

Memorandum of Pirirākau Tribal Authority and Pirirākau PSGE in Response to the Convener's Post-Conference Minute (2 October 2025)

Fast-track Approvals Act 2024 (FTAA-2507-1085) – Takitimu North Link Stage 2

in the matter of: an application for resource consents, approvals and a notice of requirement to alter a designation, to construct a four-lane, median divided highway to replace existing State Highway 2 corridor between Te Puna and Ōmokoroa, known as 'Takitimu North Link - Stage 2'

applicant: **New Zealand Transport Agency Waka Kotahi**
Requiring Authority and Applicant

1. Purpose

1.1 This Memorandum records the position of the Pirirākau Tribal Authority Incorporated and Pirirākau PSGE, and also in relation to the Joint Memorandum prepared by project participants in response to the Convener's Minute dated 2 October 2025.

1.2 Pirirākau supports the collaborative intent for a recommended joint response of interested parties; however, it considers that further process and time are required to properly address the Convener's directive to "*confer and confirm what process and time is required to appropriately consider the management plans (of the associated application)*" before the 50-working-day decision period begins.

1.3 While Pirirākau supports the overall collaborative approach and continues to work constructively with NZTA and other agencies, this Memorandum is submitted independently to record Pirirākau's specific position on process, timing, and recognition matters as they relate to the Takitimu North Link Stage 2 project.

2. Recognition and Corrections

2.1 Pirirākau acknowledges the Convener's recognition that both Pirirākau and Ngāti Taka hapū were omitted from the Section 18 Report and Schedule 3 listing. These errors require confirmation of correction to accurately reflect the hapū as relevant iwi authorities under the Fast-track Approvals Act 2024, noting also correction to persons representing these hapū.

2.2 Pirirākau requests confirmation from MfE and the EPA that:

2.2A The Section 18 report will be reissued to include the correct Pirirākau and Ngāti Taka representatives for this project; and

2.2B The Schedule 3 list used to guide panel procedure will be amended accordingly before the 50-working-day timeframe commences noting a correct record of representatives for the duration of the *FTAA-2507-1085) – Takitimu North Link Stage 2* process being; Jason Ake (*Chair*

– *Pirirākau Tribal Authority Incorporated*); Ngawa Hall (*Chair - Pirirākau PSGE*); Carlton Bidois (*Pirirākau Hapū Representative*); Jacqui Rolleston-Steed (*Pirirākau Hapū Representative*)

2.2C Pirirākau has provided the applicant with a Cultural Impact Assessment (CIA) and requests that this document be formally recognised and referenced within the application documentation, to ensure its findings and recommendations are integrated into the final Management Plans and reflected in the consent conditions.

3. Proposed Draft Management Plans and Process

3.1 Only two draft management plans are included in the Application, namely:

3.1A a draft Lizard Management Plan (which forms part of the Wildlife Approval and related conditions); and

3.1B a draft Archaeological Management Plan (which forms part of the Archaeological Authority and related conditions).

3.2 A draft Research Strategy is also included as part of the Archaeological Authority and related conditions.

3.3 The draft Wildlife Approval and Archaeological Authority conditions proposed by NZTA include a requirement for both draft management plans to be provided to Pirirākau and Ngāti Taka for comment prior to finalisation.

3.4 Pirirākau acknowledges that the applicant provided the draft Lizard and Archaeological Management Plans to Pirirākau prior to lodgement.

3.5 Pirirākau raised legitimate concerns in relation to these plans well before the final drafts were lodged as part of the substantive application.

3.6 Pirirākau is not satisfied that its concerns have been clearly acknowledged in the final drafts or in the proposed conditions for both plans.

3.6A Pirirākau's confidence in the current suite of draft management plans is limited, reflecting experiences during Stage 1 where several cultural and archaeological matters, including the recovery and handling of koiwi, were not satisfactorily mitigated or compensated. The absence of clear acknowledgement of these lessons within the Stage 2 draft plans contributes to this ongoing concern.

3.6B Pirirākau is further concerned that, under the Fast-track Approvals regime, NZTA's proposal for contractor-led drafting and delivery of future management plans introduces additional risk to the integrity of agreed mitigations and the Crown–hapū relationship. This model may inadvertently bypass direct agreement between NZTA (as requiring authority) and Pirirākau, thereby weakening accountability and cultural assurance mechanisms that underpin effective mitigation.

3.7 Pirirākau were not in opposition to the substantive application in its preparation for a normal Statutory RMA process. Pirirākau acknowledges that NZTA (the applicant) has worked under a notion

of relative partnership with Pirirākau in relation to the TNL Project Stage 1 and the various consenting and designation authorisations required for Stage 2.

3.8 The advent of NZTA's preference for the FTAA, along with the timing of central government reforms and repeals in relation to the RMA, significantly challenged Pirirākau's capacity and capability to navigate the FTAA regime and achieve appropriate recognition, mitigation, and conditions addressing the cultural, environmental, social, and economic impacts of the TNL Project construction on Pirirākau Hapū and their cultural landscapes.

3.9 The statement above, and the lack of recognition of Pirirākau's post-settlement status and autonomous customary authority within its rohe, has contributed to a diminished level of confidence that appropriate mitigation and conditions can be achieved through the yet-to-be-drafted management plans and associated conditions.

3.10 Pirirākau raised these issues during the Convener's Conference and has been asked to reply to the Convener's Minute with an indication of the time required to review the two listed Draft Management Plans.

4. Process and Time Required

4.1 In accordance with paragraph [6] of the Convener's Minute, Pirirākau proposes the following structured engagement process before the decision clock starts:

4.1A Management Plan Review

Pirirākau formally requests **30 working days from Friday 11 October 2025 through to Friday 21 November 2025** to complete its review and written comment on the two draft management plans currently lodged — the *Draft Lizard Management Plan* and the *Draft Archaeological Management Plan*.

- This timeframe sets to replace the indicative timeframe implied within the Joint Memorandum circulated by the Participants and reflects the understanding from the Convener's Conference that additional time may be determined to ensure fair and informed consideration of the management plans before the 50-working-day decision period begins.
- During this 30-day period, Pirirākau seeks to convene at least one joint technical wānanga with all relevant parties to work through both plans in detail and align on technical and cultural mitigation measures.

4.1B Progressive Engagement on Additional Management Plans

Pirirākau requests that as further draft management plans are developed, that these be shared as they are shaping rather than only once full drafts are complete. Early access will allow workshop-based engagement to strengthen cultural integrity, integrate traditional knowledge, and prevent procedural delay once the decision clock commences.

4.2 Corrections and Confirmations

4.2A Confirmation that the corrected Section 18 and Schedule 3 documents have been circulated.

4.2B Adoption of the NZTA – Pirirākau Relationship Agreement as the formal engagement framework for future collaboration.

4.3 Decision Clock

4.3A The 50-working-day decision period should not commence until the above reviews, corrections and confirmations are completed.

5. Programme Plan Rationale

5.1 A high-level Pirirākau FTAA Project Plan (7 October 2025)¹ accompanies this Memorandum. The plan provides:

5.1A A practical, time-bound schedule for reviewing management plans and conditions.

5.1B Assigned leads, dependencies, and internal sign-off responsibilities.

5.1C Defined milestones through to 21 November 2025 to ensure all hapū engagement occurs prior to the start of the decision clock.

5.2 This demonstrates Pirirākau's intent to complete all necessary reviews efficiently and within the Convener's expectations of appropriate time and process.

6. Conclusion

6.1 Pirirākau supports the intent of collaborative progress on TNL2 but records this Memorandum to ensure:

6.1A The formal correction of Crown documentation.

6.1B A fair and transparent pre-decision process; and

6.1C The appropriate integration of hapū-led input before the statutory decision timeframe begins.

Dated 10 October 2025

Jason Ake (Chair – Pirirākau Tribal Authority Inc)

Ngawa Hall (Chair – Pirirākau PSGE)

Carlton Bidois (Pirirākau Representative)

Jacqui Rolleston-Steed (Pirirākau Representative)

Signed on behalf:



Jason Ake – Chair: Pirirākau Tribal Authority Incorporated

¹ Attachment: Annex 1 – Pirirākau FTAA Project Plan (7 October 2025)