TE URI O HAU
ENVIRONS

20 October 2026

To: Mary Hill
Chair, Alternative to the Brynderwyn Hills Expert Panel

Via: Environmental Protection Authority
substantive@fasttrack.govt.nz

Project: Alternative to the Brynderwyn Hills (FTAA-2603-1178)

Subject: Te Uri o Hau Comments on Cultural Effects and Cultural Values Management Plan

Te Uri o Hau Settlement Trust is the Post Settlement Governance Entity (PSGE) for Te Uri o Hau and the recognised Treaty Settlement Entity for the project area. Te Uri o Hau Environs is a subsidiary of Te Uri o Hau Settlement Trust tasked with advocating for kaitiakitanga and rangatiratanga responsibilities in natural resource management and mātauranga Māori values within our statutory area of interest. These comments have been provided by Te Uri o Hau Environs on behalf of Te Uri o Hau Settlement Trust.

Alignment of Mana Whenua Cultural Assessments
Te Uri o Hau notes the close alignment between the cultural assessments prepared by Te Uri o Hau, Patuharakeke and Te Parawhau in relation to the Alternative to the Brynderwyn Hills Project.

The three assessments identify significant cultural effects arising from the Project, particularly where cultural effects intersect with freshwater, indigenous biodiversity, taonga species, wetlands, ngahere and the wider cultural landscape. For Te Uri o Hau, these environmental components cannot be considered in isolation. Maunga, awa, ngahere, wetlands, taonga species and tangata whenua are interconnected through whakapapa, and effects on one part of this system can affect the mauri, integrity and wellbeing of the wider cultural landscape.

Te Uri o Hau considers that the close alignment between the three cultural assessments should be afforded significant weight by the Expert Panel. It reinforces the need for the Project's ecological assessments, approval conditions and management frameworks to adequately recognise the relationship between cultural and ecological effects.
Te Uri o Hau remains particularly concerned about the adequacy of ecological information underpinning the Project and the certainty provided by the proposed conditions and management measures. Te Uri o Hau has previously identified concerns regarding ecological

baseline information and risks to taonga species, including pepeketua, mokomoko, kauri snails, manu, pekapeka and freshwater taonga species.

Accordingly, Te Uri o Hau considers that substantive amendments are required to the relevant conditions, management plans and approval frameworks to ensure that the cultural and ecological effects identified by mana whenua are appropriately addressed through clear and enforceable requirements.

Cultural Values Management Plan

Te Uri o Hau supports the inclusion of a Cultural Values Management Plan(CVMP) as a mechanism for managing cultural effects and implementing cultural requirements throughout the life of the Project. However, Te Uri o Hau does not support an approach whereby Waka Kotahi prepares the CVMP and subsequently provides it to mana whenua for consultation or comment.

The cultural values, tikanga, mātauranga, cultural monitoring requirements and cultural outcomes contained within the CVMP are matters for mana whenua to identify and determine. Accordingly, the CVMP should be prepared by mana whenua, with input from Waka Kotahi on Project implementation, interfaces with other management plans and practical delivery requirements.

This is consistent with Te Uri o Hau previous position that a CVMP should be mandatory and should recognise the distinct values, tikanga, cultural monitoring requirements and cultural outcomes of each relevant iwi and hapū.

Collective CVMP Framework

Following the collective mana whenua hui held on 14 October 2026, Te Uri o Hau supports a CVMP framework comprising:

- shared principles and requirements applying collectively across the Project;
- joint components where cultural values, effects or management requirements overlap;
- separate iwi and hapū components that recognise the distinct mana, whakapapa, tikanga, mātauranga, cultural values and kaitiakitanga responsibilities of each mana whenua group; and
- provision for further detail to be developed where necessary as Project design and implementation progresses.

This approach enables mana whenua to work collectively on matters of shared concern while ensuring that the collective process does not override or diminish the mana, rangatiratanga or individual requirements of Te Uri o Hau.

For Te Uri o Hau, the CVMP must give practical effect to the matters identified through the Te Uri o Hau CVIA and subsequent comments. These include:

- Te Uri o Hau rangatiratanga, mana whakahaere and kaitiakitanga;
- tikanga and cultural protocols;
- protection and management of wāhi tapu and culturally significant sites;
- cultural and kaitiaki monitoring;
- protection, monitoring, salvage and relocation of taonga species;
- freshwater and cultural health monitoring;
- protection and restoration of mauri;
- involvement in ecological restoration and enhancement;
- accidental discovery and cultural response procedures;
- reporting, information-sharing and cultural incident processes;
- ongoing engagement and review; and
- appropriate protection of Te Uri o Hau mātauranga and culturally sensitive information.

The Te Uri o Hau component of the CVMP must be prepared and determined by Te Uri o Hau, while the overall CVMP must provide for the collective components agreed between mana whenua.

Implementation, Review and Resourcing

Te Uri o Hau seeks amendments to the proposed CVMP conditions to ensure that the CVMP is implemented throughout the relevant phases of Project design, construction, operation, maintenance, monitoring and ecological restoration.

The CVMP should operate as a living document capable of review and amendment where detailed design changes, new cultural information becomes available, discoveries occur, monitoring identifies additional issues or changes to Project activities require a cultural response.

Appropriate resourcing must also be provided to enable Te Uri o Hau, Patuharakeke and Te Parawhau to participate effectively in the preparation, implementation, monitoring and review of the CVMP.

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The CVMP is an important mechanism for giving practical effect to mana whenua responsibilities, but it must not be used as a substitute for robust and enforceable consent and approval conditions. Matters necessary to avoid, remedy, mitigate or otherwise respond to significant cultural and ecological effects should be secured through enforceable conditions, with the CVMP providing the framework for implementing those requirements in partnership with mana whenua.

A collective hui with Waka Kotahi is planned for 10 November 2026 to progress this work.

Te Uri o Hau respectfully requests that the Expert Panel have regard to the matters raised in these comments when considering the final conditions for the Project.