Hoki Whenua Mai?

The legal and theological barriers to Land Back in the Presbyterian Church of Aotearoa New Zealand

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Introduction

The Presbyterian Church of Aotearoa New Zealand (PCANZ) is one of the biggest landowners in Aotearoa. Collectively, it owns a vast amount of land. In 2025, the combined seven Presbyteries recorded almost $800 million of property assets.[1] Including national Church property, land and building assets are estimated to be worth more than $1 billion.[2]

Many of these assets are, of course, places of worship and community life, with rich histories, traditions, and visions for the future. They are inhabited by communities of faith with a deep sense of belonging to place and committed service to their wider neighbourhood.

The land witnesses to these rich histories. But it is only a small part of the story of the land. The Presbyterian Church was established in Aotearoa New Zealand primarily as a "settler church". In this sense, it differs from the Anglican, Methodist, and Catholic traditions, which arrived as missionary movements to, with and by Māori.[3]

The first Presbyterian Minister to land in Aotearoa New Zealand, the Rev James Macfarlane, arrived in Pito-One (Petone) fourteen days after the signing of te Tiriti o Waitangi and was "the first minister of any denomination sent to minister to the newly arrived settlers."[4] It was an early sign of a monumental shift about to take place: between 1840 and 1860, the settler population boomed from just 2,000 to nearly 60,000 people – more or less equal to the Māori population.[5]

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[1] PCANZ Presbytery Financial Statistics by Parish 30 June 2025.
[2] James Perry, "First right to buy Presbyterian land is good but returning the land would be better", *Te Ao News,* 13 May 2022, https://www.teaonews.co.nz/2022/05/13/first-right-to-buy-presbyterian-land-is-good-but-returning-the-land-would-be-better/ (accessed 20 July 2026).
[3] Wayne Te Kaawa, "A Gifted People: Māori and Pākehā Covenants within the Presbyterian Church" in *Mana Māori and Christianity,* ed. Hugh Morrison, Lachy Paterson, Brett Knowles and Murray Rae (Wellington: Huia, 2012), 3.
[4] Ibid., 4.
[5] Paora Tapihana, *Kāinga: People, Land, Belonging* (Wellington: BWB, 2023), 68.

Central to the colonial project was the aggressive and intentional transfer of land from collective Māori ownership into individualised Pākehā ownership. Between 1840 and 1940, Māori lost a vast majority of their land. In Te-Ika-a-Māui, the North Island, Māori retained just 13%. In Te Wai Pounamu, the South Island, less than 1% remained in Māori hands.[6]

This land was acquired through a variety of controversial means including raupatu (confiscated land as a result of the Land Wars), tuku whenua (gifting land),[7] irregularly purchased land (for example, through individualising Māori land title, by broken agreements, or under duress), and land acquired under Acts of Parliament.[8]

In alienating Māori from their whenua and taonga – an explicit breach of Atikara II (Article 2) of Te Tiriti o Waitangi – Māori were robbed, among other things, of their kāinga way of life, their connection to whakapapa, reo and culture, and their economic base. In order to survive, many Māori were forced into an individualised wage economy, either working their ancestral lands for Pākehā landlords or migrating to cities in search of work. As Paora Tapihana records, when recession hit, many Māori were the first to lose their jobs. Now disconnected from the support systems of their kāinga, they were forced into welfare and an intergenerational cycle of poverty that continues to the present day.[9]

The Presbyterian Church has undoubtedly benefited from this process of colonisation and Māori land alienation. As a predominantly "settler church", most Presbyterian Church land was acquired indirectly from Māori. Presbyterian assets in Waikato or Taranaki, for instance, are likely on confiscated land. Other land, like at Ōrākei, was bought from the Crown or private landowners after it had been purchased from Māori or acquired through an Act of Parliament. A small amount of Presbyterian Church land was gifted directly by Māori, primarily in Te Urewera for the purposes of the Presbyterian Māori Mission there.

Because most land was acquired indirectly from Māori, it has been possible for the Presbyterian Church to plead ignorance when it comes to questions of unjust land alienation. It could be argued that the Church has benefited from a selective, collective amnesia. Many church histories for instance (including the history of the church I minister in) begin with the history of the colonial settlement *after* Māori had

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[6] Ibid, 105-106.

[7] *Tuku whenua* is here listed as a "controversial" means of acquiring land because, within a Māori framework, "gifting" land did not necessarily mean exclusive and permanent ownership of land. This view was dissonant with a Pākehā view, which understood the land "purchase" in Western terms.

[8] The Methodist Church of New Zealand, Te Hāhi Weteriana o Aotearoa, "Section 8: Kōrero Papatupu Whenua, *Land Stories*" in *Bricks and Mortar,* https://www.methodist.org.nz/tangata/property-and-insurance/bricks-and-mortar/intro/, 3rd ed. (June 2023), 8.4.

[9] Tapihana, 88-92.

already been alienated from the area.[10] Historically, the Church has shown little interest in the precolonial history of its land. Yet, as Alistair Reese has pointed out, while an organisation may not have been involved in the original land alienation, "it has become 'implicated' via its 'inheritance' of these Lots from the Crown."[11]

The Methodist Church, by comparison, has encouraged all its congregations to conduct Kōrero Papatupu Whenua (Land Story) research, with the basic aim to "restore relationships severed by injustice."[12] Where the research reveals a case of injustice, the congregation is encouraged to "take further steps to learn more and to engage in discussion with Te Taha Māori as primary Treaty Partner in the church". Such next steps could involve, among other things, returning the land, financial compensation to local hapū, giving a percentage of rental income to Te Taha Māori, a ritual act of repentance, or a public acknowledgement of past injustice.[13]

In recent times, the Presbyterian Church has also begun to recognise that responding to the legacy of colonisation involves restitution and redress for land alienation. Notably, in 2022, the General Assembly decided that, when selling land, churches must offer local iwi first right of refusal before putting those assets on the open market.[14]

While welcomed at the time as a step in the right direction, it was also acknowledged that the policy does not go nearly far enough. According to Amorangi Minister, Hone Te Rire, "Mehemea kei te pērā, whakahokia mai, kore utu. He whenua tākoha, kua tākoha atu, tākoha mai."[15] The decision fell short on several fronts: firstly, for land that had been stolen or unjustly acquired, it is hardly just to expect the victim to pay for their own land back while the Church, which has benefited from the inheritance of the land, bears no cost at all; secondly, the decision did little to resolve the collective amnesia of the Church and consequently did not involve any acknowledgement of implication in the wrongs of the past; thirdly, the decision unwittingly erected a further barrier to giving land back freely by establishing a "ground rule" of selling land to mana whenua at market value.[16]

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[10] St Heliers Presbyterian Church, *Our First Fifty Years: St Heliers Presbyterian Church, 1915-1965,* self-published, 3.
[11] Alistair Reese, *Te Papa: Naboth's Vineyard? Towards Reconciliation in Tauranga Moana: Summary Document* (2018), 2.
[12] *Bricks and Mortar,* 8.4.
[13] Ibid., 8.5.
[14] Presbyterian Church of Aotearoa New Zealand, *Minutes of the 2022 Special Assembly,* https://www.presbyterian.org.nz/sites/default/files/Special%20Assembly%2022%20Minutes%20Confirmed%20.pdf (accessed 20 July 2026), 18.
[15] "Any land that fits that description, give it back! That goes for any land gifted also, if it was gifted, gift it back!" Perry, "First right to buy."
[16] In advice received from the Church Property Trustees in 2024, it was noted that "in recognising the special position of mana whenua in relation to land and establishing a 'right of first refusal', the Church has created a ground rule that all such property is to be offered for purchase at market value."

In light of the status quo, this article seeks to explore three questions:

1. In what circumstances is it currently possible for the Presbyterian Church to legally give land back to Māori?
2. What would need to change in order to broaden the circumstances in which land can be given back?
3. Why is the issue of land restitution central to the life and mission of the Presbyterian Church of Aotearoa New Zealand?

I will explore these questions by considering a specific case study: in 2024, Ōrākei Presbyterian Church was dissolved. At the time of dissolution, various options about what to do with the land were considered, including returning the land to the local hapū, Ngāti Whātua Ōrākei. This option was deemed to be legally unfeasible because of restrictions established in the Presbyterian Church Property Act of 1885. Eventually, the decision was made to sell the land on the open market. Ngāti Whātua was offered first right of purchase but declined the offer. In this article, I seek to unpack the underlying legal and theological issues behind the eventual decision to sell the assets.

The Sale of Ōrākei Presbyterian Church

To understand the issues at stake behind the sale of Ōrākei Presbyterian Church, we need to tell the story of the land prior to Presbyterian ownership.[17] The Church sits on the ancestral lands of Ngāti Whātua Ōrākei, a hapū of the Ngāti Whātua iwi which has resided in the Tāmaki area for hundreds of years. The papakāinga, the heart of the hapū's life and identity, was at Ōkahu Bay in Ōrākei.

In 1840, the paramount chief of Ngāti Whātua Ōrākei, Āpihai te Kawau, offered the Crown approximately 3000 acres of land for the establishment of the new colonial settlement of Auckland. In return, the Crown paid Ngāti Whātua £341 – just 11p per acre. Only six months later, the Crown on-sold just 44 acres to settlers for £24,275 or £551 per acre. That equates to an over 500,000% mark-up on the value of the land per acre. The profits paid for the early development of Auckland.

Over the years, as the settlement grew, Ngāti Whātua sold thousands more acres, mostly to the Crown. By 1854, just 14 years after the initial offer of land for Auckland, the 700-acre Ōrākei block – which included the papakāinga of the hapū – was the only land left in hapū possession. Te Kawau had made clear that this block of land was inalienable and not for sale.

[17] The following history of the Ōrākei block is taken from the Waitangi Tribunal educational summary: https://www.waitangitribunal.govt.nz/en/publications/education/orakei

Despite the express wishes of the hapū, the land was eventually taken. In 1869, the Native Land Court surveyed the Ōrākei block and awarded it to just 13 people. Through this individualisation of land titles, the majority of the hapū was legally disinherited of its land overnight. The hapū effectively lost control of its own whenua and taonga.

The individualisation of title by the Native Land Court not only made it much easier for the Crown to purchase Māori land, it also introduced "inter-kin tension between those who own land (owners) and those who don't, but are still emotionally attached to it (the disowned)."[18] In the words of Paoro Tapihana, the process effectively "ripped kāinga apart: hapū by hapū, whānau by whānau, generation by generation", creating bitterness which in many places is still playing out today.[19]

In 1886, with the threat of Russian invasion, the Government took possession of 13 acres of land at Bastion Point under the Public Works Act (1882). At the time, when Ngāti Whātua chief Tūhaere sought compensation for the land, he only received £1,500, which was entirely spent meeting legal costs and expenses. Eventually, when the land was no longer needed for defence purposes, it was not returned to Ngāti Whātua. Instead, it was given to Auckland City Council in 1941 as a public reserve.

In 1908, the Government passed a special Act of Parliament to take possession of land at Ōkahu Bay so that a sewer pipe could be built across the beach in front of the papakāinga. The discharge of raw sewage into the bay was highly offensive to the hapū. Unsurprisingly, it also poisoned the shellfish beds and desecrated the local ecosystem, which was a primary source of food production for the papakāinga. To make matters worse, the village turned into a putrid swamp during heavy rain.

Meanwhile, individual blocks of land within the Ōrākei block continued to be sold. By 1914, the Crown had acquired 460 acres of the "inalienable" 700-acre block, most of which was the fertile farming land. Eventually, under the Public Works Act (1882), even those who resisted selling their land to the Crown were dispossessed of it anyway. Pākehā were allowed to lease the land for their homes, which was later gifted to them by the Crown. By contrast, Māori who continued to live on the land were forcibly evicted and their homes destroyed.

It should be noted that Ngāti Whātua Ōrākei were not simply passive victims in this story. At every step, the hapū objected to the Crown's actions and sought compensation for the alienation from their ancestral lands. Until the occupation of Bastion Point in 1977, the hapū always protested in lawful ways. Opposition has always been nonviolent (including with the occupation at Bastion Point).

[18] Tapsell, *Kāinga*, 99.
[19] Ibid.

Despite the hapū's opposition, however, a model suburb was planned and developed on the Ōrākei Block. As early as 1939 (the same year that the last Māori were still being evicted from the land), the Presbytery of Auckland had already expressed interest in purchasing a plot for a new church.[20] The current church site was eventually purchased in 1958 and the church dedicated in 1962.[21]

According to a fundraising brochure, the model settler suburb needed a model Presbyterian Church so that the suburb could "develop as a healthy Community". The proposed church was intended to "accommodate the growing number of those to whom Christian truth is the keystone of a life that satisfies." The Auckland Presbytery's New Church Campaign Committee appealed to the community for donations so that a church could be built "to the glory of God and the good of Orakei [sic]."[22]

Since 1958, the land has been in Presbyterian Church possession until, in 2026, it was sold on the open market.

The purpose of this short story of the land is to demonstrate how the Presbyterian Church has directly benefited from the alienation of Māori from their land. There is no indication in any of the correspondence relating to the land purchase that the Presbyterian Church had given any thought to the moral implications of such a purchase. Instead, the sole focus is on its mission to the growing settler population in the area, "to whom Christian truth is the keystone". The comment reveals a lack of missionary impulse: the Church primarily saw itself serving a pre-existing (largely Pākehā) Christian population.

In light of this history, it is clear that the Presbyterian Church is "implicated via its inheritance" of the land purchased from the Crown. It is not enough to say that, because it purchased the land legally, it is therefore cleared of any wrongdoing or any obligation to set right those wrongs.

Historic precedence of Landback in the Presbyterian Church

In light of this history, what restitution or redress options are available to the Presbyterian Church? There are several things to consider here including the historical precedence of the Presbyterian Church giving land back, how to interpret the Presbyterian Church Property Act of 1885, and what options are legally available

[20] Letter from the Auckland Presbytery Finance & Property Committee to V.G. Chapman of the Centenary Thanksgiving Fund Trust, 21 March 1939, unpublished.
[21] Record of Title Under Land Transfer Act 2017, Identifier: NA1612/1, 12 November 2018.
[22] The Auckland Presbytery New Church Campaign Committee, *Fundraising Brochure for a Presbyterian Church in Orakei,* unpublished.

to the Church Property Trustees, who hold all Presbyterian property in trust. We begin with the historical precedence of giving land back.

According to Rev Dr Wayne Te Kaawa (former Moderator of Te Aka Puahou, the Māori Synod of the Presbyterian Church), there have been two main instances of the Presbyterian Church giving land back to local Māori. Both occurred in te Urewera, where the Presbyterian Church established its Māori Mission in the 1910s.[23]

The second instance of giving land back was relatively simple, so we'll begin there: It took place in 2014 in Te Whaiti. Land had originally been gifted to the Presbyterian Church by a local whānau for a church to be built. When the church was eventually dissolved in the 1970s due to declining numbers, the church and manse fell into disrepair. Eventually, the whānau that gifted the land approached Te Aka Puahou to ask if the manse could be returned. Te Aka Puahou also offered the church building. After some discussion, the land and buildings were returned, along with an additional sum (approx. $20,000) for the ongoing repairs and maintenance of the property.

The first instance was more complicated. In 1918, Rev John Laughton and Sister Annie Henry established a Presbyterian Mission at Maungapōhatu and Ruatahuna among Rua Kēnana's people. Kēnana refused to give Laughton land for a church but agreed to provide land for a school and mission house. In 1927, the land was officially purchased for £10.[24] A deaconess house and small chapel was later also built on the property.

Initially, the plan of the Māori Missions Committee was to purchase the land directly from the community at Maungapōhatu. However, when the title was due to be changed, it was discovered that the community did not actually own the land. It had been acquired in 1923 by the Crown as part of the Urewera Consolidation Scheme. Vast amounts of land in te Urewera was purchased – some of it illegally, of which the land at Maungapōhatu was an example. This meant that, in order for the land transfer to go ahead, the Presbyterian Church had to purchase it from *the Crown*, not from the community at Maungapōhatu. It was never gifted, at least from a legal perspective.

In the early 1990s, a local hapū asked Te Aka Puahou for the land be returned. Much like at Te Whaiti, the school had closed in the 1950s and the buildings had fallen into disrepair. Te Aka Puahou and the Council of Assembly agreed that the land should be

[23] The following information is taken from recollections in an interview with Rev Dr Wayne te Kaawa on 28 July 2026. It is used with permission.
[24] Presbyterian Church of Aotearoa New Zealand, "Presbyterian Church to hand Maungapohatu land back to local hapu", 4 August 2018, https://www.presbyterian.org.nz/presbyterian-church-to-hand-maungapohatu-land-back-to-local-hapu (accessed 29 July 2026).

returned. However, it wasn't clear who the land should be returned to. Several whānau laid claims to the land. Eventually, it was agreed that the land should be returned to the Mapou Papakāinga Trust, which operated the local marae.

While everyone agreed that the land should be given back, the practicalities and legalities made restitution difficult. The Church Property Trustees argued that while there was a clear ethical mandate for the land to be returned, it couldn't be legally *given* back because of trust law restrictions and the wording of the Presbyterian Church Property Act (1885). Instead, the land needed to be purchased (even for the nominal amount of $1). For some of those asking for the land to be returned, a purchase (even for $1) was ethically problematic.

Eventually advice was sought from the Māori Land Court. Following that advice, the land title was changed from "General Freehold Land" to "Māori Freehold Land", which enabled the Court to make a ruling; the land was subsequently transferred at no cost to the Mapou Papakāinga Trust. At the time, there was disagreement about who could legally authorise the transfer but, by that stage, the land had been given back. In 2007, a ceremony was held to acknowledge the return of the land.

Aside from these two instances, there have been other occasions when returning land has been explored (for instance, at Matahi and Taumarunui). For various reasons, to date the blocks of land have not been given back. Often this is not so much due to the willingness of the Presbyterian Church as it is to whānau disagreeing about who the land should be returned to. These disagreements reflect the ongoing "inter-kin tensions" which have arisen through the individualisation of Māori land title.[25]

What can we learn from these instances of the Presbyterian Church giving land back? In the case of Te Whaiti, land was returned which had been *gifted* directly from a whānau for particular purposes (a church). Maungapōhatu would have been a similar case if it weren't for the fact that the land was technically not gifted by Māori, but was instead *purchased* from the Crown. Because of this, the circumstances for the Presbyterian Church acquiring the land are comparable to the Ōrākei site (which the Presbyterian Church also purchased from the Crown). There is clear precedent in the Maungapōhatu case for the Presbyterian Church returning land to Māori that had been acquired from the Crown, because it believed land restitution was the right thing to do.

We also see in these instances that the Presbyterian Church has generally recognised the moral case for giving land back and has been willing to explore what it would involve. The greatest barriers are primarily to do with legal restrictions and processes. This brings us to consider what is legally feasible under the status quo.

[25] Tapsell, *Kāinga*, 99.

Broadening the Criteria for Landback

Currently, the default legal position is that the ability of the Presbyterian Church Property Trustees (who hold all Presbyterian property assets in trust) to give land back is constrained by the trusts and purposes for which the Church property is held under the Presbyterian Church Property Act of 1885. The default position is established primarily by two sections of the Act: section 20 and section 39.

Section 20 of the Act states that all church property must be held and administered in a manner consistent with the trusts and purposes set out in the Act.[26] In the case of the land at Ōrākei, the land was purchased for the uses of worship (as Ōrākei Presbyterian Church) and of accommodation for the Minister.

Section 39 has to do with the disposal of property. When a piece of land is no longer required for the purposes for which it had been bought, the property "shall be disposed of and may be dealt with in such manner as the Presbytery shall by resolution direct."[27] In other words, when the church at Ōrākei was dissolved, the Northern Presbytery (the regional governance body of the Presbyterian Church) was given discretion as to what should be done with the property.

However, crucially, this ability to dispose of property is not an unfettered power but remains subject to the overarching trustee duties and the purposes for which a property is held in trust. In 2005, Colin Pidgeon QC gave a legal opinion on the disposal of Presbyterian Church property. In it, he concluded that if the manner of property disposal is not in the best interests of the Presbyterian Church as a whole, "there is no power given to the Presbyterian Church Property Trustees to transfer property." He goes on to say that the property could, "with the consent of the Presbytery, be sold to anyone for market value."[28] With this advice, Pidgeon established the default interpretation of the Act that "the best interests" of the Presbyterian Church mean selling property for not less than market value.

A second legal opinion attained from Kāhui Legal for this study suggests other interpretations of the Act are possible. On the one hand, Kāhui Legal acknowledged that the "default legal position" of the Church Property Trustees is to sell property at market value. In the case of the land at Ōrākei, a sale at market value would enable proceeds to be applied for the purposes of the Act, which would "arguably not occur

[26] The Presbyterian Church Property Act (1885), https://www.legislation.govt.nz/act/public/1885/33/en/latest/#DLM132680 (accessed 17 September 2026), s.20.
[27] The Presbyterian Church Property Act (1885), s.39.
[28] Colin Pidgeon, "Opinion for Macalister Mazengarb for Presbyterian Church Property Trustees Re: Horsham Downs Community Church", 24 August 2005, 2.28.

if the property was gifted to Ngāti Whātua Ōrākei for nil consideration or nominal amount."[29]

On the other hand, the Church Property Trustees do have discretion. According to the opinion received from Kāhui Legal:

> "…if the Church Property Trustees, in exercising their discretion, were to:
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> a) address the fact that the Church Land once comprised the former Ōrākei Block customarily owned by Ngāti Whātua Ōrākei; and
> b) the related issue of how it came to enter into a purchase arrangement with the Crown who acquired the Church Land through breaches of the Treaty,
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> a question arises as to whether the gifting of property as a means of restitution or reconciliation of the Church's relationship with Ngāti Whātua Ōrākei appropriately falls within the purposes associated with the Presbyterian Church, whether for worship, for ministers' housing, or general or special purposes."[30]

The legal opinion goes on:

> "If the Church Property Trustees were to determine that gifting the Church Land back to Ngāti Whātua Ōrākei as a form of restitution is consistent with those purposes and duties, we consider there is potentially a precedent to enable the gifting of Church land to Māori in any future cases of disposal – subject to an agreed process and potentially agreed purposes / shared mission with the particular iwi, hapū or whānau group (in this case study, Ngāti Whātua Ōrākei)."[31]

This potential precedence is strengthened by the numerous examples in the Presbyterian Church of giving land back to Māori (most notably at Maungapōhatu in 2007 and Te Whaiti in 2014). There is a difference, however, between these instances and the case study at Ōrākei. At Maungapōhatu and Te Whaiti, land was gifted by Māori to the Presbyterian Church for a particular purpose. When the Presbyterian Church no longer needed it for that purpose, there was a clear warrant for giving it back (admittedly, this was complicated by the fact that the land at Maungapōhatu was – unbeknownst to Māori – technically Crown land!). Giving the land back took place within ongoing relationships between Te Aka Puahou and local hapū and whānau. By contrast, at Ōrākei the land for a Presbyterian Church was not gifted by Ngāti Whātua Ōrākei. It was essentially confiscated land purchased by the Presbyterian Church from the Crown.

[29] Kāhui Legal, "PRO BONO Advice: Gifting of the Ōrākei Presbyterian Church land", 26 August 2026, paragraph 24.
[30] Ibid., paragraph 25.
[31] Ibid., paragraph 27.

In this study, I set out to answer three questions. The first is: *in what circumstances is it currently possible for the Presbyterian Church to legally give land back to Māori?* The Advice from Kāhui Legal and the circumstances surrounding the giving of land back at Maungapōhatu and Te Whaiti demonstrates that the answer to this question is not as clear cut as has previously been assumed. The default interpretation is that land must be sold at market value. But there is potential precedence for giving land back if restitution can be shown to be consistent with the purposes of the Presbyterian Church.

This leads me to the second question: *What would need to change in order to broaden the circumstances in which land can be given back?* I suggest that two concrete things could be done to enable the giving of land back to Māori in situations were there has been a clear breach of justice:

1. The General Assembly affirms that, in the context of systemic land alienation and the impoverishment of Māori, giving land back to Māori is aligned with the ministry of reconciliation in Jesus Christ to which the Church is called and is therefore consistent with the charitable purposes of the Presbyterian Church.
2. The General Assembly follows the lead of the Methodist Church by requiring churches and presbyteries to conduct a Kōrero Papatupu Whenua (land history research) when looking to sell land.

The first action would make explicit that land restitution is a valid "special purpose" for which Presbyterian land can be disposed. The second action of requiring land history research would ensure that the Presbyterian Church becomes aware of unjust land alienation and can consider the best path towards reconciliation (which could involve a range of solutions, such as giving land back or financial compensation). With these two small changes, the Presbyterian Church could significantly broaden the conversation about giving land back without needing to go through the convoluted and potentially expensive process of changing an Act of Parliament.

Theological and Missional Basis of Land Restitution

This brings us to the third and final question I sought to answer in this study: *Why is the issue of land restitution central to the life and mission of the Presbyterian Church of Aotearoa New Zealand?*

This is, of course, not a legal question, but a theological, missiological and ethical question. What does the Church believe it is called to be and do? Who is the God in whose image we are being formed? How is this God ministering in the world and what might it mean for the Church to share in that mission?

According to its Mission Statement, the Presbyterian Church "believes it is called by God to work with others in making Jesus Christ known through –

- Teaching and nurturing people in Christian faith
- Loving service responding to human need
- Proclaiming the gospel
- Seeking to transform society
- Caring for God's creation."[32]

Appealing to the Mission Statement, however, is not an exact science. The Statement uses terms that have a broad range of theological and social meaning. For instance, what is the content of the "faith" in which we are teaching and nurturing people? What does "loving service" entail, especially in a context of historic wrongs which the Church has benefited from? What does the "transformation of society" look like in light of colonisation? How do we understand caring for creation in light of the identity of Māori as kaitiaki (guardians) of the whenua? And perhaps most significantly: What exactly is the "gospel" the Church proclaims and what does "proclamation" mean?

In this final section, I will briefly explore three areas of doctrine that have significant implications for how the Church might answer the above questions.

1. A Theology of Land and the Doctrine of Creation

In 1986, the Methodist Church formed a Land Commission to address matters pertaining to the Church's land holdings and related issues of inequity. The Commission produced a report, which noted that,

> "a theology of land, appropriate to life here in Aotearoa and to a response under the Treaty of Waitangi, is rooted in creation. The Hebrew concept of a Jubilee year recognises this and leads to a just approach to land issues. Christian responses can be nothing less. A strong theology of creation will enable us to develop a just theology of land."[33]

The Report rightly identifies that the history of colonisation and land alienation in Aotearoa reflects differing understandings of whenua. The Christian doctrine of creation is central here, because it deals with questions relating to the created order and how we human beings are to relate in, with, and to the world. According to Willie Jennings, Christian theologies of creation are "in crisis" because they have

[32] Presbyterian Church of Aotearoa New Zealand, *The Presbyterian Church Mission Statement*, https://www.presbyterian.org.nz/about-us (accessed 23 July 2026).
[33] Conference, 1989, quoted in: "Kōrero Papatupu Whenua", 8.1

"failed to grasp the fundamental transformation of the world with the emergence of modern colonialism."[34]

In the Western world, Lynn White Jr. famously named the harmfulness of an inadequate Christian theology of creation. In 1967, he published an article in which he blamed Christianity for our modern-day ecological crises. "In its Western form," he said, "Christianity is the most anthropocentric religion the world has ever seen" by "not only establish[ing] a dualism between man and nature but also insist[ing] that it is God's will that man exploit nature for his proper ends."[35]

While White Jr.'s thesis has been rightly critiqued as overly simplistic, the accusation does hold water in dominant Western forms of Christianity right up until the modern day. In 2023, Jan Pranger asserts that "as a religion Christianity – at least in its European and Amer-European forms – is an extractivist religion, with beliefs and practices that are deeply intertwined with an extractivist relationship to the world."[36]

This extractivist disposition relates not just to the Church's relationship to the land, but also to Indigenous peoples. Again Pranger:

> "Settler colonialism, the form of colonialism that creates such countries as the United States, Canada, or Australia [and New Zealand], foremost aims to extract the land and its resources from a non-Native population. Settler colonialism is therefore invasive as well as extractive. Settler colonialism seeks to *replace* the Indigenous population with settlers – inhabitants from colonial centers who come to build a permanent existence from lands extracted from Native peoples and ecosystems."[37]

Precisely as a predominantly settler Church, the Presbyterian Church in Aotearoa New Zealand must confront the ways in which it has benefitted materially from this extractivist posture and even theologically defended it. Pranger demonstrates how John Locke explicitly appeals to Christian creation narratives (especially Genesis 1:28) to justify an anthropocentric and instrumentalist relationship to land. According to Locke, "the earth and everything in it is given to men for the support and comfort of their existence."[38] For him, private property rights are bound up with God's command to "subdue, till, and sow" the land, thus improving it for the benefit of humankind.

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[34] Willie James Jennings, "Reframing the World: Toward an Actual Christian Doctrine of Creation," in *International Journal of Systematic Theology*, vol. 21, no. 4 (October 2019), 388.
[35] Lynn White Jr., "The Historical Roots of Our Ecological Crisis", in *Science*, vol. 155, no. 3767 (10 Mar 1967), 1205.
[36] Jan H. Pranger, "Christianity, settler colonialism, and resource extraction", in *Dialog*, vol. 62 (2023), 138.
[37] Ibid., 140.
[38] John Locke, *Two Treatises of Government (1689)*, Hackett Publishing (1980), 23, quoted in Pranger, 142.

On this basis, Indigenous land was often deemed to be *terra nullius*, empty land, "wasteland", because it was perceived to be undeveloped or underdeveloped.

This Lockian view goes some way to explaining how the Government justified alienating Ngāti Whātua from its land and replacing it with a model suburb; and to explaining how the Presbyterian church was happy to purchase land there without any consideration as to the moral implications of such a purchase. What Pranger demonstrates is that Christian theology of creation and settler colonial extractivism have existed in a mutually symbiotic relationship. It is not necessarily that Christianity itself is the problem, but that Christian theology has been co-opted to justify an instrumentalist and extractivist relationship with land and Indigenous peoples. In turn, Christian theology has embedded and justified those beliefs, subsuming them into theologies of creation and land.

How might Pākehā Christian theologies of creation be redeemed? Lynn White Jr. suggests that Christianity might be transformed by looking back into its own tradition and recovering the thought and practice of people like St Francis of Assisi, who modelled a different relationship with the created order and with the disenfranchised.[39] Certainly, with the emergence of eco-theology, there have been concerted efforts in the last 50 years to recover and reform aspects of Christian theology and practice.

Willie Jennings, however, believes the problem is much more fundamental. He claims that the problem has its inception in the Christian scriptures themselves and how they have been read since the days of the early church. In particular, he sees as problematic the supersessionist impulse of the early Gentile church to *replace* the Jews as God's people. Because Jesus is identified with God, the Lord of heaven and earth, the crucifixion of Jesus by "the Jews" served as justification for erasing Jewish people from God's salvation history.[40]

Such an interpretation is dissonant with St Paul's writings, especially Romans 11 in which the Jewish people are described as an olive tree rooted in God's saving life. The Gentiles are branches "grafted in" to the tree and are thus *included through Christ* in the promises given to Israel. God's special relationship with Israel, in other words, still stands. The Gentile church is included as an act of grace, learning to read the scriptures in light of the first covenant of God.

For this reason, Jennings describes the Church's natural position as being "second readers". "To be Christian," he says, "is to 'read after', that is, to attune ourselves to hear, and see, and feel and smell what others have already discovered."[41] This

[39] White Jr., 1207.
[40] Jennings, 391-394.
[41] Jennings, 405.

practice of "reading after" should become "a fundamental building block …through which we consider matters of identity and belonging."[42] In other words, the act of elevating ourselves and our own interpretations first is a fundamental distortion of who the Church is called to be in Jesus Christ.

For Jennings this practice of learning to "read after" would have at least three characteristics:

1. It would carefully consider the history of Indigenous suppression and land alienation, recognising that "Christianity's history is a history of not listening to the earth, because we have not listened to enough co-inhabitors of the earth."[43]
2. It would attend to *how* we obtain knowledge and limiting the dominance of Western forms of knowing. This includes "historicising" these Western ways of knowing – seeing them as reflective of post-Enlightenment and imperialist extractivist history than as ahistorical meta-epistemologies that sit outside of time, place and culture.
3. It would give prominence to ways of knowing that take seriously the interconnectedness of life. This would involve engaging with (in a non-extractivist and non-appropriating way!) Indigenous knowledge systems and ways of being.

We return to Ōrākei. The loss of Ngāti Whātua's papakāinga was not just the loss of a village. It was the severance of a people from their whenua and taonga and with it the loss of ways of knowing and being that embodied a deeper, interconnected relationship between land and people. "Kāinga," Tapihana writes, "represent the fundamental genealogically ordered relationship of belonging – anchoring tangata to whenua – in a universe organised by a system of ambilineal kinship and descent (whakapapa)."[44]

If Jennings' analysis is correct, then it is not only Ngāti Whātua who have been impoverished by this process of severance. Pākehā, too, have become enslaved to the settler colonial extractivist mindset, which lies behind the ecological destruction we are seeing today. Properly relating to the land (as Christians who are learning to "read after" those who have gone before) cannot be divorced from the restoration of Māori to their land and to their ways of knowing and being.

In this sense, the Presbyterian Church stands to gain from doing its part to return ancestral land to Ngāti Whātua. Through building relationship with tangata whenua, the Church will be enabled to develop a more holistic doctrine of creation that moves beyond the "modern colonial framework". In giving land back, the Church and

[42] Ibid., 406.
[43] Ibid.
[44] Tapihana, *Kāinga*, 7.

its relationship to land might itself be transformed in ways that bring it closer to God's good intentions for the world and human cohabitation in it.

2. The Praxis of Reconciliation

As mentioned above, the Methodist Church encourages its congregations to tell the story of the land with the primary aim of "restoring relationships severed by injustice". In committing to this practice, the Methodist Church is seeking to take seriously the "restoration of relationship", not as an optional extra to the Christian faith, but as a living out of the ministry of reconciliation to which the Church is called in Jesus Christ.[45]

This raises a question: if reconciliation is central to the Christian gospel, then why has the Presbyterian Church (and other denominations) historically not shown more interest in healing relationships with Māori that have been "severed by injustice"? "Traditionally," writes Alistair Reese, "the church has largely neglected [social dimensions of reconciliation], preferring to concentrate on the personal ramifications of its reconciliation doctrine."[46] In other words, reconciliation has primarily been conceived in *vertical* (God-human as opposed to human-human)*, individualised* (as opposed to communal or social), and *spiritual* (as opposed to material) terms.[47] Imagined in this way, communal, social and material aspects of reconciliation are marginal at best to the mission of the church.

Reese is quick to point out, however, that this is not a particularly biblical perspective: "Scripture also establishes this [vertical] model of God's reconciling pattern towards an estranged humanity, as the paradigm for interpersonal relations."[48] For St Paul, in particular, the Church's participation in the life of Christ by the Holy Spirit is the basis of a new way of relating *to one another*. In Ephesians, for example, the reconciliatory work of Christ on the cross is the basis for establishing peace between Jewish and Gentile parts of the church.[49] In Colossians, the reconciliation in Christ is cosmic and universal in scale, leading to restored relationship between peoples and also with the

[45] 2 Corinthians 5:16-21, NRSV.
[46] Alistair Reese, *Naboth's Vineyard: Towards Reconciliation in Aotearoa New Zealand,* self-published (2007), 10.
[47] The origins of this "traditional neglect" in the Church's doctrine of reconciliation are complex but have, at least in part, to do with the rise of evangelical Christianity in the post-Enlightenment West. The Enlightenment saw a shift away from a *theocentric* to an *anthropocentric* view of the world, which placed the thinking, feeling individual at the centre of reality. Evangelical Christianity was a product of its time, giving central importance to the individual's repentance and conversion. It was also Evangelical forms of Christianity that were the most fervently *missional*. For this reason, even though Evangelicals were often deeply humanitarian, communal and social aspects of the doctrine of reconciliation were, until recently, largely absent from dominant expressions of the Christian gospel.
[48] Ibid., 12-13.
[49] Ephesians 2:14-17.

non-human created order: "…through [Christ] God was pleased to reconcile to himself all things, whether on earth or in heaven, making peace through the blood of his cross."[50]

On these grounds, Reese and others have called for social (and ecological) dimensions of reconciliation to be recovered in the Church. The salvation of God includes a new creation and a new humanity characterised by *shalom*, a holistic peace that enables the flourishing of all life. Within the context of Aotearoa, Reese contends, this movement towards a community of love and peace must take into account the severed relationships with Māori and their alienation from the land.

What does reconciliation look like in this context? Reese identifies four main characteristics: truth, repentance, justice, and forgiveness. "Truth", he says, has two components: truth-recovery (learning what has been done) and truth-telling (the public acknowledgment of that). Both of these dimensions involve a willingness to listen and a posture of humility and repentance.[51]

I mentioned earlier that the Presbyterian Church has suffered from a selective and collective amnesia. The inadequacy of its current position to offer Māori first right of purchase for land is problematic precisely because it does not require the Church to remember differently. The amnesia remains and this amnesia defines the Church's present and shapes its visions for the future.

Why does it matter that the Church actively seeks to remember differently? Collective or shared memory of the past, Rowan Light contends, "expresses belonging; how we identify and think about ourselves collectively in the present (and future) is an imaginative reflection of a shared past." He goes on:

> "Relating to the past is a *moral exercise* because it gives meaning to past experiences. This meaning, offered through memory, might be the acknowledgment of wrongful hurt, solidarity with victims, or protection against future damages… In this way, memory describes the powerful connection between how we communicate and how we relate to each other and to the world."[52]

If relating to the past is indeed a moral exercise, then the Presbyterian Church must ask what has been the effect of *erasing* Māori land alienation from our histories? The Ōrākei Presbyterian fundraising brochure is a good example of how the Presbyterian Church has seen itself as "developing healthy communities" without taking into

[50] Colossians 1:20, NRSV.
[51] Reese, *Naboth's Vineyard,* 17.
[52] Rowan Light, *Why Memory Matters: 'Remembered Histories' and the Politics of the Shared Past* (Wellington: Bridget Williams Books, 2023), 16.

account the healthy communities that had been destroyed on that very same land just years earlier. In the act of *not* telling part of the story of the land, we have been able to construct a particularly favourable history that sees the Church fundamentally as a source of goodness in society.

To remember is to "share languages of the remembered past".[53] In any given society, there are layers of shared memory, some of which are complementary while others can be quite contradictory. Often there are competing interests behind how we remember and whose memories we give prominence to. It's unsurprising then that, as social cohesion erodes in New Zealand, the content of the NCEA History Curriculum has become hotly contested.[54] It is not just about the past. It is about present identity – the same is true for the Church.

Reconciliation in the present involves learning to remember *together* so that we can come to shared understandings of the past, build a sense of togetherness in the present, and work towards a future where we come closer together rather than further apart. For the predominantly "settler" Presbyterian Church, which has tended to benefit from colonisation, this process of truth-recovery and truth-telling can be a deeply uncomfortable experience.

Discomfort often breeds resistance – sometimes as active antipathy towards Māori, but often as indifference, a lack of curiosity, and a "selective memory". According to Avril Bell, "part of this resistance to learning about our connections to historical injustices is a fear about losing our place here or that place being diminished in some way".[55] This fear, however, presupposes a zero-sum game: *either* Pākehā flourishing *or* Māori flourishing.

The reality is far more complex. Bell commented that several Pākehā she spoke with talked about how learning about their history made them feel "*more* rather than less connected, and *better* rather than worse."[56] Certainly, this is the case for Lillian Murray, who went through a process of exploring her Pākehā identity through telling her Pepeha. "I sense," she said, "that Pākehā culture at this point in time is a culture of living the questions. There is a dignity in this vulnerability as we heed a call to hold good-natured questions, that we might live into good-fruit answers together."[57]

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[53] Ibid., 17.
[54] Kārena Ngata et al., "Why the new history curriculum will deepen divisions in Aotearoa" on *The Spinoff,* 2 December 2025, https://thespinoff.co.nz/society/02-12-2025/why-the-new-history-curriculum-will-deepen-divisions-in-aotearoa?kuid=31fc80f9-a186-437f-9ab0-df56eaf7fd8b-1776038400&kref=DqEQ3u6dah9c (accessed 26 July 2026).
[55] Avril Bell, *Becoming Tangata Tiriti: Working with Māori, Honouring the Treaty* (Auckland: University Press, 2024), 125.
[56] Ibid.
[57] Lillian Murray, *Joan Cook Memorial State of the Pākehā Nation Essay, 2025*, 16.

"Living the questions" implies a posture of humility and a willingness to listen. For Reese, this is central to *repentance* (metanoia) from a biblical view. Repentance, he says, "is really the adoption of a 'different mindset' and a different way of living, based upon a reconfigured understanding of reality."[58] In this way, truth telling and repentance go hand-in-hand and are prerequisite steps on the path to "living into good-fruit" of reconciliation together.

In this short exploration of reconciliation, I have focussed on the first two characteristics identified by Reese: truth and repentance. Justice – in the case, relating to the *redemption of land* – will be the focus of the final section. Forgiveness, the fourth characteristic named by Reese, is ultimately a matter for Māori. As a predominantly "settler" church, in the history of injustice and land alienation, the Presbyterian Church has often been in the position of perpetrator (or at least inheritor). Through truth-telling and repentance, the Church will be required to enter into relationship with Māori and this may open up the door to forgiveness. But whether we are forgiven is not for the Church to decide.

3. The Praxis of Redemption

Truth-telling and repentance lead to questions of justice: seeking to right the wrongs of the past. When it comes to Māori land alienation, Pākehā repentance rings hollow if there is no attempt at redress. Reconciliation, in other words, is bound up with *redemption*. For the Presbyterian Church, a predominantly "settler church", which largely inherited land *indirectly* from Māori, this question of what "justice" means is a central and contentious one. Until now, however, it has not been explored in depth; and doing so, would undoubtedly produce discomfort.[59]

Western Christian doctrines of redemption have, like its doctrines of reconciliation, historically downplayed social and material dimensions. "Redemption" or "salvation" has been primarily conceived in personal and spiritual terms: redemption from personal sin and death. But as Murray Rae makes clear, within both Jewish and Christian traditions, which are respectively shaped by the Passover and Eucharist meals, the drama of redemption is celebrated *as a community*.[60] The Christian Eucharist, which draws on Passover imagery reinterpreted through the death and resurrection of Jesus Christ, is a dramatic enactment of the *liberation* of God's people from bondage.

Certainly, this liberation – or redemption – through the death and resurrection of Jesus Christ is, for Christians, personal and spiritual. But it also communal and

[58] Reese, *Naboth's Vineyard*, 18.
[59] Interview with Wayne te Kaawa, 27 July 2026.
[60] Murray A. Rae, *Resurrection and Renewal: Jesus and the Transformation of Creation* (Grand Rapids, MI: Baker, 2024), 146.

material. "The resurrection of Jesus from the dead," writes Rae, "establishes a missional imperative to participate in the divine project of giving life to the world. That includes … doing good, seeking justice, rescuing the oppressed, defending orphans, and pleading for widows". He continues:

> "…the kingdom [of God] cannot come without all the cries of history's victims being heard; it cannot come without their wounds being healed; it cannot come without the evil that has been done to them being confronted and finally defeated; it cannot come without the truth being told".[61]

In the context of Aotearoa, then, redemption cannot be properly conceived without "hearing the cries" of Māori, who have been robbed of their whenua and taonga; without "healing wounds" that have been left to fester from generation to generation; without "confronting the evil that has been done" and establishing new ways of being that prevent it from happening again; without truth-recovery and truth-telling. Because of its commitment to the coming of God's Kingdom, the Church should not wait for the Crown to get things right. It should be leading the way.

In the Hebrew Scriptures, in particular, redemption of people is often explicitly bound up with the redemption of land. The Methodist Church acknowledged this when it advocated for a recovery of "the Hebrew concept of a Jubilee Year".[62] The concept of Jubilee is explained in Leviticus 25. As a condition of living in the Promised Land, the people of Israel are told that "the land shall observe a Sabbath for the Lord". Every seventh year, the land is to lie fallow in order that it may enjoy "complete rest".

After seven cycles of working and resting the land – after 49 years – on the Day of Atonement, the Year of Jubilee begins, during which the land is returned to its original occupants. According to Leviticus, "the land shall not be sold in perpetuity, for the land is mine [the Lord's]; with me you are but aliens and tenants. Throughout the land that you hold, you shall provide for the redemption of the land."[63]

The underlying Hebrew understanding of property and property rights bears closer resemblance to Māori views of whenua than the predominant Western, Pākehā view. Firstly, the people belong to the land, not the other way around. They do not "own" it as a commodity. God reminds them that the land has been gifted to them by grace and is their responsibility to care for, being aware of its natural limits and allowing it to rest and recover. The seventh year of sabbath is a reminder that God cares for the flourishing of the land and that our human flourishing is also dependent on it.

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[61] Ibid., 174.
[62] *Bricks and Mortar,* 8.1.
[63] Leviticus 25:23-24, NRSV.

Secondly, because the people do not own the land, when land is sold, it is not sold in perpetuity. Instead, the occupants are likened to "tenants" who are responsible for its redemption to the original inhabitants in the Jubilee Year. This concept of returning land is designed to prevent wealth inequality, slavery, and the permanent alienation of people from their place of belonging and means of generating a living. It is especially important to note that, in Leviticus 25, the redemption of people and the redemption of land is bound up together. The Sabbath and Jubilee rhythms are intended to keep things in balance: to ensure both land and people are cared for in perpetuity.

One of the recurring themes in this article is that settler colonial extractivism has been the ideological driving force behind both Māori land alienation *and* ecological destruction. Just as the problems have a common cause, so there is a common solution. For Tapihana, the recovery of Kāinga – the communal Māori way of life that is rooted deeply in the whenua – is a "double solution" to our planet's future. "Will the Crown accept responsibility," he asks, "for the festering colonial wounds that continue spreading and infecting our nation's wider social (tangata) and economic (whenua) well-being?"[64] While Tapihana is talking specifically about the role of the Crown, the same question could be asked of the Presbyterian Church and other denominations, which own vast amounts of land and therefore have a degree of responsibility to participate in the work of redemption.

The Church's doctrine of redemption (like its doctrines of creation and reconciliation) need to be reconceived in light of modern colonialism. This involves a reimagining of dominant paradigms, such as the Passover-Eucharist liberation paradigm. "Christian settlers drew on the Exodus-Conquest narrative complex in Exodus and Joshua" to create "an imperializing rhetoric" and "anti-conquest ideology".[65] That is, the settler church has often imagined itself as the people liberated from slavery and inheriting a Promised Land given by God. Therefore they are not conquerors, but simply inheriting what has been given to them.

The early Presbyterian settlers in New Zealand, many of whom had come from the breakaway Free Church of Scotland, understood their own experiences in terms "exodus" and "wilderness" following the Great Disruption of 1843. For this reason, many of them imagined their settlement in New Zealand as the building of a "new Jerusalem" and a "godly society".[66] A similar sentiment was echoed by Thomas Bracken, and later popularised by Prime Minister Richard Seddon, in describing New Zealand romantically as "God's Own Country" (now typically referred to simply as "Godzone"). The settler population, in other words, came to see themselves as God's

[64] Tapihana, *Kāinga*, 10.
[65] Pranger, "Christianity, settler colonialism, and resource extraction," 142.
[66] Yvonne M. Wilkie, *Weaving Vision, Heritage and Hope: 150 Years of the Presbyterian Synod of Otago and Southland (1866-2016),* (Dunedin: Synod of Otago and Southland, 2016), 8.

people and the rightful inheritors of the land. According to this narrative, which has played out in colonies around the world, the Indigenous peoples are the Canaanites who, regrettably need to be dispossessed of their land, in order to build the godly and paradisical society that is envisaged.[67]

It is not surprising that Māori prophetic movements later identified *themselves* as the Israelite people, who had been exiled and to whom the land rightly belonged. The likes of Rua Kēnana found in the Christian scriptures, especially the Old Testament, a narrative that helped them to make sense of their experiences and to push back against colonial expansion and land alienation.[68]

To return to the question of *how* we remember our history, it is clear that both Māori and Pākehā have employed the Exodus redemption narrative in quite different ways to imagine themselves as God's people who have a right to the Promised Land. Until Pākehā have come to terms with the fact that their inheritance of the land has come at the cost of Māori disinheritance, liberation of people and land will always be one-sided and partial. A personalised and spiritualised doctrine of redemption simply serves to veil these urgent social and material dimensions of redemption in Aotearoa.

It should be reiterated that, for Christians, the drama of redemption is communicated and embodied in the Eucharist. Gathered in communion as a Eucharistic community, Christ calls the church "to share in the mending and rebuilding of relationships". As Rae rightly notes, this is not without trouble because "those who are called into this community are themselves in need of restoration and repair."[69] This point is key. Redemption in Aotearoa must be imagined *together in communion:* Māori and Pākehā together. The first step for Pākehā is acknowledging that we are in need of restoration and repair; indeed, that we too have been enslaved by the settler extractivist mindset. In community *with Māori*, the dissonant narratives of redemption and liberation will be aired, clearing the ground for new visions for a redeemed future to be imagined together.

What does justice look like in the context of systemic land alienation? The answer, I suggest, must be discerned with Māori, not without them. In some cases, Landback may be the only appropriate way forward. In other cases, some form of compensation, redress or apology may be the preferred option. The key is that the circumstances for redemption are to be worked out in relationship. As in Ōrākei, the settler church has been deciding for itself for too long what "healthy communities" look like. It is time that we listened.

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[67] Pranger, "Christianity, settler colonialism, and resource extraction," 143.
[68] Murray Rae, "The Subversive Theology of Rua Kēnana" in *Mana Māori & Christianity,* ed. Hugh Morrison, Lachy Paterson, Brett Knowles and Murray Rae (Wellington: Huia, 2012), 240.
[69] Rae, *Resurrection and Renewal,* 147.

Conclusion and next steps

In this study, I set out to answer three questions:

1. In what circumstances is it currently possible for the Presbyterian Church to legally give land back to Māori?
2. What would need to change in order to broaden the circumstances in which land can be given back?
3. Why is the issue of land restitution central to the life and mission of the Presbyterian Church of Aotearoa New Zealand?

The first two questions, it turns out, are relatively simple to answer. The advice from Kāhui Legal shows that there is already a potential legal argument for giving land back. This argument is based on two things: firstly, the historic precedence within the Presbyterian Church, and secondly, the willingness of the Presbyterian Church to explicitly state that landback is consistent with its missional purpose. That being the case, I suggested two practical solutions, both of which would involve resolutions at the General Assembly. The two resolutions would be something like this:

1. The General Assembly affirms that, in the context of systemic land alienation and the impoverishment of Māori, giving land back to Māori is aligned with the ministry of reconciliation in Jesus Christ to which the Church is called and is therefore consistent with the charitable purposes of the Presbyterian Church.
2. The General Assembly follows the lead of the Methodist Church by requiring churches and presbyteries to conduct a Kōrero Papatupu Whenua (land history research) when looking to sell land.

By taking these two actions, the Presbyterian Church would ensure that it learns about instances of injustice relating to land (a means of dealing with the "selective, collective amnesia) and that it has a clear, legal means of making things right.

The third question is a lot more complex to answer. Just because there is a legal avenue for land restitution, does not mean that the Church will seriously consider landback. That's because land restitution is a theological, missional and ethical issue – an issue the Church has only begun to scratch the surface of.

In researching for this paper, I note the relative lack of existing research in theology of landback within the New Zealand context. Theologians like Wayne Te Kaawa and Murray Rae are leading the way in the Presbyterian Church. The lack of research suggests that the Church has not historically seen a direct connection between land restitution for Māori and the ministry of reconciliation to which it has been entrusted.

I suggest that removing the legal barriers to land restitution will prompt a deeper line of theological and ethical enquiry in the Church. This self-enquiry will be uncomfortable because it deals with issues of land and money (and the Presbyterian Church has a lot of it!). But it is also a necessary outworking of being converted ever again to the risen Christ so that, in doing the hard work of being reconciled to one another, "we might become the righteousness of God." (2 Cor 5:21).

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