Ministry for the Environment
Manatū Mō Te Taiao

Fast-track Approvals Act 2024 – Treaty settlements and other obligations (Section 18) report

Project Name: FTAA-2511-1151 Bangor Village

To:	Date:
Hon Chris Bishop, Minister for Infrastructure	24 February 2026

Number of attachments: 5	Attachments: 1. Provisions of section 18 of the Fast-track Approvals Act 2024 2. Project location map 3. List of relevant Māori groups 4. Comments received from invited Māori groups 5. Comments received from the Minister for Māori Development and Minister for Māori Crown Relations: Te Arawhiti

Ministry for the Environment contacts:

Position	Name	Cell phone	1st contact
Principal Author	Stephen Church		
Manager, Fast-track Operations	Stephanie Frame	s 9(2)(a)	✓
General Manager	Ilana Miller	s 9(2)(a)	

Key points

1. The Ministry for the Environment (on behalf of the Secretary for the Environment) has prepared this report on Treaty settlements and other obligations under section 18 of the Fast-track Approvals Act 2024 (the Act), in relation to the FTAA-2511-1151 Bangor Village referral application.
2. The applicant, Hughes Developments Limited, proposes to develop an approximately 130-hectare site at 160 Bangor Road in Darfield, Canterbury, into 700-800 residential lots. The proposed development includes provision to establish community and/or commercial facilities, reserves and open space areas centred around an existing water race that will be enhanced, and associated infrastructure such as roading. The applicant is seeking approvals that would otherwise be sought under the Resource Management Act 1991 (RMA) and potentially under the Wildlife Act 1953. The land is owned by the applicant.
3. Section 18(2) of the Act requires that the report provide a list of relevant Māori groups, including relevant iwi authorities and Treaty settlement entities. We have identified Te Rūnanga o Ngāi Tahu, Te Ngāi Tūāhuriri Rūnanga, Te Taumutu Rūnanga, Whitiora Centre Limited, and Mahaanui Kurataiao Limited as the relevant groups.
4. The relevant Treaty settlement is the Ngāi Tahu Claims Settlement Act 1998. In its acknowledgements and apology to Ngāi Tahu, the Crown recognised its failures to fulfil its

Treaty obligations and commits to a new age of co-operation with Ngāi Tahu. The Crown also recognised Ngāi Tahu as holding rangatiratanga and mana within the Takiwā of Ngāi Tahu Whānui.

5. While other redress provided through the Ngāi Tahu settlement provides important context for this application – such as that relating to Te Waihora/Lake Ellesmere, taonga species, and the conservation protocol – we have not identified any other principles and provisions of the settlement which are directly relevant. We note that the project area is within an area subject to regulations made under Part 9 of the Fisheries Act 1996, which established the customary food gathering area/rohe moana of Te Taumutu Rūnanga.
6. Mahaanui Kurataiao Limited and Whitiora Centre Limited provided comments on the application on behalf of Te Taumutu Rūnanga and Te Ngāi Tūāhuriri Rūnanga respectively. Mahaanui Kurataiao advise they have previously provided recommended conditions to the applicant, to align with the Mahaanui Iwi Management Plan, and acknowledge that the majority of conditions or proposed mitigations have been agreed to. Mahaanui Kurataiao are neutral on whether the referral application should be accepted. Whitiora has also previously provided preliminary advice to the applicant, and supports the proposed approach to water supply and wastewater, stormwater, surface water, and landscape planting. Whitiora considers the consent conditions proposed by the applicant are sufficient to address matters of cultural concern.
7. The Minister for Māori Development and the Minister for Māori Crown Relations: Te Arawhiti support the application for referral.
8. We do not consider there are any matters raised in this report which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Signature

Ilana Miller
General Manager – Delivery & Operations

Introduction

9. Under section 18 of the Act, you must obtain and consider a report on Treaty settlements and other obligations for each referral application, prepared by the responsible agency (Secretary for the Environment).

10. The information which must be provided in this report includes:

    a. relevant iwi authorities, Treaty settlement entities, applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011 (MACA), and other Māori groups with interests in the project area;

    b. relevant principles and provisions in Treaty settlements and other arrangements;

    c. a summary of comments and further information received from invited Māori groups; and

    d. advice on whether it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.

11. This report is structured accordingly. We have provided a list of the relevant provisions of section 18 at **Attachment 1**.

Proposed project

12. The applicant, Hughes Developments Limited, proposes to develop an approximately 130-hectare site at 160 Bangor Road in Darfield, Canterbury, into 700-800 residential lots. The proposed development includes provision to establish community and/or commercial facilities, reserves and open space areas centred around an existing water race that will be enhanced, and associated infrastructure such as roading. The applicant is seeking approvals that would otherwise be sought under the RMA (including subdivision, earthworks, stormwater discharge) and potentially under the Wildlife Act 1953 (capture/relocation of lizards). The land is owned by the applicant.

13. We have provided a location map at **Attachment 2**.

Relevant iwi authorities, Treaty settlement entities, and other Māori groups

14. We note that some entities identified below may be included in more than one category. We have included a composite list of all groups at **Attachment 3**.

Iwi authorities

15. Under section 4(2) of the Act, 'iwi authority' has the same meaning as in section 2(1) of the RMA:

> *the authority which represents an iwi and which is recognised by that iwi as having authority to do so*.

16. We consider the following groups to be the relevant iwi authorities for the project area:

    a. Te Rūnanga o Ngāi Tahu, representing Ngāi Tahu.

Treaty settlement entities

17. Under section 4(1) of the Act, "Treaty settlement entity" means any of the following:

> *(a) a post-settlement governance entity (PSGE):*

(b) a board, trust, committee, authority, or other body, incorporated or unincorporated, that is recognised in or established under any Treaty settlement Act:

(c) an entity or a person that is authorised by a Treaty settlement Act to act for a natural resource feature with legal personhood:

(d) Te Ohu Kai Moana or a mandated iwi organisation (as those terms are defined in section 5(1) of the Maori Fisheries Act 2004):

(e) an iwi aquaculture organisation (as defined in section 4 of the Maori Commercial Aquaculture Claims Settlement Act 2004).

18. Under the Act, a PSGE:

(a) means a body corporate or the trustees of a trust established, for the purpose of receiving redress in the Treaty settlement of a claimant group,—

(i) by that group; or

(ii) by or under an enactment or order of a court; and

(b) includes—

(i) an entity established to represent a collective or combination of claimant groups; and

(ii) an entity controlled by an entity referred to in paragraph (a); and

(iii) an entity controlled by a hapū to which redress has been transferred by an entity referred to in paragraph (a).

19. In keeping with the procedural principles outlined at section 10 of the Act, we only identify those PSGEs which are specified in the relevant Treaty settlement Act or Treaty settlement deed.[1]

20. We have identified the following relevant Treaty settlement entities for this project area:

    a. Te Rūnanga o Ngāi Tahu, PSGE for the Ngāi Tahu Claims Settlement Act 1998;

    b. Te Ngāi Tūāhuriri Rūnanga, representing Ngāi Tūāhuriri, Papatipu Rūnanga of Ngāi Tahu Whānui as recognised in the Ngāi Tahu Claims Settlement Act 1998; and

    c. Te Taumutu Rūnanga, representing Taumutu, Papatipu Rūnanga of Ngāi Tahu Whānui as recognised in the Ngāi Tahu Claims Settlement Act 1998.

Groups mandated to negotiate Treaty settlements

21. There are no groups which have recognised mandates to negotiate a Treaty settlement over an area which may include the project area. All historical claims under te Tiriti o Waitangi / the Treaty of Waitangi have been settled in respect of the project area.

[1] Should a panel be made aware of a Treaty settlement entity established after the Treaty settlement Act is enacted (e.g. on the advice of a PSGE), then there would appear to be nothing to prevent the panel from inviting that entity to comment on the application under section 53(2)(c) of the Act.

Takutai Moana groups and ngā hapū o Ngāti Porou

22. The project area does not include the common marine and coastal area, and accordingly there are no relevant applicant groups under MACA, and no court orders or agreements that recognise protected customary rights or customary marine title within the project area.

23. The project area is not within ngā rohe moana o ngā hapū o Ngāti Porou (as set out in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).

Iwi or hapū whose practices are recognised under the Fisheries Act 1996 through regulation or bylaws

24. The project area does not include a taiāpure-local fisheries area or mātaitai reserve.

25. However, the project area is located in an area subject to a bylaw or regulations made under Part 9 of the Fisheries Act 1996. Under the Fisheries (South Island Customary Fishing) Regulations 1999, the Fisheries (South Island Customary Fishing) Notice (No. 36) 2002 (No. F233) established the customary food gathering area/rohe moana of Te Taumutu Rūnanga, which includes the project area.

26. The relevant tangata whenua are Te Taumutu Rūnanga. The regulations and notice provide for Te Taumutu Rūnanga to take fisheries resources and manage customary fishing anywhere in the rohe moana for which they are tangata whenua, which includes the project area.

Owners of identified Māori land where electricity infrastructure or land transport infrastructure is proposed

27. Section 23 of the Act provides that, in making a decision on a referral application under section 21, the Minister may determine that, for the purposes of the project, an activity described in section 5(1)(a) is not an ineligible activity if it:

    a. is the construction of electricity lines or land transport infrastructure by (or to be operated by) a network utility operator that is a requiring authority; and

    b. would occur on identified Māori land that is Māori freehold land or General land owned by Māori that was previously Māori freehold land.

28. This project does not involve an activity described in section 23(1) (i.e. including both (a) and (b)) of the Act.

Iwi authorities and groups representing hapū who are party to relevant Mana Whakahono ā Rohe or joint management agreements

29. If the project area is within the boundaries of either a Mana Whakahono ā Rohe or joint management agreement, and the application includes a proposed RMA approval described in section 42(4)(a) to (d) (resource consent, certificate of compliance, or designation), we are required to identify the relevant iwi authority/group that represent hapū that are parties to these arrangements.

30. We have not identified any Mana Whakahono ā Rohe or joint management agreements that are relevant to the project area, and accordingly there no parties to these arrangements to identify.

Any other Māori groups with relevant interests

31. We consider the following entities, owned by the relevant papatipu rūnanga, as other Māori groups that may have relevant interests in the application, as they may represent the papatipu rūnanga on environmental and other policy matters in the project area:
    a. Whitiora Centre Limited (owned by Te Ngāi Tūāhuriri Rūnanga); and
    b. Mahaanui Kurataiao Limited (owned by Te Taumutu Rūnanga and five other papatipu rūnanga).
32. For your information, the applicant advises they have consulted with Te Rūnanga o Ngāi Tahu, Whitiora Centre Limited (on behalf of Te Ngāi Tūāhuriri Rūnanga), and Mahaanui Kurataiao Limited (on behalf of Te Taumutu Rūnanga).

Relevant principles and provisions in Treaty settlements and other arrangements

Treaty settlements

33. Under section 4(1) of the Act, a Treaty settlement includes both a Treaty settlement Act and a Treaty settlement deed which is signed by both the Crown and representatives of a group of Māori.
34. The following Treaty settlements relate to land, species of plants or animals, or other resources within the project area:
    a. Ngāi Tahu Claims Settlement Act 1998.

Relevant principles and provisions

35. Section 7 of the Act requires all persons exercising powers and functions under the Act to act in a manner consistent with Treaty settlements. The relevant principles and provisions for each of these settlements are set out below.

Crown acknowledgements and apologies

36. As part of the Ngāi Tahu Treaty settlement, the Crown apologised to Ngāi Tahu for its past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries, and, in fulfilment of its Treaty obligations, the Crown states that it recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the takiwā of Ngāi Tahu whānui.
37. Respect for Ngāi Tahu views on resource management matters and enabling effective involvement of Ngāi Tahu as a Treaty partner in resource management decision-making within the takiwā are important ways in which the Crown can give ongoing effect to these acknowledgements and uphold its relationship with Ngāi Tahu.

Other redress

Te Waihora

38. The project area is within the catchment area of Te Waihora/Lake Ellesmere. The Ngāi Tahu Claims Settlement Act 1998 recognised the importance of Te Waihora by vesting the lakebed in Ngāi Tahu, providing for a joint management plan with the Director-General of Conservation over public conservation land surrounding the lake, and other forms of

redress (cultural vesting of land, leases, deferred selection properties, coastal statutory acknowledgement) near the lake.

39. Notwithstanding this, we did not identify any settlement redress relating to Te Waihora which applies to that part of the catchment that includes the project area.

40. According to the information provided by the applicant, the ecological quality of the two existing artificial water races that traverse the site is significantly degraded. The applicant proposes enhancing these water bodies as part of the development, including riparian planting. The applicant proposes the treatment and discharge of stormwater (to land primarily) in such a way that will protect the mauri of the Te Waihora catchment.

Taonga species

41. The Crown has also acknowledged the special association of Ngāi Tahu with certain taonga species of birds, plants and animals. The Ngāi Tahu Claims Settlement Act 1998 contains several other provisions relating to taonga species, including a requirement that the Minister of Conservation consult with, and have particular regard to, the views of, Te Rūnanga o Ngāi Tahu when making policy decisions concerning the protection, management, or conservation of a taonga species.

42. The settlement provisions regarding taonga species do not place any procedural obligations on the applicant or consent authority in relation to the Wildlife Act 1953 approvals for the relocation of lizards being sought as part of this application. Further, there are no lizards named amongst the taonga species listed in the Ngāi Tahu settlement.

Conservation protocol

43. The Ngāi Tahu Claims Settlement Act 1998 also provides for the Minister of Conservation to issue a protocol which sets out how the Department of Conservation (DOC) will exercise its functions, powers, and duties in relation to specified matters within the Ngāi Tahu claim area, and how DOC will interact with Te Rūnanga o Ngāi Tahu and provide for their input into DOC's decision-making process.

44. While the current version of the protocol which covers the project area provides for engagement with Te Rūnanga o Ngāi Tahu on certain matters,[2] in general it does not address the types of conservation-related approvals sought by the applicant (i.e. Wildlife Act 1953 approvals).

45. Ultimately, iwi and hapū, including papatipu rūnanga, are likely to have cultural associations with ancestral lands, water, sites, wāhi tapu, and other taonga beyond what is specifically identified in a Treaty settlement or other arrangements. Local tangata whenua and their representatives would be best placed to advise on such matters in the first instance.

Customary Marine Title/Protected Customary Rights

46. As noted above, the project area is not within a customary marine title area, protected customary rights area, or within or adjacent to ngā rohe moana o ngā hapū o Ngāti Porou.

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[2] The protocol specifies the following matters: cultural materials; freshwater fisheries; culling of species of interest to Ngāi Tahu; historic resources; RMA involvement; and visitor and public information. The protocol provisions relating to the RMA are about working with DOC on advocacy regarding the environmental effects of activities controlled and managed under the RMA, and are unlikely to be directly relevant to this application. The latest version of the protocol is appended to the 2016 Conservation Management Strategy for Canterbury (Waitaha) at pages 290-300: Canterbury (Waitaha) Conservation Management Strategy 2016.

Taiāpure-local fisheries/mātaitai reserves/areas subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996

47. As noted above, the project area does not include a taiāpure-local fishery or mātaitai reserve, but is within an area subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996. Under the Fisheries (South Island Customary Fishing) Regulations 1999, the Fisheries (South Island Customary Fishing) Notice (No. 36) 2002 (No. F233) established the customary food gathering area/rohe moana of Te Taumutu Rūnanga. This provides for Te Taumutu Rūnanga to take fisheries resources and manage customary fishing anywhere in the rohe moana for which they are tangata whenua, which includes the project area.

48. Should this application be accepted for referral, a panel may wish to consider whether the substantive application would affect the exercise of customary fishing within the rohe moana of Te Taumutu Rūnanga. Tangata whenua are likely best placed to advise the panel on this matter.

Mana Whakahono ā Rohe/Joint management agreement

49. As noted above, we have not identified any Mana Whakahono ā Rohe or joint management agreements that are relevant to the project area.

Summary of comments received and advice

Comments from invited Māori groups

50. Pursuant to section 17(1)(d) of the Act, on 19 December 2025 you invited written comments from the Māori groups identified above in paragraphs 14-32, from a list we previously provided you. These groups were provided with access to the application material and had 20 working days from receipt of the copy of the application to respond.

51. You received comments on the application from Mahaanui Kurataiao Limited and Whitiora Centre Limited, which can be summarised as follows:

Mahaanui Kurataiao Limited

52. Mahaanui Kurataiao set out the policies within the Mahaanui Iwi Management Plan 2013 that are most relevant to this application, such as those relating to Wai Māori (freshwater) and Papatūānuku (land) management. This includes more detailed policies on improving water quality, discharges of contaminants, protection and restoration of riparian margins, drain and stormwater management, earthworks, indigenous biodiversity, and protecting wāhi tapu and wāhi taonga.

53. As the kaitiaki representatives of Te Taumutu Rūnanga, Mahaanui Kurataiao advise they have previously provided recommended conditions to the applicant, to align with the Mahaanui Iwi Management Plan, and acknowledge that the majority of conditions or proposed mitigations have been agreed to. The kaitiaki representatives of Te Taumutu Rūnanga are neutral on whether the referral application should be accepted, and Te Taumutu Rūnanga reserve the right to comment on additional matters in the future.

Whitiora Centre Limited

54. Ngāi Tūāhuriri Rūnanga has mandated Whitiora Centre Limited to act on its behalf in relation to environmental policy, planning and strategy matters, including Fast-track applications.

55. Whitiora has previously provided preliminary advice to the applicant, and supports the proposed approach to water supply and wastewater (connection to reticulated services), stormwater (treated and discharged to ground), surface water (riparian planting, setback from allotments, provisions for fish passage), and landscape planting (retention of mature planting, use of indigenous species). Whitiora also considers the consent conditions proposed by the applicant (including erosion and sediment controls, an accidental discovery protocol, dust management) are sufficient to address matters of cultural concern. If the referral application is accepted, Whitiora propose further information be provided to set out how the development will be supported by essential services, such as schools, healthcare, and public transport.
56. More broadly, Whitiora notes that the Ngāi Tahu Claims Settlement Act 1998 recognises the importance of Te Waihora/Lake Ellesmere and certain taonga species to Ngāi Tahu, and the relevance of this for the application (e.g. in the management of stormwater and surface water bodies, and the integration and provision for taonga species in the development).

Consultation with departments and Ministers

57. In preparing this report, we are required to:
    a. consult relevant departments; and
    b. provide a draft of the report to the Minister for Māori Development and the Minister for Māori Crown Relations: Te Arawhiti (for response within 10 working days).
58. We have previously sought advice from Te Puni Kōkiri and The Office of Treaty Settlements and Takutai Moana – Te Tari Whakatau regarding the relevant Māori groups in this area and have incorporated their views into this report. We also consulted the Ministry for Primary Industries in relation to customary fisheries.
59. The Minister for Māori Development and the Minister for Māori Crown Relations: Te Arawhiti support the application for referral. We have provided a copy of the Minister's feedback at **Attachment 5.**

Advice on whether it may be more appropriate to deal with the proposed approvals under another Act/s

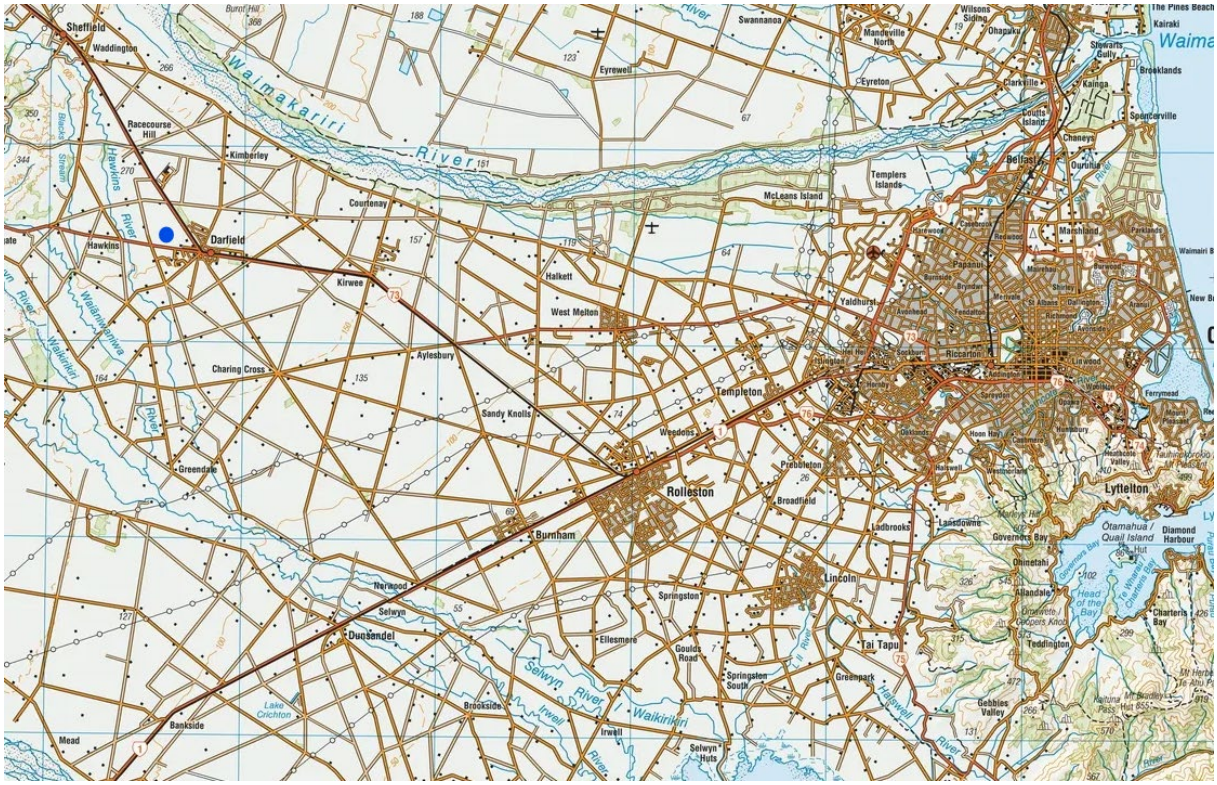
60. Under section 18(2)(m), this report must include our advice on whether, due to any of the matters identified in section 18, it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.
61. We do not consider there are any matters raised in this report which make it more appropriate for the proposed approvals to be authorised under another Act or Acts.

Attachment 1: Provisions of section 18 of the Fast-track Approvals Act 2024

Section	Information required	Paragraph reference in this report
18(1)	The Minister must, for a referral application, obtain and consider a report that is prepared by the responsible agency in accordance with this section.	9-11
18(2)(a)	Any relevant iwi authorities and relevant Treaty settlement entities	15-20
18(2)(b)	Any Treaty settlements that relate to land, species of plants or animals, or other resources within the project area	33-34
18(2)(c)	The relevant principles and provisions in those Treaty settlements, including those that relate to the composition of a decision-making body for the purposes of the Resource Management Act 1991	35-45
18(2)(d)	Any recognised negotiation mandates for, or current negotiations for, Treaty settlements that relate to the project area.	21
18(2)(e)	Any court orders or agreements that recognise protected customary rights or customary marine title within the project area.	22, 46
18(2)(f)	Any applicant groups under the Marine and Coastal Area (Takutai Moana) Act 2011 that seek recognition of customary marine title or protected customary rights within the project area.	22, 46
18(2)(g)	Whether the project area would be within or adjacent to, or the project would directly affect, ngā rohe moana o ngā hapū o Ngāti Porou (and, if so, the relevant provisions of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019).	23, 46
18(2)(h)	Whether the project area includes any taiāpure-local fisheries, mātaitai reserves, or areas that are subject to bylaws or regulations made under Part 9 of the Fisheries Act 1996 (and, if so, who the tangata whenua are).	24-26, 47-48
18(2)(i)	Whether the project involves an activity that could be the subject of a determination under 23 (and, if so, who the owners of the land are).	27-28
18(2)(j)	If the proposed approvals include an approval described in any of section 42C(4)(a) to (d) (resource consent, certificate of compliance, or designation), (i) iwi authorities and groups that represent hapū that are parties to any relevant Mana Whakahono ā Rohe or joint management agreements.	29-30, 49

	(ii) The relevant principles and provisions in those Mana Whakahono ā Rohe and joint management agreements.	
18(2)(k)	Any other Māori groups with relevant interests.	31-32
18(2)(l)	A summary of— (i) comments received by the Minister after inviting comments from Māori groups under section 17(1)(d) and (e); (ii) any further information received by the Minister from those groups	50-56
18(2)(m)	The responsible agency's advice on whether, due to any of the matters identified in this section, it may be more appropriate to deal with the matters that would be authorised by the proposed approvals under another Act or Acts.	60-61
18(3)	In preparing the report required by this section, the responsible agency must— (a) consult relevant departments; and (b) provide a draft of the report to the Minister for Māori Development and the Minister for Māori Crown Relations: Te Arawhiti.	57-58
18(4)	Those Ministers must respond to the responsible agency within 10 working days after receiving the draft report	59

Attachment 2: Project location map



Attachment 3: List of relevant Māori groups

Name of group	Type of group (section of Act)
Te Rūnanga o Ngāi Tahu	iwi authority (s18(2)(a)), Treaty settlement entity (s18(2)(a) – Ngāi Tahu Claims Settlement Act 1998)
Te Ngāi Tūāhuriri Rūnanga	Ngāi Tahu Papatipu Rūnanga –Treaty settlement entity (s18(2)(a)
Te Taumutu Rūnanga	Ngāi Tahu Papatipu Rūnanga –Treaty settlement entity (s18(2)(a); tangata whenua for customary fisheries/rohe moana (s18(2)(h))
Whitiora Centre Limited	Entity owned by Papatipu Rūnanga – other Māori group with relevant interests (s18(2)(k))
Mahaanui Kurataiao Limited	Entity owned by Papatipu Rūnanga – other Māori group with relevant interests (s18(2)(k))

Attachment 4: Comments received from invited Māori groups

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Hughes Developments – Bangor Village FTAA-2511-1151

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Mahaanui Kurataiao Limited		
***First name**	Tayla		
***Last name**	Spencer		
Postal address	226 Antigua Street, Christchurch Central 8011		
***Contact phone number**	Out of	**Alternative**	Out of
***Email**	Out of Scope		

2. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manaia Cunningham 9 February 2026

226 Antigua Street, Central Christchurch

Telephone: +64 3 377 4374

Website: www.mahaanuikurataiao.co.nz

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 claim[1].

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 Taumutu Rūnanga

Mahaanui
Kurataiao Ltd

226 Antigua Street, Central Christchurch

Telephone: +64 3 377 4374

Website: www.mahaanuikurataiao.co.nz

2.0 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:

5.1 KAITIAKITANGA

RECOGNITION OF MANAWHENUA

K1.1 Ngāi Tahu are the tāngata whenua who hold manawhenua across Ngā Pākihi Whakatekateka o Waitaha and Te Pātaka o Rākaihautū.

K1.2 Te Rūnanga o Ngāi Tahu is the tribal authority representing the collective of Ngāi Tahu whānui as per the Te Rūnanga o Ngāi Tahu Act 1996 and Ngāi Tahu Claims Settlement Act 1998.

K1.3 Papatipu Rūnanga are the regional collective bodies representing the tāngata whenua who hold manawhenua and are responsible for protecting hapū and tribal interests in their respective takiwā.

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.

5.3 WAI MĀORI

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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.

WM1.2 Te Tiriti o Waitangi is the basis for the relationship between Ngāi Tahu and local authorities (and water governance bodies) with regard to freshwater management and governance 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.

PRIORITIES FOR USE

WM3.1 To advocate for the following order of priority for freshwater resource use, consistent with the *Te Rūnanga o Ngāi Tahu Freshwater Policy Statement (1999):*

(1) That the mauri of freshwater resources (ground and surface) is protected and sustained in order to:
   (a) Protect instream values and uses (including indigenous flora and fauna);
   (b) Meet the basic health and safety needs of humans, specifically the provision of an untreated and reliable supply of drinking water to marae and other communities; and
   (c) Ensure the continuation of customary instream values and uses.

(2) That water is equitably allocated for the sustainable production of food, including stock water, the generation of energy; and

(3) That water is equitably allocated for other abstractive uses (e.g. development aspirations).

WATER QUALITY

WM6.1 To require that the improvement of water quality in the takiwā is recognised as a matter of regional and immediate importance.

WM6.2 To require the water quality in the takiwā is of a standard that protects and provides for the relationship of Ngāi Tahu to freshwater. This means that:

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(a) The protection of the eco-cultural system (see box – Eco-cultural systems) is the priority, and land or resource use, or land use change, cannot impact on that system; and
(b) Marae and communities have access to safe, reliable, and untreated drinking water; and
(c) Ngāi Tahu and the wider community can engage with waterways for cultural and social well-being; and
(d) Ngāi Tahu and the wider community can participate in mahinga kai/food gathering activities without risks to human health.

WM6.5 To require that the water quality standards in the takiwā are set based on "*where we want to be"* rather than *"this is the point that we can pollute to".* This means restoring waterways and working toward a higher standard of water quality, rather than establishing lower standards that reflect existing degraded conditions.

Relationship between water quality and water quantity

WM6.7 To ensure that the relationship between water quality and quantity is recognised and provided for in all process and policy aimed at protecting and restoring water quality. There must be sufficient water to protect water quality.

Discharges

WM6.8 To continue to oppose the discharge of contaminants to water, and to land where contaminants may enter water.

WM6.9 To require that local authorities work to eliminate existing discharges of contaminants to waterways, wetlands, and springs in the takiwā, including treated sewage, stormwater, and industrial waste, as a matter of priority.

WM6.11 Consented discharge to land activities must be subject to appropriate consent conditions to protect ground and surface water, including but not limited to:

(a) Application rates that avoid over saturation and nutrient loading;
(b) Setback or buffers from waterways, wetlands, and springs;
(c) Use of native plant species to absorb and filter contaminants; including riparian and wetland establishment and the use of planted swales; and
(d) Monitoring requirements to enable assessment of the effects of the activity.

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.

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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:

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(a) Maintaining accurate maps of existing wetlands, waipuna, and riparian margins;
(b) Requiring that the drainage of existing wetlands or waipuna or the destruction of 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.

Riparian margins

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.

DRAIN MANAGEMENT

WM14.1 To require that drains are managed as natural waterways and are subject to the same policies, objectives, rules, and methods that protect Ngāi Tahu values associated with freshwater, including:

(a) Inclusion of drains within catchment management plans and farm management plans;
(b) Riparian margins are protected and planted;
(c) Stock access is prohibited;
(d) Maintenance methods are appropriate to maintaining riparian edges and fish passage; and
(e) Drain cleaning requires resource consent.

5.4 PAPATŪĀNUKU

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

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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.

P6.3 Stormwater should not enter the wastewater reticulation system in existing urban environments.

P6.4 To require that the incremental and cumulative effects of stormwater discharge are recognised and provided for in local authority planning and assessments.

P6.6 To oppose the use of global consents for stormwater discharges.

DISCHARGE TO LAND

P8.1 To require that discharge to land activities in the takiwā:

(a) Are appropriate to the soil type and slope, and the assimilative capacity of the land on which the discharge activity occurs;
(b) Avoid over-saturation and therefore the contamination of soil, and/or run off and leaching; and
(c) Are accompanied by regular testing and monitoring of one or all of the following soil, foliage, groundwater, and surface water in the area.

P8.2 In the event that the accumulation of contaminants in the soil is such that the mauri of the soil resource is compromised, then the discharge activity must change or cease as a matter of priority.

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SOIL CONSERVATION

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

P9.2 To require the appropriate valuation of soil resources as taonga and as natural capital, providing essential ecosystem services.

P9.3 To protect the land from induced soil erosion as a result of unsustainable land use and development.

P9.4 To support the following methods and measures to maintain or improve soil organic matter and soil nutrient balance, and prevent soil erosion and soil contamination:

(a) Matching land use with land capability (i.e. soil type, slope, elevation);
(b) Restoration and enhancement of riparian areas, to reduce erosion and therefore sedimentation of waterways;
(c) Restoration of indigenous vegetation, including the use of indigenous tree plantations as erosion control and indigenous species in shelter belts; and
(d) Avoiding leaving large areas of land/soil bare during earthworks and construction activities.

CONTAMINATED LAND

P10.1 The management of contaminated land must recognise and provide for specific cultural issues, including:

(a) The location of contaminated sites;
(b) The nature of the contamination;
(c) The potential for leaching and run-off;
(d) Proposed land-use changes; and
(e) Proposed remediation or mitigation work.

P10.2 To require appropriate and meaningful information sharing between management agencies and tāngata whenua on issues associated with contaminated sites.

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

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(f) Rehabilitation and remediation plans following earthworks.

Risk of damage of modification to sites of significance

P11.2 To require that tāngata whenua are able to identify particular areas whereby earthworks activities are classified as a restricted discretionary activity, with Ngāi Tahu values as a matter of discretion.

P11.3 To use the methods identified in Section 5.8 Policy CL4.6 (Wāhi tapu me wāhi taonga) where an earthworks activity is identified by tāngata whenua as having actual or potential adverse effects on known or unknown sites of significance.

P11.4 To advocate that councils and consent applicants recognise the statutory role of the Historic Places Trust and their legal obligations under the Historic Places Act 1993 where there is any potential to damage, modify or destroy an archaeological site.

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.

Erosion and sediment control

P11.9 To require stringent and enforceable controls on land use and earthworks activities as part of the resource consent process, to protect waterways and waterbodies from sedimentation, including but not limited to:

(a) The use of buffer zones;
(b) Minimising the extent of land cleared and left bare at any given time; and
(c) Capture of run-off, and sediment control.

5.5 TĀNE MAHUTA

MAHINGA KAI

Ki Uta Ki Tai

TM1.4 To promote the principle of Ki Uta Ki Tai as a culturally appropriate approach to mahinga kai enhancement, restoration, and management, in particular:

(a) Management of whole ecosystems and landscapes, in addition to single species; and

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(b) The establishment, protection, and enhancement of biodiversity corridors to connect species and habitats.

Freshwater management

TM1.5 To require that freshwater management recognises and provides for mahinga kai, by;

(a) Customary use as a first order priority;
(b) Restoring mahinga kai values that were historically associated with waterways, rather than seeking to maintain the existing (degraded) mahinga kai value of a waterway; and
(c) Protecting indigenous fish recruitment and escapement by ensuring that waterways flow ki Uta Ki Tai and there is sufficient flow to maintain an open river mouth.

INDIGENOUS BIODIVERSITY

TM2.2 To recognise Te Tiriti o Waitangi as the basis for the relationship between central and local government and tāngata whenua with regard to managing indigenous biodiversity, as per duty of active protection of Māori interests and the principle of partnership.

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 or 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.

5.8 NGĀ TŪTOHU WHENUA

Protecting and restoring cultural landscapes

CL1.8 To identify opportunities to enhance cultural landscapes, including but not limited to:

(a) Restoration/enhancement of indigenous biodiversity;
(b) Enhancing views and connections to landscape features;
(c) Appropriate and mandated historical interpretation;
(d) Setting aside appropriate areas of open space within developments; and
(e) Use of traditional materials, design elements and artwork.

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WĀHI TAPU ME WĀHI TAONGA

CL3.1 All taonga within the takiwā of Ngāi Tahu, accidental discovery or otherwise, belong to the Papatipu Rūnanga/ Te Rūnanga o Ngāi Tahu.

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).

3.0 Referral application Rūnanga Feedback

The Kaitiaki representatives of Te Taumutu Rūnanga have previously provided recommended conditions as guidance for the applicant, to align their proposal with the Mahaanui Iwi Management Plan and avoid impacting mana whenua values.

These previous recommended conditions are still valid and Te Taumutu Rūnanga kaitiaki acknowledge that the application has agreed to the majority of conditions or proposed appropriate mitigations. The kaitiaki representatives of Te Taumutu Rūnanga would like to state a neutral position to the granting/refusal. The relevant Iwi Management Plan policies have been provided above and previously for further context.

The fact that Mahaanui Kurataiao has not commented on any particular matter should not be taken as support thereof and Te Taumutu Rūnanga reserve the right to comment on additional matters in the future.

On behalf of Mahaanui Kurataiao Ltd, this report has been prepared by Tayla Spencer | Mahaanui Kurataiao Ltd Pou Taiao, and peer reviewed by | Mahaanui Kurataiao Ltd Pou Taiao.

Date: 4 February 2026

WHITIORA

TO: **ENVIRONMENTAL PROTECTION AGENCY**

RE: **BANGOR ROAD - REFERRAL APPLICATION UNDER THE FAST-TRACK APPROVALS ACT 2024**

DATE: **9 FEBRUARY 2026**

INTRODUCTION

Ngāi Tūāhuriri is a principal hapū of Ngāi Tahu, acknowledged in Te Rūnanga o Ngāi Tahu Act 1996 and the Ngāi Tahu Claims Settlement Act 1998 (Settlement Act). The takiwā of the hapū is centered at Tuahiwi, and extends from Hurunui to Hakatere, sharing an interest with Arowhenua Rūnanga northwards to Rakaia, and thence inland to the Main Divide. This is articulated in, and discernible from, the Te Rūnanga o Ngāi Tahu (Declaration of Membership) Order 2001 (formerly Schedule 1 of the Te Rūnanga o Ngāi Tahu Act 1996). Within this area, Ngāi Tūāhuriri has maintained noho tūturu (ahi kā), meaning the tribe's 'fires' have been kept burning and that they actively exercise rangatiratanga.

Ngāi Tūāhuriri Rūnanga has mandated Whitiora Centre Limited (Whitiora) to provide advice and act on its behalf in respect of environmental policy, planning, and strategy matters. This includes proposals being referred to or processed as a substantive application under the Fast-track Approvals Act 2024 (FTAA).

BACKGROUND

160 Bangor Road lies within the takiwā of Ngāi Tūāhuriri.

Hughes Developments Limited (HDL) approached Whitiora prior to submitting a
under the FTAA to provide preliminary advice on their proposal for a subdivi
Road, Darfield. HDL have responded to this preliminary feedback (Attac
Mahaanui Kurataiao Limited recommendations and preliminary fee
Limited).

On 18 December 2025 Whitiora received an Invitation t
application for referral of the Bangor Village projec

letter provides a summary of the matters previously raised with HDL and confirms that Whitiora does not have any further concerns to be addressed.

SETTLEMENT

The Ngāi Tahu Claims Settlement Act 1998 (NTCSA) records the scope, detail, and nature of the Crown's settlement with Ngāi Tahu. These included:

- An apology
- The return of Aoraki to Ngāi Tahu
- A wide range of mechanisms for economic redress
- A wide range of mechanisms for recognition of mana
- Recognition of, and provision for mahinga kai

The Apology

The Crown's apology recognised its repeated breaches of the principles of the Treaty of Waitangi in its purchases of Ngāi Tahu land. This included acknowledgement that the Crown had failed to preserve and protect Ngāi Tahu's use and ownership of such land and valued possessions they wished to retain; as well as "past failures to acknowledge Ngāi Tahu rangatiratanga and mana over the South Island lands within its boundaries."[1]

Within the apology, the Crown recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the Takiwā of Ngāi Tahu Whānui. The apology concludes with a commitm to enter a new age of co-operation with Ngāi Tahu.

Mechanisms for Recognition of Mana

The importance of Te Waihora to Ngāi Tahu is recognised in the NTCSA. The Act vesting of the lakebed in Te Rūnanga o Ngāi Tahu as redress for the loss of r

The Mahaanui Iwi Management Plan[2] describes Te Waihora as a tri ng maj mahinga kai and an important source of mana. For over 170 ye and use change and intensification within the lake's catchment have result w considered to be one of the most polluted bodies of water in New Ze

[1] S6 Ngāi Tahu Claims Settlement Act 1998
[2] Mahaanui Iwi Management Plan, Chapter 6.1

Policy in the Mahaanui Iwi Management[3] requires that the management of land and water within the Te Waihora catchment recognises and provides for the cultural health of Te Waihora. 160 Bangor Road is within the catchment of Te Waihora, and every effort should therefore be made to ensure that the urban use of this land does not adversely and cumulatively contribute to further degradation of the lake.

Special Association with Taonga Species

The NTCSA also acknowledges the cultural, spiritual, historic, and traditional association of Ngāi Tahu with taonga species which are identified in Schedule 97 of the Act.

Relevance to the Proposed Subdivision

Matters arising from the Ngāi Tahu Settlement that concern the proposed subdivision include -

a. Management of construction and operational stormwater to ensure that the quality of water which is being treated and then transported via ground and surface waterbodies do not contribute to the existing and cumulative degradation of Te Waihora.
b. Where appropriate, to integrate and provide for taonga species within the development, including as part of landscape treatment and within water races, habitat for native fish.

COMMENTS ON APPLICATION

Overview

The proposed land is not subject to any cultural overlays.

The proposed land development does however trigger matters of interest and c
Tūāhuriri Rūnanga. These include the following:

- The management of earthworks including:
    - Run-off from exposed earthworks into waterways
    - Dust nuisance;
    - Accidental discovery of Māori artefac

[3] Mahaanui Iwi Management Plan, Policy TW4.1

- The availability and efficient use of water.
- Reticulation of wastewater.
- Protection of surface waterbodies and the habitat they provide for fish and invertebrates.
- The use of indigenous and taonga species as part of landscape treatments.

In addition, we emphasise that the preferred approach to land management in the takiwā requires taking an inter-generational view of the environment alongside the capacity of natural resources to absorb the development.[4]

Ngāi Tūāhuriri prefers an approach to land development that is informed by, and responds to, the presence of surface and ground water bodies, biodiversity, retention of trees, retention of springs and the retention of natural landforms, all of which contribute to environmental quality and preserve the physical distinctiveness of specific locations.

Three Waters

It is understood that water supply and wastewater will be connected to reticulated services. This is supported.

With respect to stormwater, HDL is proposing to discharge stormwater from individual lots to ground. Stormwater from roads will be collected via swales and treated through boulder pits. HDL states that these will be designed in accordance with the Christchurch City Council Waterways Wetland, Drainage Guide. Whitiora supports this design approach, noting that the Selwyn D Council currently lacks any design guidance for wetlands, swales, and treatment basi within or alongside its Engineering Code of Practice.

Surface Water

HDL advises that water races are to be retained and enhanced with ri as confirmed:

- that riparian margins of both sides of the water races green corridor.
- that the water races will be held separately as pa legal mechanism.

[4] Mahaanui Iwi Management Plan, 2013, Chapt aupapa/Policy P1.1.

- that the individual allotment boundaries will be set back from the water races, and the water races will not be incorporated into those allotments or otherwise used as a boundary for those allotments.

Whitiora considers greenfield subdivisions as the optimal time to ensure that the site layout provides for the health of waterbodies - with appropriate setbacks on both sides of the surface water body and riparian planting, secured via a legal mechanism such as a reserve or easement. HDL has confirmed that waterways will be planted on both sides and the setback be subject to some form of legal mechanism for protection. The proposed riparian planting and protection works are supported.

Whitiora has been provided with the full ecological report which identified that the only fish species present is the upland bully. The report advises that the absence of other species is likely due to fish passage barriers up and downstream. HDL have confirmed that any culverts installed will comply with the requirements of the National Environmental Standards for Freshwater Management to enable fish passage. The proposed fish passage provisions are supported.

HDL has confirmed that there are no springs present on site and groundwater is approx 55m below ground level. There are therefore no concerns relating to the protection of springheads.

Landscape Planting

The proposal intends to retain mature and healthy planting that already exists on the site, a
provide further landscape treatments throughout the development. These initiatives ar
and planting with indigenous species is encouraged.

Conditions of Consent

HDL has confirmed that the land development will be undertaken in a
and that this will be enforced through conditions of consent addr atters:

- best practice erosion and sediment control during ea
- best practice measures for dust management du
- an Accidental Discovery Protocol during eart
- implementation of any ecological manag transfer of fish;
- implementation of landscape plantin enous species where pos

- implementation of best practice methods for stormwater management; and
- connection to reticulated networks for water supply and wastewater.

Whitiora considers that the above conditions are sufficient to address matters of cultural concern.

Spatial Planning

If the referral application is successful, further information should be provided on the provisions being made to ensure the coordinated delivery of infrastructure and housing, as anticipated under future special planning legislation. In particular, how the development will be supported by essential services, such as schooling, healthcare facilities, and public transport.

CONTACT DETAILS

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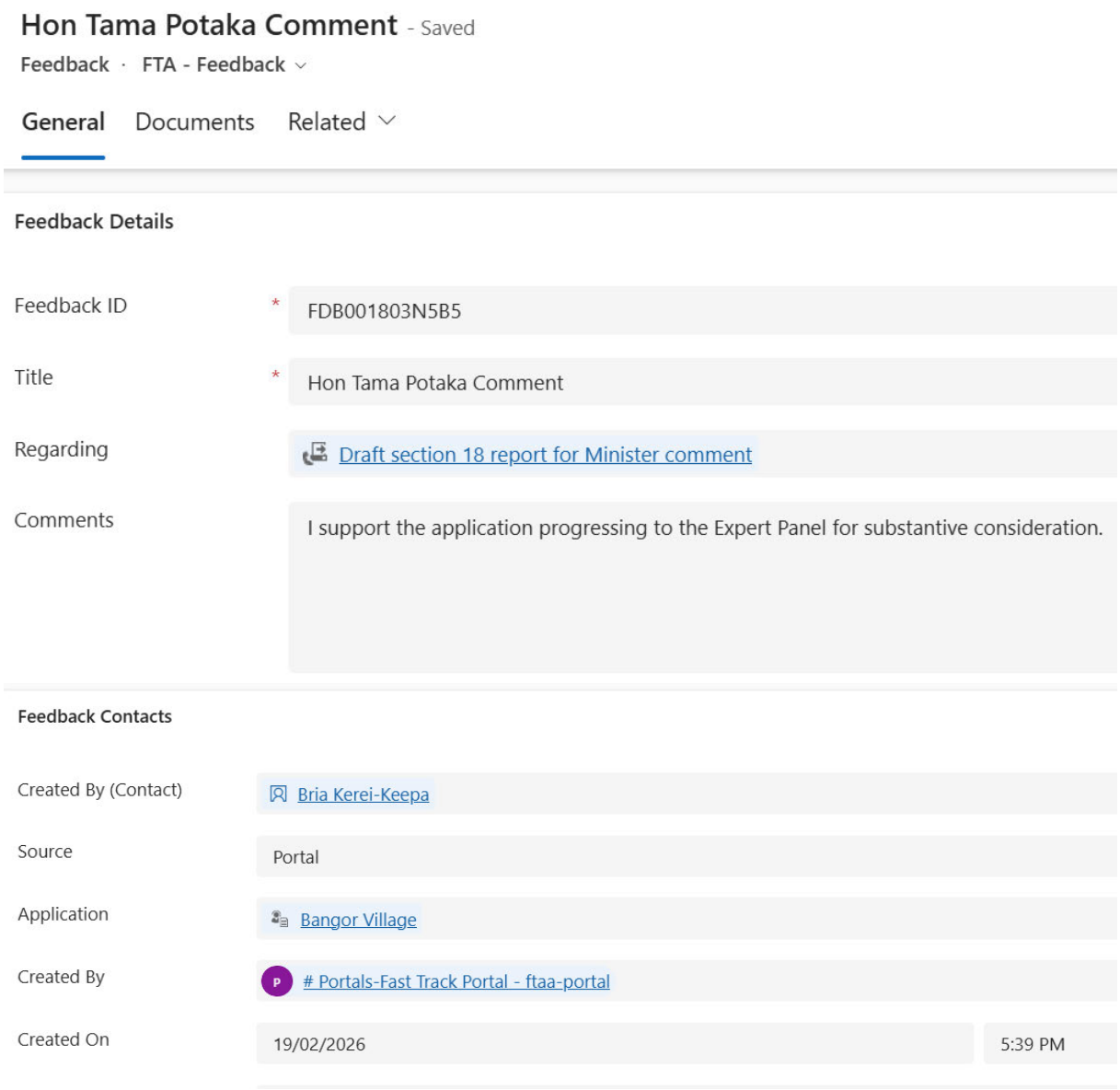
Attachment 5: Comments received from the Minister for Māori Development and Minister for Māori Crown Relations



Hon Tama Potaka Comment - Saved

Feedback · FTA - Feedback

General Documents Related

Feedback Details

Feedback ID	*	FDB001803N5B5
Title	*	Hon Tama Potaka Comment
Regarding		Draft section 18 report for Minister comment
Comments		I support the application progressing to the Expert Panel for substantive consideration.

Feedback Contacts

Created By (Contact)	Bria Kerei-Keepa	
Source	Portal	
Application	Bangor Village	
Created By	# Portals-Fast Track Portal - ftaa-portal	
Created On	19/02/2026	5:39 PM