

DRAFT PROVIDED 24 NOVEMBER 2020

CASTLECLIFF AND MILL ROAD PLAN CHANGE 58 AND 54 NGĀTI TAMAREHEROTO

CULTURAL ASSESSMENT REPORT FOR THE
WHANGANUI DISTRICT COUNCIL 2020



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1 Introduction

This report has been written on behalf of Ngāti Tamareheroto, with the assistance of the environmental team employed by Te Kaahui o Rauru. Ngāti Tamareheroto regards themselves as a hapū of both Ngāa Rauru Kiitahi and Whanganui rootstock descent. The role of Te Kaahui o Rauru in this context is to give support to Ngāti Tamareheroto. Te Kaahui o Rauru will continue to provide support, on request, to Ngāti Tamareheroto as and when required by them. Te Kaahui o Rauru recognises that it is the hapū that hold mana within their respective rohe.

2 Castlecliff Project Summary

2.1 Plan Change 58

Castlecliff is located 5.8km to the west of the Whanganui town centre and consists of residential properties on a beachfront setting. Proposed Plan Change 58 (PC58) involves the rezoning of land at Castlecliff from Reserves and Open Space, and Rural Lifestyle Zones to the Residential Zone. Castlecliff has previously has low residential growth and demand. However, Council research has shown that Whanganui's population is increasing faster than projections upon which Council has based its 2018-2048 Infrastructure Strategy. Developers wish to invest at Castlecliff and seek residential zoned land to facilitate this development.

Council is proposing to rezone 4 areas – Area 1, Area 2, Area 3, and Area 4 totalling 34.1726ha. Areas 1-3 were zoned Residential C in the Whanganui City District Scheme 1989 for low density development with a minimum site area of 4,000m². The minimum lot size for Area 4 is 5,000m², although there are lots that are less than this size due to their ability to connect to Council infrastructure.

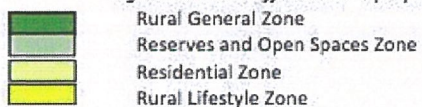
The Whanganui District Council intend to rezone land at Castlecliff to accommodate for four new areas of residential living due to a significant increase in the population that has increased the housing demand.

2.2 Castlecliff Zoning

The proposed land for Area 1 (identified in the figures below) is currently identified as a general rural zone which extends off Waitai Street, behind areas 2 and 3. The proposed lands for Areas 2 and 3 are currently identified as rural lifestyle zones which extend off Karaka Street and Waitote Street. The proposed land for Area 4 is currently identified as a rural lifestyle zone which will extend off Karaka Street and continue behind Golf Vue Place.



Figure 1: Castlecliff Areas 1- 4 proposed to be rezoned to Residential



2.3 Proposed Rezoning

Officers have considered the developer proposal to zone only Areas 1 and 2 as there are wider community benefits to rezoning a smaller area of developed Rural Lifestyle zoned land that extends beyond the developers' land (Area 3). This will enable Council to manage residential development more sustainably while avoiding isolated pockets of the Rural Lifestyle Zone in between or surrounded by areas of land zoned Residential. This also facilitates the viability of appropriately sized infrastructure upgrades for future development.

It is recommended that Area 4 be rezoned to Residential. Sites in this area are already connected to the urban reticulated infrastructure network, which means there is limited impact on network capacity and the Residential zone more accurately reflects the actual land use.

It is recommended that Areas 1 and 3 be rezoned to provide for a mix of housing densities – 400m² minimum lot sizes, as they are adjacent to properties already zoned Residential. Areas 2 and 4 are recommended to be rezoned to provide for a lower density of 800 m² minimum lot size, to facilitate a transition between the Residential Zone and the remaining area zoned Rural Lifestyle.

An issue with the project is that while the population statistics reflect the need for additional Residential land, further research is required on ecology, engineering suitability, archaeology, cultural

and traffic to identify any adverse effects on the environment that will need to be remedied or mitigated.

The figure below provides an aerial view of the Castlecliff zoning.



2.4 Plan Change 54: Manufacturing Zone Review

The current Whanganui District Plan (the District Plan) contains a single zone – the Manufacturing Zone – that is employed to manage industrial and manufacturing areas in the district. Land in the zone has generally been determined by Council to be appropriately located for a range of industrial and manufacturing activities and are typically located near transport routes and where environmental effects can generally be contained and managed. Activities currently permitted in the Manufacturing Zone include manufacturing activities, recreational facilities, commercial activities where they are ancillary to manufacturing activities, reserves and open spaces, network utilities, relocated buildings and temporary relocatable buildings, and temporary military training activities.

Council is looking to review the current objectives, policies, rules, and standards applying to industrial and manufacturing in the Industrial Environment chapter of the District Plan, including the Manufacturing Zone. The current provisions of the District Plan are not specific to industrial and manufacturing activities and there is no distinction or rules to manage the different types of industrial activities. Council is also looking to remove areas from the Manufacturing Zone that are not able to be serviced by infrastructure. Council is exploring options to classify industrial activities as 'light' or 'heavy' and assign different requirements to these.

To complement these proposed changes, Council is also looking to review the current policies in the Hazardous Substances and Contaminated Land chapter given the close inter-relationship between these topics. If facilitates that use or store hazardous substances are not appropriately located or managed, accidental release or uncontrolled use could cause temporary or permanent damage to human health, ecosystems, land, water, and air. Currently, Council follows a complicated system that determines the various rules for hazardous substances based on the zones they are located in. Since these rules have been in place, legislation and regulations have changed, requiring an update of the District Plan. There exists contaminated land in the Whanganui District that also needs to be managed appropriately.

2.5 Mill Rd Zoning

Mill Road is located between Castlecliff and Mosston. It is 1.5-2.0 km from the Tasman Sea beach and 1.2 km from the Whanganui River located directly to the south. Most of the area is farmed, with some areas cultivated. There is increasing commercial and residential development in the wider area.

The figure below displays an aerial image of the Mill Road Manufacturing Zone showing the area included in the archaeological review, enclosed within the blue lines. As part of PC 54, Council have commissioned a structure plan (the Structure Plan) to guide and inform the provision of infrastructure within the Mill Road Manufacturing Zone (Mill Road). Mill Road consists of 107ha, a small part of which has been developed for industrial use. Council considers that commercial interest in the area is growing and Mill Road, if developed as envisaged, will require significant infrastructure investment to service industrial development. The Structure Plan makes several recommendations which are considered in this Assessment.



3 PART A: TE TĀHUHU KŌRERO

Ngāti Tamareheroto / Ngāti Kauika / Ngā Aruhe

Ko Matemateaonga te maunga.

*Ko Waitotara, ko Okehu, ko Kai Iwi, ko Karamu, ko Mokoia, ko Rotokawau, ko Te
Waiwherowhero, ko Te Wainui a Rua ngā wai.*

Ko Kaierau te taumata.

*Ko Pungarehu, ko Kokohuia, ko Whare Kakaho, ko Te Oneheke, ko Nukuiro, ko
Kaierau, ko Mokoia, ko Rapanui, ko Okupe, ko Taipakē Tawhito ngā kāinga.*

E kī ana te kōrero, 'E rua au, he Rauru au, he Awa au, aue.'

Matemateaonga is the ancestral mountain range.

*Waitotara, Okehu, Kai Iwi, Karamu, Mokoia, Rotokawau, Te Waiwherowhero, Te
Wainui a Rua are the ancestral waters.*

Kaierau is the summit of refuge.

*Pungarehu, Kokohuia, Whare Kakaho, Te Oneheke, Nukuiro, Kaierau, Mokoia,
Rapanui, Okupe, Taipakē Tawhito are the ancestral sites of abode.*

*According to ancestral decree, 'We are of two lines of descent, we are of Rauru
and we are of Awa (the River), alas'.*

Ngāti Tamareheroto and its' forefathers Ngāti Tahinganui, Ngāti Tūtemangarewa, Ngāti Kauika, Ngāti Tahau and Ngā Aruhe were located on the true right of Te Wainui a Rua (the Whanganui River) mouth. The Hapū estate is predominantly coastal. In accordance with kōrero tuku iho (ancestral narrative) the Hapū boundaries stretch between the mouth of the Whanganui River mouth and the Okehu stream, inland via Kaierau (St Johns Hill) to Whakaware and Puatērapa at the junction of the Ruahine, Tokomaru and Rangitatau land blocks.

As stated above Ngāti Tamareheroto acknowledges descent from both Ngā Rauru Kītahi and Whanganui iwi rootstock. This report has been prepared for Ngāti Tamareheroto (inclusive of Ngāti Kauika and Ngā Aruhe) with the very much appreciated technical support of Te Kaahui o Rauru.

The Iwi taketake (original people) of this area are called Ngā Aruhe. The name refers to the fernroot that was once the staple diet of our early ancestors. According to tribal elders these ancestors came from the land, i.e. they were here before those that arrived via waka. Elders say that when Kupe came on Matahourua that it was Ngā Aruhe who passed down the record of this event.

Archaeological evidence of intense occupation in the 'Otamatea West' and Rapanui and 'Springvale' - Kokohuia - Titoki - areas are the remaining physical connection that we have to these ancestors. The urupā on Rapanui Road uncovered in 2008-2009, that dates to the late 14th or early 15th century A.D. is a Ngā Aruhe urupā. The tūpuna were interred upright and their teeth attest to a diet of fern root.

To give further context to the era of Ngā Aruhe we recall the following. Turi, captain of the Aotea waka is thought by academics to have arrived in the mid. 14th century A.D. Rauru, the eponymous ancestor of Ngā Rauru Kītahi, predates Turi by four generations. Rauru's mother was Rongoueroa, a descendant of Ruatipua from whence is derived the old name of the Whanganui River, i.e. Te Wainui-ā-Rua. Rauru married into the ancient people of this coast called Te Kāhui Rere, who were renowned for their ability to levitate at will, hence the name.

"The closest named spots of Ngāti Tamareheroto and hence Ngāti Kauika as well to the areas of interest are Pungarehu (at the Pilot Station), Okupe (Te Kaihau o Kupe), the Waiwherowhero stream, Kokohuia, Kaierau, Mokoia (Lake Westmere) and Rapanui. Rapanui is our oldest to date known urupā. Pungarehu is a wāhi tapu and wāhi tūpuna. Our tūpuna Tutemangarewa was ritually farewelled there with fire, hence the name. Kokohuia was an area full of natural resources that were used by us and all hapū of the area, up and down the coast and river.

The wetland and dune system of the Springvale development area are connected to the wider area, particularly to Kokohuia. The area is located on a pathway that links the awa and coast to the Rapanui and Roto Mokoia area.

The vast area between Rapanui, Roto Mokoia, Kaierau, Kokohuia, Pungarehu and the wider Okupe area (Castlecliff) are some of the last undeveloped areas where our ancient people lived in the seasonal manner that they did. The dunes and higher spots surrounding the wetlands were used as camping sites. The term 'seasonal' from a non-Māori perspective suggests a lack of permanence. From a Māori perspective the opposite interpretation applies, i.e. the rotation of the seasons is a permanent cycle that repeats year in year out. The tī and karaka trees in the area are definite signs of occupation.

We expect that earthworks will uncover further signs of occupation, including middens and umu. We also anticipate the possible presence of koiwi tangata, the remnants of waka and carved and /or uncarved implements. Over the decades various toki (adze heads) have been found particularly along the coastline.”

Following the ‘Sale of Whanganui’ Ngāti Tamareheroto and Ngāti Kauika were forced to stop the traditional practice of rotational living between the ancestral sites. In the late 1800’s and early 1900’s, small clusters of our Hapū migrated into nearby Kokohuia / Okupe where they adapted to living in the manner that colonisation imposed. Ngāti Kauika in particular were and still are a well-established community of whānau within this area, the descendants of whom are still here. Other whānau of Hapū such as Ngā Wairiki of Kauangaroa and Ngāti Pāmoana of Koroniti, to name a few, also migrated to this area for access to resources including work.

3.1 Hekenui’s Boundaries - Whanganui Tribe

As part of the 1938 Whanganui Riverbed case Whanganui rangatira Hekenui Whakarake was asked to describe to the Court the boundaries of the Whanganui tribe. In response Hekenui said,

“Yes, commencing at Taipake at Kai Iwi on the Coast, thence to Mangapapa, thence to Puketotara block, thence it follows the ridge to Whakaihuwaka, thence it runs to the boundary of Taumatamahoe, thence along that boundary to Rakauateatua, a hill, thence to Whitianga, thence to the boundary of Maraekowhai, thence to Te Rimuputa, thence to Te Orongopai at Taringamutu, thence to Komakoriki in Ohura South, thence to the Pukehou Block, thence it crosses the Whanganui, thence along the Whakapapa River to the boundary of the Waimarino block and the junction with the Mangahuia River, thence it follows the Mangahuia to its source on the Ruapehu, thence to Auahitotara, thence it follows the Waimarino County boundaries to Whangaehu, thence to the mouth of the Whanganui River, thence along the coast to Kai Iwi”.

This statement has become known as ‘Hekenui’s boundaries. Taipakē (the commencement point) is presently one of the three remaining marae of Ngāti Tamareheroto / Ngāti Iti / Ngāti Pūkeko. Taipakē and associated hapū consider themselves included within the definition of Whanganui tribe as given by Hekenui.

3.2 Te Runanga o Tupoho

Ngāti Tamareheroto are aligned to both Te Kaahui o Rauru and Te Runanga o Tupoho.

3.3 Ngaa Rauru Kiitahi Iwi / Te Kaahui o Rauru

The rohe of Ngā Rauru Kītahi begins at Te Kaihau-a-Kupe (the mouth of the Whanganui River), it follows the coastline to Te Awanui-a-Taikehu (Paatea River), inland to the Matemateaonga range and back to the point of origin via Kaierau (St Johns Hill). The tribal estate of Ngaa Rauru Kiitahi, including kāinga tawhito, is outlined within the preamble of the Ngaa Rauru Kiitahi Claims Settlement Act 2005.

Te Kaahui o Rauru - the post settlement governance entity, provides on request assistance to Ngāti Tamareheroto, on matters that arise within the Whanganui River to Okehu Stream area.

Ngaa Rauru Kiitahi has a mandated Pūtaiao Management Plan which must be given effect to in any proposed plan change and/or development in the wider Castlecliff area.

3.4 Okupe - Te Kaihau o Kupe

Okupe, or in its extended form - Te Kaihau o Kupe is an area of significant occupation. This is the original name of Castlecliff. The restoration of the original names upon the landscape is important to our hapū. The extended name tells the narrative of the famous navigator Kupe to the mouth of the Whanganui River. 'Kaihau' is a sacred ceremony still practiced today. It involves ceremonial fasting, i.e. one eats only of the wind, in preparation for entering what was for Kupe a new land and people.

3.5 Te Waiwherowhero

Te Waiwherowhero is the name known by Ngāti Tamareheroto for the underground stream that flows in the Karaka Street area. It pops up in places and seen particularly whilst digging on the lower properties of Karaka Street. As the name suggests the water is of a reddish / ochre colour. This is a result of the high iron oxide content within the land which is picked up by the water. The 'unnamed' waterway referred to in documents is quite likely to be Te Waiwherowhero.

Elders say that the paru (mud) from waterways like this are used for dying woven garments such as piupiu and so forth. These waterways are taonga, a highly prized resource.

3.6 Kokohuia

The Kokohuia repo is of huge significance as a wāhi tapu and wāhi tūpuna. A significant battle took place here. As discussed in the Springvale plan change process, Kokohuia extends to include what has been referred to as the Titoki wetland. They are part of the same wetland system. Extensive cooking sites and middens have been found whilst draining this area. It was an area of economic importance

to the people with mahinga kai sites including tuna, harakeke, manu, raupo and its by-product pua. Despite the mal-treatment of this wetland successive Councils, the area remains of high importance to our people and the wider community. Attempts have been made by the local Kura and whānau / iwi members to restore the repo, or parts of, to a state of well being. This is the aspiration.



The area is well known as a crossroads, with whānau stopping there to replenish their stocks as they travelled through. Pā sites once surrounded the whole area of the plan changes.

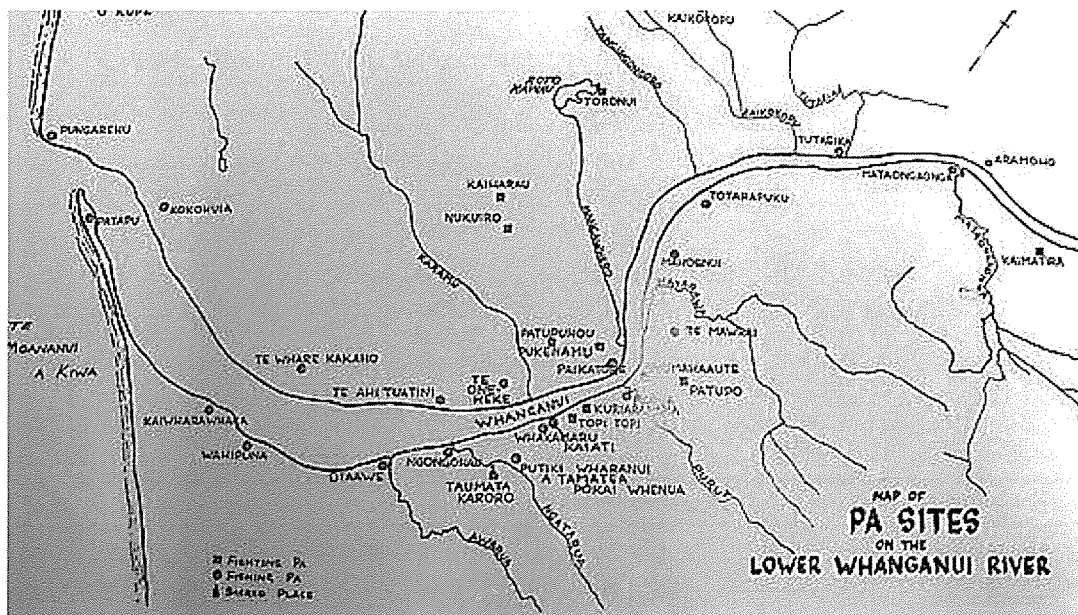
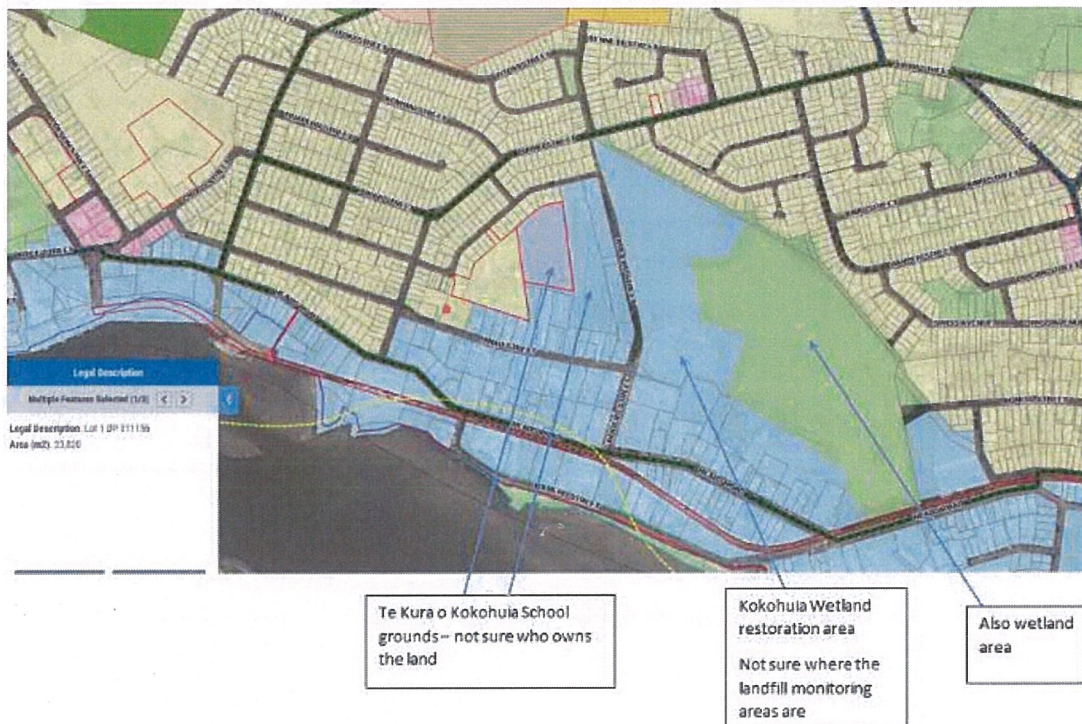


Figure 2: Pa Sites

While the area stipulated in the figure below appears to have no active waterways, a remnant waterway is situated on the southern end of Mill Road parallel with the road. The waterway feeds into the Titoki Wetland (recorded as Kokohuia II) within the Mosston Park Reserve. The remnant Kokohuia Wetland has been partially restored and features an area of open water and regenerating native vegetation typical of coastal dune wetlands. The Kokohuia wetlands were listed as a traditionally important site.

The figure below displays an image of the Kokohuia area and relevant environments within this area.



4 PART B: NGATI TAMAREHEROTO VALUES AND ASSESSMENT

4.1 Te Tomokanga ki Te Matapihi

The Ngāti Tamareheroto values are best articulated by those stated within the Whanganui Land Settlement Negotiation Trust Agreement in Principle, i.e.:

Ko te rangawhenua te mātāpuna o te ora

Mai te whare toka ki te tokatū

He matapihi ki uta, he matapihi ki tai, he matapihi ki te ao

He ao āpōpō, he ao tea

Our nationhood sustains us

Our tribal domain dictates our worldview

*Our culture and economy sustain and elevate our mana motuhake and tino
rangatiratanga*

Our legacy, our aspirations, our future.

Toitū Te Kupu (Innate Integrity)

Toitū Te Mana (Inherited Authority)

Toitū Te Whenua (Physical & Metaphysical Sustenance)

We add to these :

Toitū te Wai (Inherited responsibility to care for the life giving qualities of water)

4.2 Mana Motuhake

Aligned with 'Toitū te Mana', Mana Motuhake refers to the unique authority we have as hapū located within this specific area to influence decisions which require the input of Tangata Whenua / Mana Whenua. Our Mana motuhake in this context is derived from the descent of our hapū from the original inhabitants of this specific area. The ancient human remains within this area belong to our ancestors. The artefacts found here belong to our ancestors. The signs of occupation, e.g. middens, rua, māra, belong to our ancestors. We are their descendants.

4.3 Whakapapa / Kotahitanga

Ngāti Tamareheroto recognises the whakapapa that connect many of the lower river hapū and iwi to one another. We also recognise and value the relationships we share with all elements of the taiao (environment). Our world view dictates that mankind is a younger sibling to other elements of the environment. This worldview dictates the ethic of kaitiakitanga, inherent responsibility to place, present and future generations.

4.4 Te Mana o te Wai / Toitū te Wai

At its simplest, the principle of Te Mana o te Wai reflects the paramountcy of the health and wellbeing of wai. Te Mana o te Wai has been one of the fundamental guiding principles for the Iwi Chairs forum of which the Whanganui Iwi are participants. This concept in a slightly different form is also part of the National Policy Statement of Freshwater.

Te Mana o te Wai involves three interrelated elements:

Protecting: Te Mana o te Wai ensures that the first right to the water goes to the water;

Enabling: The Wai is nurturing and provides us with a koha to enable sustainable use; and

Regenerating: Te Mana o te Wai requires us to restore and regenerate those waterways that have declining mouri.

Healthy waterways will always be of paramount importance to Ngāti Tamareheroto.

Our waterways / sources are used for a multitude of purposes including:

- Wairua (spiritual) - Tohi rites, removal of tapu associated with war/death, baptisms and blessings of people and items.
- Tinana (physical body) – washing after childbirth or menstruation, water for cleaning and cooking, collection of food and weaving resources, preserving/storing food.
- Hinengaro (mental wellbeing) – collection of rongoa (healing plants), drinking water (mental clarity), teaching and learning (education), meditation.
- Whānau – transportation (waka), recreation, gathering of building resources, positioning of Pā, manaaki (sharing / reciprocating) resources.
- Mahinga kai – The customary gathering of food and natural materials, the food, and resources themselves and the places where those resources are gathered. Mahinga kai species and places are fundamental to this relationship and observation of their health is the primary way that we assess the health and well-being of the aquatic environment.

From a Māori perspective water is regarded have its own intelligence, comprised of its nature and the multitude of life forms within it that respond to various stimuli. Water communicates its needs to humans and our comprehension depends entirely upon the intimacy of our relationship with it (Ngata 2018).

These key statements provide the position of the hapu of these matters, and these have remained a consistent view of the hapu.

4.5 Te Awa Tupua (Whanganui River Claims Settlement) Act 2017

The Awa Tupua Act 2017 recognised Te Awa Tupua as ‘a living and indivisible whole comprising the Whanganui River from the mountains to the sea, incorporating its tributaries and all its physical and metaphysical elements’. The act embodied in law a set of intrinsic values as follows :

Ko te awa te mātāpuna o te ora.

The river is the source of spiritual and physical sustenance.

E rere kau mai te Awa nui mai i te Kāhui Maunga ki Tangaroa.

The great river flows from the mountains to the sea.

Ko au te awa, ko te awa ko au.

I am the river and the river is me.

Ngā manga iti, ngā manga nui e honohono kau ana, ka tupu hei Awa Tupua.

The small and large streams that flow into one another and form one River.

Ngāti Tamareheroto affirms these values and aspires to ensure that no negative impacts are felt by Te Awa Tupua from developments that occur within our specific hapū rohe. We realise the limitations of our authority but wish to state that this is our aspiration.

4.6 Repo

Māori knew repo or wetlands as larders, troves of seasonal sustenance and a store of materials to fashion into mats, ropes, walls, clothes. Healers knew them as dispensaries of medicines, tinctures, and supplements. Europeans knew them as a blight. Repo had no place in the agrarian ethic they brought here—flat land was coveted; where Māori saw resources, colonists saw pasture, sheep, and fences.

Repo are one of Aotearoa New Zealand's most important freshwater ecosystems. Wetlands are defined as low-lying waterlogged places bordering rivers and streams, and forming quiet edges of lakes, rivers, low lying floodplains, estuaries, and harbours. They are classified into many types, including: swamps, bogs, fens, marsh, peatlands, pakihi, flushes, lagoons, saltmarsh. In the last 150 years more than 90% of repo in Aotearoa have been destroyed or significantly modified through draining and other human (anthropogenic) activities (Harmsworth 2002).

Repo have historical, cultural, economic, and spiritual significance for Māori and are viewed as a tāonga. They are reservoirs for knowledge, well-being, and utilisation as well as mahinga kai for a range of culturally important tāonga species of plants, animals, fish, birds, insects, and micro-organisms (Harmsworth 2002). They purify water, prevent floods and erosion, store carbon, provide resources like peat and flax, process nutrients, act as nurseries and offer recreation and aesthetic value.

Wetlands are often referred to as repo, poharu and roto, for Ngāti Tamareheroto hapū we also use the word 'huhi'. Verbal accounts collected thus far signify that the plan change area is culturally significant area for Hapū. This area has been recorded as a bustling place where everyone shared mahinga kai, rongoa and mātauranga. Mātauranga Māori refers to Māori knowledge that provides the understanding and interpretation of the natural and spiritual world through a Māori lens (Harmsworth 2002).

The connection and values that tangata whenua have with the proposed plan change area extends to the whole zone of the study area. Verbal accounts from tangata whenua recall this area as a connected whole including Kokohuia wetland, Titoki wetland. Tangata whenua harvested kai, rongoa (medicines) and resources from this area, they also resided and cooked and ate there.

Key Māori concepts pertaining to wetlands include:

- Whakapapa (connection to people and the environment)
- Tāonga tuku iho, Te Ao Tūroa (inter-generational equity)
- Mana whenua (status, authority, prestige over a defined area)
- Kaitiakitanga (guardianship, action, and association)
- Oranga (existence, health, and wellbeing)
- Mouri (life force, energy, balance)
- Tapu (restricted, sacred, off-limits)
- Noa (unrestricted, open)
- Rahui (regulated)
- Te Ao Mārama (interconnection – all parts of the environment are connected, understanding the whole)
- Tau utuutu (giving back what you take)
- Mātauranga Māori (Māori knowledge)

(Harmsworth 2002).

Based on these values and accounts already captured mahinga kai and tāonga values associated with this area are linked with specific kawa (protocols) and tikanga (customs) in the way species, were harvested, consumed, grown, and preserved.

4.6.1 Wetland Destruction

In Aotearoa, wetlands as a whole have been aggressively drained to the point that only approximately 10% remain. A 2008 research paper by Manaaki whenua calculated that wetlands once covered 2.4

million hectares of Aoteaora to which less than 250,000 remain. The greatest loss is in the North Island where less than five percent of wetlands survive. Today, our wetlands still face drainage, clearance, pollution, choking sediment, invasive weeds, and mammalian pestilence.

In the Whanganui and Castlecliff context this is no exception. The Kokohuia wetland was once connected to the Whanganui river and the Tītiki wetlands in Mossoton park and adjacent areas. In the 1940s settlers drained and turned this area into residential and industrial areas. In the 1950s the low point of this area was used as a rubbish dump site.

The destruction of these wetlands and development of this area is closely associated with the colonisation of tangata whenua, their displacement/urbanisation and subsequent loss of language and culture. From a Maori perspective, environmental damage is “part of a larger story of colonisation, urban migration and the loss of ancestral knowledge around care and communication with nature”. Fulfilling the role of kaitiaki can only occur when those who would speak and act for rivers are living in their rohe (Ngata 2018).

4.7 Tongi Tawhito / Wāhi Tapu - Wāhi Tūpuna

‘Tongi Tawhito’, in local dialect loosely translates as an ancestral site of significance. Tongi tawhito may be wāhi tapu or wāhi tūpuna. The area of the proposed plan change, just as in Springvale is likely to be a place where these sites of significance can be found. Tongi tawhito are our ancestral signposts on the landscape. They may be specific locations or areas. Rich in history, tongi tawhito should be regarded as national treasures, not just for the hapū at place but for the entire nation - as a physical record of our existence.

A good deal of tongi tawhito within the Whanganui area have been destroyed to enable ‘development’. The Tirimoana is a prime example in which multiple sites were destroyed. If any of these sites, often unknown until discovery, are to be retained it will be essential that the plan changes consider the mechanisms recommended in this report to ensure their existence.

Tongi Tawhito – sites of significance of our ancestors passed down through the generations for our protection.

4.8 Mouri

In this context mouri is referring to the life force of either an aspect of the environment or the people.

In all instances the optimum state of mouri is sought, i.e. mouri ora - a healthy, vibrant, sustainable life force.

Ngāti Tamareheroto believe that the wellbeing of the environment directly reflects in the wellbeing of its people. In order for our people to be well we must ensure that our environment is well. Mouri ora for the hapū is also reliant on the recognition by Councils etc of our inherent rights to effectively influence decisions that impact upon the mouri of the people and the environment.

5 Assessment of Impacts to Ngāti Tamareheroto

5.1 Plan Change 58 – Assessment of Impacts to Ngāti Tamareheroto

5.1.1 Mana Motuhake

Note : Ngāti Tamareheroto, whilst still in the stages of building capacity, often request the technical assistance of Ngaa Rauru Kiitahi environmental staff. It is for this reason that the impacts are being written primarily from the hapū perspective. This is not a disregard of the mana of Ngaa Rauru Kiitahi but more an acknowledgement that it is through Ngāti Tamareheroto that Ngaa Rauru Kiitahi are here.

Developers brought the idea of developing outer Castlecliff to Council. Council identified this as an opportunity to develop a larger area than was sought by the developers with the aim of achieving a more comprehensive development. As Treaty partners, Ngāti Tamareheroto would expect to be involved in these initial conversations to participate as decision makers in the areas that Council will target for development. This step has not occurred and instead Ngāti Tamareheroto, with the assistance of Ngaa Rauru Kiitahi is being engaged as part of an effect's assessment.

As a result of Council extending the development area, the required change to the Whanganui District Plan must now be a Council initiated plan change, meaning Council partly bears the cost. Again, neither Ngāti Tamareheroto or Ngaa Rauru Kiitahi were party to this decision.

Ensuring Ngāti Tamareheroto (with the assistance of Ngaa Rauru Kiitahi) is involved with decision making at planning level ensures that Ngāti Tamareheroto 's values that relate to the development area, and the taiao in general, influence and guide decision making to ensure that Ngāti Tamareheroto are not inappropriately adversely affected by the proposed development. For example, Council's approach to the development is to first consider supply and demand whereas Ngāti Tamareheroto would first consider the intrinsic values of the area itself and whether it is appropriate to develop here.

The relationship of mana whenua with their environment is governed by principles and practices (kawa and tikanga), which include such elements as tauututu (reciprocity), kaitiakitanga (duty of care) and karakia (spiritual invocation). Whilst kawa and tikanga stem from common precepts, they are interpreted differently by individual Hapū and Iwi in determining and directing what resources are used and by whom, when they are used and the way they are used.

In the 1848 deed, this area was confiscated from Iwi and then purchased by the government. Ngāti Tamareheroto has identified that their ancestors used this area to collect kai and rongoa within the proposed area. In oral traditions handed down we note that this area is interconnected with the

nearby Kokohuia and Titoki wetlands. It is an ancient space for the local hapū whose connection has been severed due to historical acts of confiscation. With the proposed re-zoning and urban development there is potential that these Iwi will now never have the opportunity to re-connect with their history in this space and tupuna who had a presence and history there.

Further to this, if the plan change goes ahead, it will be essential that Ngāti Tamareheroto is engaged early on regarding any actual developments and resource consent processes. It is expected that the Council will facilitate direct engagement before the lodging of any consents for those developments with the applicant and encourage cultural impact assessments that are catered to the specific environmental impacts that may occur in establishment.

5.1.2 Whakapapa

WSP has utilised the Guidelines for Undertaking Ecological Impact Assessments published by the Environment Institute of Australia and New Zealand 2018 to assess the ecological values of the PC 58 Area. These guidelines assign a value to the various elements of the ecosystems in accordance with their conservation status (e.g. At Risk, Threatened, Not Threatened), assigning high value to those elements that are At Risk or Threatened. For waterbodies that have low water quality and habitat the guidelines describe the value of those waterbodies as low. An overall level of effect is ascertained by combining the assigned value with the magnitude of effect – where a value is lower, the overall level of effect will be lower. Ngāti Tamareheroto has significant concerns with this method of effects assessment. Rather than viewing an ecosystem element as valuable due to its intrinsic worth, the guidelines ascribe a value that aligns with a conservation status. Conservation statuses are based on the current state of an element which could be degraded due to development. Ngāti Tamareheroto would prefer to assign value to an ecological element based on its intrinsic value and the potential the element has to contribute to the wider ecological ecosystem.

Ngāti Tamareheroto is concerned with the lack of baseline data Council is using to support PC 58. For example, there is uncertainty around current water quality, and it is unclear whether the proposal will result in an additional 558 lots or 115 lots.

5.1.3 Whenua and Flooding

The PC 58 Area contains areas of low to moderate susceptibility to liquefaction. PC 58 should contain a requirement that, at development stage, each property is assessed for liquefaction risk and managed accordingly, including through the types of building foundations that are adopted.

The Geological Assessment notes that there are no active coastal erosion processes acting upon the old sea cliff, however, some areas that are overly steep should be regarded as potentially unstable. It

is unclear what is meant by “oversteep”, however, Ngāti Tamareheroto considers no building should be undertaken in unstable areas.

There has been no real flooding assessment undertaken by Council. The Geotechnical assessment notes that there are overflow paths but due to the nature of the dune sand, flooding may be mitigated by soaking to sand. Ngāti Tamareheroto considers that a flooding assessment should be undertaken by Council before PC 58 is finalised to ensure that areas that are prone to flooding do not contain buildings or buildings that increase flooding hazards.

There is a possibility that the PC 58 Area contains contaminated material – the Geotechnical Assessment has identified that low lying areas may contain compressible organic material that needs to be removed and disposed of. Area 1 has had its contour modified and likely contains some fill. Areas 2 and 3 contain soil material and construction debris deposits. Fairways and greens at the Golf Course have also been sprayed with agrichemicals with residue likely left in soils. Chemicals have also been stored in Area 1. No PSI or DSI has been undertaken. Ngāti Tamareheroto considers that a PSI and DSI must be undertaken prior to PC 58 being finalised. If contaminated material is present within the PC 58 Area, this will have significant ramifications for the other values on site, including for freshwater if contaminated soil becomes bioavailable.

Due to poorly developed topsoil within the PC 58 Area, the Geotechnical Assessment recommends vegetation is established to avoid wind and water erosion. Ngāti Tamareheroto supports this recommendation and considers that any planting on site should be with appropriate native planting.

5.1.4 Taonga Species

PC58 involves the removal of existing vegetation from 30ha of land. This land is currently used for low density grazing and as a golf course. therefore, the Ecological Assessment (2020) considers the effects to native vegetation to be low. The Ecological Assessment (2020) notes that the Proposed Rezone Areas are dominated by common native and exotic species with larger areas of regenerating natives in Areas 2, 3 and 4. Area 4 in particular contains a Pōhutukawa tree which is identified as Threatened – Nationally Vulnerable. Other than the presence of the Pōhutukawa tree, the Ecological Assessment (2020) notes that the Proposed Rezone Area contains no At Risk to Threatened species and, therefore, they describe the value of these habitat areas as low. As discussed under Wānanga, Ngāti Tamareheroto challenges the classification of native vegetation as ‘low’ and considers it absurd that habitat will only be described as of value if they are not classified as At Risk to Threatened. Rather, Ngāti Tamareheroto see PC 58 as an opportunity to enhance native vegetation that is within the PC 58 Area.

In previous work completed by Ngāti Tamareheroto and others it has been highlighted that significant areas will need to be reserved to ensure there are ecological corridors. Understanding the area including nearby plan changes to enable residential areas means that Ngāti Tamareheroto has significant concerns about a further reduction in potential ecological areas for taonga species. Enabling design that creates these ecological zones, ensuring a connection from inland to the sea is essential. This is not merely adding native planting, this will require significant investment in a conservation programme that includes the Karaka repo and Kokohuia. There must be no impacts to the repo from the plan change, and there should be significant emphasis in reserving areas from the development for wider ecological restoration.

The Pōhutukawa is on private property and the Ecological Assessment (2020) states that it is unlikely to be cleared in the event of subdivision. This provides no assurance to Ngāti Tamareheroto that the Pōhutukawa will be protected. Ngāti Tamareheroto requests that the Pōhutukawa is protected through PC 58.

Present on Site are tui, Kahu, tīwaiwaka and the tauhou, these are all tāonga species to Ngāti Tamareheroto. The Ecological Assessment (2020) considers the value of fauna within the Proposed Rezone Areas to be low. Again the Ecological Assessment (2020) notes that there are No At Risk or Threatened species of bird present within the 4 zones at the site visit and further consider it to be unlikely that the site supports any At Risk or Threatened species with any regularity. However, the Ecological Assessment (2020) accepts that the Site may still provide habitat for a range of common species and notes that the wider Castlecliff area may support At Risk / Threatened species. Further south at the Whanganui River Estuary are a number of birds that are considered taonga species by Ngāti Tamareheroto.

Vegetation clearance will result in the loss of habitat for birds. The Ecological Assessment (2020) notes that this loss will only occur temporarily whilst vegetation is cleared but residential planting and street trees will provide habitat again for birds. Ngāti Tamareheroto considers that the temporary loss of vegetation will generate significant effects to taonga species. Furthermore, it is not guaranteed that revegetation will provide habitat to an extent necessary for taonga species. It is recommended that vegetation removal occurs outside of bird nesting season (September to January inclusive) and that the duration of works is as short as possible to minimise any potential adverse effects.

No bats were recorded by the Ecological Assessment (2020); however, it was noted that large golf course trees may provide habitat. Some of these trees will be felled for development. An acoustic bat survey should be undertaken and/or bat tree clearance protocols should be implemented in areas

where large trees are proposed to be removed. This will confirm the presence or absence of bats at this site and avoid risk of felling trees occupied by bats.

No lizard survey was undertaken by the Ecological Assessment (2020) despite lizards being recorded within 5km of the Site. The Ecological Assessment (2020) notes that there may be lizards present on Site. Ngāti Tamareheroto considers that a lizard survey must be commissioned by Council and completed before PC 58 is notified to confirm the values on Site, the effects to those values and the measures to avoid, remedy or mitigate those effects. There is potential that lizards will be affected by the proposal, however a survey is required to determine their current presence in the area.

5.1.5 Te Mana o te Wai

Ngāti Tamareheroto were particularly focused on the design of the three waters infrastructure, the impacts of a densely urbanised area on increased stormwater and the management of human waste. Ngāti Tamareheroto note their opposition to any treated wastewater or stormwater flowing into waterways. Due to the low water table in the area, drainage, to reduce those impacts is opposed, returning the areas to repō is preferred.

All wastewater must be processed through the reticulated system. Stormwater should not be discharged to the ocean or the repo. Alternative methods for management should be considered. Where the stormwater is being discharged, this water must be treated to the highest possible standards. Ngāti Tamareheroto totally opposes the discharge of contaminated water into Te Awa Tupua. Ngāti Tamareheroto will require cultural monitoring of the discharge sites as part of any consent. Methods must be used which recycle the stormwater within a closed system as much as possible by applicants and should be a condition of any consents to ensure a reduction in the quantity of stormwater being discharged.

PC 58 will result in an increased stormwater discharge to the waterbodies within the PC 58 area which will reduce water quality through the introduction of heavy metals, hydrocarbons, and sediment. This will have flow on effects for fish and macroinvertebrates causing death or adverse effects to development and functioning. Council has undertaken no baseline data testing and so it is difficult to understand what the effects to water quality will be from PC 58. Ngāti Tamareheroto requests that baseline water data testing is undertaken prior to the finalisation of PC 58 so that Ngāti Tamareheroto has an understanding of the effects that will be generated to water quality. PC 58 should also contain a methodology by which water quality that discharges from the PC 58 Area to the ocean is of pristine quality to protect the ecosystems that receive the water.

Council has not undertaken a hydrological study to understand issues relating to flow and water quantity. However, WSP suggests that an increased flow could result in less raupō, an increase in flowing water and better habitat for birds and fish within the wetlands. WSP also consider that an increased flow could wash out sediment in the Unnamed Stream and decrease macrophyte dominance but could also erode stream banks. Increased flow could result in a dune swale wetland at the Longbeach Swale or a larger ponded area with erosion and impacts to flora and fauna. Ngāti Tamareheroto considers that a hydrological study must be undertaken to understand the effects PC 58 will have on te mana o te wai and the waterbodies affected. Ngāti Tamareheroto considers that the water network should be considered holistically which may mean that some of WSP's predicted results may not be appropriate for the wider network. This is discussed further below under Assessment and Recommendations.

5.2 Unnamed Stream A (Te Waiherowhero stream)

PC 58 proposes to increase the rate of stormwater discharged to an unnamed open stream that runs along the edge of the Karaka Wetland. Ngāti Tamareheroto believe that this 'unnamed' stream is part of the Te Waiherowhero water system. The discharge point from the stream is proposed to be upgraded which will require works within the stream. There are eight private footbridges and culverts over and within the stream which before 2002 were informal accessways. Concrete blocks or boulders surround the culverts and the culverts restrict water flow. The stream is dominated by silt and dense macrophyte growth that reduces stream flow and traps sediment.

The stream is highly modified, straightened, lacks shading within the riparian margin and is dominated by exotic species. No fish survey was undertaken but it can be expected it would contain similar aquatic species to the Karaka Wetland.

The Ecological Assessment (2019) ascribes the Unnamed Stream a moderate value due to the presence of tuna and inanga. Again, Ngāti Tamareheroto questions the ecological value methodology and notes that the stream presents an opportunity to further enhance the mauri of the PC 58 Area including through consideration as to how the stream can be enhanced and best interact with its surrounding environment, including the Karaka Wetland. This is discussed further below under Assessment and Recommendations.

5.3 Longbeach Drive Outfall

PC 58 proposes to increase the current discharge from the Longbeach Drive outfall to the coastal swale it discharges to. The swale is defined as 'Active Duneland' and is classified as rare habitat in Schedule F of Horizon's One Plan. A site visit by WSP reveals that the swale is currently dominated by exotic plant species and is unlikely to support common wetland species. The swale contains no At Risk or Threatened habitat but does contain some common native vegetation. Animal life in the swale is like the Karaka Wetland with common native bird species present as well as exotic species. Currently there is limited opportunity for the swale to support fish life as ponded water is only 50cm in diameter. There are no streams discharging to or from the swale. The Ecological Assessment (2019) considers the Longbeach Swale habitat to be of moderate value and if stormwater is likely to pond here, considers that there is potential to develop the area into a dune slack wetland. Longbeach Swale birds are considered low value by WSP. Ngāti Tamareheroto again considers that the swale presents an opportunity to consider how each ecological element can be enhanced and managed to support the ecosystems that surround it. This is discussed further below under Assessment and Recommendations.

5.3.1 Tongi Tawhito

We were not able to review the Archaeological report for Castlecliff, however we expect there may be similar outcomes to the Mill Road site and Springvale. We expect that the archaeological report will be completed, and we will be supplied with a copy.

The proposed plan change area is located near sand dunes. Sand dunes were often utilised by Ngāti Tamareheroto hapū for burials. As an archaeological assessment is being carried out of the PC 58 Area Ngāti Tamareheroto reserves its position on the value of tongi tawhito until they have had the opportunity to review the archaeological assessment.

5.4 Assessment

Ngāti Tamareheroto respect that water is interconnected and that change in one part of the system, affects all other parts of a system. For this reason, Ngāti Tamareheroto take a holistic approach to the management of water and are concerned at the ad hoc nature that PC 58 addresses the water systems that will be affected by PC 58. Ngāti Tamareheroto envisage a series of interconnected wetlands that work together to treat water so that when it is being discharged from the Karaka Wetland out to sea, that water is of pristine quality. The Karaka Wetland is administered by the Department of

Conservation and Council, it is expected that a tripartite agreement including Ngāti Tamareheroto should be established to ensure co-design of its restoration and that of other repo on the area.

PC 58 has the potential to generate significant effects to wai including as follows:

- Construction and stormwater discharges
- Loss of vegetation
- Loss of habitat to support fauna
- Disturbance to fauna
- Release of suspended sediment contaminants from excavated dunes.

A more holistic approach should address all of these matters. This approach should ensure the following recommendations are adopted:

- All earth worked areas are revegetated with native vegetation identified in the Planting Plan.
- New habitat should be provided for displaced birds, prior to the removal of habitat for those birds. This will enable those birds to stay in the area.
- Earthworks should take place outside of bird breeding seasons to avoid birds not finding mates and maintaining territory.

Council is uncertain as to current water quality. PC 58 will result in an increased stormwater discharge to the waterbodies which will reduce water quality through the introduction of heavy metals, hydrocarbons, and sediment. This will have flow on effects for fish and macroinvertebrates causing death or adverse effects to development and functioning. The Ecological Assessment (2019) recommends that stormwater is treated prior to discharge into the stormwater network via swales and wetlands and that baseline data should be collected and compared with monitoring data to understand the effects. Further engagement with Ngāti Tamareheroto to determine what the aspirational outcomes are and how to achieve this state will be required.

Council has not undertaken a hydrological study to understand issues relating to flow and water quantity. However, WSP suggests that an increased flow could result in less raupō, an increase in flowing water and better habitat for birds and fish within the wetlands. WSP also consider that an increased flow could wash out sediment in the Unnamed Stream, decreasing macrophyte dominance. Increased flow could also erode stream banks. Increased flow could result in a dune swale wetland at the Longbeach Swale or a larger ponded area with erosion and impacts to flora and fauna.

The Site contains pockets of stormwater retention and overflow paths. The proposal will result in capacity issues and as a result an upgrade to wastewater and stormwater networks will be required.

Wastewater and stormwater networks are already at capacity. Stormwater retention ponds at the golf course are being considered. The Golf Course has suggested they use stormwater to irrigate their course, however, Council is averse to this due to issues with long term certainty. Ngāti Tamareheroto believes the Golf Course development would require significant investment and management to ensure the system was culturally appropriate.

5.5 Repo

It is important to acknowledge that the area itself sits in the middle of some very prominent traditional Pā sites, notably Kaiērau and Nukuīro to the north and Kokohuia and Pungarehu to the south of the area. According to verbal accounts the northern reaches of the Springvale study area, noted close to the proposed area of this plan change, are also connected to the water table that runs from Lake Mokoia and Otamatea. This connects the mauri of the ancestors who are buried at Rapanui urupā to Springvale and its surrounds.

At the southern end of the Springvale area the lower reaches were home to a greater wetland system which connected the Titoki and Kokohuia wetlands. The Titoki and Kokohuia area was a place full of natural resources used by all Hapū up and down the river. The wetland and dune system of the Springvale development area is connected to the wider area, particularly to Kokohuia. The area is located on a pathway that links the awa (river) coast to the Rapanui Roto Mokoia area.

All along the lower areas of the river banks, from the mouth of the river there were a series of fishing kainga where Hapū would seasonally travel to harvest kai moana. The Springvale, Kokohuia and adjacent areas were frequently visited as a point of access and travel as well as for their mahinga kai.

5.5.1 Karaka Wetland

The Karaka Wetland is located between the sea and Karaka Street and is a part of a series of natural dune wetlands stretching 4.2km along the coast. The Karaka Wetland is fed by groundwater flowing under Castlecliff and was created as a result of the construction of the North and South Moles at the Whanganui River Mouth in the late 1800's. The North Mole established moving sand at Castlecliff and beach built up over time to its present size. As the beach grew, groundwater at Karaka Street pooled to create a lagoon. Dunes then rose in front of the lagoon, creating a sheltered environment establishing wetlands, including the Karaka Wetland. Water from the Karaka Wetland discharges to an unnamed stream and flows out to sea.

PC 58 proposed to increase the stormwater that is currently being discharged into the Karaka Wetland at two locations – an unnamed stream and a sump at the end of Kāpiti Terrace. Both stormwater

discharge points are planned to be upgraded. The Taupata Street outfall will also be upgraded and an engineered swale on Council owned land will be used to attenuate / treat stormwater before it enters the wetland.

Discharges from the Karaka Stream contain high concentrations of dissolved iron collected as water flows through iron sands under Castlecliff. When groundwater emerges within the wetland it converts iron into ochre, a rust coloured mud that is present in the wetland. The unnamed waterway is potentially what Ngāti Tamareheroto elders spoke of as Te Waiwherowhero. As the name suggests, the water was a reddish oxidised colour.

Paru is also found in at least one part of the wetland and is highly valued by Ngāti Tamareheroto as a traditional black dye for weaving.

The Karaka Wetland is a “Dune Slack Wetland” which is identified as a rare habitat type in Schedule F of the Horizons One Plan. The Karaka Wetland is dominated by raupō, harakeke, tī kōuka and taupata which is mingled with exotic pest plant species. Habitat supports banded kōkopu, inanga, longfin eels, shortfin eels and redfin bully which have been observed in the Karaka Wetland. The longfin eel and inanga are classified as At Risk / Declining. Birds within the wetland include common native birds and introduced. Habitat can support At Risk / Threatened Bird although no extensive bird survey was undertaken as part of PC 58. Possums and ferrets are present at the wetland, although there is no co-ordinated pest management at the site.

The Ecological Assessment (2019) ascribes the Karaka Wetland a high ecological value noting there is potential to restore the wetland through an effective management plan, planting, and community involvement. However, the Ecological Assessment (2019) considers the value of bird species to be low.

As earlier described, repo is of high significance to Ngāti Tamareheroto. These areas must be protected and the discharge of any paru, either via wastewater or stormwater are unacceptable to Ngāti Tamareheroto. Particularly for areas of discharge from the Golf Club site, Ngāti Tamareheroto consider increased and location of discharge to be unacceptable.

6 Assessment and Recommendations Plan Change 58

If the proposed plan change is to go ahead in spite of Ngāti Tamareheroto opposition then;

- Ngāti Tamareheroto expect that all developers understand their responsibilities to cultural impacts, particularly in relation to tongi tawhito. Within the plan change one of the key highlighted areas must be the management of potential cultural sites. This should be managed by ensuring that developers, in their pre-consenting phase, are directly engaged with Ngāti Tamareheroto and co-developing stringent cultural monitoring requirements and accidental discovery policies. The plan change if it is to go ahead must ensure that the well-used nature of this site and surrounding areas by Ngāti Tamareheroto hapū mean that Ngāti Tamareheroto categorise this area as a sensitive area with the high likelihood of sites being disturbed.
- Ngāti Tamareheroto considers no building should be undertaken in unstable areas.
- Ngāti Tamareheroto considers that a flooding assessment should be undertaken by Council before PC 58 is finalised to ensure that areas that are prone to flooding do not contain buildings or buildings that increase flooding hazards.
- Ngāti Tamareheroto considers that a PSI and DSI must be undertaken prior to PC 58 being finalised. If contaminated material is present within the PC 58 Area, this will have significant ramifications for the other values on site, including for freshwater if contaminated soil becomes bioavailable.
- Ngāti Tamareheroto considers that a PSI and DSI must be undertaken prior to PC 58 being finalised. If contaminated material is present within the PC 58 Area, this will have significant ramifications for the other values on site, including for freshwater if contaminated soil becomes bioavailable.
- to poorly developed topsoil within the PC 58 Area, the Geotechnical Assessment recommends vegetation is established to avoid wind and water erosion. Ngāti Tamareheroto supports this recommendation and considers that any planting on site should be with appropriate native planting.
- It is recommended that vegetation removal occurs outside of bird nesting season (September to January inclusive) and that the duration of works is as short as possible to minimise any potential adverse effects.
- An acoustic bat survey should be undertaken and/or bat tree clearance protocols should be implemented in areas where large trees are proposed to be removed. This will confirm the presence or absence of bats at this site and avoid risk of felling trees occupied by bats.

- Ngāti Tamareheroto considers that a lizard survey must be commissioned by Council and completed before PC 58 is notified to confirm the values on Site, the effects to those values and the measures to avoid, remedy or mitigate those effects. There is potential that lizards will be affected by the proposal, however a survey is required to determine their current presence in the area.
- Any areas of exposed earth (as a result of construction) should be revegetated to minimise sediment loss to receiving environments.
- Preparation and implementation of an erosion and sediment control plan should be a condition of consent. This should take into account best practice and principles set out in the Horizons Regional Council One Plan.
- It is recommended that following development of the area, the street trees to be planted should be appropriately chosen native species, to improve the general biodiversity of the area and provide appropriate habitat for local birdlife.
- If the proposed plan change went ahead in spite of Ngāti Tamareheroto opposition, any water changes, diversions, quantity and quality decisions that are proposed to be made regarding ground or surface water must be made in partnership with the Ngāti Tamareheroto..
- Wastewater, stormwater and drinking water infrastructure must be developed Ngāti Tamareheroto. This would take the form of a co-decision-making option by maintaining our Hapū voice through our collective Rūnanga, the Whanganuitanga Declaration of Nationhood (1994) and the development of Hapū/Iwi Management Plans. (Outstanding Natural Landscape Cultural Assessment – Appendix B; 4.3.3), or the use of Sec 33 or Sec 36b of the RMA. This is the preferred approach in order to give effect to the protection and enhancement of the values held around wai.
- Mouri Measurement must be formally included in all infrastructure design and monitoring and resourced by the Council and the applicants. This will be delivered by the Combined Hapū using Dr Gail Tipa's Cultural Health Assessment. Ngāti Tamareheroto also endorse the 'Mauri Scale' as a way to provide clarity over the qualitative measures on a wider scale. Ngāti Tamareheroto requires the establishment of mouri and cultural monitoring specially regarding water management at all steps of the proposed plan change and future proposed developments.
- Te Mana o te Wai demonstrates that the first right to water, both in terms of quality and quantity must be given to the waters themselves. The right for the waters to sustain themselves free of harmful contaminants and paru is a cultural bottom line for the Hapū. We

expect any development, where changing water meets at least class B on the Mauri Scale; Mauri Piki.

- All wastewater must be managed through the Council's reticulated system.
- Stormwater should not be discharged to the ocean or the repo. Alternative methods for management should be considered.
- Where the stormwater is being discharged, this water must be treated to the highest possible standards of which Ngāti Tamareheroto will provide input into to achieve Te Mana o te Wai.
- Ngāti Tamareheroto will require cultural monitoring of the discharge sites as part of any consent. Methods must be used which recycle the stormwater within a closed system as much as possible by applicants and should be a condition of any consents to ensure a reduction in the quantity of stormwater being discharged.
- Ngāti Tamareheroto has indicated that, if the proposed plan change went ahead in spite of their opposition, that the Council establish clear processes within the policy of the plan change that encourages the direct engagement of potential developers with Ngāti Tamareheroto early and well before any lodgement takes place.
- Ngāti Tamareheroto has indicated that, if the proposed plan change went ahead in spite of their opposition, the Hapū seek access arrangements which ensures the Hapū has formalised opportunities to reconnect with the land which will be essential in retaining the reo regarding the unique relationship that Hapū have with the specific whenua. This will be made more difficult if land will be alienated further to multiple land owners. Without that access the development of whenua specific reo will be hindered.
- If the proposed plan change went ahead in spite of their opposition, Ngāti Tamareheroto seeks formalised agreement from the Council that any naming of streets, reserves, communal areas in the development be reserved solely for Ngāti Tamareheroto to provide mandated names. The restoration of traditional names, remembering activities and events in any naming of areas will be essential to the long-term use of the correct usage and pronunciation.
- In the future, early engagement, ideally in the design stage of plan changes is expected so that Ngāti Tamareheroto can provide guidance as to the cultural matters should be locked into the initial work, rather than having to participate in the assessment phase only.
- All earth worked areas are revegetated with native vegetation identified in the Planting Plan.
- New habitat should be provided for displaced birds, prior to the removal of habitat for those birds. This will enable those birds to stay in the area.

- Earthworks should take place outside of bird breeding seasons to avoid birds not finding mates and maintaining territory.
- A qualified ecologist should undertake further assessments of site-specific areas where vegetation removal will take place to ensure that no rare or threatened plant species or lizards will be impacted by works.
- Consideration should be given to construction works occurring outside of the main bird nesting season which is September-December inclusive. Dedicated surveys of 'Threatened' marsh crake and spotless crake should be undertaken, if the hydrological report states that the proposal will alter existing water levels in the wetland. Any areas of exposed earth (as a result of construction) will be revegetated to minimise sediment loss as soon as is practicable. Preparation and implementation of an erosion and sediment control plan should be a condition of consent. This should take into account best practice and principles set out in the Horizons Regional Council One Plan.
- These recommendations should be resourced by the Council to enable effective participation from the hapu.

6.1 Te Mana o Te Wai

A Ngāti Tamareheroto kaitiaki approach to environmental management respects that water is interconnected and that change in one part of the system, affects all other parts of a system. For this reason, Ngāti Tamareheroto take a holistic approach to the management of water and are concerned at the ad hoc nature that PC 58 addresses the water systems that will be affected by PC 58. Ngāti Tamareheroto view the PC 58 area and wider surrounds as a series of interconnected waterbodies that include wetlands, streams, swales, and the ocean. These waterbodies work together to provide habitat within which taonga species can thrive and procreate. PC 58 presents an opportunity to maximise the efficiencies of these waterbodies ensuring water quality and habitat is pristine to support taonga species. Furthermore, that water quality is pristine when it is discharged out to sea.

Ngāti Tamareheroto considers that PC 58 presents an opportunity to manage the Karaka Wetland, the Unnamed Stream, the stormwater swales and connected area as one unit, perhaps as reserve areas, to provide both the function of treating stormwater from the PC 58 Area but to also treat water and habitat in the most effective and efficient way to support natural ecosystems. Such management could require the setting aside of areas between the waterbodies as reserve and incorporating these areas into the management plan. A management plan could draw on the existing Management Plan for Karaka Wetland and would consider such matters as:

- Effects to the wetland system as a whole.
- How Ngāti Tamareheroto, as tangata whenua, could work with the Department of Conservation and Council to deliver a management plan.
- Consideration of the most appropriate habitat throughout the systems.
- Undertaking proper baseline data testing to ensure it is clear what the current state is.
- Incorporate pest management to provide further enhancement to the area.
- Utilisation of golf course area for overflow stormwater discharge.

PC 58 has the potential to generate significant effects to wai including as follows:

- Construction and stormwater discharges
- Loss of vegetation
- Loss of habitat to support fauna
- Disturbance to fauna
- Release of suspended sediment contaminants from excavated dunes.
- An iron ochre bug is present in lower Castlecliff. This causes biological build-up and blocks subsoil drainage systems.
- A hydrological assessment should be undertaken to better understand the hydrology of the proposed increase in stormwater at the receiving environments (e.g. wetland, stream, and sand dunes) and associated effects. Following receipt of the hydrological report further mitigation measures for the increase in stormwater can be recommended.
- Baseline water quality monitoring of the existing stormwater discharge should take place to understand the current state of the water quality in order to measure changes over time to ensure increase in stormwater discharges does not result in reduced water quality.
- Both Karaka Wetland and the Long Beach detention area have potential to be enhanced through further planting, and through pest plant and animal control. These areas could provide greater recreational and amenity values to the Outer Castlecliff area.

7 Plan Change 54 – Assessment of Effects to Ngāti Tamareheroto

7.1 Mana Motuhake

PC 54 considers at a high level the land within the Whanganui District that is or is not appropriate for manufacturing and industrial activities, including the use of hazardous substances. PC 54 also considers, at a more detailed level, Mill Road, and an appropriate layout of this area to support industrial activities. PC 54 impacts on significant planning documents for the Whanganui District, including the District Plan, the Long-Term Plan, and the Infrastructure Strategy.

Such consideration of land use, and incorporation into significant planning documents, goes to the heart of planning for the Whanganui District and is a conversation that Te Kaahui o Rauru (as the representatives of Ngaa Rauru Kiitahi), as Treaty partners with Council, and present lead support to Ngāti Tamareheroto should be at the centre of. However, it appears as though Council instead views Ngaa Rauru Kiitahi and Ngāti Tamareheroto as a stakeholder, requiring at best consultation on these projects but not input at development stage or as a decision maker. Ngaa Rauru Kiitahi, in support of Ngāti Tamareheroto considers that steps should now be taken by Council to include Ngāti Tamareheroto as a decision maker on PC 54. This could include establishing a steering committee for PC 54 with Ngāti Tamareheroto representation.

7.2 Whakapapa

No archaeological assessment has been undertaken for all of the land within the Manufacturing Zone. Ngāti Tamareheroto considers that Council should agree an approach with Ngāti Tamareheroto in relation to the value of whakapapa and archaeology / heritage and how the associated values can be protected through PC 54.

An archaeological assessment has been undertaken for Mill Road. This assessment considers that Mill Road has a comparatively low risk for the presence of archaeological remains. However, there is a possibility that archaeological remains could potentially be present. The most likely archaeological remains to be present in the review area would be of comparable middens (including shell and/or bone) and cooking areas (consisting of burnt and fractured stones and charcoal). Archaeological remains of Māori origin are most likely to originate from utilisation of swamp and scrub land resources, such as birds, fish, koura, and eels, as well as raupo, or other wetland plant resources. The evidence of stone working and the hunting and cooking of moa described by 19th century commentators may extend into the Mill Road area. If such sites are present, they are likely to be buried under the Mosston series of dunes. Evidence associated with early Maori settlement or moa hunting would be of very

significant scientific value. The low sand dunes at the Mosston Road end of Area 2 and the Area 8 dune adjoining Manuka Street have the highest potential for archaeological remains. Generally, the dunes across the review area have the highest potential for discovery of buried remains. Possibly old pathways also crossed the review area and this use may have left archaeological remains.

Development of Mill Road will involve earthworks. Ngāti Tamareheroto acknowledges that there are no recorded archaeological sites at Mill Road. However, there is a possibility for sites to be present. As such, Ngāti Tamareheroto would like to work with Council to develop an accidental discovery protocol that must be adopted as a consent condition or be required to meet permitted activity standards.

7.3 Hauora

The determination of rules relating to hazardous substances has the potential to significantly affect human health should the rules be inappropriately drafted. Not only could human health be affected from a physical perspective, but there could also be significant effects to wairua. Council has suggested a number of options to address the need for better management around hazardous substances and contaminated land. Again, Ngāti Tamareheroto considers that these require wider consideration and conversations that cannot be fully canvassed in a cultural impact assessment. Ngāti Tamareheroto considers a steering committee should be established that includes Ngāti Tamareheroto representation to further discuss options.

The Structure Plan confirms that land use history on some sites within Mill Road have a history of land use activities that are on the HAIL list. The Structure Plan recommends a Detailed Site Investigation (DSI) of those sites. Ngāti Tamareheroto considers that the entire Mill Road should be subject to a DSI to confirm the presence, or otherwise of contaminated soil. Although HAIL activities have not been identified on the site, there is potential for seepage from the contaminated areas within Rākau Road and Mānuka Street.

7.4 Mouri

Ngāti Tamareheroto is concerned that Mill Road may not be the most appropriate area for industrial development. The area is wet and has slope instability, ground settlement and liquefaction issues. Mill Road is also located in close proximity to Aranui School. Furthermore, significant infrastructure investment is required at Mill Road to facilitate development, although this may be an issue for other areas pegged for industrial activities in the district.

Ngāti Tamareheroto is concerned that the Structure Plan for Mill Road focuses on maximising development potential as opposed to protecting and enhancing the natural features of the area such as the Kokohuia and Titoki Wetlands. The purpose, objectives and principles of the Structure Plan contain nothing relating to cultural and environmental protection. Ngāti Tamareheroto is concerned that side-lining these important factors will result in significant adverse effects to the mouri of the area.

The Structure Plan recommends a whole of area approach to landscaping Mill Road that integrates stormwater infrastructure with roading, transport, cycleways, and walkways. Ngāti Tamareheroto considers that appropriate natives should be used in planting to support local native ecosystems.

7.5 Te Mana o te Wai

Hazardous substances have the potential to generate significant effects to te mana o te wai. Hazardous substances, if discharged to water, could cause significant effects to the mouri of that water. Contaminated land, if disturbed, can also increase the bioavailability of hazardous substances which could enter watercourses, effecting the mouri of that wai. Council has suggested a number of options to address the need for better management around hazardous substances and contaminated land. Again, Ngāti Tamareheroto considers that these require wider consideration and conversations that cannot be fully canvassed in a cultural impact assessment. Ngāti Tamareheroto considers a steering committee should be established that includes Ngāti Tamareheroto representation to further discuss options.

There currently exists very little formal stormwater infrastructure at Mill Road and there is considerable ponding on site. Currently the Mill Road stormwater main discharges into the “Mill Road Drain”, an open drain that then discharges into the Titoki Wetland which discharges into the Whanganui River via the Heads Road industrial area stormwater reticulation. There are capacity issues at Heads Road and significant upgrade is required to cater for increased stormwater. The Structure Plan also recommends low impact urban design methods to maximise the retention of permeable surfaces as well as more stormwater retention ponds like the pond at Rākau Road. PC 54 proposes to discharge stormwater from Mill Road to the Mill Road Drain through a series of piped networks and open drains as well as secondary overland flow paths. Low maintenance planting will be undertaken along open drains. PC 54 will also install a new stormwater main from the Mill Road drain culvert under Mosston Road that will discharge directly to the Whanganui River. Ngāti Tamareheroto has significant concerns with the proposal to increase stormwater discharge from an industrial area to the Titoki Wetland and Whanganui River. Both sites are significant to Ngāti Tamareheroto (see Significant

Sites) and Ngāti Tamareheroto is opposed to any increase of stormwater discharge without proper consideration of the effects and involvement in the PC 54 process as outlined in Assessment of Effects to Ngāti Tamareheroto - Mana Motuhake.

The Structure Plan confirms that water supply will need to be upgraded at Mill Road as current capacity will not meet future demand. Ngāti Tamareheroto considers that any consideration of upgrades to the water supply will need to involve Ngāti Tamareheroto as Treaty partner. Water take and quantity in the Whanganui District is a significant issue to Ngāti Tamareheroto and Ngāti Tamareheroto is concerned that increased water take will impact on fresh and marine water within the district. Ngāti Tamareheroto requests further information in this respect.

The development of Mill Street will also result in a need to upgrade wastewater infrastructure including an upgrade of the Tregenna Pump Station that currently services the wider area. Ngāti Tamareheroto have concerns with the impact of increased wastewater discharge on its eventual receiving environment. Ngāti Tamareheroto wish to ensure that wastewater that is discharged from the pump station is of pristine quality to support its receiving environment. Ngāti Tamareheroto requests further information in this respect.

8 Assessment and Recommendations Plan Change 54

If the plan change was to go ahead, in spite of Ngāti Tamareheroto opposition, then the following recommendations are considered essential to the management of the cultural impacts.

- Ngāti Tamareheroto considers that steps should now be taken by Council to include Ngāti Tamareheroto as a decision maker on PC 54. This could include establishing a steering committee for PC 54 with Ngāti Tamareheroto representation.
- Ngāti Tamareheroto acknowledges that there are no recorded archaeological sites at Mill Road. However, there is a possibility for sites to be present. As such, Ngāti Tamareheroto would like to work with Council to develop an accidental discovery protocol that must be adopted as a consent condition or be required to meet permitted activity standards.
- The Structure Plan confirms that land use history on some sites within Mill Road have a history of land use activities that are on the HAIL list. The Structure Plan recommends a Detailed Site Investigation (DSI) of those sites. Ngāti Tamareheroto considers that the entire Mill Road should be subject to a DSI to confirm the presence, or otherwise of contaminated soil. Although HAIL activities have not been identified on the site, there is potential for seepage from the contaminated areas within Rākau Road and Mānuka Street.
- Council has suggested a number of options to address the need for better management around hazardous substances and contaminated land. Again, Ngāti Tamareheroto considers that these require wider consideration and conversations that cannot be fully canvassed in a cultural impact assessment. Ngāti Tamareheroto considers a steering committee should be established that includes Ngāti Tamareheroto representation to further discuss options.
- The Structure Plan recommends a whole of area approach to landscaping Mill Road that integrates stormwater infrastructure with roading, transport, cycleways, and walkways. Ngāti Tamareheroto considers that appropriate natives should be used in planting to support local native ecosystems.
- Ngāti Tamareheroto wish to ensure that wastewater that is discharged from the pump station is of pristine quality to support its receiving environment. Ngāti Tamareheroto requests further information in this respect.
- These recommendations should be resourced by the Council to enable effective participation from the hapu.

9 Conclusion

Ngāti Tamareheroto oppose in its entirety proposed plan change 54 and 58 due to the cultural impacts being significant and welcomes the opportunity to engage on this report with the Council.

DRAFT PROVIDED 24 NOVEMBER 2020

10 References

Assessment of Ecological Effects – Stormwater Discharge Points, Castlecliff Whanganui. WSP New Zealand Limited, 13 August 2019.

Preliminary Geotechnical Appraisal – Whanganui District Council Plan Change 58 Outer Castlecliff. WSP New Zealand Limited, 25 February 2020.

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