

Before Gisborne District Council

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Under the Resource Management Act 1991 (the **RMA**)

In the matter of of application by Gisborne District Council for resource  
consent to modify a stopbank at Te Karaka

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**STATEMENT OF EVIDENCE OF ALAN HARONGA  
FOR THE WI PERE TRUST**

**Dated 25 September 2026**

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1. My name is Alan Haronga.
2. I am Chair of the Wi Pere Trust and provide this evidence on behalf of the owners of the TK 15, 17 and 18 blocks that are directly affected by this consent application.
3. The Wi Pere Trust's property comprising these blocks is approximately 21.2ha in area, some 17ha of which is currently protected by the Te Karaka Flood Scheme. The address of the property is 72 and 87 Kanakanaia Road.
4. As explained in the Trust's submission, the Wi Pere Trust operates under the Māori Purposes (Wi Pere Trust) Act 1991, and serves 600 beneficiaries .
5. The consent application to upgrade the Scheme would remove the stopbank currently in place near the river margin of the Trust's property, and relocate it to the south (under what is called Option 3), meaning nearly 12 additional hectares of the Trust's property is outside the stopbank, and within the flood plain.
6. Wi Pere's submission opposing this proposal makes the comment at the top of page 2 that "the TK18 blocks were part of the original corpus of the Trust when it was constituted and have never been in pakeha ownership."
7. In fact, as noted above, the Wi Pere land that is affected by this application includes the TK15 and TK 17 Blocks in addition to TK18, as shown on Figure 6 of the application documents. I attach a current map to identify the land blocks in relation to the current and proposed flood banks to which this application relates to as Attachment 1.
8. To support Wi Pere's submission, I refer to the book *Wiremu Pere, The Life and Times of a Maori Leader*, 1837 – 1915. Author Joseph Anaru Te Kani Pere and Others.
9. The Author now deceased is my cousin and he asked the Wi Pere Trust to assist in the publication of his book.
10. A copy of the Deed that constituted the Wi Pere Trust on 14 April 1899, is attached to the back of the book. A copy of the words of the Deed is transcribed on pages 375 to 395 of the book. On pages 391 to 394 is the schedule of properties that constituted the Wi Pere Trust. On page 393 Karaka Section 15 of some 28 acres and owned by Arapera Pere, Wi Pere's wife and Karaka 17 of some 28 acres and owned by Riria

Mauaranui, Wi Pere's mother was part of the original corpus of the Trust. A copy of the book can be made available on request. A summary of the land titles TK 15, TK 17 and TK 18 showing uninterrupted ownership from inception of the Trust to today are attached as Attachment 2. This is a summary from the Land Registry Online, part of the official Government organisation we knew as LINZ. You will note several of the early trustees were non-whānau, namely George Foster, Henry Cheetham Jackson, H.W Symes, F.H Bull and R.G Dobson. Attachment 3 includes copies of the original title documents.

11. Like many of Wi Pere's lands, they were lived on, farmed or cropped or leased to earn revenue for the whānau to benefit from, and that continues today. The TK 15, 17 and 18 blocks are currently used mainly for maize production. Cashflow not capital gain is very important to the whānau for their daily lives as the land could not be sold. These particular blocks (TK 15, TK 17 and TK 18) are identified as part of the Trust's papakainga and horticulture development strategy. The Council's preferred option removing the existing flood banks, would prevent us from implementing this strategy and disadvantaging the Wi Pere whānau for generations to come.
12. Since 1907, the Wi Pere whānau required land to live on and land has been allocated to the whānau as papakāinga. Karaka sections 15, 17 and 18 have been allocated to the Te Kani (Halbert) whānau, and they have had a long and beneficial relationship with the land that has provided a very good source of revenue for the whānau for some decades.
13. The whānau always had aspirations to build and reside on their papakāinga, in particular TK15, being the highest part of their papakāinga. In the early 1980's the whānau built a shed which included a sleep out as a first step to more permanent occupation. A vineyard was planted to provide a source of revenue. However, Cyclone Bola in 1988, devastated the vineyard but missed the sleep out which survives today and is currently the Civil Defence emergency site for Te Karaka in case of another flood event like Bola and more recently Cyclone Gabrielle.
14. The whānau still have aspirations to live on their papakāinga but would need better assurances of safety in case of major flooding. As noted above, the Council's preferred option would reduce this source of revenue and remove the opportunity for future generations to live on the land. I should note here (as stated in Wi Pere's submission) that the

Trust's property within the existing stopbank did not get flooded in Cyclone Gabrielle.

15. The Scheme upgrade under Option 3 will significantly impact that relationship and source of revenue for the Te Kani (Halbert) whānau, and equally affect the Trust's relationship with this ancestral land more broadly, as explained above. In addition to undermining the Trust's papakainga and horticulture development strategy, we are concerned at river sediment and gravel being deposited on the land, effectively returning that land to the river and floodplain, and exposing it to flooding at much lower river levels than at present.
16. I attach a recent letter from the Council confirming the intention to remove the stopbank on the Trust's property as part of the Scheme upgrade, and referring to legal powers if needed for that purpose, if access is not agreed to by the Trust.
17. The Trust considers the Scheme upgrade to be effective alienation of a large area of the Trust's property, which fails to recognise or provide for the Trust's relationship with its ancestral land as required by s 6 (e) of the RMA.
18. I can confirm that at no stage has Wi Pere ever agreed to or expressed a preference for Option 3 to the Council, which appears from the papers I have sighted to have been selected without regard to the significance of the property to the Trust and its 600 beneficial owners. There is no assessment of the direct impacts on the Wi Pere Trust blocks specifically that I am aware of, while other land including houses that may be affected by additional flooding have been identified.
19. Acknowledging the role of and mandate of Te Aitangi a Māhaki, their representatives in the process would not have the understanding to express the specific interests and concerns of the Trust about the proposal, as outlined in this evidence.
20. When Wi Pere looks at the property and construction costs associated with Option 1 and Option 3 of \$22,132,100.00 and \$23,804,279.00 (sourced from the Council), there is very little difference between the options. As I understand it, the two options are also very similar in terms of actually protecting Te Karaka from flooding, which the Trust strongly supports. However, for the reasons explained in this evidence, Option 3 is strongly opposed and should not proceed without Wi Pere trustee and beneficiary endorsement.

Alan Haronga.  
25 September 2026

Attachment 1: Map of Wi Pere Te Karaka Blocks affected by this consent.  
Attachment 2: Land Title records for TK 15 and TK 17.  
Attachment 3: TK15 and 17 Land Title Histories.  
Attachment 4: Letter from Council dated 7 September.