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21 July 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 Environs Comments on Additional Application Material

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

Te Uri o Hau Environs provided a Cultural Values and Impact Assessment (CVIA) for the Northern Corridor Section 2B (Alternative to the Brynderwyn Hills Project) in April 2026. That CVIA remains current and relevant to the Expert Panel's consideration of this application and should be afforded substantial weight.

The findings and recommendations contained within the CVIA form the basis of these comments. Te Uri o Hau continues to maintain that the project will result in permanent and irreversible impacts on aspects of the cultural landscape and that many of these effects cannot be fully avoided, remedied or mitigated. Any support for the project remains conditional upon robust and enforceable conditions that recognise and provide for Te Uri o Hau rangatiratanga, mana whakahaere and kaitiakitanga responsibilities.

Te Uri o Hau seeks that all recommendations and conditions contained within the CVIA be adopted and given effect through the Fast-track approvals process.

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Scope of Te Uri o Hau Comments

Te Uri o Hau will limit its comments to those activities, effects, assessments, management plans and proposed conditions that relate to the area of interest of Te Uri o Hau within the Alternative to the Brynderwyn Hills Project. For the assistance of the Expert Panel, Te Uri o Hau considers the relevant project area for the purposes of these comments to extend from the summit of the Brynderwyn Hills, in the vicinity of the Artillery Road intersection, southward through the Piroa catchment, Wairau catchment, Pukepōhatu (Bald Rock), Pukearenga and Pukekaroro landscapes, including the Pukekaroro Stream catchment. This area contains important ancestral landscapes, waterways, wāhi tapu, taonga species habitats, and sites of historical and cultural significance to Te Uri o Hau. While the wider rohe of Te Uri o Hau extends beyond this area, these comments are confined to those parts of the project where Te Uri o Hau cultural values, rangatiratanga interests, and kaitiakitanga responsibilities are directly affected.

Relationship of these comments to the Te Uri o Hau CVIA

These comments should be read alongside the Te Uri o Hau CVIA.

The CVIA identifies that:

- The Brynderwyns, Pukekaroro, Pukearenga and Pukepōhatu are culturally significant ancestral landscapes and Outstanding Natural Landscapes (ONL).
- Piroa Stream, Pukekaroro Stream, Wairau tributaries and associated wetlands form part of a wider interconnected cultural and ecological network that ultimately contributes to the health and mauri of the Kaipara Moana.
- The mauri of the whenua is not divided into separate environmental components but functions as a living system where effects on maunga, awa, ngahere and wetlands are interconnected.
- The project contributes to the ongoing fragmentation of the cultural landscape and further constrains the ability of Te Uri o Hau to exercise kaitiakitanga and maintain cultural relationships with significant sites and resources.

Accordingly, Te Uri o Hau considers that the cultural effects identified in the CVIA provide an important context for understanding the significance of the adverse landscape, ecological, freshwater and biodiversity effects acknowledged within the applicant's technical assessments.

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Assessment of Landscape and Visual Effects

Brynderwyn Hills Southern Escarpment (ONL)

Te Uri o Hau notes that the applicant's own assessment concludes that the proposal will result in high adverse effects on natural character, high adverse effects on ONL values, substantial loss of indigenous vegetation, and significant modification of the Piroa Stream system and its tributaries. These findings are of particular concern to Te Uri o Hau and are consistent with the cultural effects identified in the Te Uri o Hau CVIA.

The CVIA identifies Piroa Stream and its tributaries as culturally significant waterways that form part of an interconnected cultural landscape linking maunga, awa, ngahere, wetlands, ancestral boundaries, traditional travel routes, mahinga kai resources, and the wider health of the Kaipara Moana. For Te Uri o Hau, these environments are not separate landscape features, but part of a living system connected through whakapapa. Effects on one component of this system inevitably affect the mauri and wellbeing of the whole.

Te Uri o Hau considers that the proposed modification of Piroa Stream and its tributaries, together with the loss of indigenous vegetation, large scale earthworks, stream diversions and alteration of natural landforms, will adversely affect:

- The mauri of the natural environment,
- Whakapapa relationships between whenua, wai and tangata,
- The exercise of kaitiakitanga responsibilities,
- The integrity and continuity of the wider cultural landscape, and
- The ability of future generations of Te Uri o Hau to maintain cultural relationships with this area.

The applicant's findings of high adverse effects on natural character and ONL values reinforce the concerns already expressed within the CVIA. Te Uri o Hau considers that these effects extend beyond visual and landscape matters and represent a direct impact on the cultural, spiritual and ancestral values associated with the Brynderwyn Hills, Piroa Stream catchment and the wider interconnected cultural landscape of Te Uri o Hau.

Southern Approaches to the Brynderwyn Hills

Te Uri o Hau notes that the applicant's assessment identifies moderate adverse effects on landscape and visual amenity values, and moderate adverse effects on the natural character of streams and wetlands within the southern approaches to the Brynderwyn Hills. While the landscape assessment characterises these effects as moderate, Te Uri o Hau considers that the cultural effects are more significant when viewed through the lens of whakapapa, mauri, rangatiratanga and the interconnected nature of the wider cultural landscape.

The Te Uri o Hau CVIA identifies waterways, wetlands, tributaries, riparian margins and downstream receiving environments as components of a single interconnected living system. The CVIA recognises that the mauri of the whenua cannot be separated into individual ecological or landscape features, as maunga, awa, ngahere, wetlands and people are connected through whakapapa. Effects on one component inevitably affect the health and wellbeing of the wider system.

Te Uri o Hau is particularly concerned by the proposed modification of tributaries of the Wairau River, including the Main Mayflower Stream, Puriri Downs Stream and Wetland 24, together with the proposed stream diversions, culverting, spoil disposal activities, wetland encroachment and extensive earthworks associated with the Project. The applicant acknowledges that these waterways and wetland systems will experience a reduction in natural character as a result of the proposed works.

The CVIA identifies the Wairau River, Piroa Stream, Pukekaroro Stream and associated tributaries as part of a wider catchment system that ultimately contributes to the health and mauri of the Kaipara Moana. Te Uri o Hau therefore considers that the effects of stream modification cannot be assessed solely at the individual stream scale. The cumulative effects on the wider freshwater network and downstream receiving environments must also be recognised.

Te Uri o Hau considers that the mauri of freshwater environments is adversely affected when waterways are diverted, enclosed within culverts, deprived of natural stream function, or subjected to spoil disposal and earthworks. Such activities interrupt the natural relationships between water, wetlands, riparian margins, taonga species and tangata whenua. This is inconsistent with the principles of Te Mana o te Wai recognised within the CVIA, which place the health and wellbeing of freshwater systems as the first priority.

Te Uri o Hau is also concerned by the proposed impacts on Wetland 24. The CVIA recognises the importance of wetlands within the wider freshwater system and their role in

maintaining ecological health, water quality, habitat values and mauri. Wetlands are taonga and are not simply ecological features. Their degradation contributes to the ongoing loss of cultural values and ecological resilience across the wider catchment.

Te Uri o Hau further notes that the project area lies within a cultural landscape that includes Pukearenga, Pukepōhatu, Piroa, Pukekaroro and associated waterways. The CVIA identifies the ongoing fragmentation of the cultural landscape through roading infrastructure, earthworks, land modification and historical land loss as a significant adverse effect on Te Uri o Hau rangatiratanga and the ability to exercise kaitiakitanga. The proposed works within this section of the Project represent a further stage of that fragmentation.

Of particular concern is the cumulative nature of these effects. When considered together with the effects on the Brynderwyn escarpment, Piroa Stream, Pukekaroro Stream catchment, indigenous vegetation and ONL elsewhere within the Project area, Te Uri o Hau considers that there is an ongoing erosion of cultural values, customary relationships and environmental integrity. The Project therefore cannot be assessed as a series of isolated effects but must be considered across the wider cultural landscape identified in the CVIA.

Volcanic Hills and Pukekaroro Stream Valley

Te Uri o Hau notes that the applicant's assessment concludes that the proposal will result in moderate-high adverse effects on landscape and visual amenity values and moderate-high adverse effects on the natural character of the headwaters of the Pukekaroro Stream.

Te Uri o Hau emphasises that Pukekaroro is not simply a landscape feature. The CVIA identifies Pukekaroro as a wāhi tapu and a statutory area associated with Te Uri o Hau history, whakapapa and the events of Te Ika-a-Ranganui (1825). The maunga remains spiritually significant to Te Uri o Hau and contains important cultural associations that continue today. Accordingly, effects on the Pukekaroro landscape and stream catchment are also effects on Te Uri o Hau cultural identity and relationships with place.

The Pukekaroro Stream and surrounding landscape are of significant cultural importance to Te Uri o Hau, including their connection to the events of Te Ika-a-Ranganui in 1825.

Te Uri o Hau considers that stream diversions, culverting, extensive earthworks, spoil disposal activities and vegetation clearance within the upper catchment will adversely affect

the mauri and functioning of this freshwater system and its downstream relationship with the Kaipara Moana.

The proposal would alter stream form, remove indigenous vegetation and introduce substantial engineered structures into what is currently a relatively secluded catchment. Te Uri o Hau also regards the volcanic hills and associated landforms as part of a wider ancestral landscape whose cultural values extend beyond their visual appearance.

Comments on Proposed Mitigation

Te Uri o Hau acknowledges the mitigation and restoration measures proposed within the Assessment of Landscape and Visual Effects, including native revegetation, stream margin planting, naturalisation of stream diversions and avoidance of spoil disposal within parts of the ONL.

While supported in principle, Te Uri o Hau considers that these measures do not fully address the underlying cultural effects associated with:

- Loss of indigenous vegetation.
- Diversion and culverting of waterways.
- Alteration of natural landforms.
- Adverse effects on the mauri of interconnected freshwater systems.

Te Uri o Hau is particularly concerned that many proposed mitigation outcomes rely on ecological recovery occurring over periods of 10 to 40 years or longer, during which cultural values will remain adversely affected.

Accordingly, Te Uri o Hau seeks that the following measures are secured through enforceable conditions and implemented with direct involvement from Te Uri o Hau throughout all phases of the project.

- Avoidance of stream diversions, culverting and wetland loss wherever practicable.
- Recognition that the affected waterways form part of a wider interconnected freshwater system that contributes to the health and mauri of Kaipara Moana.
- Recognition of the cultural significance of Pukekaroro, Pukepōhatu, Pukearenga and the wider cultural landscape.

- Strong freshwater, erosion and sediment control conditions.
- Te Uri o Hau involvement in freshwater management, monitoring and restoration planning and programmes.
- Implementation of the freshwater, cultural monitoring and management recommendations contained within the Te Uri o Hau CVIA.
- Restoration and enhancement of affected streams, wetlands and riparian margins using Te Uri o Hau values and mātauranga.
- Recognition of Te Uri o Hau rangatiratanga, mana whakahaere and kaitiakitanga responsibilities within all relevant management plans and approval conditions.
- Long term cultural health monitoring of affected waterways and wetlands consistent with the recommendations contained within the Te Uri o Hau CVIA.
- Protection and restoration of indigenous vegetation within the Pukekaroro catchment.
- Catchment wide consideration of cumulative effects on cultural values and mauri.
- Conditions requiring active restoration and enhancement to achieve measurable cultural and ecological outcomes.

Proposed Regional Resource Consent Conditions

Condition RC9A - Cultural Values Management Plan

Te Uri o Hau does not support Condition RC9A as currently drafted. The condition assumes that a Cultural Values Management Plan (CVMP) may be prepared but does not require one.

Given the scale of effects on waterways, indigenous vegetation, cultural landscapes and matters of significance to mana whenua, Te Uri o Hau considers that preparation, approval and implementation of a CVMP must be mandatory.

Te Uri o Hau seeks that:

- A CVMP must be prepared once a contractor has been appointed, and no later than the start of detailed design.
- The CVMP be implemented for the duration of construction, operation, maintenance, monitoring and ecological restoration activities associated with the project.

- The CVMP contain separate sections for each relevant iwi and hapū with recognised interests in the project area.
- Each iwi and hapū section identify cultural values, tikanga requirements, cultural monitoring expectations, environmental outcomes, engagement requirements, kaitiakitanga expectations and cultural response procedures.
- The CVMP recognise that tikanga may differ between mana whenua groups and provide for those differences to be appropriately implemented.
- The CVMP be developed in partnership with affected iwi and hapū and not be finalised until written input has been sought from all relevant mana whenua entities.
- Te Uri o Hau notes that Recommendation 1.1.2 of the CVIA specifically requires the Applicant to fund and provide for the development of a Cultural Management Plan by Te Uri o Hau. The CVIA also identifies the required contents of that plan, including partnership arrangements, tikanga and cultural protocols, cultural monitoring, accidental discovery procedures, environmental protection controls, reporting requirements and redress measures.

Te Uri o Hau therefore considers that RC9A should require a Cultural Values Management Plan as a mandatory condition and not leave its preparation optional.

Designation conditions

Cultural Values Management Plan (Designation Conditions D10A-D10G)

Te Uri o Hau notes that the proposed designation conditions require the preparation and implementation of a Cultural Values Management Plan (CVMP). Te Uri o Hau supports the requirement for a CVMP and considers that it is an important mechanism for recognising and providing for Te Uri o Hau cultural values, rangatiratanga, mana whakahaere and kaitiakitanga responsibilities. However, Te Uri o Hau is concerned that the proposed conditions provide only for engagement and comment on a draft CVMP, with the final decisions regarding content remaining solely with the Requiring Authority.

The Te Uri o Hau CVIA identifies the need for a CVMP that includes partnership arrangements, tikanga and cultural protocols, cultural monitoring requirements, environmental protection measures, accidental discovery procedures (ADP), reporting requirements and cultural redress measures. The CVIA also identifies the need for ongoing

partnership and the ability for Te Uri o Hau to exercise mana whakahaere throughout the life of the Project.

Accordingly, Te Uri o Hau seeks that:

- The CVMP be developed in partnership with affected iwi and hapū rather than through consultation alone.
- The CVMP contain separate sections for each relevant iwi and hapū so that each group can identify its own values, tikanga, cultural monitoring requirements and cultural outcomes.
- The CVMP be treated as a living document that can be reviewed and amended where new cultural information, discoveries, monitoring results or changes to project design arise.
- Te Uri o Hau to be provided with annual opportunities to review the effectiveness of the CVMP and recommend amendments where required.
- Any disagreement between the Requiring Authority and affected iwi or hapū regarding the content of the CVMP be documented and provided to the relevant authority as part of compliance reporting.

Brynderwyn Hills Bus Crash Memorial Site (Conditions D10H-D10I)

Te Uri o Hau acknowledges and supports the intent of Conditions D10H and D10I, including the establishment of an Avoid Area around the Brynderwyn Hills Bus Crash Memorial Site and the requirement to notify Te Uri o Hau prior to works being undertaken in proximity to the site.

However, Te Uri o Hau considers that these conditions do not fully recognise the cultural, historical and spiritual significance of the Memorial Site, nor the importance of the site to the descendants and whānau of those who lost their lives in the 1963 Brynderwyn bus crash. The Te Uri o Hau CVIA identifies the Memorial Site as a place of deep cultural significance and enduring intergenerational importance for Te Uri o Hau. The CVIA recognises that the site is associated with a significant historical event in which kaumātua, whānau and members of the wider Māori community lost their lives returning from Waitangi, and that the impacts of the tragedy continue to be felt by descendants today.

Te Uri o Hau also notes that the CVIA specifically seeks the protection of the Memorial Site and recommends the preparation of a Memorial Preservation Plan in partnership with Te Uri o Hau and the affected whānau. The CVIA further recommends cultural monitoring and the implementation of protective measures for works occurring in the vicinity of the site.

Accordingly, Te Uri o Hau seeks that Conditions D10H and D10I be strengthened to require that:

- Te Uri o Hau is engaged prior to any works occurring within or adjacent to the Memorial Site Area to confirm appropriate cultural protocols (including karakia), access arrangements, monitoring requirements and protection measures.
- Where appropriate, engagement is undertaken with whānau connected to the Memorial Site and the descendants of those affected by the Brynderwyn bus crash.
- Tikanga processes, including karakia, waerea, blessing and whakanoa, are undertaken where required by Te Uri o Hau.
- Measures to avoid, remedy or mitigate adverse effects on the Memorial Site Area include setbacks, fencing, signage, access controls, exclusion zones and restrictions on storage, parking, machinery movements or other construction activities within or immediately adjacent to the Memorial Site Area.
- Cultural and kaitiaki monitoring is provided where required by Te Uri o Hau, particularly where works may directly or indirectly affect the Memorial Site through vegetation clearance, falling trees, earthworks, vibration, machinery operation, stormwater discharge, sedimentation, dust generation, access arrangements or accidental damage.

Te Uri o Hau supports the establishment of the Avoid Area and considers it an important first step in recognising the significance of the Memorial Site. However, avoidance alone will not adequately recognise or provide for the cultural values associated with the site. The conditions should also require cultural engagement, tikanga processes, cultural monitoring and management of indirect construction effects to ensure the ongoing protection of the site and its significance to Te Uri o Hau and the whānau of those who were affected by the Brynderwyn bus tragedy.

Construction Noise and Vibration (Conditions D11-D20)

Te Uri o Hau notes that the proposed Construction Noise and Vibration conditions are primarily directed towards the management of effects on occupied buildings, sensitive receivers and infrastructure. While Te Uri o Hau supports these measures, the conditions do not appear to recognise the potential effects of construction noise, vibration and blasting on taonga species and their habitats.

The Te Uri o Hau CVIA identifies noise, vibration, artificial lighting and other construction and operational disturbances as having the potential to adversely affect taonga species, including pepeketua, pekapeka, manu and aquatic species. The CVIA notes that these disturbances can disrupt breeding, feeding and resting behaviours, contribute to habitat displacement, and adversely affect the mauri of the wider environment.

Te Uri o Hau is particularly concerned that the proposed conditions do not require any assessment, monitoring or adaptive management response where significant noise, vibration or blasting activities occur in proximity to known taonga species habitat, ecological management areas, stream corridors, wetlands, indigenous forest or species relocation sites.

Accordingly, Te Uri o Hau seeks that the Noise and Vibration conditions be amended to require:

- Consideration of potential effects on taonga species and sensitive habitats when preparing any noise or vibration management measures.
- Assessment of noise and vibration effects where works occur in proximity to known pepeketua, pekapeka, manu, tuna or other taonga species habitat.
- Consultation with Te Uri o Hau where blasting, vibration-inducing activities or prolonged high-noise activities are proposed near sensitive ecological areas.
- Monitoring and adaptive management measures where noise or vibration effects are identified as having the potential to adversely affect taonga species or their habitats.
- Provision for Te Uri o Hau input into any site specific management measures where significant ecological or cultural risks are identified.
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Te Uri o Hau considers that recognising and managing the effects of noise and vibration on taonga species is consistent with the findings and recommendations of the CVIA and forms an important part of the exercise of kaitiakitanga and the protection of mauri within the Project area.

Landscape Planting (D21-D26)
Te Uri o Hau generally supports the proposed Landscape Planting conditions and the use of eco-sourced indigenous species. However, Te Uri o Hau considers that planting should not be viewed solely as landscape mitigation but as an opportunity to restore mauri and contribute to the reconnection of the wider cultural landscape identified in the CVIA. The CVIA recognises that the Project contributes to the fragmentation of cultural connections between maunga, awa, ngahere and culturally significant sites and recommends long term restoration and enhancement measures to address these effects.

Te Uri o Hau seeks involvement in the preparation and implementation of the Landscape Concept Plan, including species selection, restoration priorities and planting locations, to ensure the planting outcomes are consistent with Te Uri o Hau cultural values, mātauranga Māori and ecological restoration aspirations. Te Uri o Hau also supports the use of eco-sourced indigenous plants and seeks opportunities for Te Uri o Hau plant suppliers and restoration initiatives to be incorporated where practicable.

Indigenous Vegetation (D27-D30)
Te Uri o Hau supports the requirement for indigenous vegetation mitigation planting but notes that replacement planting does not fully compensate for the loss of mature indigenous vegetation, habitat values and cultural landscape connections identified in the CVIA. The CVIA recognises that indigenous vegetation forms part of an interconnected system of maunga, awa, ngahere and taonga species and that the removal of indigenous vegetation contributes to the ongoing fragmentation of the cultural landscape.

Te Uri o Hau seeks involvement in the identification of mitigation planting locations and species composition to ensure that planting contributes to ecological connectivity, taonga species habitat enhancement and long-term restoration of cultural values.

Pekapeka (Bats) (D31-D34)
Te Uri o Hau supports the proposed protections for pekapeka and notes that the CVIA identifies pekapeka as taonga species with cultural and spiritual significance whose presence reflects the health and integrity of the ngahere. The CVIA also recognises pekapeka as indicators of the mauri of the wider landscape.

Te Uri o Hau seeks that any bat management, monitoring, roost identification and mitigation measures be undertaken in partnership with Te Uri o Hau and that Te Uri o Hau be provided with monitoring information and notified of any adverse events affecting pekapeka.

Avifauna Management Plan (D35-D37)

Te Uri o Hau notes that the CVIA identifies manu as taonga species connected through whakapapa to Tāne Mahuta and recognises their importance as indicators of forest health, ecological integrity and mauri. The CVIA specifically sought the development of an Avifauna Management Plan in agreement with Te Uri o Hau.

While Te Uri o Hau supports the requirement for an Avifauna Management Plan, the proposed conditions do not provide any role for Te Uri o Hau in its development or implementation. Te Uri o Hau therefore seeks that the AMP be prepared in partnership with Te Uri o Hau and that Te Uri o Hau has opportunities to contribute to survey methodologies, management measures, monitoring requirements and habitat restoration outcomes.

Proposed Archaeological Authority Conditions

Te Uri o Hau notes that the proposed Archaeological Authority Conditions require the preparation of a Historic Heritage Management Plan and include measures to protect archaeological sites not subject to the authority, including pā sites Q08/360, Q08/39 and Q08/700 that are within our rohe. The proposed conditions also include an Accidental Discovery Protocol (ADP) and requirements for engagement with iwi representatives in the event of discoveries during works.

The Te Uri o Hau CVIA identifies archaeological sites, pā sites, terraces, pit complexes, wāhi tapu and wāhi taonga within the project area as important expressions of whakapapa, occupation history and cultural identity. The CVIA also recognises that disturbance of these places' risks severing cultural connections between Te Uri o Hau and the whenua.

Te Uri o Hau generally supports the inclusion of archaeological protection measures; however Te Uri o Hau seeks the following amendments and additions:

- Te Uri o Hau must be involved in the preparation, review and implementation of the Historic Heritage Management Plan.
- The Historic Heritage Management Plan should recognise and provide for Te Uri o Hau cultural values, tikanga, mana whakahaere and kaitiakitanga responsibilities.

- Te Uri o Hau cultural monitors should be involved in activities undertaken in proximity to identified archaeological sites and areas of archaeological potential.
- The proposed Accidental Discovery Protocol should be consistent with the Cultural and Accidental Discovery Protocol sought by Te Uri o Hau in the CVIA.
- Te Uri o Hau must receive a copy of the final archaeological report required to be completed within 24 months of the completion of works.
- All archaeological information, discoveries and reporting relating to archaeological sites within the Te Uri o Hau area of interest should be provided to Te Uri o Hau.

Te Uri o Hau requests that the Expert Panel have regard to the archaeological, cultural heritage and site protection recommendations already contained within the Te Uri o Hau CVIA and ensure that any final authority conditions are consistent with those recommendations.

Ecological Management Plan

Te Uri o Hau considers that the Ecological Management Plan must be read in the context of the CVIA, which identifies taonga species and their habitats as integral components of the wider cultural landscape and expressions of whakapapa, mauri, rangatiratanga and kaitiakitanga. The CVIA recognises that species such as pepeketua, tuna, pekapeka, manu, kauri snails and other indigenous fauna are not simply ecological resources, but taonga that maintain ancestral connections between whenua, wai, ngahere and tangata. Their presence reflects the health and mauri of the wider environment, while their decline or displacement is an indicator of ecological and cultural degradation. The Brynderwyns, Pukearenga, Pukekaroro and Pukepōhatu landscapes, together with the Piroa, Wairau and Pukekaroro catchments, form an interconnected cultural and ecological system that supports these taonga species and the responsibilities of Te Uri o Hau as kaitiaki.

The CVIA states that Te Uri o Hau has an enduring responsibility to protect and conserve taonga species and their habitats for future generations, and that wildlife management must recognise Te Uri o Hau authority, participation and leadership in decision making processes affecting those species. Te Uri o Hau therefore considers that all ecological management, monitoring, salvage, translocation, habitat restoration and reporting associated with this Project must be undertaken in partnership with Te Uri o Hau and in a manner that recognises and provides for Te Uri o Hau rangatiratanga, mana whakahaere and kaitiakitanga responsibilities. The Ecological Management Plan should not be treated solely as a technical

ecological document but as a mechanism for protecting the cultural, spiritual and environmental values associated with taonga species and the wider cultural landscape identified within the CVIA.

Te Uri o Hau notes that it was not involved in the preparation of the Ecological Management Plan and has not previously been provided with an opportunity to contribute to its development. Accordingly, Te Uri o Hau seeks meaningful involvement in the review, implementation, monitoring and adaptive management of all ecological management plans associated with the Project to ensure that Te Uri o Hau cultural values, mātauranga Māori and kaitiakitanga responsibilities are appropriately recognised and provided for.

Pepeketua (Hochstetter's Frog) Management Plan

The Te Uri o Hau CVIA identifies pepeketua as taonga species with deep cultural and spiritual significance. Pepeketua are closely connected to whenua and wai and are recognised as indicators of environmental and spiritual wellbeing. The CVIA notes that pepeketua are descendants of Tūtewehiwehi, the atua ancestor of freshwater creatures, and that their presence reflects the strength of mauri within freshwater systems and ngahere. The protection of pepeketua and their habitat is therefore an important expression of Te Uri o Hau kaitiakitanga responsibilities.

Te Uri o Hau considers that any survey, salvage, relocation, monitoring or management of pepeketua must recognise their status as taonga species and provide for Te Uri o Hau participation, cultural oversight and tikanga throughout the process.

Te Uri o Hau seeks:

- Te Uri o Hau preference is that Hochstetter's Frog be referred to by its ingoa Māori, Pepeketua.
- A kaitiaki to accompany the project herpetologist during all surveys, salvage and relocation activities.
- Copies of all data collected within Te Uri o Hau rohe.
- All pepeketua found within Te Uri o Hau rohe and requiring relocation to be relocated within Te Uri o Hau rohe.
- Karakia to be undertaken during relocation activities.

- Immediate notification of any mortality event and consultation regarding the treatment of remains.

Lizard Management Plan

The CVIA identifies taonga species as important expressions of whakapapa, mauri and kaitiakitanga within the wider cultural landscape. Indigenous reptiles form part of the interconnected ecological systems associated with the Brynderwyns, Pukearenga, Pukekaroro and Pukepōhatu landscapes and contribute to the overall health and resilience of those ecosystems. For Te Uri o Hau, the protection of indigenous reptiles is consistent with kaitiakitanga responsibilities to protect taonga species and maintain the mauri of the environment.

Te Uri o Hau considers that lizard management activities should be undertaken in partnership with mana whenua and in a manner that recognises Te Uri o Hau kaitiakitanga responsibilities.

Te Uri o Hau seeks:

- A kaitiaki to be present during all surveys, salvage, clearance and relocation activities.
- All lizards requiring relocation that are found within Te Uri o Hau rohe to be relocated within Te Uri o Hau rohe.
- Copies of all data collected within Te Uri o Hau rohe.
- Karakia to be undertaken during relocation activities.
- Immediate notification of any mortality event and consultation regarding the treatment of remains.

Invertebrate Management Plan

The CVIA identifies invertebrates as indicators of mauri and environmental health. The CVIA specifically recognises the cultural significance of kauri snails and notes that they are taonga species with longstanding cultural associations for Te Uri o Hau. The CVIA also records Te Uri o Hau involvement in kauri snail translocation and ongoing kaitiakitanga responsibilities for these species and their habitats. The presence and health of invertebrate

communities are closely connected to freshwater quality, indigenous ecosystems and the wider health of the cultural landscape.

Te Uri o Hau therefore considers that surveys, salvage, handling and relocation of invertebrates should be undertaken in partnership with Te Uri o Hau and in accordance with tikanga and cultural protocols.

Te Uri o Hau seeks:

- A kaitiaki to accompany the project entomologist during all surveys, salvage and relocation activities.
- Clarification regarding the treatment and management of Rhytid and Kauri snail shells recovered during surveys and salvage.
- Copies of all data collected within Te Uri o Hau rohe.
- Immediate notification of any mortality event and consultation regarding the treatment of remains.
- Karakia to be undertaken during relocation activities.

Release Sites, Monitoring and Reporting

Release Sites

Te Uri o Hau notes that it was not involved in the identification or selection of proposed release sites. This is inconsistent with the recommendations of the Te Uri o Hau CVIA, which specifically seek that relocation sites for taonga species be identified and confirmed by Te Uri o Hau and that all relocation activities be undertaken in partnership with Te Uri o Hau.

Given the cultural significance of taonga species and their habitats, Te Uri o Hau considers that release site selection should recognise cultural values, habitat suitability, whakapapa connections and long-term kaitiakitanga responsibilities. Te Uri o Hau therefore seeks meaningful involvement in the assessment, selection, approval and ongoing management of all release sites associated with the Project.

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Monitoring

The Te Uri o Hau CVIA recognises that monitoring is a critical mechanism for ensuring that Te Uri o Hau can continue to exercise kaitiakitanga and mana whakahaere throughout the life of the Project. The CVIA specifically recommends cultural monitoring, ecological monitoring, cultural health monitoring and post construction monitoring programmes developed in partnership with Te Uri o Hau.

Te Uri o Hau therefore seeks that a Te Uri o Hau kaitiaki be present during monitoring activities associated with species management, relocation programmes, habitat restoration and release site assessments. Monitoring should include both ecological indicators and cultural health indicators developed by Te Uri o Hau.

Reporting

The CVIA identifies ongoing reporting as an important component of recognising and providing for Te Uri o Hau rangatiratanga and mana whakahaere. Te Uri o Hau therefore seeks copies of all monitoring reports, survey reports, relocation reports, mortality records, ecological assessments and compliance reporting relating to activities undertaken within Te Uri o Hau rohe.

Te Uri o Hau also seeks timely notification of any significant ecological incidents, mortality events or adaptive management responses arising from monitoring results, together with opportunities to participate in decisions regarding any remedial actions.

Wildlife Approvals

Te Uri o Hau notes that the Wildlife Approval conditions require the preparation and implementation of an Ecological Management Plan and associated species management plans. Te Uri o Hau relies on and incorporates by reference the comments made elsewhere in this submission regarding the Ecological Management Plan, species management plans, monitoring, reporting, taonga species, cultural monitoring, release sites and kaitiakitanga responsibilities. Te Uri o Hau expects those matters to be reflected throughout all plans prepared under the Wildlife Approvals.

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ENVIRONS

Conclusion

Te Uri o Hau considers that the additional technical reports, management plans and supporting information made available through the Fast-track Approvals process largely confirm the conclusions reached in the Te Uri o Hau CVIA. The applicant's own assessments acknowledge significant adverse effects on ONL, indigenous vegetation, waterways, wetlands, stream headwaters, natural character, taonga species habitats and the wider cultural landscape. Te Uri o Hau considers that these findings reinforce the cultural effects identified within the CVIA and support the need for the recommendations, mitigation measures and conditions sought by Te Uri o Hau.

Te Uri o Hau considers that these effects extend beyond ecological, landscape and visual matters and have direct implications for:

- Mauri.
- Rangatiratanga.
- Mana whakahaere.
- Kaitiakitanga.
- Wāhi tapu and wāhi taonga.
- Taonga species.
- Waterways, wetlands and freshwater systems.
- Whakapapa relationships between whenua, wai and tangata, and
- The integrity of the wider Te Uri o Hau cultural landscape.

Te Uri o Hau respectfully requests that the Expert Panel give substantial weight to the findings, recommendations and proposed conditions contained within the Te Uri o Hau CVIA and ensure that any approvals granted include robust and enforceable conditions that recognise and provide for Te Uri o Hau cultural values, rangatiratanga, mana whakahaere and long-term kaitiakitanga responsibilities. Te Uri o Hau further seeks ongoing involvement in monitoring, restoration, adaptive management and decision-making processes throughout the life of the Project, consistent with the recommendations set out in the CVIA.