

BEFORE THE FAST-TRACK EXPERT CONSENTING PANEL

IN THE MATTER

of an application for approvals under section 42 of
the Fast-track Approvals Act 2024 ("FTAA")

AND

IN THE MATTER

the substantive application by New Zealand
Transport Waka Kotahi ("Waka Kotahi") for the
Brynderwyns alternative project

MEMORANDUM OF COUNSEL FOR TE PATUHARAKEKE TE IWI TRUST BOARD
("PATUHARAKEKE")

12 August 2026

MAY IT PLEASE THE PANEL

1. This memorandum responds to the Panel's invitation at paragraph [10] of Minute 5 for mana whenua, iwi, and hapū to provide their views on whether further hui and/or site visits would be of assistance to the panel and, if so, how such engagement might best be undertaken.
2. Patuharakeke supports the Panel's decision to hold hui to enable mana whenua, iwi, and hapū to present their comments to the Panel kānohi ki te kānohi.¹ This accords with its tikanga and is also consistent with transferring the procedural requirements in Patuharakeke's Mana Whakahono a Rohe over into the fast-track process. Patuharakeke hold mana whenua over the northern side of Piroa (Brynderwyn Hills) while Te Uri o Hau hold mana whenua over the southern side of Piroa. Patuharakeke is supportive of Te Uri o Hau hosting the organised hui.
3. Patuharakeke considers that a site visit(s) with its pūkenga and pūkenga Te Uri o Hau is appropriate and would be beneficial to the Panel.² As set out in Minute 6, during its 5 August 2026 site visit the Panel was accompanied by NZTA's experts and visited various locations within the proposed designation the applicant appears to have considered to be of importance. The proposed designation also covers many sites of immense cultural significance to Patuharakeke, as its cultural impact assessment identified, which were not visited by the Panel, and in respect of which Patuharakeke considers the Panel would benefit from hearing from pūkenga kānohi ki te kānohi at place, in the same way it has from the applicant's experts.
4. Should the Panel decide to undertake a further site visit(s) Patuharakeke is happy to provide a suggested itinerary and any other information or other assistance the Panel may need.



Madeleine C Wright

Counsel for Patuharakeke Te Iwi Trust Board

¹ Minute 5, paragraph [8].

² Minute 5, paragraph [9].