



North West Rapid Transit FTAA-2511-1146

From Chloe Trenouth
Date Tue 2026-08-18 10:32 AM
To Substantive <substantive@fasttrack.govt.nz>
Cc Karen Wilson Adrian Pettit

Tēnā koe,

I provide the following comments to the Panel on behalf of Te Ākitai Waiohū.

Te Ākitai Waiohū has considered the Panel's draft decision and conditions, and provides the following comments:

- Te Ākitai Waiohū does not oppose the decision to approve the project but continues to be concerned about the lack of due cognisance NZTA has taken of Treaty Settlements. Other than acknowledging Treaty Settlements, determining that NZTA has undertaken extensive consultation, and accepting conditions that require ongoing consultation through the design of the project, the draft decision and conditions do not place any greater weight on Treaty Settlement redress. Requiring engagement with mana whenua to identify how cultural values will be reflected in the Project does not fully address Treaty obligations. Where statutory acknowledgements and cultural redress apply, a higher standard of recognition, engagement and protection is required.
- Amendments to the conditions are required as outlined in the table below to provide greater certainty and close the loop of consultation required by the conditions.

Designation condition 3	Outline Plan(s) and Management Plans (a) Outline Plan(s) may be submitted in parts or in stages to address particular activities (e.g., design or construction aspects), or to reflect the staged implementation of the Project. (b) Outline Plans must include (as relevant): 1. Form and Landscaping Statement; and (ii) Construction Noise and Vibration Management Plan, <u>and</u> <u>(iii) Statement summarising the outcomes from engagement required by conditions 5-7, including any adverse effects on cultural values identified and the extent to which they are avoided, remedied or mitigated,</u> unless otherwise stated in the conditions below.	Amendment is required to provide a check and balance to actually addressing issues raised through engagement and to demonstrate that appropriate engagement has been undertaken. Noting that concerns are not simply about the reflection of cultural values but the management of adverse effects on cultural values. Because adverse effects on cultural values cannot be fully understood at this phase of design there needs to be opportunity to address these at the outline plan phase.
Designation condition 26A	Arch Hill Scenic Reserve – Native Vegetation Removal (a) If native vegetation within the Designation is removed in Arch Hill Scenic Reserve shown in Schedule F, the Requiring Authority must:	Amendment required to clarify that the preference is Arch Hill rather than allowing for either option.

	(i) for temporary construction works, plant native vegetation in those areas where vegetation was removed. (ii) for permanent works, plant an equal area (in m2) within Arch Hill Scenic Reserve or <u>if not practicable</u> elsewhere within the Designation. ...	
Resource consent condition 2	(a) A management plan or plan required by a condition must: (i) be prepared and implemented in accordance with the relevant condition; (ii) be prepared by a SQEP(s); and (iii) include sufficient detail relating to the management of effects associated with the relevant activities and/or stage of work to which it relates. (b) The Consent Holder may prepare management plans or plans in parts or in stages to address specific activities or to reflect the staged implementation of the Project. (c) In preparing the management plans or plans listed in Condition 3(b) the Consent Holder must consult with: 1. Te Kawerau ā Maki for works between Brigham Creek Station and west of Te Whau River / SH16 causeway; 2. Ngāti Whātua o Kaipara for works between Brigham Creek Station and Westgate; and 3. Ngāti Whātua Ōrākei, Te Ākitai Waiohū and Ngaati Te Ata for works east from Te Whau / SH16 causeway to Ian McKinnon Drive; <u>and</u> 4. <u>Include in the management plans a summary of comments received along with a summary of where comments have been incorporated, and where not, the reasons why.</u> (d) The management plans or plans must be implemented as certified.	Amendment is required to provide a check and balance to address issues raised through consultation. This is a standard approach accepted in resource consent conditions requiring management plans. It does not tie the consent holder to a certain outcome but demonstrates the appropriate consultation has been undertaken.

Ngā mihi | Regards

Chloe Trenouth

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