

Te Kowhai East Development

Cultural Impact Assessment



Prepared for Te Kowhai East Limited Partnership Ltd

Dated 13 August 2026

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1. Whakatakinga / Introduction

Te Kowhai East (TKE) development covers around 187 hectares of land that is proposed for industrial and commercial development. The project is being led by Te Kowhai East LP (TKELP), a joint venture partnership between Bluehaven Holdings Ltd and Waikato Land Ltd and is currently seeking approval through the Fast-track Approvals Amendment Act 2025 (FTAA) process.

TKE is located within a wider growth corridor that links to existing and planned urban development areas including Horotiu, Te Awa Lakes, Te Rapa North, Rotokauri North, and Rotokauri. The site benefits from a strategic location adjacent to State Highway 1 and the completed Koura Drive / SH39 interchange, providing strong regional connectivity. Key infrastructure is already in proximity, including Council water and wastewater networks with available capacity to support development, meaning that significant network upgrades are not anticipated. The site also lies within the Mangaheka Stormwater Catchment, where stormwater management solutions can be effectively applied.

This Cultural Impact Assessment (**CIA**) has been prepared in accordance with Te Ture Whai Mana and Tai Tumu, Tai Pari, Tai Ao, which guide an approach grounded in kaitiakitanga and mana whakahaere. These frameworks emphasise the protection and restoration of natural systems, alongside the meaningful recognition of cultural values in decision-making processes.

The Te Kowhai East area is of cultural significance to Ngāti Reko, Ngāti Māhanga, Ngāti Wairere, and Ngāti Tamainupō. Ngāti Hauā and Ngāti Korokī Kahukura maintain recognised whakapapa connections and customary interests. Together they have enduring cultural, historical, and ancestral relationships with the whenua, reflecting their shared history and ongoing responsibilities as kaitiaki.

Te Whakakitenga o Waikato provides an important collective governance and representative role across the wider Waikato-Tainui confederation, supporting the collective interests of its affiliated iwi and hapū while recognising the mana whenua and customary relationships of each within their respective rohe.

A key purpose of this CIA is to ensure that the values of the Te Kowhai catchment are appropriately recognised and provided for. This includes consideration of waterways, wetlands, indigenous biodiversity, cultural landscapes, and sites of significance, and ensuring that any potential effects are appropriately avoided, minimised, or mitigated.

TKE also presents an opportunity for mana whenua to be engaged early and in a meaningful way in shaping the future development of the area. Through ongoing partnership and collaboration, cultural values can be embedded within planning, design, and environmental management processes, supporting outcomes that reflect kaitiakitanga and contribute to the long-term health and wellbeing of the environment.

This assessment acknowledges the recognised customary rights, mana whenua interests, and enduring cultural, historical, and ancestral connections of Ngāti Reko, Ngāti Māhanga, Ngāti Wairere, Ngāti Hauā, Ngāti Tamainupō, and Ngāti Korokī Kahukura within the Te Kowhai East area and the wider Rotokauri and Kirikiriroa landscape. The assessment is informed by the values, aspirations, and kaitiakitanga responsibilities of the participating iwi and recognises the enduring whakapapa relationships that bind all these iwi and hapū to this place.

2. Aromatawai / Methodology

The preparation of this CIA for the TKE development has been informed by a detailed review of project information and supporting technical documentation provided by BBO, Maven Consultants, Ecological Solutions, CKL, Adapt, Te Miro Water Consultants, SLR, WGANZ, Adrian Morton Landscape, CMW, and Traffic Safe.

This report considers the potential cultural, environmental, and heritage effects associated with the proposed TKE development, alongside opportunities to recognise, protect, and appropriately incorporate the values and aspirations of Ngāti Reko, Ngāti Māhanga, Ngāti Wairere, Ngāti Hauā, Ngāti Tamainupō, and Ngāti Korokī Kahukura throughout all stages of the development.

This CIA has been developed using the following methods and information sources.

Formal consultation and engagement have been undertaken through a series of hui with the Tangata Whenua Working Group (TWWG) which is made up of mandated representatives from Ngāti Māhanga, Ngāti Hauā, Ngāti Tamainupō, Ngāti Wairere, Ngāti Reko (Waikeri Marae), Te Uri o Māhanga and Waikato-Tainui.

A. The consultation engagement process has included the following to date:

- 27 September 2021 – Online project presentation to Te Uri o Māhanga.
- 14 March 2022 – Whanaungatanga, project introduction and overview hui.
- 4 April 2025 – Preliminary discussion on site characteristics, cultural values, and environmental considerations.
- 12 May 2025 – Fast Track referral update and project status overview hui, including land-use, infrastructure & 3-waters management, ecology, cultural engagement, urban design programme, CIA and partnership opportunities.
- 15 May 2025 – Specific project information emailed to TWWG including – masterplan & staging plan for industrial land-use, spatial planning maps, 3-waters assessment, and groundwater assessment.
- 17 June 2025 – Project overview hui, including water take and initial infrastructure considerations.
- 27 June 2025 – Waikato-Tainui project update hui, including masterplan, waters infrastructure & assessment, water-take options.
- 7 July 2025 – Project update hui, including water take requirements, environmental considerations, regulatory update, stakeholders, iwi / mana whenua engagement, including updated Terms of Reference and wider area ownership details.
- 28 August 2025 – Specific project information emailed to TWWG including full water take consent application.

- 8 September 2025 – Project update hui, including refinement of ecological assessment findings and potential effects on waterways and habitats, water take consent, Fast Track consenting process, infrastructure connections, heritage, and CIA discussion.
 - 10 November 2025 – Site visit, project update hui, including discussion on ecological enhancement opportunities and mitigation measures, water-take consent, SW design basis, and CIA preparation.
 - 15 May 2026 – Fast Track application and project update hui, including overall programme status, next steps, and continued partnership approach with TWWG, including CIA preparation.
 - 18 May 2026 – Specific project information emailed to TWWG including – stormwater management, water supply and wastewater options, transport, ecology, archaeology, HPL, water take consent conditions and programme.
 - 26 June 2026 - Draft CIA overview and discussion
 - 10 August 2026 – Confirmed and approved final CIA
- B. TWWG hui has supported ongoing dialogue, information sharing, and the continued involvement of mana/tangata whenua working group via online discussions.
- C. Consideration of relevant statutory frameworks, including the Resource Management Act 1991 and the National Environmental Standards for Freshwater Regulations 2020.
- D. Assessment of relevant objectives, policies, and outcomes within Tai Tumu, Tai Pari, Tai Ao, ensuring alignment with broader iwi environmental aspirations and kaitiakitanga outcomes.
- E. Review of existing CIA and consent documentation relating to large-scale developments within the Rotokauri, Ruakura, Te Rapa and Kirikiriroa areas.
- F. Engagement with Waikato-Tainui staff in relation to Te Ture Whai Mana and water-take consents.
- G. Review and assessment of technical reports presented to the TWWG for the TKE area against Waikato-Tainui values, objectives, and policies set out in Tai Tumu, Tai Pari, Tai Ao.

3. Te Kaupapa o Te Kowhai / Te Kowhai East Proposal

TKE is a proposed 187-hectare predominantly industrial development located beside the SH1C / Te Koura Drive (SH39) Interchange on the northern edge of Hamilton, as referred to in Figure 1 below. The development is planned to support future business growth and create employment opportunities in the Waikato region.

The proposal includes around 125 hectares of industrial land, which is expected to be divided into approximately 209 lots for light industrial and business activities. The TKE development will also include one neighbourhood centre, new roads, walking and cycling paths, stormwater infrastructure, open-space areas, and water and wastewater services.

The site is currently used as a dairy farm and is generally flat, with gently rolling hills in the northern and north-eastern areas. Several farm drains cross the site and flow into the Mangaheka Stream, which runs through the site from the south-east to the north-west.

To establish the development, works will include subdivision, earthworks, water takes, stormwater and wastewater discharges, and the construction of supporting infrastructure. An open space corridor is proposed along the existing stream and drainage network and will include stormwater treatment, wetland planting, ecological enhancements, and walking and cycling connections. A large wetland is proposed in the north-western part of the site to help manage and treat stormwater before it enters surrounding waterways.



Figure 1: TKE project site (source ADAPT Studio)

Construction is expected to begin during the 2027/2028 construction season (subject to receiving appropriate consents), with the development likely to be completed in stages over approximately 10 to 15 years.

Resource consents are being sought for the full development area, including industrial activities, earthworks, discharges, water takes, and supporting infrastructure.

A subdivision consent is also being sought for approximately 187 hectares of the site, covering the first four construction stages and creating around 125 hectares of developable industrial land.

The site is located within the Waikato District, immediately north of Hamilton City boundary, and is surrounded by Te Kowhai Road, Koura Drive, State Highway 1C, Mathers Road, and Onion Road.

Overall, the proposal will change the site from rural farmland into a large industrial and employment area with supporting infrastructure, open spaces, and community facilities. Refer to Figure 2, which outlines recent masterplan design.

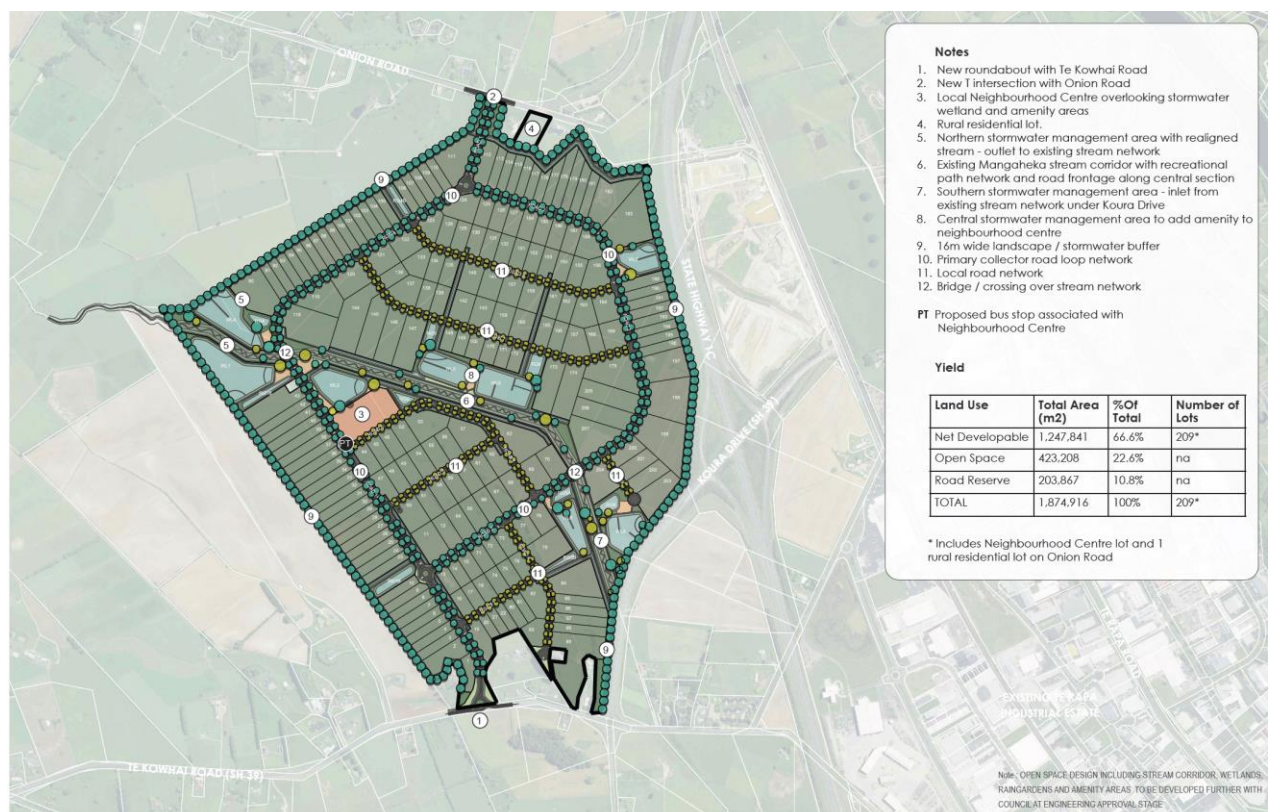


Figure 2 TKE Master Plan (source: ADAPT Studio)

4. Ngā Mana Whenua

Within the proposed Te Kowhai East area, several hapū hold recognised customary rights and interests in the whenua. These rights are long-standing and are founded on whakapapa, historical occupation, and enduring relationships with the land. As such, they do not need to be re-established or proven to decision-makers.

This report also provides a brief overview of the history of the hapū within the Te Kowhai area, including their relationships with one another and their shared connections to the wider landscape, to help explain their collective history within the rohe.

4.1 Ngāti Reko

Ngāti Reko me ōna rito is intrinsically connected to its cultural landscape, with Waikeri Marae, the whare tūpuna Te Ko o Mangaheko, and the wharekai forming key anchors of identity, whakapapa, and ahi kā. The Waipā and Waikato Rivers remain central to Ngāti Reko cultural identity, customary practices and intergenerational wellbeing. Refer to Figure 3 below.

Historically, the wider Mangaheka and Tangirau catchments has been cultural significant as a wai puna and mahinga kai area. It supported a diverse and range of customary resources such as tuna, kaeo and irrigation for māra kai. This landscape formed part of a wider koha system that sustained Ngāti Reko and contributed to the wellbeing of the kāhui ariki, in the time of Tumate Mahuta.

Ngāti Reko have maintained enduring occupation, use, and kaitiakitanga responsibilities across this rohe. Cultural narratives associated with Tangirau, including the digging of puna for wai and associations with Tāwhiao during his retreat towards Kāwhia (from which the name Waikeri is derived), reinforce the deep historical and spiritual connections to place.

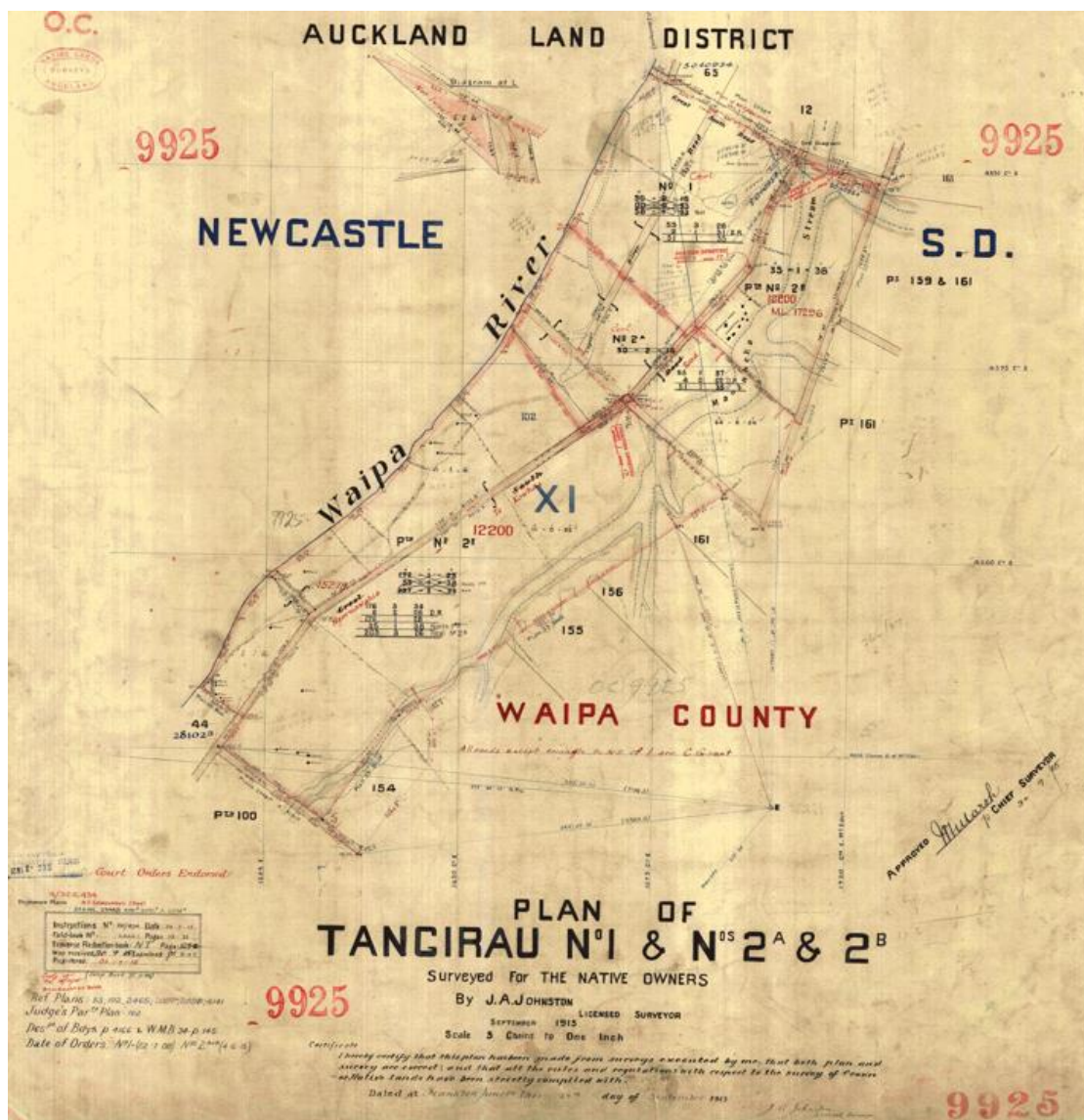


Figure 3: Ngāti Reko traditional connections to Mangaheka Stream and Tangirau wetlands (Source: Norman Hill)

However, it is acknowledged that the Mangaheka stream, Te Kowhai Stream and Tangirau wetland system and surrounding environments have undergone significant change over time because of drainage, land development, farming practices have resulted in the degradation and near loss of much of the original wetlands and mahinga kai values. While some cultural landscapes remain intact, the overall system is now heavily modified, fragmented, and in parts, ecologically diminished.

Notwithstanding these changes, Ngāti Reko retain a strong aspiration to protect remaining cultural landscapes, sustain marae-based connections, and progressively restore the mauri of Mangaheka, and Tangirau where feasible.

4.2 Ngāti Wairere

Ngāti Wairere through their tribal connections to Tamainupo and Māhanga (as Matua and Tupuna) and as participants on the Tangata Whenua Working Group serve to support those with an intimate connection and relationship to the whenua – Te Kowhai East.

In particular we draw on the following points which ensure the restored and retained connection to whenua and whakapapa korero, enhancement of waahi and whenua to ensure the best possible environmental outcome is achieved.

- Whānaungatanga: fostering relationships with meaningful and ongoing engagement;
- Whakapapa: infusing cultural identity with design principles and symbolism;
- Waahi Taonga: heritage site protection;
- Mahinga Kai: protection and restoration of taonga species;
- Ngā Wai Ora: integrated management of three waters,
- Kotahitanga: partnership opportunities; and
- Formalising a Cultural Impact Assessment and Memorandum of Understanding covering the above.

Ngaati Waireres tribal footprint is primarily within the current identified boundaries of Kirikiriroa-Hamilton extending Northeast towards Hapuakohe Range. Heoi are supportive of actions which preserve, restore, improve, maintain or enhance the whakapapa korero o te whenua.

4.3 Ngāti Hāua

Hauā is the eponymous ancestor of Ngāti Hauā. His father Koroki married Tumataura, daughter of Wairere, and had two sons. Hape through whom Ngāti Koroki Kahukura descent; and Hauā from whom Ngāti Hauā descent. Whilst Ngāti Koroki Kahukura remained in the Maungatautari area, Ngaati Hauā encompassed the lands and waters within the east and north of Maungatautari. In particular Tamahere, Tauwhare, parts of Hamilton City, Morrinsville up to Te Aroha and across the Kaimai ranges into Matamata and Hinuera.

The historical description of the Ngāti Hauā area of interest can generally be associated with the location of maunga. These maunga are Taupiri, Maungatautari and Te Aroha. The following tauparapara acknowledges our maunga and other iwi and hapū who straddle the boundaries of Ngāti Hauā.

Titiro mai ngā kohatu o Ngaati Hauā
Mai Te Aroha Maunga mai i te raki, tera Tamatera nga kaitiaki
Titiro ki te rawhiti, Ngaati Maru tera
Tona korero mai Te Aroha ki Katikati ki Ngā Kuri a Whareki ki tikirau

Te Hauāuru mai Te Aroha ki Taupiri, tena a Ngaati Paoa me Wairere
 Titiro mai ki te tonga Te Aroha ki Wairere, tena a Ngaati Hauā e mihi mai nei
 Titiro ki Wairere ki Maungatautari
 Ka huri ahau ki te patetere ki Raukawa ki te Ihingarangi ki Ngaati Koroki nga kaitiaki tena o tena
 maunga
 Engari, titiro ki Maungatautari ki te raki ki Taupiri e ngunguru e mihi mai nei
 Ngaati Hauā i waenganui ko tona korero he piko, he taniwha te maunga o nga Kīngi
 Ko wai tou Atua"

Look to the mountain rocks from Te Aroha to the north.
 I see the hapū of Tamaterā tangata whenua, tangata kaitiaki.
 Look to the beginning of the sun to the east, Ngaati Maru, Ngaati Pukenga from Te Aroha to Katikati
 as tangata whenua and kaitiaki, from the howling dogs of Te Arawa.
 Look from the west, from Te Aroha to Taupiri, Ngaati Paoa, Ngaati Wairere.
 Look to the south Te Aroha ki Wairere. Ngaati Hauā we greet you within.
 Look to the western side from Wairere to Maungatautari amongst our neighbours Te Arawa,
 Mataatua, Ngaati Raukawa Te Ihingarangi o Ngaati Koroki.

Like many Waikato iwi and hapū, Ngāti Hauā experienced significant land loss through colonisation and Crown actions. During the nineteenth and twentieth centuries, further whenua was taken under the Public Works Act for roads, railways, schools, hydro-electric developments, and other public infrastructure. A longstanding grievance relates to the compulsory acquisition of land at Waharoa for an aerodrome in 1951. The expansion of European settlement fundamentally altered the landscape, waterways, and cultural connections throughout the wider rohe, including areas of Kirikiriroa.

Ngāti Hauā consider that Crown actions since 1840 have had lasting cultural, social, and economic impacts on the iwi. These historical grievances led to the Ngāti Hauā non-raupatu settlement with the Crown in July 2013.

Ngāti Hauā connect and share mana whenua interests across the Te Kowhai area through whakapapa hapū, including Ngāti Wairere, Ngāti Māhanga, Ngāti Tamainupō and Ngāti Korokī Kahukura.

4.4 Ngāti Tamainupō

Ngāti Tamainupō descend from the tupuna Tamainupō, the son of Kōkako and Whaeatapoko, who married Tūkotuku, a daughter of Māhanga and Paratai. During the seventeenth century, Ngāti Tamainupō established themselves throughout Kirikiriroa, from the Waikato River to Te Kōpae (now Hopuhopu), and along the Waipā River between Ngāruawāhia and Whatawhata. Through this occupation, they developed enduring relationships with the whenua and waterways that continue today.

Ngāti Tamainupō are also descendants of Ngāere, the rangatira of Pukeiahua Pā at Ngāruawāhia, and maintain ancestral associations with the kāinga of Ngāere in the Mangaharakeke area. These whakapapa connections reinforce their longstanding occupation and cultural authority across this part of the Waikato.

Ngāti Tamainupō hold significant mana whenua and kaitiaki responsibilities extending from the west coast through to central Kirikiriroa. Their presence reflects generations of settlement, cultivation, and resource management. Their rohe includes the lands known as Pōwhenua, gifted by Māhanga to Tūkotuku and Tamainupō on their marriage, extending west towards the coast at Whāingaroa.

The interwoven whakapapa of Waikato-Tainui hapū firmly establishes Ngāti Tamainupō as mana whenua within Kirikiriroa and provides an important connection to Rotokauri and Te Kowhai East project area. Through these relationships, Ngāti Tamainupō share mana whenua interests with their whanaunga hapū, including Ngāti Wairere, Ngāti Māhanga, Ngāti Hauā, and Ngāti Korokī Kahukura. Together, they uphold tikanga, protect taonga, and maintain the mauri of the whenua and awa.

Today, Ngāti Tamainupō continue to exercise their kaitiaki responsibilities across the western and central Waikato through Kirikiriroa. A key strategic objective is to protect and strengthen the identity and integrity of Ngāti Tamainupō while ensuring that the principles of kaitiakitanga are reflected in the planning, development, and ongoing management of places such as Te Kowhai East.

4.5 Ngāti Koroki Kahukura

Ngāti Koroki Kahukura have a long and enduring connection to the lands and waterways surrounding Hamilton and the upper Waikato River. Before the Waikato War, they were a thriving and prosperous people who traded successfully with European settlers while maintaining strong ties to their whenua and tikanga.

Like many Waikato iwi and hapū, Ngāti Koroki Kahukura supported the Kīngitanga to protect their lands from increasing Crown pressure. When Crown forces crossed the Mangatawhiri River in 1863, war spread throughout the Waikato, including the wider Hamilton region. Many Ngāti Koroki Kahukura people were killed, imprisoned, or forced to retreat to Maungatautari. Their rangatira, Tioriori, was captured while helping a wounded British soldier and later released in the hope he could help restore peace. Despite this, the Crown confiscated large areas of their land, causing lasting hardship.

The loss of land through confiscation and the Native Land Court had a devastating impact. Land that had been held collectively was divided into individual titles, making it easier to sell. Over time, much of Ngāti Koroki Kahukura's whenua was lost, leaving the iwi virtually landless. These losses also weakened their economic base, cultural identity, and connection to their traditional lands.

The Waikato River and Maungatautari remain central to the identity of Ngāti Koroki Kahukura. These taonga are not only part of their history but continue to shape their role as kaitiaki today. The health of the Waikato River is closely connected to the wellbeing of the people, and changes to the river through drainage, pollution, and hydroelectric development have deeply affected the iwi and their cultural heritage.

Today, the rapid growth of Hamilton and surrounding areas such as Rotokauri and Te Kowhai means it is increasingly important to recognise the history and enduring mana whenua relationship of Ngāti Koroki Kahukura with this landscape. The history provides important cultural context for development, environmental management, and the ongoing protection of the Waikato River, Maungatautari, and the wider Kirikiriroa region.

Ngāti Korokī Kahukura continue to exercise their kaitiaki responsibilities across the western and central Waikato including Kirikiriroa. A key strategic objective is to protect and strengthen identity, cultural values, and enduring relationship with the whenua, while ensuring the principles of kaitiakitanga are embedded in the planning, development, and ongoing management of places such as Rotokauri and Te Kowhai East.

4.6 Ngāti Māhanga

Maahanga

Tukootuku

Wairere

Tumataura

Hauaa

Ka moe a Maahanga i a Paratai Ahitapu ka puta ko Tukootuku. Ka moe a Tukootuku i a Tamainupoo ka puta ko Wairere. Ka moe a Wairere i a Tutekapua ka puta ko Tuumataura. Ka moe a Tumaataura i a Koroki ka puta ko Hauaa.

Maahanga was the eponymous ancestor of Ngaati Maahanga people and descended from the Tainui waka. Maahanga settled in the lower Waipaa and Waikato valleys where he had several children with his wife Paratai Ahitapu. His daughter Tukootuku married Tamainupo and had a son, Wairere, who married Tutekapua and had a daughter Tuumataura, who married Koroki and had Hauaa. This is the direct whakapapa relationship between Ngaati Maahanga, Ngaati Tamainupoo, Ngaati Wairere, Ngaati Koroki-Kahukura and Ngaati Hauaa.

Ngaati Maahanga have an enduring ancestral relationship with Te Kowhai as part of the wider Horotiu–Waipaa cultural landscape. This relationship is based on whakapapa, customary occupation, the use of the whenua and waterways, and the movement of Ngaati Maahanga tuupuna throughout the landscape between the Waikato and Waipaa Rivers. Prior to Raupatu, the Horotiu–Waipaa Block comprised approximately 100,000 acres extending between these two major rivers, within a landscape in which Ngaati Maahanga lived, travelled, gathered resources and maintained

relationships with other closely connected hapuu (Hayward & Samuels, 2015). Te Kowhai forms part of an interconnected ancestral landscape in which whenua and wai provided the physical and cultural pathways through which mana, whakapapa and relationships were maintained.

The Waipaa River is particularly important to understanding the Ngaati Maahanga relationship with Te Kowhai. Traditional evidence records movement along the Waipaa through Tangirau and Te Mimi o Wharewete and onward to Tokomaapuna at the confluence of the Waipaa and Waikato Rivers (Wai 898, 4.1, p. 17). These waterways connected places of occupation, mahinga kai, whaanau and hapuu across the landscape and not separated. The whakapapa of Maahanga further embeds these relationships within the whenua.

Through Maahanga's daughter Tukootuku, her marriage to Tamainupoo and their son Wairere, Ngaati Maahanga whakapapa is interwoven with the people and places of the wider Te Kowhai, Horotiu and Kirikiriroa landscape. Accordingly, the Ngaati Maahanga relationship with Te Kowhai East is not based on proximity to the development site alone, but from whakapapa, ancestral occupation, customary movement and use of the whenua and waterways that collectively form this cultural landscape. Raupatu and subsequent changes in legal ownership and land use disrupted physical occupation and access but did not extinguish that ancestral relationship or the continuing responsibilities of Ngaati Maahanga as mana whenua and kaitiaki of this whenua.

5. Ngā Mahi Whanaketanga / Assessment of Activities

Mana whenua has worked with TKELP throughout the preparation of the substantive FTAA application to better understand the proposed development and the activities planned within TKE.

Mana whenua recognise the importance of supporting economic development, employment opportunities, and infrastructure that contributes to the growth of the Waikato region. However, development of this scale also has the potential to affect the environment, cultural landscapes, and the values associated with the wider catchment.

Potential effects may include impacts from earthworks, stormwater, traffic, noise, lighting, and increased development pressure on waterways, wetlands, indigenous biodiversity, and other natural resources that are important to mana whenua.

It is therefore important that future development of TKE is planned and managed in a way that recognises the cultural significance of the area and protects the health and mauri of the whenua and waterways. Appropriate measures should be implemented to avoid, remedy, or mitigate adverse effects and to achieve positive cultural and environmental outcomes.

As development will involve earthworks within a culturally significant landscape, ongoing engagement with mana whenua is important. Appropriate cultural monitoring and accidental discovery protocols should be in place to ensure that any cultural materials, archaeological sites, or kōiwi are managed appropriately.

Today, the area remains a wāhi taonga for mana whenua, reflecting enduring connections through whakapapa, history, and occupation. Protecting these values is important to maintaining the relationship between mana whenua, the whenua, and the wai and taonga tuku iho for present and future generations.

5.1 Heritage

The reported archaeological information shows that there are currently no recorded archaeological sites within the project area.

However, the absence of recorded sites does not mean the area is without cultural significance. The wider Te Kowhai and Mangaheka area has a long history of Māori occupation and use, particularly around waterways, wetlands, mahinga kai areas, travel routes, and places of settlement.

As earthworks are proposed, there remains the possibility that previously unknown archaeological features, cultural materials, or kōiwi tangata may be uncovered during construction.

It is important to recognise that the whenua remains culturally significant regardless of whether archaeological sites have been formally recorded or not.

To support the protection of these values, a Cultural Management Plan (**CMP**) should be prepared for the project. The plan should provide an overarching framework for cultural monitoring, engagement, and the management of cultural values throughout all stages of development.

This includes Accidental Discovery Protocol (**ADP**) to ensure that any kōiwi, archaeological material, artefacts, or other cultural finds are managed in a culturally appropriate manner and in partnership with mana whenua.

5.2 Stormwater

The TKE site sits within the Mangaheka catchment and is crossed by the Mangaheka Stream, which flows through the site before eventually connecting the Waipā River.

At present, stormwater from the site drains directly into the Mangaheka Stream through farm drains and overland flow paths. Parts of the stream corridor are known to be prone to flooding, and this will need to be carefully managed as development occurs.

The proposed industrial development will increase the number of hard surfaces, such as roads, buildings, and paved areas. This means more rainwater will run off the site and enter the stormwater system.

To manage this, a range of stormwater measures are proposed which include:

- Swales and drainage channels to collect and slow stormwater.
- Constructed wetlands to treat and temporarily store stormwater before it enters the Mangaheka Stream.
- Rainwater collection and reuse systems within industrial lots.
- Protection of overland flow paths to help manage larger storm events.
- Stream restoration and erosion control along the Mangaheka Stream.

The aim is to manage stormwater so that flows leaving the site are similar to those that of today, helping to reduce flooding and minimise effects on downstream waterways.

In some areas, stormwater may be let into the ground where conditions allow. This can help recharge groundwater, support stream flows, and better match the natural water cycle.

The protection and restoration of the health and mauri of the Mangaheka Stream, including the Te Kowhai Stream, is an expectation of mana whenua. Stormwater management must ensure that water quality is maintained and improved, and that no further degradation of these waterways occurs.

All stormwater solutions should contribute to the long-term restoration and wellbeing of the Mangaheka and Te Kowhai streams, while also protecting the health and mauri of the Waipā River and Waikato River as receiving environments.

5.3 Wastewater

TKELP is working with Hamilton City Council (HCC), Waikato District Council (WDC) and IAWAI staff to investigate suitable wastewater servicing options for the development and its integration with the wider wastewater network.

A range of wastewater servicing scenarios have been assessed to determine the wastewater demands associated with the future industrial activities across the site. The assessment indicates that overall wastewater generation is expected to be relatively low, reflecting the anticipated nature of development within the industrial precinct.

The engineering assessment identified that peak wastewater flows during heavy rainfall events are primarily influenced by groundwater and stormwater infiltration into the wastewater network.

While most industrial activities are expected to create low volumes of wastewater, some future industries may produce higher-strength waste streams that require additional treatment. In these situations, site specific treatment and disposal systems may be required and will be addressed through detailed design and future consenting processes.

As the TKE site is lower than the existing public wastewater network, a wastewater pump station will be required to service the development.

The current proposal is for a single pump station to collect wastewater from across the site and pump it into the public wastewater network through a rising main.

Depending on the final design, additional lifting stations may be required within the site to help move wastewater efficiently through the network.

The pump station will also include emergency storage and additional capacity to manage wastewater flows during peak periods and unexpected events.

Wastewater should be managed in a way that protects the health and mauri of the Waikato River and surrounding environment. Best practice measures should be used to avoid adverse effects and support the protection and restoration of the river, consistent with the intent of Te Ture Whaimana and Te Mana o te Awa.

5.4 Water Supply

TKELP is working with HCC, WDC, Waikato Regional Council (WRC) and IAWAI staff to identify suitable water supply solutions for the development and its connection to the wider water network.

To understand future water demand, four water supply scenarios have been assessed:

- Based on the Regional Infrastructure Technical Specifications (RITS), which sets out design requirements for water supply infrastructure and firefighting water supply.
- Reduced Population – Based on the projected full-time equivalent workforce identified in the economic business case and maintaining other RITS design requirements.
- Reduced Population and GD06 (Upper Range) – Based on the projected workforce and the upper range of industrial water demand identified in the GD06 guidelines.
- Reduced Population and GD06 (Lower Range) – Based on the projected workforce and the lower range of industrial water demand identified in the GD06 guidelines.

The assessment of these scenarios above provides an overview of the likely water demand for the proposed TKE industrial development. It also identifies opportunities to reduce overall water consumption using water efficient devices or features and rainwater harvesting systems.

Rainwater collected on site may be used for a range of non-potable purposes to reduce reliance on the municipal water supply. Under this approach, water from the public network or other supply sources may only be required during extended dry periods or for firefighting water storage where necessary.

Mana whenua acknowledge that the Waikato River already carries the effects of historical over-allocation and development pressures. In this context, the TKE development should ensure that future growth supports the protection and enhancement of the health and mauri of the awa, consistent with the principles of Te Ture Whaimana o Te Awa o Waikato, Te Mana o te Wai, and the Waikato-Tainui Environmental Management Plan – Tai Tumu, Tai Pari, Tai Ao.

It is important to reduce or limit the amount of water taken from the Waipā and Waikato catchment to help protect the health and mauri of waterways. Measures such as water-efficient design, rainwater collection, and water conservation should be used wherever possible within TKE to reduce demand on freshwater resources.

Where water allocations are not fully used within TKE, or surplus water becomes available, the priority should be given to returning those allocations to iwi for future use and management.

To ensure the principles of Te Ture Whaimana and Te Mana o te Awa are incorporated into all stages of the TKE water-take and associated activities.

5.5 Earthworks

TKE will involve significant earthworks across the site, including large-scale cut and fill to reshape and level the land for development. As part of the earthwork's sections of the Mangaheka Stream are proposed to be modified, including some minor widening, and lowering of the stream bed to improve flood capacity and meet stormwater management requirements.

New roads will be constructed throughout the development and designed to connect with the surrounding road network. Stormwater run-off will be managed by a treatment train approach, including rain gardens, swales and wetlands.

The preliminary earthworks design indicates that large volumes of soil will be cut and moved across the site to create suitable development platforms. Current estimates suggest that most of the excavated material can be reused on-site, reducing the need to import or remove large quantities of fill.

Earthworks are expected to include cuts of up to 13 metres in depth and fills of up to 3.6 metres in depth in some locations. The final earthworks design will be refined through detailed engineering and geotechnical investigations.

The proposed earthworks and modifications to the Mangaheka Stream affect the cultural and environmental values of the area.

Mana whenua generally do not support unnecessary earthworks modifications to natural stream channels, particularly where these may further affect the health, mauri, natural character, or flow of the Mangaheka Stream.

Any proposed works must result in ecological and cultural enhancements, including improved water quality, healthier habitats, enhanced biodiversity, and better overall stream health. Such works should be developed in partnership with mana whenua and guided by a "best for taiao" approach, ensuring the long-term wellbeing of the environment is prioritised.

5.6 Biodiversity

Overall, the TKE area has low biodiversity due to long-term land drainage and modification of natural waterways. The Mangaheka Stream has been heavily changed and now provides limited habitat and generally poor water quality, with aquatic life typical of a modified and degraded system.

Old aerial photos also show that the natural stream system has been greatly changed over time, with many natural channels now replaced by drains.

Even with these changes, native fish are still present. Eels are likely to be common in permanent water areas on the site. However, habitat for banded kōkopu is very limited. Fish movement may also be blocked in places by structures like culverts.

The Tangirau wetland in the lower catchment is a more natural area and provides important habitat for species such as black mudfish. The wider catchment still supports some native fish, including banded kōkopu, shortfin eel, longfin eel, and black mudfish.

These surveys did find introduced fish like gambusia, goldfish, koi carp, and catfish, along with native shortfin and longfin eels.

Overall, the site has heavily changed waterways that still support some native fish, but habitat quality is low. There are opportunities to improve the streams, restore more natural flow, and help fish move more freely.

Mana whenua support ecological mitigation measures that improve environmental outcomes, including:

- Improving stream connectivity by removing farm culverts;
- Restoring stream edges through riparian planting;
- Reducing stormwater erosion within the site and downstream;
- Protecting and restoring modified stream areas where possible; and
- Identifying and protecting key habitat for black mudfish.

The Mangaheka Stream is an important area for restoration and biodiversity enhancement work within TKE.

Restoration should focus on improving water quality, increasing native biodiversity, restoring streams and wetlands, and planting native vegetation along waterways. These actions will also enhance biodiversity across the wider site. Mana whenua support a “best for taiao” approach, with restoration and ecological enhancement undertaken in partnership with mana whenua to provide long term cultural and environmental benefits.

5.7 Visual

The proposed change from rural farmland to industrial development will result in a significant change to the cultural landscape of the whenua. This includes changes to the visual setting, natural character, and the ability to recognise and connect with the historical and cultural values of the area.

Even though the wider area is becoming increasingly urbanised, the remaining rural characteristics still hold cultural meaning and should be carefully considered in the design and layout of future development.

A Cultural Landscape Plan (**CLP**) should be developed in partnership with mana whenua to incorporate cultural design elements and ensure the identity and history of the landscape are reflected as the area develops.

TKE provides an opportunity to support economic growth, employment, and infrastructure investment within the Waikato region. Mana whenua recognise the benefits that development can bring and support an approach that balances growth with the protection and enhancement of cultural and environmental values.

As development progresses, it is important that the cultural significance of the area and the enduring relationship of iwi with the whenua and waterways are recognised and provided for. Future development should seek to protect and enhance the health and mauri of the environment while delivering positive outcomes for the wider community.

Mana whenua looks forward to continuing to work with TKELP throughout the FTAA process and future stages of development. Ongoing engagement and partnership will help ensure that iwi values, interests, and aspirations are reflected in planning, design, and decision-making.

The matters identified in this assessment extend beyond the FTAA application and should continue to inform future structure planning, detailed design, resource consent processes, and development within the wider Te Kowhai East area and the Mangaheka catchment. Through continued collaboration, there is an opportunity to achieve positive cultural, environmental, social, and economic outcomes for present and future generations.

6. Ngā Tūtohu / Recommendations

The following recommendations support the cultural values of all hapū, improve environmental outcomes, and recognise their ongoing role as kaitiaki within the rohe and wider area of Te Kowhai.

6.1 Partnership and Engagement

- a) The FTAA substantive application for TKE should recognise the ongoing relationship between mana whenua and the project area and provide for ongoing engagement throughout the project life cycle.
- b) TKELP and mana whenua should continue working in partnership, supported by a Memorandum of Understanding (**MOU**) or Kawenata, to guide engagement and collaboration as the project progresses.

6.2 Cultural Heritage and Landscape

- a) Mana whenua must first karakia whakawaatea (bless and cleanse) the areas before any works take place.
- b) A CMP should be prepared for the project. The CMP should provide an overarching framework for cultural monitoring, engagement, and the management of cultural values throughout all stages of development.
- c) An ADP should be adopted for all earthworks and development activities enabled by the EPA Fast Track consent decision.
- d) Future development should identify, avoid where practicable, and appropriately manage any effects on sites, features, and areas of cultural significance.

6.3 Three Waters

- a) Stormwater, wastewater, and water supply infrastructure should be designed to achieve positive environmental outcomes and minimise adverse effects on freshwater systems.
- b) Highest level of stormwater treatment should be used before it is discharged into waterways.
- c) Ecological restoration and indigenous planting should be integrated into future development layouts, open spaces and stormwater infrastructure.
- d) Wastewater must be managed to protect the health and mauri of the Waikato River, groundwater, and the wider environment. Best practice systems should be used to avoid adverse effects and protect the mauri of these water bodies. This approach supports Te Ture Whaimana and Te Mana o te Awa by helping to restore and protect the health and wellbeing of the river.
- e) Water use should be efficient and minimised where possible and any unused or surplus water allocations within TKE should be prioritised for return to iwi for future use and management.
- f) Transport network planning across the TKE area must consider stormwater treatment infrastructure.

6.4 Earthworks

- a) Ensure sufficient erosion and sediment control measures are in place for earthworks.
- b) Effectively manage the impact of contaminated land on the surrounding environment. Ensure contaminated land is not used as fill.
- c) Promote the adoption of best practice land and soil management that minimises soil erosion, nutrient leaching, and sediment and nutrient runoff.

6.5 Biodiversity and Ecological Restoration

- a) Preserve the physical integrity of receiving streams, so restoration to focus on improving water quality, increasing native species, restoring stream and wetland areas, and planting native vegetation along Mangaheka and Te Kowhai stream edges. This will also support wider land-based biodiversity across the site.
- b) Planned ecological enhancement should be undertaken in partnership with mana whenua to achieve a “best for taiao” approach, where restoration work provides lasting cultural and environmental benefits.
- c) Future landscaping and restoration planting should utilise eco-sourced indigenous whakapapa species in partnership with mana whenua nurseries.
- d) Appropriate consideration should be given to broader biodiversity gains, including benefits for native bats, birds, lizards, and other taonga.
- e) Support the establishment of programmes to restore and expand wetland habitat.
- f) Establish or maintain ‘buffer zones’ of appropriate indigenous plant species around wetlands to protect them from the effects of land use and to help reduce fluctuations in wetland water levels.

6.6 Cultural Landscape

- a) TKE should include ways to reflect mana whenua values, stories, history, mātauranga Māori, and whakapapa in the buildings and landscape. This should be guided by a CLP and incorporated and activated into the TKE project.
- b) Opportunities for Te Reo Māori names, interpretation, artwork, and cultural design features should be included where possible.
- c) Mana whenua should be given the opportunity to name reserves and streets.
- d) Mana whenua cultural design principles reflected where possible.

6.7 Climate Resilience and Sustainable Development

- a) TKE should provide an industrial development that is resilient to future climate change effects, including flooding, increased rainfall intensity, drought, and temperature changes.
- b) Natural based solutions should be used where practical to improve environmental resilience and ecological function.
- c) Encourage industry to implement industry best practice or best practicable option for improving air quality.
- d) The cumulative effects of industrial growth, including traffic, noise, lighting, dust, and impacts on natural resources, to be managed to protect the cultural and environmental values of the

area. When making decisions on future development projects, cumulative effects must be considered.

- e) Support the promotion of innovative green business initiatives and practices.

6.8 Social and Economic Partnership

- a) The MOU / Kawenata between TKELP and mana whenua to provide for opportunities for iwi businesses, contractors and environmental practitioners to participate in future development of TKE.
- b) A MOU / Kawenata will address support for employment, training, and skills development opportunities for mana whenua where possible. Other activities should involve apprenticeships, cadetships opportunities for our mana whenua within the project and throughout the project where possible.
- c) Mana whenua businesses to be afforded the opportunity to explore business opportunities within the TKE on a commercial basis.

7. Te Whakatau / Position Statement

Mana whenua recognises that TKELP intends to deliver much needed industrial land, employment and economic benefits to the Waikato region and that TKELP is seeking substantive consents via the FTAA.

Mana whenua acknowledges the role of TKE in supporting future development in the Te Kowhai, Rotokauri and greater Kirikiriroa area. The development can provide long-term benefits for the wider community, if it is developed in a way that respects the cultural, environmental, and historical values of the Te Kowhai landscape.

Within this CIA context, mana whenua acknowledges that the proposed TKE development, includes large-scale earthworks, land raising, and urbanisation, represents a significant transformation of the existing environment.

Accordingly, mana whenua supports the Te Kowhai East development including the activities required to enable it, subject to the establishment of a MOU / Kawenata, appropriate consent conditions and the implementation of the recommendations contained within this CIA.

Mana whenua expects to remain actively involved in future planning, design, consenting, and development of TKE under the FTAA process.

8. Ngā Kupu Whakakapi / Conclusion

Mana whenua is committed to working in partnership with TKELP, HCC, WDC, WRC, other Statutory bodies, and other stakeholders to support future development that upholds kaitiakitanga and protects the mauri of the environment. The development of a MOU / Kawenata would help guide this partnership and set a clear framework for working together.

As the Te Kowhai area develops it must do so with a steadfast focus on protecting and enhancing cultural and environmental values for present and future generations.

This approach balances economic growth with the care of taiao, whenua, and wai, ensuring the wellbeing of people and place remains central to decision-making and that outcomes reflect what is best for taiao within the rohe.

Mana Whenua Acknowledgement and Sign-off



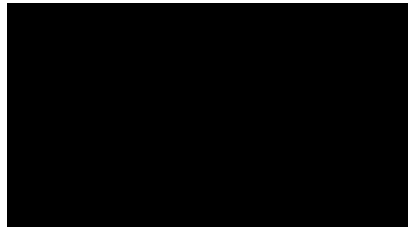
Ngāti Māhanga - 



Ngāti Koroki Kahukura – 



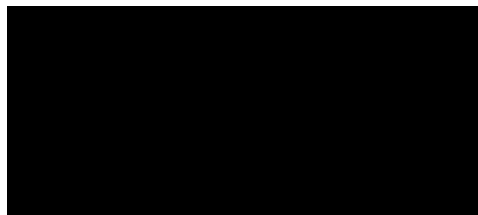
Ngāti Wairere – 



Ngāti Hauā – 



Ngāti Reko – 



Ngāti Tamainupo – 