

Whitiora has been mandated by Ngāi Tūāhuriri Rūnanga, one of the principal hapū of Ngāi Tahu, to provide advice on environmental policy and consenting matters in relation to the Project. NZTA appreciates and acknowledges Whitiora's ongoing engagement, and remains committed to continuing to engage with Whitiora as the application progresses.

Attachment 6 - NZTA response to comments from Whitiora in relation to State Highway 1 North Canterbury – Woodend Bypass Project (Belfast to Pegasus)					
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Commenter 5 – Whitiora					
3 May 2026	S53 Comments – Background Para 2	6.1	Project location	The Project will permanently alter an area of high cultural significance to Ngāi Tūāhuriri, Ngāi Tūhaitara, Ngāti Rakiāmoa and Ngāi Tahu, who have had continuous and concentrated occupation within the area for more than 47 generations. The Project corridor passes through a cultural landscape that historically included multiple Pā, with Kaiapoi Pā being of particular national significance. Recorded archaeological sites identified within the designation and Project boundary overwhelmingly concern Māori occupation and cultural practices. These sites reflect a landscape that was characterised by extensive kāinga nohoanga and mahinga kai including horticultural cultivation practises (borrow pits and modified soils), urupā and burials, trail systems, customary fisheries, fowling and other mahinga kai gathering and processing areas (middens/ovens). Accordingly, Ngāi Tūāhuriri expects that construction of the Project will involve accidental discoveries of previously unrecorded archaeological sites of Māori origin.	NZTA acknowledges the project traverses an area of high cultural significance and will continue to work with Whitiora under the jointly prepared Archaeological and Cultural Sites Management Plan (ACSMP) in relation to any discoveries during the project.
3 May 2026	S53 Comments – Background Para 3	6.2	Cultural values	The activities to be authorised by this Substantive Application will also have a cumulative effect on cultural values through the permanent loss of wetlands, modifications to culturally significant waterbodies and the loss of indigenous biodiversity. The mitigation, off-setting and compensation proposed in the Substantive Application are all necessary to assist with some degree of restoration of cultural values within the landscape.	NZTA acknowledges the cultural values associated with these matters and the need to propose mitigation and offsetting as described in the application documents and secured by the regional consent conditions.
3 May 2026	S53 Comments – Background Para 4	6.3	Water quality	Water quality, and the health of aquatic ecosystems, are also matters of high interest and concern for Ngāi Tūāhuriri. The construction of the Project has the potential to adversely impact water quality and aquatic ecology. It is also important to acknowledge that the locality remains dominated by a complex of inter-connected water bodies that extend from inland of the Project site, to the coast - <i>Te Tai o Mahaanui</i> – which is a Statutory Acknowledgement, to be recognised and considered in Resource Management processes.	NZTA acknowledges the significance of freshwater matters to Ngāi Tūāhuriri and has proposed a comprehensive suite of mitigation and conditions.
3 May 2026	S53 Comments – Archaeology Authority Conditions Point 1	6.4	Cultural monitoring of earthworks	Having regard to the extent and significance of the cultural landscape between the Waimakariri and the Rakahuri Rivers, Whitiora expects that requirements for cultural monitoring of earthworks should be enabled across the whole Project site. Currently, the proposed conditions (specifically Condition AA5.(d)(i)) only identifies cultural monitoring related to archaeological investigations. This falls short of expectations for such a culturally important location, and does not align with the content of the draft Archaeological and Cultural Sites Management Plan which anticipates Cultural Advisors or Monitors: a. being present or taking tikanga actions based on the mandate of Ngāi Tūāhuriri; and	The designation conditions relating to the ACSMP are not sought to be altered and address these matters by way of the joint preparation requirement. However, in relation to the Archaeological Authorities NZTA proposes to delete the words “during archaeological investigations” from Proposed Condition AA2(b)(i) for alignment purposes.

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				b. monitoring project works at their discretion (see Section 7.4 of the draft Archaeological and Cultural Sites Management Plan).	
3 May 2026	S53 Comments – Archaeology Authority Conditions Point 2	6.5	ACSMP	Proposed Condition AA.5.g requires material changes to the certified Archaeological and Cultural Sites Management Plan to be submitted in writing to HNZPT for certification. Whitiara must also be advised of any material changes to the Archaeological and Cultural Sites Management Plan.	Under the designation conditions relating to the ACSMP, the document is jointly prepared and therefore Whitiara will be included in any material changes. Condition 2 on the Archaeological Authorities (which formerly contained Condition AA.5.g) has been updated to note the requirement to include Whitiara in any changes.
3 May 2026	S53 Comments – Wildlife Approval Conditions	6.6	Lizard Management Plan	Whitiara requests that Condition WA.2 is amended to require that any up-date to the Lizard Management Plan is advised to Whitiara, as well as DOC.	Condition WA.2 includes a requirement where material changes are made that these are provided to Whitiara for review and comment.
3 May 2026	S53 Comments – Resource Consent Conditions	6.7	Conditions	Whitiara has reviewed the proposed resource consent conditions for the Substantive Application and is generally in agreement. In the event that the Panel makes changes to those conditions, Whitiara needs to be assured that conditions for the following matters are not reduced in scope or effect; and that conditions for monitoring are rigorous and enforceable: - Conditions enforcing the comprehensive management of earthworks, including separation from, and protection of waterbodies from the effects of earthworks and the management of dust; - Conditions for stabilisation and revegetation of earth-worked sites; - Conditions concerning the maintenance and/or reinstatement of the geomorphology of surface water bodies to a natural state, specifically noting the conditions for the realignment of Waihora Stream, Taranaki Stream and the Taranaki Stream tributary; - Conditions for the provision of fish passage; - Conditions for monitoring water quality within wetlands and surface water bodies and groundwater; - Conditions enforcing the implementation of legally enduring ecological offset and compensation measures as proposed in the Substantive Application; and the monitoring of the success of those measures; - Conditions requiring the mitigation of effects on the amenity values of Lees Road	NZTA acknowledges the need for appropriate conditions and is not proposing any changes to the lodged set of proposed conditions which will reduce their overall scope and effect.
3 May 2026	S53 Comments – Management Plans	6.8	Management plans	The proposed conditions require a suite of management plans to be developed. Whitiara notes that its involvement in the review and content of those management plans is fundamental to ensuring that matters relating to the cultural values, interests and priorities of Ngāi Tūāhuriri are addressed. Accordingly, Whitiara supports the retention of those conditions which require NZTA to engage with Whitiara in the development of management plans. This includes conditions requiring protocols to enable Ngāi Tūāhuriri to raise environmental issues during construction.	NZTA notes that the proposed condition set includes requirements for engagement on management plan development and is continuing to work on this in parallel with Whitiara. The proposed conditions include a requirement that any material changes shall be provided to Whitiara for comment prior to submission for certification.

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				Whitiara also seeks an additional condition requiring that any up-date or change to a Management Plan is advised to Whitiara as the project progresses; and that any proposed change that is material to matters of high importance or interest to Ngāi Tūāhuriri require engagement prior to the change being made.	