

Before the Independent Hearings Commissioner at New Plymouth

*Under:* the Resource Management Act 1999

*In the matter of:* hearing of the resource consent application by the New Plymouth Pistol Club Inc for a land use resource consent for the use of a gun range and associated facilities within the General Industrial Zone on the existing site at 228 De Havilland Drive & 1206 Devon Road (LUC24-48583)

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STATEMENT OF EVIDENCE OF RAUKURA SALISBURY  
ON BEHALF OF PUKETAPU HAPŪ  
DATED 8 MAY 2026

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## **INTRODUCTION**

1. Ko Taranaki te Mounga  
Ko Waiongana te awa  
Ko Te Atiawa te iwi  
Ko Puketapu te hapū  
Ko Muru Raupatu te Marae  
Ko Raukura Salisbury tōku ingoa
2. My full name is Raukura Wikitoria Ganiga Salisbury. I am an employee of Nga Kaitiaki o Puketapu Hapū Charitable Trust (Puketapu or Hapū). My role with Puketapu is the taiao and consents lead. I am also a descendent of Puketapu Hapu. I have completed the accredited Making Good Decisions course for Environmental Commissioners. I also hold a Level 5 Diploma in Environmental Management.
3. I present this evidence on behalf of Puketapu Hapū to support with conditions.
4. This document and process stands in its own right. My evidence is to assist the Commission understand the landscape of Puketapu, our people and future directions guided by our values.

## **PURPOSE AND SCOPE OF THIS EVIDENCE**

5. The purpose of this evidence is to address:
  - a. Puketapu Hapū.
  - b. Cultural Landscape of Puketapu.
  - c. Puketapu cultural values.
  - d. Area of Interest

## **PUKETAPU HAPŪ**

6. The hill of Puketapu was occupied for over 1000 years. During the late 17th century, approximately 8,000 people resided at Puketapu and kaumatua (elders) say that up to 30,000 people are still buried there. Unfortunately, today it has been destroyed to accommodate the New Plymouth Airport.

7. Our Puketapu rohe includes the townships of Bell Block, Lepperton, Inglewood and Egmont Village. The tribal district starts north from Ongatiki on the coast to Matataiore (Browns Road) to Painanga (Tate Road) to Te Ngapara to Kaikuku (intersection of Richmond Road and Kairau Road West). Where the Mangonaia stream meets the Waiongana (Richmond Road/ Te Arei Road intersection) at Kopua Kanakana, then follow the Mangarewa stream including Manutahi, Mataitawa and Kairoa then to the Waiongana River to Te Tahunaatutawa (Warwick Castle).

## **CULTURAL LANDSCAPE OF PUKETAPU**

8. Puketapu rohe is a cultural landscape of historical importance. It was and continues to be occupied and utilised to sustain our people. It contains a wealth of occupation such as marae (meeting house), kāinga nohoanga (dwelling place), umu (oven), wāhi mahi kohātu (quarry sites), ara tawhito (traditional travel routes), māra (gardens), Tauranga waka (canoe landing sites), Tauranga ika (customary fishing grounds), mahinga kai (customary freshwater fishing grounds), wāhi pakanga (battle sites), pā (fortified villages) and urupā.
9. These sites, areas, spaces, and places are where our mātauranga, the knowledge of our ancestors, contributes to present day knowledge and is passed on to our tamariki and mokopuna. This knowledge is dynamic and can adapt and respond to all situations. Mātauranga is intergenerational and is passed down through whakapapa, waiata (song), haka (war dance), whakataukī (proverbs), pūrākau (legends), kōrero tuku iho (ancestral stories), toi (art), rōngoa Māori (traditional medicine) or whakairo (carvings). Many of our important sites and areas have been destroyed or disturbed by development and those that remain are in varying conditions of degradation. We seek to protect our cultural landscape from inappropriate activity, subdivision, use and development to ensure our tamariki and mokopuna can continue to be guided daily by the mātauranga of their tūpuna.
10. The sites and areas within Puketapu rohe are connected in the natural and physical environment. Puketapu Pā, our mātua pā after which our hapū is named, is the most important site within our rohe. Its proximity to important urupā and status as one of the earliest locations of settlement on the west coast, has cemented its importance for generations. But its defences were eventually lowered by disease, the elements and earthmovers and now only a small mound at the western end of New Plymouth airport's runway remains, the land taken

though concerns were raised by uri o Puketapu who were concerned about impacts on the urupā and given the land had been inherited from their tūpuna.

## **PUKETAPU CULTURAL VALUES**

11. When considering proposals within Puketapu rohe, with our te ao Māori worldview and our mātauranga and tikanga Māori, Puketapu utilises, among many matters, the following values when considered proposals within our cultural landscape and on or in proximity to Puketapu sites and areas of significance:
  - a. Kaitiakitanga – Guardianship, enhance, protect, preserve.
  - b. Rangatiratanga – Exercise authority, self-determination, sovereignty
  - c. Mana Whenua – Inherited user rights
  - d. Mauri – Life force, energy, life principle
  - e. Tapu – Sacred, treasured, valued, prohibited, unclean.
  - f. Rāhui – Protection, restriction, conservation
  - g. Hauora – Health and wellbeing
12. In addition, Puketapu utilise the Te Atiawa iwi management plan Tai Whenua, Tai Tangata, Tai Ao and the strategic plan of Puketapu te Ika o te Rangi in assessing proposals alongside the above mentioned values.
13. This evidence is presented on behalf of Puketapu Hapū in relation to the application by the New Plymouth Pistol Club (NPPC) for land use consent to continue and expand activities associated with a gun club, including the construction of new facilities, earthworks, and disturbance of contaminated land.
14. Puketapu Hapū are mana whenua for the area in which the Pistol Club is located. The site sits within a culturally significant landscape associated with the Mangaoraka Stream and its tributaries. A tributary of the Mangaoraka Stream flows through and adjoins the site. The Mangaoraka Stream is a tributary of the Waiongana Stream and is subject to Statutory Acknowledgement under the Te Ātiawa Iwi Settlement. The surrounding area also contains Sites and Areas of Significance to Māori, including Rongonui Pā, Pahau Pā, and Ikamoana Pā. These sites reinforce the historical occupation, identity, whakapapa, and intergenerational relationship of Puketapu with this landscape.
15. Puketapu acknowledges the long-standing occupation of the site by the applicant. However, the scale and persistence of contamination now identified at the site raises significant concerns regarding adverse effects on the taiao, the

Mangaoraka catchment, and the exercise of mana whenua responsibilities as kaitiaki.

16. The application is a Non-Complying Activity under the Proposed District Plan and engages significant matters under sections 5, 6(e), 7(a), and 8 of the Resource Management Act 1991 (RMA), the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011 (NESCS), and Te Mana o te Wai under the National Policy Statement for Freshwater Management (NPS-FM).

## **BACKGROUND AND ENGAGEMENT**

17. Following lodgement of the application in 2024, Puketapu provided feedback through He Whakamarama to the applicant regarding the potential adverse effects of the proposed works on the wai associated with the Mangaoraka tributary.
18. Puketapu acknowledges that the applicant has subsequently engaged positively with the hapū, particularly regarding environmental and cultural values associated with the site.
19. As a result of that engagement, several important amendments and commitments have been supported by Puketapu, including:
  - a. Realignment of Range 1 to maintain a minimum 10 metre setback from the Mangaoraka tributary;
  - b. Removal of all structures within 10 metres of the stream;
  - c. Weed removal and ongoing weed management;
  - d. Landscaping and revegetation along the full length of the stream corridor within the lease area;
  - e. Use of eco-sourced indigenous species guided by Restoration Planting in *Taranaki: A Guide to the Egmont Ecological District*;
  - f. A proposed 5-year maintenance period for planting establishment;
  - g. Preparation of a Contaminated Site Management Plan during construction and earthworks phases;
  - h. Development of a longer-term Site Management Plan for legacy contamination management; and
  - i. Inclusion of erosion and sediment control measures.
20. Puketapu acknowledges these improvements as positive steps toward recognising cultural and environmental responsibilities associated with the site.

21. However, despite these positive amendments, several significant matters remain unresolved.

## **WHAKAPAPA AND CULTURAL LANDSCAPE**

22. The Mangaoraka Stream and its tributaries form part of a wider interconnected cultural landscape linking the maunga to the moana.
23. These waterways are ancestral features that carry whakapapa and sustain the relationship between people, whenua, and wai. Historically, the Mangaoraka catchment supported:
  - a. movement through the landscape;
  - b. mahinga kai gathering;
  - c. settlement and occupation;
  - d. cultural practices; and
  - e. intergenerational connection.
24. The significance of nearby pā sites, including Rongonui Pā, confirms the importance of this landscape to Puketapu identity and continuity. Puketapu Strategy 2037, *Te Ika o Te Rangī*, reinforces these responsibilities and aspirations.
25. Key values identified within the Strategy include:
  - a. *“Our lands and waterways are protected, preserved and thriving”;* and
  - b. *“Our whakapapa is enduring and connects us to people and place.”*
26. Key outcomes include:
  - a. *“Puketapu uri are reconnected to the whenua and living within our rohe where they are supported to thrive”;* and
  - b. *“Puketapu whenua and wai are regenerated and protected for generations to come.”*
27. These values are directly relevant to the assessment of this application.

## **CONTAMINATION CONCERNS AND EFFECTS ON WAI**

28. The principal concern for Puketapu remains the extent and potential movement of heavy metal contamination associated with historic shooting activities onsite. Information contained within the technical reports identifies contaminants including lead, antimony, and zinc within the site soils and bund areas.

29. While I am not presenting myself as a contamination expert, the information provided within the applicant's reports indicates that some sampling results exceed accepted freshwater and soil guideline values. In particular, the reported results for hotspot SB02 suggest elevated lead concentrations above ANZECC freshwater trigger levels.
30. Puketapu's concern is therefore not only the presence of contamination, but whether the proposed works, including modifications to bunds and fill areas, can adequately prevent contaminants from migrating into surface water or groundwater over time.
31. The Mangaoraka tributary provides habitat for taonga species such as tuna, inanga, and piharau, and these species are important indicators of the health and mauri of the wai. Based on the information currently available, Puketapu does not consider there is yet sufficient certainty that adverse effects on the tributary and surrounding groundwater systems can be fully avoided or appropriately managed.

#### **EFFECTS ON MAURI**

32. Under Te Mana o te Wai, the first priority is the health and wellbeing of the waterbody itself. The current proposal does not adequately demonstrate that the mauri of the Mangaoraka tributary will be protected or restored.
33. Puketapu considers that the mauri of the Mangaoraka tributary remains at risk due to:
  - a. ongoing heavy metal contamination;
  - b. contaminant mobilisation during earthworks;
  - c. potential groundwater migration pathways; and
  - d. insufficient evidence demonstrating long-term contaminant containment.
34. The proposal currently relies heavily on erosion and sediment controls. While these measures may reduce physical sediment discharge, they do not adequately address dissolved heavy metal transport.
35. Riparian planting and landscape restoration are positive measures, but planting alone cannot remediate chemically contaminated soils where contaminant mobility remains active. Without robust remediation and groundwater management, the mauri of the stream will continue to be compromised.

36. The ongoing migration of heavy metals into the water cycle fundamentally conflicts with Te Mana o te Wai because:
  - a. contaminants degrade the life-supporting capacity of the stream;
  - b. taonga species become unsafe or unable to thrive;
  - c. sediment and groundwater pathways become compromised; and
  - d. future generations inherit cumulative ecological degradation.
37. The proposed mitigation measures are largely sediment-focused and do not sufficiently address dissolved contaminant transport. Riparian planting and minor earthworks reshaping may assist with erosion control, but these measures do not remediate the underlying contaminant source.
38. Without removal or engineered containment of hotspot contamination, the mauri of the tributary will continue to decline.

#### **EFFECTS ON MANA AND KAITIAKITANGA**

39. The lack of a comprehensive Cultural Impact Assessment prepared in partnership with Puketapu remains a significant concern. Mana whenua responsibilities as kaitiaki require active protection of the environment for future generations. Puketapu has an obligation to ensure that present-day decisions do not leave a legacy of contamination for mokopuna.
40. Allowing high-risk contaminants to remain onsite without sufficient remediation challenges the exercise of rangatiratanga and undermines tikanga-based environmental management. Puketapu considers that genuine partnership under section 8 of the RMA requires active protection rather than procedural consultation alone.

#### **REMAINING MATTERS OF ISSUE**

41. Puketapu acknowledges that constructive engagement has occurred with the applicant and that several matters raised through engagement have now been incorporated into the proposed consent conditions. This includes provisions relating to contaminated land management, surface water and sediment monitoring, riparian planting, erosion and sediment controls, accidental discovery procedures, and cultural notification requirements.
42. However, several matters remain only partially addressed or unresolved.

### ***Stormwater and Groundwater Management***

43. Puketapu acknowledges that the proposed conditions now include requirements for:
- a. a Site Management Plan (SMP);
  - b. an Ongoing Site Management Plan (OSMP);
  - c. erosion and sediment controls;
  - d. surface water and sediment monitoring; and
  - e. riparian planting and maintenance adjacent to the unnamed tributary of the Mangaoraka Stream.
44. While these measures are positive, Puketapu considers that further information and additional safeguards are still required to ensure the long-term protection and enhancement of the Mangaoraka Stream and its tributaries. In particular, Puketapu seeks greater certainty that:
- a. proposed bund modifications will not increase contaminant leaching;
  - b. fill activities will not adversely affect groundwater pathways;
  - c. heavy metals will not migrate toward the tributary;
  - d. long-term contaminant risks will be appropriately managed; and
  - e. existing contamination hotspots will be adequately isolated or remediated.
45. Although surface water and sediment monitoring has been proposed, the current conditions do not clearly provide for:
- a. dedicated groundwater monitoring wells between the ranges and the Mangaoraka tributary;
  - b. baseline groundwater sampling prior to works;
  - c. long-term groundwater monitoring following completion of works; or
  - d. engineered stormwater treatment systems specifically designed for heavy metal attenuation.
46. Puketapu considers that engineered stormwater treatment infrastructure should be required as part of the proposal. This may include:
- a. bio-retention systems;
  - b. equivalent contaminant treatment systems capable of heavy metal removal prior to discharge or infiltration.

### ***Monitoring Near Rongonui Pā and the Mangaoraka Stream***

47. Puketapu acknowledges that the draft conditions include accidental discovery procedures and provisions requiring notification to Puketapu prior to earthworks commencing.

48. However, due to the proximity of Rongonui Pā (SASM ID 448) and the Mangaoraka tributary, Puketapu considers that stronger cultural safeguards are still necessary.
49. In particular, Puketapu seeks:
- a. mandatory appointment and resourcing of cultural monitors during all ground-disturbing activities;
  - b. preparation and implementation of a formal Accidental Discovery Protocol developed in partnership with Puketapu; and
  - c. clear agreed procedures for the management of taonga, kōiwi, wāhi tapu, or culturally significant materials encountered during works.
50. Puketapu considers these measures essential to appropriately recognise and protect the cultural, historical, and spiritual significance of the area.

#### ***Future Urban Development and Reverse Sensitivity***

51. Puketapu Hapū are actively engaged with New Plymouth District Council regarding future urban growth planning, including the Future Urban Zone identified as Area R.
52. While the proposed conditions include substantial noise management provisions, Puketapu remains concerned that the long-term noise and environmental effects associated with Range 6 and Range 7 may adversely affect future urban development opportunities within Area R and create reverse sensitivity conflicts over time.

#### **RECOMMENDED CONDITIONS**

53. Should consent be granted, Puketapu considers the following conditions essential in addition to those already agreed to and included in the draft condition set.

#### ***Contaminated Land Management***

54. Preparation and implementation of a Remediation Action Plan (RAP) where contamination hotspots or elevated contaminant concentrations are identified.
55. Mandatory off-site disposal of soils exceeding relevant NESCS commercial/industrial contaminant thresholds, including known hotspot areas such as SB02 and SB04.

### ***Groundwater And Surface Water Protection***

56. Installation of dedicated groundwater monitoring wells between the ranges and the Mangaoraka tributary.
57. Reporting of groundwater, surface water, and sediment monitoring results to both Council and Puketapu.
58. Implementation of engineered stormwater treatment systems capable of heavy metal attenuation and removal prior to discharge or infiltration.

### ***Cultural Monitoring And Protection***

59. Preparation and implementation of a formal Accidental Discovery Protocol developed in partnership with Puketapu and Te Ātiawa.
60. Ongoing engagement with Puketapu regarding detailed consent conditions, monitoring frameworks, remediation activities, and restoration implementation.

### **CONCLUSION**

61. Puketapu acknowledges the positive engagement undertaken by the applicant and the amendments already incorporated into the proposal and draft consent conditions. Puketapu also acknowledges the inclusion of conditions relating to contaminated land management, erosion and sediment control, riparian planting, surface water and sediment monitoring, and accidental discovery procedures.
62. Puketapu's position is that support for the application remains conditional upon resolution of these outstanding matters and the strengthening of several proposed consent conditions.
63. Without these additional safeguards, the proposal risks perpetuating long-term degradation of culturally significant waterways and failing to fully uphold the principles of kaitiakitanga, Te Mana o te Wai, Te Ika o te Rangī, and sustainable management under the Resource Management Act 1991.