

BEFORE THE NEW PLYMOUTH DISTRICT COUNCIL HEARING COMMISSIONER

IN THE MATTER OF

The Resource Management Act 1991

AND

Applications by Bunnings Limited to construct and operate
a Bunnings Warehouse and associated development at 662
Devon Road, Waiwhakaiho (LUC25/48839 and
SUB17/46785.02)

BRIEF OF EVIDENCE OF BEVERLEY ANNE HINEHOU KATARAINA GIBSON

&

SERA JAYNE TE ARAROA GIBSON

On behalf of Ngāti Tāwhirikura Hapū

21 September 2026

A. Introduction and experience

Beverly Anne Hinehou Kataraina Gibson

1. Whakapapa

Ko Taranaki me Rangiuru ōku Maunga
Ko Aotea me Te Arawa ōku Waka
Ko Waingongoro, Waiwakaiho me Kaituna ōku Awa
Ko Ngaruahine, Te Atiawa me Te Arawa ōku Iwi
Ko Aotearoa, Ngakaunui, Owae, Katere Ki Te Moana me Ngati Moko ōku Marae
Ko Okahu, Ngatimanuhiakai, Ngati Tu, Ngati Rahiri, Ngāti Te Whiti ōku Hapū
Ko Beverley Anne Hinehou Kataraina Gibson angiau.

2. Ko wai au?

My full name is Beverly Anne Hinehou Kataraina Gibson. I present this evidence on behalf of Ngāti Tāwhirikura Hapū in relation to the proposed Bunnings Warehouse and associated works at 662 Devon Road, Waiwhakaiho.

3. Formal Qualifications:

My qualifications include a Master of Management, a Postgraduate Diploma in Health Service Management, and a Bachelor of Arts from Massey University. I am also a PhD candidate at Te Whare Wānanga o Awanuiārangi, where I am undertaking doctoral research of Ethical Responsibilities in Hapū Trustee Leadership.

I am a Registered Nurse with a current practising certificate and am currently contracted as an Audit, Assurance and Risk Auditor with Te Whatu Ora. I am also a Chartered Fellow of the Institute of Directors, with extensive governance experience across the health, Māori, and community sectors.

My previous governance roles include directorships with the Taranaki District Health Board and Parininihi ki Waitotara, as well as serving as Chair of Te Korowai o Ngāruahine Post Settlement Governance Entity. I currently hold governance positions as a Trustee on the Board of Diabetes New Zealand, Chair of Te Ihōwai Limited, and Chair of Mahia Mai A Whai Tara.

4. Hapū Governance Leadership:

My association with Ngāti Tāwhirikura Hapū Charitable Trust is grounded in my whakapapa to Ngāti Tāwhirikura and a longstanding commitment to supporting the aspirations, wellbeing, and development of the hapū. I have served the Hapū Trust in governance roles as both Trustee and Chair, contributing to its strategic direction, financial oversight, accountability, and relationships with Uri, funders, and external organisations.

My specific governance contributions have included strengthening financial management and reporting processes; supporting audit, assurance, and risk oversight; developing and improving governance policies and procedures; strengthening trustee accountability and decision-making processes; and promoting greater transparency in the stewardship of hapū funds and resources. I have also contributed to securing and

overseeing external funding, strengthening organisational systems, supporting the development of the Uri registration process, and improving the Trust's governance and administrative infrastructure.

An important focus of my governance contribution has been strengthening hapū participation, connection, and advocacy for the protection of whenua and places of cultural significance. This has included supporting initiatives relating to whakapapa, cultural development, Uri engagement, Puanga, rangatahi development, and opportunities for Uri to participate more actively in the affairs and future direction of the hapū.

My governance responsibilities have also extended to representing and advocating for hapū interests in relation to external development proposals that may affect our whenua, cultural heritage, and relationships with significant places. This has included my involvement in responding to applications by Bunnings Limited to construct and operate a Bunnings Warehouse near Aotere Pā, a place of considerable cultural and historical significance to Ngāti Tāwhirikura. As part of this process, I have contributed to the preparation of a report to be presented to the New Plymouth District Council Hearing Commissioner, setting out the basis for opposing and seeking the decline of this application. This work reflects the responsibility of hapū governance not only to participate in statutory processes, but also to ensure that hapū perspectives, tikanga, whakapapa, cultural values, and relationships with whenua and wāhi significant to the hapū are appropriately recognised and protected in decisions that may affect them.

I have also supported the development of relationships with local and central government agencies, funders, iwi, businesses, and other organisations where those relationships could advance hapū aspirations, while recognising the importance of maintaining the independence of hapū decision-making and protecting the interests of Uri.

My governance experience has involved navigating periods of significant organisational challenge and responding to matters concerning trustee responsibilities, financial accountability, conflicts of interest, the use and protection of hapū assets, and the authority exercised by trustees on behalf of Uri. These experiences have reinforced for me the importance of robust governance systems, collective decision-making, transparency, accountability, and responsible stewardship.

Through this experience, I have come to understand that hapū trusteeship extends beyond the conventional responsibilities associated with organisational governance. Hapū trustees hold an entrusted responsibility to Uri, whenua, whakapapa, tikanga, tupuna, and future generations. This experience has significantly informed my doctoral research and my interest in understanding the ethical responsibilities of hapū trustees, how entrusted authority should be exercised, and where decision-making authority appropriately rests between trustees and the wider hapū collective.

Sera Jayne Te Araroa Gibson

5. Whakapapa

Ko Taranaki me Tarawera ngā maunga

Ko Tokomaru, Aotea me Te Arawa ngā waka.

Ko Waiwhakaiho, Waingongoro me Kaituna ngā awa.

Ko Aotearoa, Te Aroha o Titokowaru, Katere ki Te Moana me Ngāti Moko ngā marae.

Ko Ngāti Tāwhirikura, Ngāti Rahiri, Ngāti Manuhiakai, Ōkahu-inūāwai me Tapuika ngā hapū.

Ko Te Ātiawa, Ngāruahine me Te Arawa ngā iwi.

Ko Sera Jayne Te Araroa Gibson tōku ingoa.

6. Ko wai au?

My full name is Sera Jayne Te Araroa Gibson. I present this evidence on behalf of Ngāti Tāwhirikura Hapū in relation to the proposed Bunnings Warehouse and associated works at 662 Devon Road, Waiwhakaiho.

7. Formal Qualifications:

My formal qualifications include a Master of Science in Marine Science from the University of Auckland, a Postgraduate Diploma in Biological Sciences, and a Bachelor of Science in Zoology from the University of Otago.

8. Environmental Governance Experience:

I have previously presented evidence for Ngāti Tāwhirikura during the Proposed New Plymouth District Plan hearings concerning the Māori Purpose Zone. My relevant experience includes leadership of landscape scale restoration projects within the rohe, including work on Taranaki Mounga and the Waiwhakaiho river. I am currently General Manager – Taiao for Te Tōpuni Ngārahu Trust. I was formerly Pou Taiao for Te Kotahitanga o Te Ātiawa Trust where I facilitated and drafted Tai Whenua, Tai Tangata, Tai Ao, prepared submissions on resource management matters, supported ngā hapū o Te Ātiawa, and engaged with councils and applicants on resource consent processes.

9. Hapū Working Group:

We, Bev and Sera, are both members of the Ngāti Tāwhirikura working group established to work and consider the Bunnings proposal. As such we have received and reviewed the information made available from the applicant, contributed to a series of consultation meetings, and visited the application site on a number of occasions. Our evidence reflects that collective process and the advice and position maintained by the Hapū through the working group. We are authorised to provide this evidence on behalf of Ngāti Tāwhirikura Hapū by the Trustees of the Ngāti Tāwhirikura Charitable Trust.

B. Purpose and scope

10. The purpose and scope of our evidence is to explain:
 - a. The submission made by Ngāti Tāwhirikura on the Bunnings applications;
 - b. The importance of Sites and Areas of Significance to Māori within the rohe of Ngāti Tāwhirikura, and the outcomes sought for those places;
 - c. The importance of Aotere Pā, including its persistence, legacy, and prominence within the cultural landscape;
 - d. The role of Ngāti Tāwhirikura in design processes and applied cultural expression in achieving the planned character for areas of the District the contain SASM;
 - e. The engagement between the Applicant and the Hapū, and the consistency of the position of the Hapū; and
 - f. Why the proffered planting and proposed water tank mural treatments do not provide an appropriate response to the cultural context created by Te Pou Tūtaki and their wider landscape.
 - g. Actual and potential cultural effects of the proposed access, relationship to Aotere Pā, and the wider cultural landscape.
11. We give this evidence as members of Ngāti Tāwhirikura and members of the Hapū working group for the Bunnings proposal. Where we refer to planning provisions, we do so to explain outcomes that the Hapū understood those provisions were intended to support.

C. Ngāti Tāwhirikura and the cultural landscape

12. The rohe of Ngāti Tāwhirikura begins at Waitaha and extends inland through the places recorded by our tūpuna, follows Taranaki to Pouākai and Mangorei, and returns by Waiwhakaiho to the sea and along the coast to Waitaha. This is not an abstract boundary. It describes a lived landscape made up o kāinga, pā, urupā, ara, awa, wetlands, māra, ngahere, Mouna, and coastal places.
13. Real people lived, worked and died here. They are the tūpuna of those who remain obliged to preserve and protect the cultural landscape of Ngāti Tāwhirikura today. Preserving that landscape secures our relationship back to our tūpuna and recognises our right to sustain the natural, historical, cultural and spiritual values associated with this whenua.
14. That landscape has been heavily modified. Industrial development, public infrastructure, roading, the railway and other landuses have destroyed, truncated or dominated many features. The effects are cumulative. The fact that the surrounding environment has already been modified does not reduce the significance of what remains. It increase the importance of retaining, reconnecting and amplifying those surviving space.

15. The Hapū has been working to restore its physical and cultural presence across our rohe. This includes reconnecting places, restoring waterways and indigenous vegetation, re-establishing cultural practises and ensuring that development makes our history, identify and continuing authority visible rather than further obscuring them.

D. Sites and Areas of Significance to Māori

16. Sites and Areas of Significance to Māori, commonly referred to as SASM, do not exist as isolated dots on a planning map. Their significance arises from relationships between people and place and between pā, kāinga, urupā, waterbodies, vegetation, travel routes, food-producing areas and the coast. It is artificial to view each site separately from those features, relationships and events.
17. The scheduled boundary of a SASM is a planning tool. It does not define the full extent of the cultural relationships, values or setting that give the place meaning. Nor does it mean that activities outside the mapped line are culturally neutral.
18. Ngāti Tāwhirikura has consistently identified three broad types of outcome that may be appropriate for a significant place:
 - a. retention of the place in the landscape;
 - b. maintenance or restoration of an active relationship between the Hapū and the place; and
 - c. applied cultural expression that appropriately enhances or amplifies the place and its narratives.
19. Those outcomes are not interchangeable and they are not automatically appropriate at every place. They must be determined by Ngāti Tāwhirikura on a case-by-case basis. At some places avoidance and quiet protection will be required. At others the priority may be ecological restoration, access, occupation, teaching, interpretation, cultural activity or a contemporary built expression. Only the Hapū can determine what response is tika for the particular place and relationship.
20. Protection does not mean preserving a site as a museum object while development around it removes its meaning. It requires space for mana whenua to exercise kaitiakitanga, manage threats, sustain relationships, share narrative and, where appropriate, recontextualise the place through applied cultural expression.

E. Aotere Pā

21. Aotere Pā is part of that connected landscape. Ngāti Tāwhirikura Hapū Charitable Trust owns Lot 3 DP 509004 adjoining the application site. The property contains

part of Aotere Pā and is zoned Māori Purpose. It is one of a limited number of places in the district where the Hapū owns ancestral land and can directly exercise authority to advance collective aspirations.

22. Aotere was only relatively recently returned to Ngāti Tāwhirikura from Ravensdown as part of its restoration of their former site. The Ravensdown site was purchased by Bluehaven, and the Hapū worked with that company for many years to reimagine how Aotere Pā would be respected as the area was redeveloped. In late 2022 we learned that Bluehaven was selling the property to Bunnings, and we have engaged with Bunnings at every opportunity available to us to continue the return and reconciliation of this SASM.
23. Aotere Pā must not be understood only as an archaeological feature within the cadastral boundaries of the Hapū property. It is part of a wider system of occupation and relationship that includes the Waiwhakaiho and Mangaone, nearby pā and kāinga, Te Pou Tūtaki, areas of vegetation, former cultivation and travel connections through the landscape.
24. Aotere Pā has persisted despite extensive modification of the surrounding landscape. Roads, rail and industrial activities have changed its setting, but they have not removed its identity, its associations or the obligations held by the Hapū. Its survival makes it an important marker of the enduring presence of Ngāti Tāwhirikura in Waiwhakaiho.
25. The prominence of Aotere Pā is not confined to elevation or visibility from a particular viewing point. It is also cultural prominence. The Pā remains a reference point through which uri understand occupation, authority, movement and relationships across the landscape. Its prominence should be strengthened by future development, not diminished until it becomes an isolated and illegible remnant surrounded by roads, parking and industrial buildings.
26. The aspirations of the Hapū for Aotere Pā include social, cultural and economic activity and the ability for uri to access, interpret, care for and maintain an active relationship with the place. More broadly, the Māori Purpose zoning enables the Hapū to consider cultural, educational, ecological restoration and papakāinga initiatives. Those future choices are part of the receiving environment; they should not be prejudiced by the design of adjoining development.
27. Aotere Pā is already constrained by Smart Road and the railway corridor. The positioning of an additional access or road immediately along the application-site boundary risks enclosing the whenua within transport and industrial infrastructure. It also risks severing the relationship between Aotere Pā and the wider cultural landscape to the north and east.

F. The Special Purpose – Māori Purpose Zone

28. Ngāti Tāwhirikura actively sought Māori Purpose zoning for Aotere Pā as part of a wider and coordinated vision for ancestral land across the rohe. As explained through the District Plan hearings the Hapū does not intend to duplicate every activity on every parcel of Māori Purpose zoned land. The intention was for those places to work collectively to restore our physical presence and relationships across the cultural landscape.
29. We understand that the Māori Purpose Zone is intended to enable tangata whenua to exercise responsibilities as kaitiaki and mana whenua and to provide for social, cultural, environmental and economic needs. It anticipates a living and evolving environment, including pā, papakāinga, education, cultural activity, restoration and other Hapū-led development.
30. The present level of development on our property should not be interpreted as final. The aspirations of the Hapū includes the future occupation, restoration and cultural use enabled by the zone. Assessment of the Bunnings interface should recognise that future, rather than assuming the neighbouring land will remain vacant or passive.

G. Design processes and applied cultural expression

31. Requests to input into a design process is not a request for a Māori-themed decoration to be added to a project after the fundamental decisions have been made. It is a process in which mana whenua participates early enough to influence the project brief, site structure, orientation, movement, landscape, architecture, infrastructure, materials, narrative and long-term management.
32. Hapū evidence presented to the District Plan hearings explained that context is critical. Buildings and infrastructure must respond to place as a living extension of relationships. Co-design allows the project itself to be reconsidered through that context. It can affect where development occurs, how people enter and move through it, what is made prominent, what is protected, and how the development contributes to the restoration of mana whenua visibility.
33. Applied cultural expression is one possible outcome of that process. Applied cultural expression is not simply art or entertainment. It gives life to cultural realities and may include tohu, language, technology, planting, rongoā, raranga, structures, facilities and spatial relationships that support an active connection with place.
34. For applied cultural expression to be authentic it must have whakapapa and provenance. It must be led or authorised by the relevant mana whenua, arise from

an informed understanding of place, and be integrated with the function and form of the development. Its integrity depends on the process by which it is created as much as its final appearance.

35. The objective is not simply for Māori imagery to be visible. The objective is for Ngāti Tāwhirikura to be visible and active within our own landscape, and for development to recognise the authority, narratives and aspirations associated with that place.

H. Engagement with Bunnings

36. Ngāti Tāwhirikura has engaged with Bunnings and its advisers in good faith over a number of years. As members of the working group established for that purpose, we have participated in and supported that engagement. The Hapū has invested time and cultural knowledge to assist the applicant to understand the site and the adjoining cultural landscape.
37. The advice of the Hapū has remained consistent throughout that engagement. We have repeatedly identified:
 - a. the importance of the interface with Aotere Pā;
 - b. the need to protect the setting, visibility and cultural integrity of Aotere Pā and Te Pou Tūtaki;
 - c. the need for the architecture, landscape and movement network to respond to the cultural context;
 - d. the importance of views and relationships between significant places;
 - e. the need to protect Mangaone and its mauri; and
 - f. concern about the long-term consequences of the access and infrastructure layout, including its potential to enable future industrial access or a road corridor.
38. These are not new positions for the Hapū. These are the consistent positions and advice the Hapū has provided over many years to the development of this land with previous owners. It is also consistent with the advice provided through the District Plan hearings, and it is our understanding that the outcomes we have expressed above are supported by District Plan provisions.
39. We consider that engagement should not be measured only by the number of meetings held or opportunities offered to comment, or even the length of time taken. The relevant question is whether the advice of mana whenua has materially informed the project. In this case, the principal layout, access arrangements, building form and wider development structure have not, in our view, been adequately reshaped around the Ngāti Tāwhirikura property adjoining, Aotere Pā, Te Pou Tūtaki and the cultural landscape.

I. The design responses offered by Bunnings

40. We understand that opportunities advanced by Bunnings as cultural responses include planting and a mural or graphic treatment on the water tank. The Hapū does not consider those measures to be an appropriate or sufficient application of applied cultural expression in this context and have made the Applicant aware of this over the last three years.
41. Planting can be meaningful where species selection, spatial arrangement, purpose, establishment and ongoing management arise from a mana whenua-led restoration or cultural design strategy. Planting used principally to screen an adverse interface is mitigation. It should not be described as applied cultural expression merely because indigenous species or a cultural narrative may be attached to it.
42. A mural on a water tank may also be a valid artistic commission in another context. Here it risks treating cultural expression as a surface treatment on utility infrastructure after the location, layout and form of the development have been determined. It does not address the relationship between the development and Aotere Pā. It does not restore a physical or functional connection, protect the setting of the Pā, resolve the access corridor or make the wider cultural landscape legible.
43. There is also an issue of appropriateness relative to Te Pou Tūtaki. Te Pou Tūtaki marks a line of resistance and authority established when land sales threatened the livelihood and whenua of Te Ātiawa. In that landscape, cultural imagery cannot appropriately be used to decorate or culturally endorse development that has not first resolved its effects on the surviving whenua and the authority of the Hapū.
44. The same applies to Aotere Pā. Applied cultural expression should amplify the Pā and support an active relationship with it. It should not compete with it, divert attention to a corporate utility structure, or operate as a substitute for avoiding and managing adverse effects on the Pā and its setting.
45. For these reasons the issue is not whether the particular artwork is attractive or whether planting has some benefit. The issue is that those measures do not arise from, or substitute for, an integrated design response to the cultural landscape. They are too limited and too detached from the structural decisions that determine the effects of the proposal.

J. Access and proximity to the Ngāti Tāwhirikura Property

46. The access adjoining the Tāwhirikura property must also be considered over time. As presently proposed, service vehicle movements introduce operational noise, vehicle lighting, visual movement and an industrial edge beside Aotere Pā. These

effects occur in combination with Smart Road, the railway and surrounding industrial development.

47. Almost every plan that the Hapū has received from Bunnings has shown this as a future road corridor. Discussion on a potential future road, and its implications for the Ngāti Tāwhirikura property have consistently been raised with the applicant over the last three years.
48. We understand that the wider application site is zoned and available for future industrial development. If the access is later enlarged or used to serve that land, the frequency, duration and range of traffic effects could increase substantially. The corridor may require widening, additional lighting, signage, utilities and changes to the landscape buffer. Those changes would further constrain the use of the Tāwhirikura property and strengthen the physical barrier between Aotere Pā and its wider setting.
49. If the corridor were ultimately developed as a public road extending Katere Road to Smart Road, the effect would be more significant. Aotere Pā would be enclosed between Smart Road, the railway, the new road and industrial development. That would permanently affect the legibility of the Pā, access and safety for uri, the suitability of the whenua for sensitive Māori Purpose activities, and the ability to reconnect the site with the cultural landscape.
50. The current application should not predetermine that outcome or establish a corridor that makes it the default future solution. Nor should the Hapū be left to address the cumulative consequences through a series of later consent processes after the practical alternatives have been narrowed by the Bunnings layout that passes on the effects of development to the Hapū.

K. Position of Ngāti Tāwhirikura on the application and conclusions

51. The submission of Ngāti Tāwhirikura opposed the application and sought that it be declined. The submission identified the receiving environment as a sensitive and interconnected cultural landscape and raised concerns about the protection of Aotere Pā, the interface with the adjoining Hapū property, views and relationships between significant places, Mangaone, the proposed access and the enabling of a future road corridor.
52. The submission identified actual and potential effects including:
 - a. further severance of Aotere Pā from surrounding significant places and natural and physical features;
 - b. Aotere Pā becoming surrounded by roads, accessways and parking areas;
 - c. Aotere Pā and Te Pou Tūtaki becoming increasingly illegible in the urban form;

- d. development that ignores or subjugates the cultural context of Ngāti Tāwhirikura; and
 - e. further degradation of the health, intrinsic values and life-supporting capacity of Mangaone.
53. Those concerns remain. Changes to the access design and the addition of planting do not resolve the underlying concern about the relationship between Bunnings, the future development land and Aotere Pā. Nor do they demonstrate that the future cultural and development opportunities enabled by the Māori Purpose Zone will be protected. These have been and remains the consistent advice and position of Ngāti Tāwhirikura with respect to the proposal.
54. In our view the effects of the proposal on Ngāti Tāwhirikura, our relationship with wāhi tapu, the Mangaone, and returning to our ancestral lands are significant.
55. Like our Hapū, Aotere Pā has persisted. Our responsibility now is to ensure that development allows it to remain prominent, connected and alive within the landscape, rather than becoming a small cultural remnant at the edge of an industrial development, and road access corridor.
56. We recommend that this application be declined.