

23 of July 2026

Adele Radburnd
Novo Group Limited
Level 1, 279 Montreal Street
PO Box 365
Christchurch 8140



Customer Services
P. 03 353 9007 or 0800 324 636

PO Box 345
Christchurch 8140

P. 03 365 3828
F. 03 365 3194
E. ecinfo@ecan.govt.nz

www.ecan.govt.nz

Kia ora Adele,

Thank you for providing Canterbury Regional Council (CRC) notice under section 11(1)(b)(i) of the Fast-track Approvals Act (FTAA) on 24 June 2026. Section 11(1)(c) states that CRC have 20 working days in which to respond to this notice. Please consider this has CRC's response to that notification.

For completeness, CRC notes that a meeting was held on 15 July 2026 to discuss the contents of a referral application in addition to the formal notification. CRC's feedback on this information is captured below.

PROJECT SUMMARY

As CRC understand it, Wolfbrook Developments (Pegasus) Limited is proposing the subdivision and residential development of an approximately 77-hectare site, comprising the following land parcels:

- Lot 221 DP 400595
- Lot 213 DP 403716
- Lot 701 DP 403716
- Lot 2 DP 407339
- Lot 4 DP 407339
- Lot 206 DP 412982
- Lot 210 DP 453895
- Lot 211 DP 437099
- Lot 701 DP 437099
- Lot 205 DP 552775
- Lot 208 DP 417391
- Lot 1 DP 5295055
- Lot 3 DP 595055

The Project proposes a residential subdivision that would contain:

- Up to 1,000 residential allotments of different residential densities;
- Development of a commercial and community hub;

- Establishment of three waters infrastructure;
- Alterations to existing and establishment of new roads;
- Associated earthworks, servicing, landscaping and related works.

FEEDBACK

Based on the information provided by the Applicant, CRC staff have raised the following comments regarding this proposal. These comments are set out below.

Planning - Consent Requirements

Based on the information provided to date, it is not possible for CRC to confirm the specific regional council requirements for the proposal until comprehensive descriptions of the proposed activities, servicing arrangements, construction methodology and stormwater management approach has been provided to CRC.

However, based on the scale and nature of the development site in addition to discussions during the preapplication meeting, CRC anticipates that the Applicant should carefully assess whether regional consents are required under the Canterbury Land and Water Regional Plan (CLWRP), Canterbury Air Regional Plan (CARP), and any relevant National Environment Standards (NES).

In particular, CRC anticipates that the Applicant's rule assessment should consider whether consent is required for the following activities.

1. Land use consent under section 9 of the Resource Management Act 1991 (RMA), including for earthworks and/or land disturbance;
2. Land use consent under section 13 of the RMA, placement, alteration or maintenance of any structures in the bed of a river and/or the realignment of any river;
3. Take and use consent under section 14 of the RMA, if any groundwater/surface water takes, dewatering, or construction related water take is proposed; and
4. Discharge consent under section 15 of the RMA, including for construction phase stormwater, operational phase stormwater, sediment laden water, contaminants to land or water, any dewatering discharge and wastewater discharge, and/or air discharges.

At this stage, the level of project specific detail provided means CRC is not yet able to confirm the consent requirements for the proposal, or the applicable activity status. CRC would welcome further details on the proposed activities and the reasons why any permitted activity thresholds may not be met. This would assist CRC in providing more specific feedback on consent requirements under the CLWRP, CARP and NESs. CRC is also happy to work through any applicable planning provisions with Novo Group.

A substantive application would need to include a comprehensive assessment of effects across all relevant consenting matters, supported by appropriate technical assessments and draft management plans where necessary.

CRC would welcome the opportunity to review any rule assessment alongside a draft assessment of effects and associated technical reports and/or management plans in advance of a substantive application being lodged. Early provision of these documents would allow CRC to provide timely and constructive feedback before the substantive application is lodged.

CRC notes that the referral notice provided identifies the potential need for other approvals not administered by CRC. CRC recommends that the referral and substantive application

clearly distinguish between approvals required from CRC and approvals required from other agencies or authorities.

Policy Framework

The substantive application would also need to include a comprehensive policy assessment against the relevant policy framework within the Canterbury Regional Policy Statement (CRPS), CLWRP and CARP alongside any relevant national direction.

CRC would also welcome the opportunity to review any draft policy assessment in advance of a substantive application being lodged. Early provision of this assessment would allow CRC to provide timely and constructive feedback before the substantive application is formally lodged.

Conditions

A substantive application would also need to include a comprehensive set of proposed conditions. To assist with this, CRC has attached to this letter a set of standard template conditions (s9, s13, s14 and s15) relevant to the consents potentially being sought.

Please note that these template conditions are provided as a general guide. Not all conditions will be relevant to the proposed activity. For those that are relevant to the activities sought in this application, CRC notes that site-specific considerations may necessitate the addition, removal, and/or amendment of conditions. CRC hopes the attached template conditions will assist in preparing a condition set that is appropriate for the specific proposal.

CRC would also welcome the opportunity to review the draft condition framework as the application develops, noting that any final conditions would ultimately be considered by the expert panel as part of the Fast-track process.

CRC looks forward to continuing to engage collaboratively with the Applicant and Novo Group on this Fast-track project. CRC is keen to assist where it can by providing early feedback, noting that CRC is not the decision-maker for the substantive application, but rather plays a role as a relevant local authority providing input to assist the Applicant, the EPA, and the expert panel. CRC is therefore keen to engage early and constructively to help ensure relevant matters are identified and addressed as efficiently as possible, and to support a more efficient consenting process.

CRC are happy for this document to be used as evidence of consultation when lodging your application. We look forward to continuing to work with you as your application progresses.

Ngā mihi,



Henry Winchester

Manager Consents Planning

LIST OF ATTACHMENTS:

Attachment 1: RMA265442 - FT Pre-App - Project Pegasus West - MEETING MINUTES - 15 July 2026

Attachment 2: s9 Conditions - Earthworks Over an Aquifer

Attachment 3: s13 Conditions - Works in the Bed

Attachment 4: s14 Conditions - Dewatering Water Take

Attachment 5: s14 Conditions - GW Take

Attachment 6: s14 Conditions - SW Take

Attachment 7: s15 Conditions - Construction-Phase Stormwater Discharges

Attachment 8: s15 Conditions - Operational-Phase Stormwater Discharges

Attachment 9: s15 Conditions - Air Discharge

Pre-Application Advice for Wolfbrook Developments (Pegasus) Limited – RMA265442

Disclaimer: This technical advice note does not constitute legal advice and should not be relied upon as such. Please note this preliminary advice has been given prior to any official guidance from the Ministry for the Environment relating to Canterbury Regional Council’s role under the Fast-track Approvals Act 2024.

Meeting Date:	15 th July 2026
----------------------	----------------------------

Executive Summary

Wolfbrook Developments (Pegasus) Limited (the applicant) have sought a meeting with Canterbury Regional Council (CRC) to discuss the potential option of using the Fast-track Approval Act (FTAA) for the Pegasus West Development Project. The project is not listed in Schedule 2 of the FTAA. Accordingly, the applicant is seeking referral under the FTAA.

CRC Staff – Anna Stewart, Victoria Kingsbury, Sam Prystupa, Wanda Kingma (Consent Planning)
APPLICANT – Adele Radburnd and Jeremy Phillips (Novo Group) Fred Coughlan (Wolfbrook Developments (Pegasus) Limited).

Introduction

Fast-track Act Consenting:

Under the FTAA, the applicant is required under section 11(1)(b)(i) to notify the relevant local authorities. Wolfbrook Developments (Pegasus) Limited will need to provide evidence of this consultation as part of their application (section 13(4)(k) and (ka)).

Pegasus West Development (the Project):

Canterbury Regional Council requested a pre-app meeting to discuss the proposed Pegasus West Development FTAA application.

This pre-application meeting forms part of this consultation and discusses the process going forward for the applicant under the FTAA. Specifically, to introduce the relevant fast-track planning contacts, outline how early engagement and technical review will be managed, and provide the applicant and consultant team with guidance on the type and timing of information that will assist the referral and substantive application stages.

Minutes – Notes – Advice

CRC outlined that fast-track applications are managed by a dedicated team due to the tight timeframes and the need for consistent coverage. CRC’s role is to provide comments and technical

advice rather than act as the decision-maker. This allows CRC to be more directive and constructive in pre-application feedback, including identifying issues, suggesting matters for refinement, and helping applicants focus on the matters most likely to assist the panel.

CRC noted that early technical input can help narrow the issues that remain for the panel. The approach is to front-load advice where possible, address simpler matters early, and leave only genuinely unresolved or substantive issues for the formal decision-making process.

The applicant team provided a high-level update on the Pegasus West proposal. The project is intended to deliver master-planned residential development in a location considered by the applicant to be appropriate in terms of water infrastructure and broader planning considerations. The applicant advised that technical assessments are being progressed and that known matters include cultural values, ecology, stormwater, waterways, infrastructure and site history.

The applicant acknowledged that there is a long planning and consenting history associated with the site and that information provided to date has assisted in understanding existing regional consents and related matters. Further technical work and surveys are expected as the project progresses.

- Early engagement is encouraged so that key issues can be identified, scoped and, where possible, resolved before the formal panel stage.
- Draft technical reports should be shared as early as practicable. Feedback on drafts will be treated constructively and without criticism of incomplete work.
- A shared issue-tracking spreadsheet is recommended to record technical matters, responsibilities, actions, status, and agreed or unresolved positions.
- Expert conferencing or targeted technical meetings may be useful for matters such as stormwater, ecology, cultural values, waterways and infrastructure.
- The referral stage can remain relatively high level, but the more information available early, the easier it is for Council and technical experts to prepare meaningful advice and manage tight statutory timeframes.
- Section 11 feedback is generally expected to be high level and focused on confirming engagement and identifying matters that may require further work.
- Commercially sensitive material and free and frank pre-application discussions will be managed carefully in the event of any LGOIMA request.
- The applicant should consider clearly identifying proposed mitigations, public interest considerations, economic benefits, and any matters that may need to be left for the substantive application stage.

Next steps / actions:

Action	Responsibility	Status / Notes
--------	----------------	----------------

CRC Pre-application Meeting Minutes

Share draft technical reports as they become available.	Applicant / consultant team	To assist early issue identification and technical review.
Prepare or agree a shared issue-tracking spreadsheet.	CRC and applicant / consultant team	To track issues, actions, responsibilities, status and unresolved matters.
Identify applicant technical experts and key workstreams.	Applicant / consultant team	Will assist Council to line up relevant technical reviewers.
Consider targeted technical meetings or expert conferencing.	CRC and applicant / consultant team	Particularly for stormwater, ecology, cultural values, waterways and infrastructure matters.

Signed by



Victoria Kingsbury
Principal Consent Planner

Fast-Track Pre-Lodgement Notification Response

Purpose - This document provides a response from DOC following notification in writing for an application under the Fast-track Approvals Act 2024.

Project Details

Project name:	Pegasus West
Engagement type:	Notification for referral
Response sought from DOC	Summary response (20 working days)
Applicant/agent:	Applicant: Wolfbrook Developments (Pegasus) Limited Agent: Adele Radburnd (Novo Group)
Project overview:	The project is for the development of a masterplanned residential community to include up to 1,000 residences on a parcel of land currently operated as a golf club.
Location:	77 hectares of land located between Pegasus, Ravenswood and Woodend, North Canterbury, legally described as: - Lot 221 Deposited Plan 400595 - Lot 213 Deposited Plan 403716 - Lot 701 Deposited Plan 403716 - Lot 2, 4 Deposited Plan 407339 - Lot 206 Deposited Plan 412982 - Lot 210 Deposited Plan 453895 - Lot 211, 701 Deposited plan 437099 - Lot 205 Deposited Plan 552775 - Lot 208 Deposited Plan 417391 - Lot 1 Deposited Plan 595055 - Lot 2 Deposited Plan 595055 - Lot 3 Deposited Plan 59055 - Lot 4 Deposited Plan 59055
Date pre-lodgement request received:	24 June 2026
Documents provided by the applicant:	Letter entitled 'Fast-track Approvals Act 2024 Section 11 Notification Pegasus West Development Project' prepared by Novo Group Limited, dated 24 June 2026

	Graphic supplement entitled '2026_070 Wolfbrook Pegasus West FTA_H' prepared by DCM Urban Design Limited dated 24 June 2026
Summary of pre-lodgement engagement: The applicant notified DOC on the 24 th of June 2026 and provided the documents noted above. The applicant requested a summary response within 20 working days. This is a response within the specified timeframe, further to the information provided.	
Fast track project lead DOC:	Shawn Gardner – Consultant Fast-track Consents Advisor (Enspire)
DOC Permissions/ Approvals Identified by applicant in pre-lodgement request as potentially required:	Wildlife Act Approvals (WAA) (species not specified) Complex Freshwater Fisheries Approvals (CFFA) for fish salvage works
DOC Commentary on Fast Track approvals and permissions identified:	It is the applicant's responsibility to comply with the Fast-track Approvals Act 2024 (FTAA) and ensure that the necessary approvals are identified and all required information is provided as part of the referral application. Section 13(4) sets out the information to be included in a referral application. Wildlife Act Approvals WAA authorise acts that would otherwise be an offense under the Wildlife Act (1953), including to: - Catch and handle wildlife onsite (including wildlife sampling and wildlife salvage) - Take samples from wildlife - Take or destroy the eggs of wildlife - Attach identification tags to wildlife - Mark, tag, or attach other scientific apparatus to wildlife - Catch and temporarily hold wildlife in captivity (less than 3 months) - Transfer captive wildlife from one holding facility to another holding facility - Kill wildlife - Hunt, disturb, kill or catch alive protected wildlife that are causing damage - Translocate wildlife If any of these activities are required for protected species, wildlife approvals for these activities in relation to that species will be required. DOC notes that it is possible that threatened wetland birds and threatened indigenous plants exist onsite. Shag species, gulls and waders may use the site. Grass skinks are likely to be present. DOC considers it likely that WAA will be required for grass skinks. DOC considers that adverse effects on conservation values, including indigenous biodiversity, that arise as a result of the project must be

	appropriately managed. This is of particular importance where the species affected are Threatened or At-Risk and where those effects may be cumulative. Complex Freshwater Fisheries Approvals There are records of At-Risk (longfin eel, Canterbury galaxias, upland bully, giant bully) and Threatened (inanga) species on and in the vicinity of the site. There are also records of Canterbury mudfish (Threatened, Nationally Critical), which is the highest threat ranking category. There is mapped non-migratory galaxias habitat (Canterbury galaxias and Canterbury mudfish) on the site as well as in the vicinity of the site. There are also mapped wetlands in the vicinity of the site. The applicant has indicated the need to obtain Complex Freshwater Fisheries Approvals (CFFA). DOC considers it likely that CFFA will be required. The applicant should be aware of the approval requirements under the Freshwater Fisheries Regulations. The information requirements for CFFA are specified in clause 3 of Schedule 9 of the Act. The project will need to address this information requirement if CFFA are included in the application. We recommend, if there is a possibility CFFA is required, that this is included in the referral application. The applicant should be aware that any instream structures will need to adhere with the New Zealand Fish Passage Guidelines Earth Sciences New Zealand NIWA.
Treaty partners:	DOC is aware of the following Treaty partners that may be relevant to the site: • Te Rūnanga o Ngāi Tahu DOC encourages the applicant to reach out to the relevant Māori groups as required by section 11(b)(ii) of the FTAA.
Treaty Settlement implications/considerations:	The following Treaty settlements are considered relevant to the site: Ngāi Tahu Claims Settlement Act 1998 DOC has a statutory obligation to advocate for the preservation of freshwater fisheries, wetlands, freshwater fish habitat, the protection of water quality, the protection of historic resources, and the preservation of indigenous vegetation and habitats. The applicant should consider how to preserve, protect, and minimise impacts on these values. The information provided was inadequate to make a determination of what listed taonga species are likely to be impacted. The applicant should be aware of the listed taonga species in Schedule 12 of the Ngāi Tahu Claims Settlement Act 1998 (NTCSA). The applicant should seek to minimise the impacts to any listed taonga species and should consult with Ngāi Tahu on the same.
Potential Resource Management Act (RMA) considerations and effects: <i>Note: DOC's role in relation to 53(2)(m)(i) FTAA</i>	The pre-lodgement notification was primarily in relation to the wildlife approval being sought. Some primary RMA considerations for DOC include that relevant biodiversity and environmental effects are considered as part of the full and comprehensive AEE included in the substantive application, which should specifically address the management of any indigenous species and habitats onsite, including threatened plant species, and freshwater values including fishes and invertebrates, wetlands and streams. In relation to this, DOC

	considers that undertaking an assessment of the potential impacts on Canterbury mudfish is especially prudent. The AEE should include: • A clear description of all proposed activities and required approvals, including why each approval is required (what rule or standard is not met) and for each rule or standard that is met, a description of how this rule or standard is met • A summary of any mitigations proposed in expert reports • Proposed monitoring and adaptive management strategies, including ecological triggers and strategies for when triggers are tripped • An assessment against relevant plans and policies including the National Policy Statement for Indigenous Biodiversity and the National Policy Statement for Freshwater Management The site is potentially habitat to multiple Threatened and At-Risk species, and surveys should be undertaken by a suitably qualified expert to determine the presence (or not) of these species. Wetland and waterway loss will need to be carefully considered to ensure there is no net loss in extent and values from the proposed activities. The Department has a statutory requirement to advocate for the preservation of freshwater and customary fisheries. The application should give particular consideration to the potential impacts on indigenous and recreational fisheries and seek to minimise these impacts where possible. Conditions should be developed and presented to manage any effects on the above. DOC would like to see draft conditions prior to the submission of the substantive application. Further advice can be provided during any pre-lodgement consultation on the substantive application.
DOC Statutory Planning Document considerations in relation to site (e.g. CGP/CMS/CMP):	The following DOC Statutory Planning documents are relevant to the project: • Conservation General Policy 2005 • Canterbury (Waitaha) Conservation Management Strategy 2016 At a high level, no inconsistency with these documents has been identified, but the Project will need to consider them if it proceeds to a substantive application.
Any specific information requests to applicant(s)/agent for pre-app engagement at this point:	Should the application be referred, the applicant is encouraged to engage with DOC prior to lodging a substantive application. Specific documents DOC would like to review include: • Assessment of Environmental Effects • Ecological report • Any wildlife management plans (including, but not limited to those required for any WAA) • Offsetting and compensation plan • Draft conditions The Ecological report should include:

	• Findings from surveys of existing ecology onsite, including surveys for any Threatened and At-Risk species, including indigenous flora and stocktake of any waterways, streams and wetlands onsite • Details of any proposed works within streams, wetlands or waterways (including enhancement activities) and how these activities are expected to impact any existing freshwater habitats onsite • Details of any proposed mitigations and how these will reduce any ecological impacts • For any unavoidable ecological impacts, a description of why they cannot be avoided and a reference to how they will be offset/compensated for. It is noted that management plans should include (at a minimum) the following information: • Details of mitigation and minimisation strategies utilised to minimise impacts on wildlife and indigenous ecosystems • Any proposed exclusion periods (based on species present and any vulnerable periods for these species) • Salvage/relocation plans, including methodology and release locations (including at least one primary release location and one secondary release location) • Monitoring requirements and methodologies • Where no WAA is proposed, management plans should detail how impacts on indigenous species will be avoided such to comply with the requirements of the Wildlife Act (1953) Fish Management Plans should also include: • A Freshwater Monitoring Programme, including water quality, quantity, temperature, fish monitoring and habitat monitoring • A Baseflow Monitoring Programme, with the identification of limits/triggers and mitigations/remediation options should monitoring show reductions below triggers • Details on any proposed augmentation of stream flows If offsetting or compensation is proposed, an Offsetting and Compensation Plan should be provided. This should include, at a minimum: • A description of ecological values where effects cannot be avoided • A description of any methods employed to minimise impacts on relevant ecological values in the first instance • Identification of specific proposed offsetting, including locations and timeframes • For any temporary or permanent loss of freshwater values, Stream Ecological Valuation and Environmental Compensation Ratios • Any proposed long-term pest management and how it will be funded and actualised
--	--

Any further information/considerations:	DOC notes that the project site includes the Brockenhurst wetlands (see image below), which is a Stewardship Area under s.25 of the Conservation Act 1987 (the Conservation Act). This falls under the definition of Public Conservation Land (PCL) in the FTAA. The area is a narrow tributary stream channel of the Taranaki Stream catchment. Any works involving this PCL will require a concession. DOC is the administering agency for this area of PCL.  DOC notes that there are many recorded archaeological sites within and near the project site. It is therefore possible that the applicant could encounter archaeological sites during the works. The applicant should be aware of the relevant requirements under the Heritage New Zealand Pouhere Taonga Act 2014 and apply for any necessary approvals under the same. DOC has a responsibility for the preservation of any archaeological sites within lands administered by DOC. Therefore, the disturbance of any archaeological sites within the Brockenhurst wetlands may be subject to additional approvals.
Additional Notes:	While DOC will assist applicants as much as we can when they engage in pre-lodgement consultation, it is the applicant's responsibility to comply with the FTAA and ensure they have applied for all approvals they need. Guidance for applying for a wildlife approval under the FTAA can be viewed here: Guidance for applying for a wildlife approval DOC encourages the applicant to share draft substantive application documents, including proposed draft conditions, should the application be referred. This enables DOC to provide feedback on how the draft documents align with the information requirements of the Act. Note that a panel will invite the statutory bodies listed in clause 4 of Schedule 7 to comment on any wildlife approval as part of any substantive application (NZCA, conservation boards, Fish and Game Council, and Game Animal Council). We encourage applicants to engage with these bodies in advance of lodging a substantive application.

	For clarity of use and easy reading, DOC recommends that the application documents clearly address each of the requirements in the relevant schedule of the Act, with a separate section for each required approval. This enables the relevant authorities and the Panel to clearly understand the relevant issues for each approval. Freshwater/Wetlands The applicant should undertake surveys to confirm the presence (or not) of any wetlands on the site and specifically address how wetlands will be managed in the substantive application documents. This includes confirmation of any works proposed within wetlands or waterways, including enhancement activities. Physical fish surveys (trapping/netting/e fishing) are recommended to be undertaken and included in the ecological report, these assist in providing information such as abundance, population size, structure and other information which would assist in assessing freshwater values at the site. It is recommended that the applicant provide a stocktake, undertaken by a suitably qualified and experienced person, of any current fish barriers onsite in the substantive application and advise of any proposed works to remove or alter them. For any proposed instream structures, the applicant should ensure that they meet and are aware of the Freshwater Fisheries Regulations and any approvals that may be required under the same. Of particular interest to DOC is the potential presence and management of Canterbury mudfish. Birds It is recommended that the applicant ensure that site surveys are undertaken by a suitably qualified and experienced person to determine the presence of birds onsite and specifically address the same in the substantive application documents. Some indigenous (absolutely protected) birds may have territories inside the project area and will be reluctant to leave. It is recommended that a Bird Management Plan be implemented to avoid effects on indigenous bird species where possible, particularly in relation to vegetation clearance. DOC would like to review any proposed Bird Management Plan prior to the submission of the substantive application. DOC notes that WAA is required for any activity that results in the injury or mortality of native birds. Lizards It is recommended that site surveys are undertaken by a suitably qualified and experienced person to determine the presence, abundance, and likely habitation areas of any native lizards onsite. Vegetation clearance will need to ensure lizards are protected and will likely need WAA. A Lizard Management Plan (LMP) will be required, to manage salvage and release lizards. The LMP should identify a suitable lizard release site and a second backup release site. Long-term management for lizards at the release site should be provided for.
--	--

	DOC would like to review the LMP prior to the submission of the substantive application.
--	--



Te Rūnanga o NGĀI TAHU

30 June 2026

Novogroup
PŌ Box 365
Christchurch

s 9(2)(a)

Tēnā koe Adele

**Re: FAST-TRACK APPROVALS ACT 2024 SECTION 11 NOTIFICATION PEGASUS
WEST DEVELOPMENT PROJECT**

Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) provides this **preliminary** response regarding your proposal for the Pegasus West Development Project (Project) in response to your letter dated 24 June 2026. We understand that the project is for a master planned residential development with a supporting commercial/community node as an extension to Ravenswood and Pegasus under the Fast-track Approvals Act 2024 (**FTAA**).

For this application, Te Rūnanga defers to Papatipu Rūnanga to provide feedback. We request that they are provided with sufficient detail, about the project, to enable them to provide a response that can fully inform the application.

Te Rūnanga is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996. Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their respective rohe.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu Whānui, “for all purposes”, Te Rūnanga accepts and respects the right of Papatipu Rūnanga to provide their own comments. We emphasise that Papatipu Rūnanga are distinct Treaty settlement entities in their own right (as defined in s4 of the FTAA), with their own mandates, responsibilities, cultural knowledge, and decision-making structures. Engagement with Te Rūnanga does not replace or diminish the need for you, as the applicant, to undertake robust, early, and meaningful engagement with each of the Papatipu Rūnanga¹ whose takiwā and interests intersect with the project area and wider environment.

¹ As Papatipu Rūnanga are Treaty Settlement Entities under section 4 FAA, section 11(b)(ii) of that Act requires that they are notified in writing before a referral application is lodged.

As you identified in your letter the Papatipu Rūnanga with interests across the proposed area is Ngāi Tūāhuriri. Papatipu Rūnanga are supported in their rangatiratanga and kaitiakitanga responsibilities by Whitiara Centre Limited (**Whitiara**), who represent the interests of Papatipu Rūnanga within their rohe. You need to engage with Papatipu Runanga, and we strongly encourage you to contact Whitiara consents@whitiara.org.nz as soon as possible.

This response is provided on a preliminary basis for initial engagement purposes only. It is not intended to be a complete or definitive statement of the Treaty settlement provisions or other matters that may be relevant to your proposal. Further matters may arise through ongoing engagement with Papatipu Rūnanga and any review of more detailed project information. If further engagement with Te Rūnanga is required, Papatipu Rūnanga will advise you.

Nāku noa, nā



Deidre Francis
Senior Environmental Advisor
Te Rūnanga o Ngāi Tahu

cc: consents@whitiara.org.nz;

RE: FTAA 2024 Project - S11 Notice - Pegasus West Development Project



Fast Track <fasttrack@heritage.org.nz>

To Adele Radburnd

You forwarded this message on 24/07/2026 11:43 am.

Reply

Reply All

Forward

Thu 23/07/2026 3:41 pm

Tēnā koe Adele,

Thank you for your email notifying Heritage New Zealand Pouhere Taonga (HNZPT) of your intention to lodge a referral application for the Pegasus West Development Project.

The proposed project area is located within a significant cultural and archaeological landscape. Central to this landscape is Kaiapoi (Kaiapohia) Pā (recorded as M35/7 and M35/10 on ArchSite and recognised on the Rārangi Kōrero, List No. 5733), located near the proposed project. Directly adjacent to the proposed project area the development of the Pegasus Township uncovered a large and complex archaeological landscape that remained intact below the surface. This archaeological landscape extends into the project area, demonstrated by the recorded archaeological sites that exist within the proposed project boundary including a pā site (M35/440) and middens/ovens (M35/12, M35/1013, and M35/1014). Further evidence of this landscape will exist subsurface and therefore have not yet been identified as recorded sites. The project area also lies within Te Kohanga o Kaikai-a-Waro, a Wāhi Tapu (List No. 9506) that includes significant cultural and archaeological sites.

The proposed project will result in further modification and destruction of this significant landscape. HNZPT advocates for avoidance of significant archaeological sites and promotes early, on-going and meaningful engagement with applicants to identify and consider ways to avoid and minimise modification and destruction.

We strongly recommend that, if referred, the applicant engages directly with both Ngāi Tūāhuriri and Heritage New Zealand Pouhere Taonga to discuss ways to avoid and minimise the effects of the proposal on this significant landscape.

If you have any questions or wish to discuss, please respond to this email. The contact point for all engagement with HNZPT on Fast-track matters is fasttrack@heritage.org.nz.

Ngā mihi,

Fast-track Team | Heritage New Zealand Pouhere Taonga

Tairangahia a tua whakarere; Tātakihia ngā reanga o āmuri ake nei | Honouring the past; Inspiring the future

<https://www.heritage.org.nz/>

This communication may be a privileged communication. If you are not the intended recipient, then you are not authorised to retain, copy or distribute it. Please notify the sender and delete the message in its entirety.