for these planting areas.

Recommendation 2

The inclusion of locally sourced indigenous planting in landscaping plans is an important mitigation measure for subdivision development. This includes street trees and landscaping, which may include indigenous species like *Plagianthus regius*.

The final landscape plan will be provided to the Rūnanga. In the first instance, we invite comments and suggestions on appropriate planting types for these areas.

Recommendation 3

Robust erosion and sediment controls must be installed and maintained in accordance with ECAN's Erosion and Sediment Control guidelines.

A detailed and comprehensive site management plan will be provided for each stage of works. The erosion and sediment control will align with ECANs guidelines ensuring adequate protection and management of sediment and run off associated with construction. Specific detailed plans will be included where works are in close proximity to waterways.

These plans will be submitted to ECAN for approval as each stage of work commences.

Recommendation 4

The policies identified in the Ngāi Tahu Subdivision and Development Guidelines should be referred to by the developer, particularly regarding stormwater management, water supply and use (grey water recycling) and indigenous planting. These guidelines have been attached at the end of this document.

These guidelines have been adopted where relevant. A detailed assessment of this is provided as an attachment to this letter.

Recommendation 5

Future subdivision development should incorporate best practice onsite stormwater management controls to mitigate the effects of development and allow for stormwater infiltration.

- ***Stormwater should be directed to detention ponds and swales to reduce runoff from site and allow for infiltration.***
- ***Stormwater discharge from roads and carparks should not be directed to waterways.***

Best practice stormwater management is being adopted in the proposed servicing arrangement for the development. A stormwater management plan and infrastructure report can be provided in due course which outlines how this is achieved. At a high level, a series of stormwater management areas will be created. Stormwater will be directed to these ponds where it will undergo treatment prior to being discharged to waterways (with some incidental discharge to ground from stormwater basins).

Recommendation 6

To protect any potential wāhi tapu/wāhi taonga values for the site, an Accidental Discovery Protocol consistent with Appendix 3 of the Mahaanui Iwi Management Plan is recommended for all earthworks. Even shallow soil disturbance has the potential to uncover culturally significant material.

An accidental discovery protocol will be proposed with the application.

Next Steps

We would appreciate the opportunity to:

- Seek your feedback on specific aspects of the development
- Discuss opportunities for ongoing collaboration
- Understand any concerns or considerations you may have.

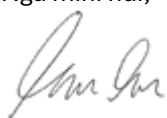
Our client is keen to submit their fast-track application on the 7th of February. We invite any comments or requests from MKT on any of the matters discussed above. We anticipate further opportunities for collaboration and comment will be provided through the Fast Track process, however, we hope we are able to collaborate and build off the previous feedback which has been provided prior to making our fast-track application.

If you have any requests, including for information, to meet, or to visit the site please get in touch.

Attachments

- Scheme Plan
- Record of previous consultation
- Assessment of compliance with Ngāi Tahu subdivision and development guidelines

Ngā mihi nui,



Jono Begg

Planning Manager – Inovo Projects



CREATE
PLAN
DELIVER

Attachment A: Scheme Plan

Attachment B: Record of previous consultation

22 February 2022

Attention: Bruce Van Duyn - [REDACTED]

Ohoka Plan Change Request

Manawhenua Statement

Ngāi Tahu are tangata whenua of the Canterbury region and hold ancestral and contemporary relationships with Canterbury. The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act) and, through this structure and this Act, sets the requirements for recognition of tangata whenua in Canterbury.

The following Rūnanga hold manawhenua over the project's location, as it is within their takiwā:

- Te Ngāi Tūāhuriri rūnanga

The natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; cultural landscapes and land - are taonga to manawhenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the cultural identity of ngā rūnanga manawhenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high cultural significance to ngā rūnanga manawhenua are articulated in the Mahaanui Iwi Management Plan (IMP).

Summary of Proposal

- This proposal seeks to amend the Waimakariri District Plan Planning Maps, by rezoning 156 hectares of Rural zoned land to expand the Ohoka settlement.
- Key features of the proposed Outline Development Plan (ODP) area include:
 - Two commercial centres, educational facilities or a retirement village in the area immediately adjoining the larger of the two commercial zones on Whites Road;
 - A small village square for community events/gatherings;
 - 800 residential units and a school or retirement village,
 - Provision for native riparian planting, naturalisation, and instream enhancement.
- The main drainage features include the Ohoka Stream which crosses the northern end of the site, and the Ohoka South Branch (stream) crossing near the middle of the site.

- Within the site are several land drains crossing the site that discharge directly into the Ohoka Stream or Ohoka South Branch.
- Four fish species were identified, the native longfin eel, shortfin eel, upland bully, and the introduced brown trout
- Groundwater was encountered between 0.9m and 1.5mbgl.

Stormwater Management and possible in-stream works

- Water reticulation is to be provided from the establishment of a new source or from upgrading of the existing source and headworks.
- Wastewater reticulation within the site can gravitate into the Rangiora Wastewater Treatment Plant.
- Primary stormwater runoff from residential allotments will be discharged via stormwater management facilities to the Ohoka Stream and Ohoka South Branch.
 - Stormwater runoff within road corridors will be via roadside swales and culverts.
 - All sumps will have trapped and/or inverted outlets and connected to the piped stormwater network.
- The road corridor will be used as overland flow paths to direct stormwater runoff when the drainage network is at full capacity.

Earthworks and Landscaping

- Proposed minimum waterbody setbacks for earthworks and buildings in the ODP;
 - 10 metres from the Ohoka Stream tributary, Groundwater Seep, Northern and Southern Spring Channel and South Ohoka Branch.
 - 20 metres from the northern springhead.
 - 30 metres from the large southern springhead.
 - 5 metres from the un-named waterway along the furthest southwest boundary of the ODP area
- The applicant has already indicated that they will follow the ECAN Sediment and Erosion Control Toolbox and will abide by the Accidental Discovery Protocol during earthworks.
- For all earthworks across the site, an Accidental Discovery Protocol will be implemented at the time of site development, in addition to appropriate erosion and sediment controls.

Evaluation in relation to Mahaanui Iwi Management Plan (MIMP)

The matters that are relevant to this proposal have been identified as:

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

(a) Low risk to sites:

(i) Accidental discovery protocol (ADP)

Comment: The applicant has indicated an Accidental Discovery Protocol will be followed.

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues of importance concerning such activities, as per *Ngāi Tahu subdivision and development guidelines*.

Consistency with this policy depends on the recommendations of the rūnanga being adopted.

P6.1 To require on-site solutions to stormwater management in all new urban, commercial, industrial and rural developments (zero stormwater discharge off site) based on a multi tiered approach to stormwater management:

(b) *Reducing volume entering system* - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);

(c) *Reduce contaminants and sediments entering system* - maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and

(d) *Discharge to land based methods*, including swales, stormwater basins, retention basins, and constructed wetponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.

Comment: To reduce the volume of stormwater discharged to waterways flowing through the site, the applicant should consider the installation of swales on the carpark (where practical), rainwater tanks and greywater re-use systems.

P6.5 To encourage the design of stormwater management systems in urban and semi urban environments to provide for multiple uses: for example, stormwater management infrastructure as part of an open space network that provides for recreation, habitat and customary use values.

P7.3 To require waste minimisation as a basic principle of, and approach to, waste management. This means reducing the volume of waste entering the system through measures such as:

- (c) Incentives for existing and new homes, business, developments and council services to adopt greywater recycling and install low water use appliances; and
- (d) On site solutions to stormwater that avoid stormwater entering the wastewater system.

P11.1 To assess proposals for earthworks with particular regard to:

- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
- (b) Potential effects on waterways, wetlands and waipuna;
- (c) Potential effects on indigenous biodiversity;
- (d) Potential effects on natural landforms and features, including ridge lines;
- (e) Proposed erosion and sediment control measures; and
- (f) Rehabilitation and remediation plans following earthworks.

P11.7 To require that indigenous vegetation that is removed or damaged as a result of earthworks activity is replaced.

Comment: Should any indigenous vegetation be removed or damaged, this should be replaced by locally sourced indigenous plants.

P11.8 To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated earthworks activity.

Comment: Several waterways flow through the site and are vulnerable to effects resulting from foreseeable development of the area in the future. Appropriate controls are recommended below.

TM2.8 To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:

- (c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space;

WM6.17 To require the development of stringent and enforceable controls on the following activities given the risk to water quality:

- (b) Subdivision and development adjacent to waterways;

Comment: A minimum 20m buffer from all waterways with a 10m planted setback is recommended.

WM13.7 To recognise the protection, establishment, and enhancement of riparian areas along waterways and lakes as a matter of regional importance, and a priority for Ngāi Tahu.

Comment: All riparian areas should be planted with locally sourced indigenous species.

Conclusion

During their respective kaitiaki hui on the 17th of February 2022, Te Ngāi Tūāhuriri Rūnanga assessed this proposal.

The protection of waterways is a significant concern to the rūnanga. Additionally, there are no known New Zealand Archeological Authority Māori sites identified within the proposed area.

Various recommendations were made by the Kaitiaki to mitigate, avoid and remedy potential adverse effects on tangata whenua values. These are discussed below.

Recommendations

Recommendation 1:

Where practicable, there should be a 20m setback between the proposed subdivision development and waterways that flow through the site. Additionally, there should be a 10 buffer within the setback which should be planted with locally sourced indigenous plants to assist with nutrient uptake and to enhance biodiversity values.

Recommendation 2:

The inclusion of locally sourced indigenous planting in landscaping plans is an important mitigation measure for subdivision development. This includes street trees and landscaping, which may include indigenous species like *Plagianthus regius*.

- When available, the final landscape plan/plans for the site should be sent to the Rūnanga.

Recommendation 3:

Robust erosion and sediment controls must be installed and maintained in accordance with ECan's Erosion and Sediment Control guidelines.

Recommendation 4:

The policies identified in the Ngāi Tahu Subdivision and Development Guidelines should be referred to by the developer, particularly regarding stormwater management, water supply and use (grey water recycling) and indigenous planting. These guidelines have been attached at the end of this document.

Recommendation 5:

Future subdivision development should incorporate best practice onsite stormwater management controls to mitigate the effects of development and allow for stormwater infiltration.

- Stormwater should be directed to detention ponds and swales to reduce runoff from site and allow for infiltration.
- Stormwater discharge from roads and carparks should not be directed to waterways.

Recommendation 6:

To protect any potential wāhi tapu/wāhi taonga values for the site, an Accidental Discovery Protocol consistent with Appendix 3 of the Mahaanui Iwi Management Plan is recommended for all earthworks. Even shallow soil disturbance has the potential to uncover culturally significant material.

Mahaanui Kurataiao and its staff are available to discuss this report further or assist in direct engagement with rūnanga if desired.

Report Prepared by:

Hayden Zervos | Environmental Advisor

Peer Reviewed By:

Sapphire Wairau | Environmental Advisor

Appendix One

Ngāi Tahu subdivision and development guidelines

Note: These guidelines are to be read in conjunction with Policies P4.1, P4.2 and P4.3

Cultural landscapes

1.1 A cultural landscape approach is the most appropriate means to identify, assess and manage the potential effects of subdivision and development on cultural values and significant sites [refer Section 5.8 Issue CL1].

1.2 Subdivision and development that may impact on sites of significance is subject Ngāi Tahu policy on *Wāhi tapu me wāhi taonga and Silent Files* (Section 5.8, Issues CL3 and CL4).

1.3 Subdivision and development can provide opportunities to recognise Ngāi Tahu culture, history and identity associated with specific places, and affirm connections between tāngata whenua and place, including but not limited to:

- (i) Protecting and enhancing sites of cultural value, including waterways;
- (ii) Using traditional Ngāi Tahu names for street and neighborhood names, or name for developments;
- (iii) Use of indigenous species as street trees, in open space and reserves;
- (iv) Landscaping design that reflects cultural perspectives, ideas and materials;
- (v) Inclusion of interpretation materials, communicating the history and significance of places, resources and names to tāngata whenua; and
- (vi) Use of tāngata whenua inspired and designed artwork and structures.

Stormwater

2.1 All new developments must have on-site solutions to stormwater management (i.e. zero stormwater discharge off site), based on a multi-tiered approach to stormwater management that utilises the natural ability of Papatūānuku to filter and cleanse stormwater and avoids the discharge of contaminated stormwater to water [refer to Section 5.4, Policy P6.1].

2.2 Stormwater swales, wetlands and retention basins are appropriate land based stormwater management options. These must be planted with native species (not left as grass) that are appropriate to the specific use, recognising the ability of particular species to absorb water and filter waste.

2.3 Stormwater management systems can be designed to provide for multiple uses. For example, stormwater management infrastructure as part of an open space network can provide amenity values, recreation, habitat for species that were once present on the site, and customary use.

2.4 Appropriate and effective measures must be identified and implemented to manage stormwater run off during the construction phase, given the high sediment loads that stormwater may carry as a result of vegetation clearance and bare land.

2.5 Councils should require the upgrade and integration of existing stormwater discharges as part of stormwater management on land rezoned for development.

2.6 Developers should strive to enhance existing water quality standards in the catchment downstream of developments, through improved stormwater management.

Earthworks

3.1 Earthworks associated with subdivision and development are subject to the general policy on *Earthworks* (Section 5.4 Issue P11) and *Wāhi tapu me wāhi taonga* (Section 5.8, Issue CL3), including the specific methods used in high and low risk scenarios for accidental finds and damage to sites of significance.

3.2 The area of land cleared and left bare at any time during development should be kept to a minimum to reduce erosion, minimise stormwater run off and protect waterways from sedimentation.

3.3 Earthworks should not modify or damage beds and margins of waterways, except where such activity is for the purpose of naturalisation or enhancement.

3.4 Excess soil from sites should be used as much as possible on site, as opposed to moving it off site. Excess soil can be used to create relief in reserves or buffer zones.

Water supply and use

4.1 New developments should incorporate measures to minimise pressure on existing water resources, community water supplies and infrastructure, including incentives or requirements for:

- (i) low water use appliances and low flush toilets;
- (ii) grey water recycling; and
- (iii) rainwater collection.

4.2 Where residential land development is proposed for an area with existing community water supply or infrastructure, the existing supply or infrastructure must be proven to be able to accommodate the increased population *prior* to the granting of subdivision consent.

4.3 Developments must recognise, and work to, existing limits on water supply. For example, where water supply is an issue, all new dwellings should be required to install rainwater collection systems.

Waste treatment and disposal

5.1 Developments should implement measures to reduce the volume of waste created within the development, including but not limited incentives or requirements for:

- (i) Low water use appliances and low flush toilets;
- (i) Grey water recycling; and
- (ii) Recycling and composting opportunities (e.g. supporting zero waste principles).

5.2 Where a development is proposed for an area with existing wastewater infrastructure, the infrastructure must be proven to be able to accommodate the increased population *prior* to the granting of the subdivision consent.

5.3 New rural residential or lifestyle block developments should connect to a reticulated sewage network if available.

5.4 Where new wastewater infrastructure is required for a development:

- (i) The preference is for community reticulated systems with local treatment and land based discharge rather than individual septic tanks; and

- (ii) Where individual septic tanks are used, the preference is a wastewater treatment system rather than septic tanks.

Design guidelines

6.1 New developments should incorporate low impact urban design and sustainability options to reduce the development footprint on existing infrastructure and the environment, including sustainable housing design and low impact and self sufficient solutions for water, waste, energy such as:

- (i) Position of houses to maximise passive solar gain;
- (ii) Rainwater collection and greywater recycling;
- (iii) Low energy and water use appliances;
- (iv) Insulation and double glazing; and
- (v) Use of solar energy generation for hot water.

6.2 Developers should provide incentives for homeowners to adopt sustainability and self sufficient solutions as per 6.1 above.

6.3 Urban and landscape design should encourage and support a sense of community within developments, including the position of houses, appropriately designed fencing, sufficient open spaces, and provisions for community gardens.

6.4 Show homes within residential land developments can be used to showcase solar hot water, greywater recycling and other sustainability options, and raise the profile of low impact urban design options.

Landscaping and open space

7.1 Sufficient open space is essential to community and cultural well being, and the realization of indigenous biodiversity objectives, and effective stormwater management.

7.2 Indigenous biodiversity objectives should be incorporated into development plans, consistent with the restoration and enhancement of indigenous biodiversity on the landscape.

7.3 Indigenous biodiversity objectives to include provisions to use indigenous species for:

- (i) street trees;
- (ii) open space and reserves;
- (iii) native ground cover species for swales;
- (iv) stormwater management network; and
- (v) home gardens.

7.4 Indigenous species used in planting and landscaping should be appropriate to the local environment, and where possible from locally sourced seed supplies.

7.5 Options and opportunities to incorporate cultural and/or mahinga kai themed gardens in open and reserve space can be considered in development planning (e.g. pā harakeke as a source of weaving materials; reserves planted with tree species such as mātai, kahikatea and tōtara could be established with the long term view of having mature trees available for customary use).

Attachment C: Assessment of compliance with Ngāi Tahu subdivision and development guidelines

Cultural Landscapes

Guideline	Evidence/Actions Taken
1.1 Cultural landscape approach	We are inviting MKT to provide further information in relation to the existing recommendation. This should ensure that this approach is continued.
1.2 Sites of significance	There are no listed Site of significance or Silent file areas identified in relation to the site
1.3 Cultural recognition	Natural waterways on the site are generally to be retained. Some artificial and low value waterways/wetlands may be removed through the proposal, however offset mitigation is provided to ensure the overall ecological outcomes and health of waterbodies on and across the site are improved. Improving these waterways and prioritising springs and natural waterways recognises their cultural importance. MKT are invited to provide recommendations in relation to the landscaping plans and in particular proposed planting palette.

Stormwater Management

Guideline	Evidence/Actions Taken
2.1 On-site solutions	Stormwater management areas are proposed to manage stormwater within the site. Stormwater will largely be attenuated and then disposed of within the site.
2.2 Appropriate plantings	Stormwater basins are designed to provide for ecological value as well as their functional value. A variety of planting may be utilised to ensure these outcomes are achieved. MKT are invited to provide recommendations in relation to the landscaping plans and in particular proposed planting palette.
2.3 Multiple use design	As mentioned above stormwater management areas will be multi-functional providing for ecological enhancement of the area as well as stormwater disposal. Existing waterways may also be improved to contain recreational aspects where appropriate.
2.4 Construction management	Construction phase stormwater management is proposed through best practice erosion and sediment control measures. Existing waterways will be protected through the works ensuing sedimentation and erosion is managed so it does not result in adverse effects on any of these features.
2.5 Existing infrastructure	Old farm drains are being removed and other channels enhanced.
2.6 Water quality enhancement	Existing water quality will be enhanced as the current use of the site for farming cattle which results in effluent runoff potentially contaminating these waterways. By developing the site and providing substantial stormwater treatment areas the water quality of existing waterways will be significantly improved.

Earthworks

Guideline	Evidence/Actions Taken
3.1 Cultural considerations	An accidental discovery protocol can be implemented for to ensure these works manage risk associated with accidental finds.
3.2 Minimal exposure	Erosion sediment and dust control measures will ensure any exposed areas are managed appropriately. Following works areas will be stabilised as soon as possible to ensure exposed areas are minimised.
3.3 Waterway protection	Some of the earthworks proposed may temporarily disturb existing waterway beds and margins. Generally, this is for the purpose of enhancement. When this work is occurring it is proposed to temporarily divert flows so the actual water body isn't affected by the works. Upon completion the banks will be stabilised and enhanced through planting so they are stable.
3.4 On-site soil management	Soil will be retained on site as much as possible. This minimises the need to import soil which can be costly, so reuse is considered in the earthworks plans.

Water Supply and Use

Guideline	Evidence/Actions Taken
4.1 Water conservation	The proposal will see the creation of vacant lots to be developed by independent home builders. These home builders will be encouraged to consider installing low water use appliances, grey water recycling and rainwater collection.
4.2 Infrastructure capacity	A new community drinking water supply is proposed. This will effectively see existing takes being re-allocated and a new well (or wells) constructed to provide potable water supply.
4.3 Supply limits	Water supply has been assessed in considering our proposed design. Rainwater tanks are not required due to sufficient supply.

Waste Treatment and Disposal

Guideline	Evidence/Actions Taken
5.1 Waste reduction	The proposal will see the creation of vacant lots to be developed by independent home builders. These home builders will be encouraged to consider installing low water use appliances, and grey water recycling.
5.2 Infrastructure capacity	A network capacity assessment has been completed prior to the design of the subdivision. Our assessment identifies the need for holding tanks to store wastewater prior to disposal, however subject to these upgrades the existing infrastructure can effectively service the development.
5.3 Rural connections	All proposed lots will be provided a connection to a reticulated network

5.4 Treatment systems	Existing council infrastructure facilities are proposed to be utilised for this development, and no new treatment or disposal infrastructure is required.
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Design Guidelines

Guideline	Evidence/Actions Taken
6.1 Low impact design	Design guidelines have been updated for the development. In addition, lots are arranged to provide sufficient space for builders to position dwellings to achieve maximum solar gain. The NZ building code will ensure double glazing and insulation on all new dwellings. Other sustainability items will be encouraged to the home builders and other purchasers.
6.2 Sustainability incentives	The lots of are of a shape and size that homeowners are able to adopt sustainable and self-sufficient solutions.
6.3 Community design	The proposed design guidelines will include direction on these matters .
6.4 Show homes	When show homes are organised with home builders, the developer will encourage them to showcase any sustainable house construction techniques they have available.

Landscaping and Open Space

Guideline	Evidence/Actions Taken
7.1 Open space provision	Generous open space is provided through the various green areas on the site. Substantial buffers around waterways and SMA's provide multi-functional areas which will enable some recreational use. A polo field is proposed across stage 4. Buffer areas around spring heads can be developed to provide additional recreational spaces and add to the open space network.
7.2 Indigenous biodiversity	Indigenous Biodiversity across the site will be enhancement as demonstrated in the landscape plans for the site.
7.3 Native species use	A variety of exotic and Indigenous species are proposed across the site. Oaks are proposed as street trees and in several areas along waterways due to their shading characteristics. MKT are invited to provide comment on the proposed landscaping plan.
7.4 Local sourcing	Locally sourced landscaping will be incorporated where appropriate.
7.5 Cultural gardens	Open space areas generally include waterways. Indigenous planting in these areas may encourage some cultural theme to provide for informal collection of mahinga kai and for weaving materials. MKT are invited to provide further feedback on the proposed landscape plans and planting palette.

MANA WHENUA ADVICE

J7201 – Carter Group - Ohoka Fast Track Application

To: Rolleston Industrial Developments Ltd

Contact: Jono Begg (consultant)

1.0 Mana Whenua Statement

Ngāi Tahu holds and exercises rangatiratanga within the Ngāi Tahu Takiwā and has done so since before the arrival of the Crown. The rangatiratanga of Ngāi Tahu resides within the Papatipu Rūnanga. The Crown and Parliament have recognised the enduring nature of that rangatiratanga through:

- Article II of Te Tiriti o Waitangi (Te Tiriti);
- the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown; and
- the 1998 Ngāi Tahu Claims Settlement Act (NTCSA) in which Parliament endorsed and implemented the Deed of Settlement.

The contemporary structure of Ngāi Tahu is set down through the Te Rūnanga o Ngāi Tahu Act 1996 (TRoNT Act). Article II of Te Tiriti o Waitangi (Te Tiriti), the TRoNT Act, Ngāi Tahu Claims Settlement Act (NTCSA) 1998, and the 1997 Deed of Settlement (Deed of Settlement) between Ngāi Tahu and the Crown sets the requirements for recognition of tangata whenua in Canterbury.

As recorded in the Crown Apology to Ngāi Tahu in the NTCSA, the Ngāi Tahu Settlement marked a turning point, and the beginning of a “new age of co-operation”. The Crown apologised for its “past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries” and confirmed that it “recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui”. This Mana Whenua Advice Report is provided without prejudice to the High Court freshwater claim¹.

Each Papatipu Rūnanga has their own respective takiwā, and each is responsible for protecting the tribal interests in their respective takiwā, not only on their own behalf of their own hapū, but again, on behalf of the entire tribe.

The following Rūnanga hold mana whenua over the project’s location, as it is within their takiwā:

- Te Ngāi Tūāhuriri Rūnanga

2.0 Summary of Proposal

Rolleston Industrial Developments Ltd have requested preliminary application advice via Inovo Projects in regard to a proposed subdivision development in Ohoka. The application for this development is due to be lodged on the 7th of February 2025, via the Fast Track application process.

The proposed development is to contain approximately 860 residential lots, a commercial centre and a retirement village.

Full and final advice can not be provided until the Assessment of Environmental Effects and Ecology Reports have been provided. As yet, we have not we have not received this information, therefore the full impact on mana whenua values cannot be assessed at this time.

3.0 Consultation Methodology

Mahaanui Kurataiao Limited review the application documents and undertake an assessment of the application against the Mahaanui Iwi Management Plan.

A briefing report is prepared for Kaitiaki representatives who have been mandated by the Papatipu Rūnanga they represent to speak on behalf of hapū on environmental issues.

A Mahaanui Kurataiao Limited staff member meets with Kaitiaki representatives to discuss the application and Kaitiaki provide feedback based on Mātauranga Māori.

Mana Whenua Advice is provided to outline the relevant policies in the Mahaanui Iwi Management Plan and the feedback provided by Kaitiaki representatives.

The relevant policies and Kaitiaki feedback for this application are provided in the following sections of this report.

4.0 Mahaanui Iwi Management Plan 2013

The Mahaanui Iwi Management Plan (IMP) is a written expression of kaitiakitanga, setting out how to achieve the protection of natural and physical resources according to Ngāi Tahu values, knowledge, and practices. The plan has the mandate of the six Papatipu Rūnanga, and is endorsed by Te Rūnanga o Ngāi Tahu, as the iwi authority.

Natural resources – water (waterways, waipuna (springs), groundwater, wetlands); mahinga kai; indigenous flora and fauna; ngā tūtohu whenua and land - are taonga to mana whenua and they have concerns for activities potentially adversely affecting these taonga. These taonga are integral to the identity of ngā rūnanga mana whenua and they have a kaitiaki responsibility to protect them. The policies for protection of taonga that are of high significance to ngā rūnanga mana whenua are articulated in the IMP.

The policies in this plan reflect what Papatipu Rūnanga support, require, encourage, or actions to be taken with regard to resolving issues of significance in a manner consistent with the protection and enhancement of Ngāi Tahu values, and achieving the objectives set out in the plan.

The relevant Policies of the IMP to this proposal have been identified as:

TE TIRITI O WAITANGI

K2.2 The articles of Te Tiriti o Waitangi should be given effect to in accordance with the significance of the treaty to Māori as the founding document of the nation.

Comment: *Ngāi Tahu signed the Treaty document written in Māori, as did the majority of other Māori rangatira signatories. This granted 'te kawanatanga katoa' (governorship of their lands) to the Queen (Article One), guaranteed 'te tino rangatiratanga' (the unqualified exercise of chieftainship) of Māori over their lands, settlements and taonga (Article Two), and promised equity for Māori and European settlers (Article Three), and peace for all.*

5.3 WAI MĀORI

TĀNGATA WHENUA RIGHTS AND INTERESTS IN FRESHWATER

WM1.1 Ngāi Tahu, as tāngata whenua, have specific rights and interests, in how freshwater resources should be managed and utilised in the takiwā.

CHANGING THE WAY WATER IS VALUED

WM2.1 To consistently and effectively advocate for a change in perception and treatment of freshwater resources: from public utility and unlimited resource to wāhi taonga.

WM2.2 To require that water is recognised as essential to all life and is respected for its taonga value ahead of all other values.

Controls on land use activities to protect water quality

WM6.16 To require, in the first instance, that all potential contaminants that may enter the water (e.g. nutrients, sediments and chemicals) are managed on site and at source rather than discharged off site. This applies to both rural and urban activities.

ACTIVITIES IN THE BEDS AND MARGINS OF RIVERS AND LAKES

Riparian areas

WM12.2 To require the protection and restoration of native riparian vegetation along waterways and lakes in the takiwā as a matter of priority, and to ensure that this can occur as a permitted activity.

Use and enhancement of river margins in the built/ urban environment

WM12.4 All waterways in the urban and built environment must have indigenous vegetated healthy, functioning riparian margins.

WM12.5 To require that all waterways in the urban and built environment have buffers or setback areas from residential, commercial, or other urban activity that are:

- (a) At least 10 metres, and up to 30 metres; and
- (b) Up to 50 metres where the space, such as towards river mouths and in greenfield areas.

WM12.6 In the urban environment, it is accepted that waterways may have existing exotic vegetation along margins (e.g. exotic specimen trees in waterside reserves). However, the objective is still to promote native riparian vegetation, as taonga valued for flood control, the maintenance of water quality, mahinga kai and cultural wellbeing.

Structures in the beds and margins of waterways

WM12.13 To require that any structure, essential or otherwise, in the bed or margin of a waterway (e.g. floodgate) supports and enables passage for migratory indigenous fish species and does not compromise any associated kōhanga.

WETLANDS, WAIPUNA AND RIPARIAN MARGINS

WM13.1 To recognise and protect all wetlands, waipuna and riparian areas as wāhi taonga that provide important cultural and environmental benefits, including but not limited to:

- (a) Mahinga kai habitat;
- (b) The provision of resources for cultural use;
- (c) Cultural well-being;
- (d) The maintenance and improvement of water quality; and
- (e) Natural flood protection.

WM13.2 To protect, restore, and enhance remaining wetlands, waipuna, and riparian areas by:

- (a) Maintaining accurate maps of existing wetlands, waipuna, and riparian margins;
- (b) Requiring that the drainage of existing wetlands or waipuna or the destruction or modification of existing native riparian areas be a prohibited activity;
- (c) Requiring the use of appropriate fencing, buffers, and setback area to protect wetlands, waipuna, and riparian areas from intensive land use, including stock access and irrigation;
- (d) Supporting initiatives to restore wetlands, waipuna, and riparian areas; and
- (e) Continuing to educate the wider community and landowners of the taonga value of these ecosystems.

WM13.3 To support the establishment, enhancement, and restoration of wetlands, riparian areas and waipuna as a measure to avoid, remedy or mitigate any actual or potential adverse effects of land use and development activities on cultural and environmental values.

Comment: *Te Tiriti o Waitangi and the sale and purchase agreements for Canterbury and Te Pātaka o Rākohaitū guarantee the protection of tāngata whenua interests in water. Surface and groundwater quality is degraded as a result of urban and rural land use. This has significant effects on the relationship of Ngāi Tahu to water, particularly with regard to mauri, mahinga kai, cultural well-being and indigenous biodiversity.*

5.4 PAPANUKU

SUBDIVISION AND DEVELOPMENT

Basic principles and guidelines

P4.3 To base tāngata whenua assessments and advice for subdivision and residential land development proposals on a series of principles and guidelines associated with key issues

of importance concerning such activities, as per Ngāi Tahu subdivision and development guidelines.

STORMWATER

- P6.1** To require **on-site** solutions to stormwater management in all new urban, commercial, industrial, and rural developments (zero stormwater discharge off site) based on a multi-tiered approach to stormwater management:
- (a) Education- engaging greater general public awareness of stormwater and its interaction with the natural environment, encouraging them to take the steps to protect their local environment and perhaps re-use stormwater where appropriate;
 - (b) Reduce volume entering system - implementing measures that reduce the volume of stormwater requiring treatment (e.g. rainwater collection tanks);
 - (c) Reduce contaminants and sediments entering system – maximising opportunities to reduce contaminants entering stormwater e.g. oil collection pits in carparks, education of residents, treat the water, methods to improve quality; and
 - (d) Discharge to land-based methods, including swales, stormwater basins, retention basins, and constructed wet ponds and wetlands (environmental infrastructure), using appropriate native plant species, recognising the ability of particular species to absorb water and filter waste.
- P6.2** To oppose the use of existing natural waterways and wetlands, and drains, for the treatment and discharge of stormwater in both urban and rural environments.

SOIL CONSERVATION

- P9.1** To sustain and safeguard the life supporting capacity of soils, mō tātou, ā, mō kā uri ā muri ake nei.

EARTHWORKS

- P11.1** To assess proposals for earthworks with particular regard to:
- (a) Potential effects on wāhi tapu and wāhi taonga, known and unknown;
 - (b) Potential effects on waterways, wetlands and waipuna;
 - (c) Potential effects on indigenous biodiversity;
 - (d) Potential effects on natural landforms and features, including ridge lines;
 - (e) Proposed erosion and sediment control measures; and
 - (f) Rehabilitation and remediation plans following earthworks.

Indigenous vegetation

- P11.7** To require that indigenous vegetation that is removed or damaged as a result of earthworks is replaced.
- P11.8** To require the planting of indigenous vegetation as an appropriate mitigation measure for adverse impacts that may be associated with earthworks activity.

Comment: Soil is a fundamental resource, and together with air and water, is the basis on which life depends. As the natural capital upon which much of the region's economy depends, it is critical that the true (and non-replaceable) value of our soils is recognised and provided for in policy and planning processes.

5.5 TĀNE MAHUTA

INDIGENOUS BIODIVERSITY

Integrating indigenous biodiversity into the landscape

TM2.8 To require the integration of robust biodiversity objectives in urban, rural land use and planning, including but not limited to:

- (a) Indigenous species in shelter belts on farms;
- (b) Use of indigenous plantings as buffers around activities such as silage pits, effluent ponds, oxidation ponds, and industrial sites;
- (c) Use of indigenous species as street trees in residential developments, and in parks and reserves and other open space; and
- (d) Establishment of planted indigenous riparian margins along waterways.

Comment: *Ngāi Tahu has a particular interest in indigenous biodiversity, both for its inherent value on the landscape and the ecosystem services it provides, and with regard to mahinga kai. Indigenous flora and fauna has sustained tāngata whenua for hundreds of years, providing food, fibre, building materials, fuel, medicine and other necessities.*

5.8 NGĀ TŪTOHU WHENUA

WĀHI TAPU ME WĀHI TAONGA

Protecting wāhi tapu and wāhi taonga

CL3.8 To require, where a proposal is assessed by tāngata whenua as having the potential to affect wāhi tapu or wāhi taonga, one or more of the following:

- (a) Low risk to sites:
 - (i) Accidental discovery protocol (ADP).

Comment: *Ngā tūtohu whenua, or cultural landscapes, is a concept used in the Mahaanui IMP to recognise areas and places of particular importance. As a planning tool, cultural landscapes are a culturally meaningful and effective framework for the identification, protection and management of sites and places of significance, the multiple values associated with those sites and places, and the relationship of tāngata whenua to them.*

4.1 Guidance to Moderate Impacts on Mana Whenua Values

The above policies from the Mahaanui Iwi Management Plan provide a framework for assessing the potential negative impacts of the proposed activity on Mana Whenua values and provide guidance on how these effects can be moderated.

Te Tiriti o Waitangi protects Tikanga Māori values & practices as a constitutional legal instrument governing Aotearoa New Zealand.

Te Ngāi Tūāhuriri Rūnanga have a unique and abiding interest in the sustainable management of te taiao – the environment. Wai māori (freshwater) is a taonga of Ngāi Tahu, governed under the domain of rangatiratanga and defined by Ngāi Tahu tikanga and ritenga. Wetlands, waipuna and riparian areas are all considered to be wāhi taonga by Ngāi Tahu, treasured for their role in providing habitat for mahinga kai. It is critical that existing wetlands, waipuna and riparian areas are retained, restored,

maintained and enhanced, degraded areas should be restored, and opportunities taken to re-establish wāhi taonga across the landscape.

Following European settlement, the drainage of swamps and wetlands, the felling of bush, the conversion of land to agricultural use, and the introduction of acclimatised species had a devastating effect on mahinga kai resources and sites, and the physical loss of land and access to mahinga kai sites had an equally devastating effect on the ability of tāngata whenua to provide for their own sustenance.

Water is a significant cultural resource that connects Ngāi Tahu to the landscape and the culture and traditions of the tūpuna. All water originated from the separation of Rangi and Papatūānuku and their continuing tears for one another. For tāngata whenua the current state of health of the waterways and groundwater is evidence that water management and governance in the takiwā has failed to protect freshwater resources. Water and land must be managed as interrelated resources embracing the practice of Ki Uta Ki Tai, which recognises the connection between land, groundwater, surface water and coastal waters. Water is a taonga and the collective responsibility for protecting this taonga is a fundamental principle of Ngāi Tahu freshwater policy.

The historic and continued physical modification of waterways and removal of wetlands has occurred at the expense of Ngāi Tahu values associated with waterways, wetland areas and the ecosystem services they provided. The conversion of streams into boxed drains, piping of waterways and the widespread modification of riparian margins, along with the extensive drainage of wetlands and springs, have compromised the natural ability of the regions waterways to contain, store and clean water and provide habitat for mahinga kai. It is critical that existing wetlands, waipuna and riparian areas are protected, maintained or enhanced, degraded areas should be restored, and opportunities taken to re-establish wāhi taonga across the landscape.

Restoring indigenous biodiversity values is one of the most important challenges for the future management in the takiwā. A healthy economy relies on a healthy environment. Indigenous biodiversity, along with air, water and soil, are all taonga; they are the regions natural capital, providing a suite of ecosystem services.

Kaitiaki for Te Ngāi Tūāhuriri Rūnanga are opposed to any further loss of waterways or wetlands. Although some may consider them to have little value, for Kaitiaki they are taonga and need to be retained, protected and enhanced. Over 90% of wetlands have been lost, along with the habitat they provide for taonga species.

5.0 Preliminary Rūnanga Feedback

This consultation request has been reviewed by Kaitiaki representatives for Te Ngāi Tūāhuriri Rūnanga on a preliminary basis as the Assessment of Environmental Effects and Ecology reports have not been provided. Full impacts on mana whenua values have not been assessed.

6.0 Recommendations

Kaitiaki for Te Ngāi Tūāhuriri Rūnanga are opposed to any further loss of waterways or wetlands. No recommendations are provided as there are no mitigation measures considered appropriate.

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Renée Cridland | Mahaanui Kurataiao Ltd Environmental Advisor, and peer reviewed by Kelly Sunnex | Mahaanui Kurataiao Ltd Environmental Advisor.

Date: 31 January 2025



Te Ngāi Tū Ahuriri Rūnanga Inc.

13 May 2025

Via email to:

ATTN: Jo Appleyard

CC: Chris Ford

Tēnā koe and to whom it may concern,

Re: Carter Group Fast-track consenting application

Ngāi Tūāhuriri is a principal hapū of Ngāi Tahu, acknowledged in Te Runanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centred at Tuahiwi, and extends from Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and inland to the Main Divide. Within this area, Ngāi Tūāhuriri actively exercises rangatiratanga and kaitiakitanga over te taiao.

Te Ngāi Tūāhuriri Rūnanga is centred at the Tuahiwi Marae on Kaiapoi Māori Reserve 873. The rūnanga is one of the eighteen Papatipu Rūnanga who form the collective of Te Rūnanga o Ngāi Tahu, the statutorily recognised tribal representative body. Te Kawenata recognises that Tino Rangatiratanga resides in ngā Papatipu Rūnanga.

We routinely exercise our Rangatiratanga in relation to the taiao, ngā wai and whenua in our takiwā, and play a leading role to advance the interests of our hapū, whānau and the communities that we are part of and live within.

Te Ngāi Tūāhuriri Rūnanga support development in our takiwā because it creates opportunities for our whānau and our communities. We also hold an inherent responsibility to ensure the whenua and moana are treated with respect and care. Balancing different priorities can be hard, but in our experience where parties engage with Rūnanga early and in a meaningful way issues and barriers are usually able to be resolved. This also creates co-investment opportunities.

We are aware that Carter Group Limited has a project listed in Schedule 2 of the Fast-track Approvals Act 2024. The purpose of this letter is to open lines of communication with Carter Group about your project. As mana whenua, our Rūnanga are likely to be impacted by your project, and this is an opportunity to commence meaningful engagement with Carter Group to discuss that. We are aware that you've also engaged with Te Rūnanga o Ngāi Tahu and Mahaanui

Kurataiao Limited about this project, but we'd ask that your engagement with mana whenua be solely with Whitiora Centre as the representative of Te Ngāi Tūāhuriri Rūnanga (we have engaged with Te Rūnanga o Ngāi Tahu and Mahaanui Kurataiao who also support this).

Could you please contact Kyle Davis [REDACTED] to advance discussions.

Nāku noa, nā

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

Tania Wati
Chair - Te Rūnanga o Ngāi Tūāhuriri Rūnanga

12 June 2025

Ngāi Tūāhuriri Rūnanga
c/o Whitiōra
351 Lincoln Road
Addington
Christchurch 8024

By Email: Kyle Davis [REDACTED]

Tēnā koutou,

FAST TRACK APPLICATION CONSULTATION – ŌHOKA RESIDENTIAL DEVELOPMENT

I trust this letter finds you well. My name is Jono Begg, and I am a planning consultant with Inovo Projects Limited. I am writing on behalf of Carter Group to engage with Ngāi Tūāhuriri Rūnanga, via Whitiōra, regarding a proposal to develop a residential area within Ōhoka. This proposal will form part of an application for fast-track approval under the recently enacted Fast-track Approvals Act2024.

This proposal builds upon and closely resembles the previous Ōhoka Private Plan Change request (RCP031), which was reviewed in 2022 with feedback received from Mahaanui Kurataiao who provided feedback on behalf of Te Ngāi Tūāhuriri Rūnanga as part of this earlier process. We appreciate the valuable insights provided through that earlier process and seek to continue in that collaborative spirit with your Rūnanga, recognising the role Whitiōra now plays in facilitating cultural advice on behalf of Ngāi Tahu and Te Ngāi Tūāhuriri Rūnanga.

We are now advancing the proposal with greater technical detail as part of the fast-track application. The application will include comprehensive consents covering District, Regional, and National Environmental Standard requirements to authorise construction, subdivision, land use, and infrastructure operations.

Given Ngāi Tūāhuriri Rūnanga's previous involvement and cultural kaitiakitanga in this rohe, we welcome the opportunity to engage with Whitiōra to ensure that the development reflects and upholds cultural values and considerations.

We would be pleased to arrange a hui at your nearest convenience, or receive your feedback on any of the attached information. We would look to attend a hui with our various specialists who may be able to provide technical information in relation to the proposal. We will continue to send through relevant information as it becomes available.

Our intention is to lodge the Fast Track Consent Application on the **24th of June**, so will undertake to provide any information and requests in good time to enable complete consultation prior to lodgement.

This letter provides the following key information:

- Summary of the Existing Proposal
- Summary of Changes since the Previous Plan Change Application
- Response to Previous Cultural Feedback
- Next Steps

Summary of the Existing Proposal

When cultural advisors were consulted through the plan change process, the key features of the Outline Development Plan (ODP) were identified as:

Subdivision Design:

- Two commercial centres, educational facilities, or a retirement village adjoining the larger commercial zone on Whites Road.
- A small village square for community events/gatherings.
- 800 residential units and a school or retirement village.
- Provision for native riparian planting, naturalisation, and instream enhancement.

Servicing:

- Water reticulation provided from a new source.
- Wastewater reticulation extended to Rangiora Wastewater Treatment Plant.
- Stormwater runoff managed through dedicated treatment areas discharging to the Ōhoka Stream and Ōhoka South Branch.
- Road corridors used as overland flow paths when drainage systems reach capacity.

Setbacks:

- Various setbacks ranging from 5m to 30m from waterbodies including the Ōhoka Stream tributary, spring channels, and unnamed waterways.

Summary of Changes and the Current Proposal

Further investigations have led to minor design updates:

- Removal of the Mill Road commercial centre, replaced with residential lots.
- Increase in residential units to approximately 876.
- Enhanced specificity in ecological enhancement locations.

Critical waterways remain central to the design, including:

- Minor realignments and enhancements of spring channels.
- Retention and enhancement of groundwater seep areas.
- Offset planting for removed artificial water features.

Servicing Updates:

- Stormwater Management Areas (SMAs) designed for both stormwater and ecological benefits.
- Wastewater disposal via extended reticulated network.
- New community drinking water scheme using transferred irrigation consents.

Response to Cultural Advice

The design process has been guided by cultural advice previously received through consultation under alternative consenting processes. Whilst the proposal under the fast-track scheme has been amended, the feedback from Te Ngāi Tūāhuriri Rūnanga has helped to inform the current application.

Recommendations provided were considered and are individually addressed below:

Recommendation 1

Where practicable, there should be a 20m setback between the proposed subdivision development and waterways that flow through the site. Additionally, there should be a 10 buffer within the setback which should be planted with locally sourced indigenous plants to assist with nutrient uptake and to enhance biodiversity values.

This requirement is generally being complied with. Covenants will be recommended on certain sites which are located within buffer distances to ensure these are achieved.

It is noted some temporary works may be required near/in waterways on the site. These will be

managed to ensure significant ecological areas and water bodies are protected through the works. Best practice site management including erosion and sediment controls plans should effectively mitigate any potential impact on the value of these waterbodies.

It is also noted several waterbodies with low ecological values are proposed to be replaced through the development of the site. Several additional areas have been identified as wetlands; however most are low quality, artificial and or ephemeral and have little ecological value. Where the subdivision results in the removal of these areas, additional areas are proposed to be enhanced to offset their loss. The design of these areas has been determined through consultation with a freshwater ecologist specialist and other specialists.

Riparian planting areas, and ecological enhancement areas are proposed throughout the site and adjacent to waterways. Landscape plans are being prepared with a mixture of plant species which aim to improve ecology and amenity of these areas. We invite Whitiora to provide their recommendation on options for locally sourced indigenous plants which may be appropriate for these planting areas.

Recommendation 2

The inclusion of locally sourced indigenous planting in landscaping plans is an important mitigation measure for subdivision development. This includes street trees and landscaping, which may include indigenous species like Plagianthus regius.

The final landscape plan will be provided to the Rūnanga. In the first instance, we invite comments and suggestions on appropriate planting types for these areas.

Recommendation 3

Robust erosion and sediment controls must be installed and maintained in accordance with ECan's Erosion and Sediment Control guidelines.

A detailed and comprehensive site management plan will be provided for each stage of works. The erosion and sediment control will align with ECANs guidelines ensuring adequate protection and management of sediment and run off associated with construction. Specific detailed plans will be included where works are in close proximity to waterways.

These plans will be submitted to ECAN for approval as each stage of work commences.

Recommendation 4

The policies identified in the Ngāi Tahu Subdivision and Development Guidelines should be referred to by the developer, particularly regarding stormwater management, water supply and use (greywater recycling) and indigenous planting. These guidelines have been attached at the end of this document.

These guidelines have been adopted where relevant. A detailed assessment of this is provided as an attachment to this letter.

Recommendation 5

Future subdivision development should incorporate best practice onsite stormwater management controls to mitigate the effects of development and allow for stormwater infiltration.

- *Stormwater should be directed to detention ponds and swales to reduce runoff from site and allow for infiltration.*
- *Stormwater discharge from roads and carparks should not be directed to waterways.*

Best practice stormwater management is being adopted in the proposed servicing arrangement for the development. A stormwater management plan and infrastructure report can be provided in due course which outlines how this is achieved. At a high level, a series of stormwater management areas will be created. Stormwater will be directed to these ponds where it will undergo treatment prior to being discharged to waterways (with some incidental discharge to ground from stormwater basins).

Recommendation 6

To protect any potential wāhi tapu/wāhi taonga values for the site, an Accidental Discovery Protocol consistent with Appendix 3 of the Mahaanui Iwi Management Plan is recommended for all

earthworks. Even shallow soil disturbance has the potential to uncover culturally significant material.

An accidental discovery protocol will be proposed with the application.

Next Steps

We appreciate that Whitiara, on behalf of Te Ngāi Tūāhuriri Rūnanga, may have additional comments or feedback on this application based on the additional information provided and we welcome consultation. As mentioned, with a pending lodgement date we look forward to hearing from you soon.

Please let us know if you require further detail in advance of any hui or if you wish to arrange a site visit. We value your continued input and collaboration.

Ngā mihi nui,



Jono Begg

Planning Manager – Inovo Projects



Attachments:

- Updated Scheme Plan
- Record of Previous Consultation Feedback
- Assessment Against Ngāi Tahu Subdivision and Development Guidelines



Te Ngāi Tū Ahuriri Rūnanga Inc.

30 June 2025

Via email to:

ATTN: Jo Appleyard

CC: Chris Ford, Jono Begg

Tēnā koe and to whom it may concern,

Re: Carter Group Fast-track consenting application – Ōhoka project (Rolleston Industrial Development Ltd).

Ngāi Tūāhuriri is a principal hapū of Ngāi Tahu, acknowledged in Te Runanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centred at Tuahiwi, and extends from Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and inland to the Main Divide. Within this area, Ngāi Tūāhuriri actively exercises rangatiratanga and kaitiakitanga over te taiao.

Te Ngāi Tūāhuriri Rūnanga is centred at the Tuahiwi Marae on Kaiapoi Māori Reserve 873. The rūnanga is one of the eighteen Papatipu Rūnanga who form the collective of Te Rūnanga o Ngāi Tahu, the statutorily recognised tribal representative body. Te Kawenata recognises that Tino Rangatiratanga resides in ngā Papatipu Rūnanga.

We routinely exercise our Rangatiratanga in relation to the taiao, ngā wai and whenua in our takiwā, and play a leading role to advance the interests of our hapū, whānau and the communities that we are part of and live within.

Te Ngāi Tūāhuriri Rūnanga support development in our takiwā because it creates opportunities for our whānau and our communities. We also hold an inherent responsibility to ensure the whenua and moana are treated with respect and care. Balancing different priorities can be hard, but in our experience where parties engage with Rūnanga early and in a meaningful way issues and barriers are usually able to be resolved. This also creates co-investment opportunities.

We are aware that **Carter Group Limited** is preparing an application for their project in **Ōhoka (Rolleston Industrial Developments Ltd)**, under the Fast-track Approvals Act 2024. The purpose of this letter is to open lines of communication with Carter Group about your project. As mana whenua, our Rūnanga are likely to be impacted by your project, and this is an opportunity to commence meaningful

engagement with Carter Group to discuss that. We are aware that you've also engaged with Te Rūnanga o Ngāi Tahu and Mahaanui Kurataiao Limited about this project, but we require that your engagement with mana whenua be solely with Whitiōra Centre as the representative of Te Ngāi Tūāhuriri Rūnanga (we have engaged with Te Rūnanga o Ngāi Tahu and Mahaanui Kurataiao who also support this).

Could you please contact Kyle Davis ([REDACTED]) and Nicola Rykers ([REDACTED]) to advance discussions.

Nāku noa, nā

A handwritten signature in blue ink, appearing to be 'Tania Wati', written on a light blue background.

Tania Wati
Chair - Te Rūnanga o Ngāi Tūāhuriri Rūnanga

Meg Davidson

Subject: FW: Consultation Documents – Ohoka Fast Track Application

From: Kyle Davis [REDACTED]
Sent: Thursday, 14 May 2026 1:26 pm
To: Jono Begg [REDACTED]
Subject: RE: Consultation Documents – Ohoka Fast Track Application

Kia ora anō Jono,

Apologies for lack of comms up to this point. We've had a larger than expected volume of applicants requesting pre-lodgement engagement. We now have our heads around the overall EPA process to an extent.

Thank you for forwarding through materials to date. Our probable preference with your case is to make assessments and comments post-lodgement due to capacity and a few other process issues. Experience to date has shown our side of things to have a quicker turnaround post-lodgement. The main hold-ups we've observed with other applications have been aspects other than those we need to cover.

Do you guys have a date in mind for when you'll lodge?

Ngā mihi,
Kyle

From: Jono Begg [REDACTED]
Sent: Thursday, April 23, 2026 11:13 AM
To: Consents <consents@whitiora.org.nz>; Kyle Davis [REDACTED]
Cc: Pia Jackson [REDACTED]; Bruce Van Duyn [REDACTED]; Tallulah Parker [REDACTED]; Meg Davidson [REDACTED]
Subject: RE: Consultation Documents – Ohoka Fast Track Application

Morena,

The share link for Ōhoka consultation has been updated to have the Stormwater Report (including Stormwater Quality) prepared by PDP. This is the **final document on the transmittal list**.

[☐ Ohoka Fast Track - Consultation](#)

Given that we are moving closer to lodgement, it would be much appreciated if we could receive all comments on the information provided to date **by the 1st of May** at the latest. This will ensure we have time to digest the comments and potentially make updates.

If you have any feedback to provide earlier, it would be great to receive it when it becomes available.

Please let me know if you have any questions.

Ngā mihi

Jono Begg

Resource Management Planning Team Manager
020 4000 0294 | inovo.nz

From: Jono Begg

Sent: Monday, 20 April 2026 3:01 pm

To: 'consents@whitiora.org.nz' <consents@whitiora.org.nz>; 'Kyle Davis' [REDACTED]

Cc: Pia Jackson [REDACTED] 'Bruce Van Duyn' [REDACTED] 'Tallulah Parker'

Subject: RE: Consultation Documents – Ohoka Fast Track Application

Kia ora, A few more reports have been added to share folder. The only outstanding document from the list is the Stormwater Report, which we hope to provide in the next day or so.

I note that for the Infrastructure Report and Site Management Plan we have not provided appendices. These generally refer to the other specialist reports already provided.

Please let me know if you have any access issues or any questions.

Ngā mihi

Jono Begg

Resource Management Planning Team Manager
[REDACTED] | inovo.nz

From: Jono Begg

Sent: Friday, 17 April 2026 11:06 am

To: 'consents@whitiora.org.nz' <consents@whitiora.org.nz>; 'Kyle Davis' [REDACTED]

Cc: Pia Jackson [REDACTED] 'Bruce Van Duyn' [REDACTED] 'Tallulah Parker'

[REDACTED] 'Meg Davidson' [REDACTED]

Subject: RE: Consultation Documents – Ohoka Fast Track Application

Hi all,

Please refer to the previously shared folder link as further specialist draft reports have been added for consultation. [📁 Ohoka Fast Track - Consultation](#)

It is noted that there are few documents still to come. The attached schedule sheet (dated 17/04/26) has been updated detailing what has been provided to date.

As discussed, and given the impending application lodgement, we look forward to receiving any comments back from whitiora.

If you have any questions please do not hesitate to contact me or Pia.

Ngā mihi

Jono Begg

Resource Management Planning Team Manager
[REDACTED] | inovo.nz

From: Jono Begg

Sent: Friday, 10 April 2026 3:13 pm

To: 'consents@whitiora.org.nz' <consents@whitiora.org.nz>; Kyle Davis [REDACTED]

Cc: Pia Jackson [REDACTED] 'Bruce Van Duyn' [REDACTED] Tallulah Parker

Subject: Consultation Documents – Ohoka Fast Track Application

Hi all,

Following earlier conversations with Kyle please find attached is a schedule of the documents previously provided, along with a list of additional documents that are intended to be provided shortly (others may also be added).

The link below provides access to the documents that have already been circulated (excluding any documents where an updated version has since been provided). These documents are provided without prejudice and should be treated as draft.

Link: [Ohoka Fast Track - Consultation](#)

Further documents will be added to this shared folder as they become available and can then be circulated to the relevant specialists. We will advise when new documents are uploaded, with the intention that the majority will be available next week.

The following new documents are now available:

- Ecology Report – prepared by Instream
- Water Supply Strategy – prepared by Inovo

If you have any questions please do not hesitate to contact myself or Pia (Copied in here).

Ngā mihi

Jono Begg

Resource Management Planning Team Manager

| inovo.nz



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