

MEMO

Project Number	FTAA-2603-1194
To	Fast-track Panel – Waikanae North Development
Subject	Response to Minute 9 – integration of the cultural assessments into the technical assessments
Date	11 September 2026

Purpose

1. This memorandum is provided in response to paragraphs [8] and [9] of Minute 9 of the Expert Panel (the Panel) dated 8 September 2026.
2. At paragraph [9] the Panel requests the Applicant provide a consolidated response in tabulated form addressing:
 - (a) how all of the experts and authors, and their technical assessment reports that accompanied the application, reviewed, considered and, where appropriate, incorporated the interim Ātiawa ki Whakarongotai cultural impact assessment report; and
 - (b) how the technical assessments prepared by the Applicant's experts in the nine disciplines listed in Minute 9 responded to the invited comments from the Ātiawa ki Whakarongotai Charitable Trust (ĀKWCT) dated 29 July 2026 and the cultural impact assessment report prepared by Ngā Hapū o Ōtaki (NHoŌ) dated 28 July 2026.
3. In respect of [9](b) of the request, the technical assessments that accompanied the application were finalised in March 2026 and lodged at the end of that month. They did not respond to comments made in July 2026, or the NHoŌ CIA which was only received with the section 53 comment from NHoŌ. The substance of the matters raised in those comments was, however, largely raised during earlier consultation – particularly by Te Ātiawa ki Whakarongotai through the preliminary site-values memorandum of 8 February 2022, the Interim CIA and the engagement that preceded and followed its receipt. The assessments responded to the Applicant's understanding of those issues when they were prepared – Table 1 outlines the various matters raised and how and where in the application, conditions and technical reports they have been responded to. Where the section 53 comments have raised further issues, the Applicant has responded through its section 53 comments response and through changes to the proposed conditions, rather than by attempting to revise the technical assessments.
4. Table 1 is arranged by expert and report, so that the Panel can read a single discipline across all three cultural documents in one row. The second column answers [9](a), the third and fourth answer [9](b), and the fifth identifies where the response is recorded or secured.
5. Much of the underlying material is already before the Panel, in the Applicant's response to the section 53 comments lodged on 11 August 2026 – the covering report, the response to the ĀKWCT comments (Attachment K) and the response to the NHoŌ comments (Attachment L). Table 1 consolidates that material and cross-refers to it rather than repeating it at length. Condition references are to Conditions Version 2, provided on 21 August 2026.

Background - Engagement and early cultural input

6. The Panel's request is best understood against the engagement record, because the Interim CIA was not the beginning of the cultural input into this project. It was a formalisation, some three and a half years in, of engagement that has been shaping the project design from the outset. The chronology below is drawn from the Consultation Summary Report (Appendix 37 of the application) and is set out more fully at Topics C9 and C11 of Attachment K and Part 3 of Attachment L of the Applicant's section 53 comments response.
7. Engagement with Ātiawa ki Whakarongotai began in October 2021, well before any statutory process required it. Early consultation was favourable, as long as key aspects were respected. On 8 February 2022 the Trust provided a preliminary site-values memorandum identifying matters across whakapapa, wairua, mauri, māramatanga and te ao tūroa. That memorandum, not the CIA, is the origin of the design responses embedded in the application, and it predates the masterplan. Engagement was then sustained through on-site kōrero and hui during 2023 and 2024.
8. Engagement with Ngāti Raukawa ki te Tonga began in February 2022, initially by sharing the Te Ātiawa preliminary site-values assessment as a starting point for discussion. Representatives attended an on-site hui and site visit on 7 August 2023 alongside Te Ātiawa, following which WNDL agreed to resource NHOŌ to prepare its own cultural impact assessment, on the same basis as the Trust. The issues raised at that hui were consistent with those raised by Te Ātiawa and were responded to in the application design and technical reporting. When direct engagement stalled, WNDL initiated and maintained a second channel through the NHOŌ Taiao team from June 2024, as detailed in Attachment L of the Applicant's section 53 comments response. Ngāti Toa Rangatira deferred the cultural lead to Te Ātiawa. Muaūpoko was also engaged, and no comment has been received.
9. From April 2025 the Trust prepared its cultural impact assessment, commissioned and funded by WNDL, delivering the Interim CIA in August 2025. WNDL funded the Trust's participation throughout, including the cost of preparing the assessment, and made a standing offer to meet the cost of the NHOŌ assessment, first in August 2023 and again in February 2026.
10. The Trust's Interim CIA was expressed as an interim document. The Trust recorded that its recommendations were "a starting point in lieu of a full assessment against the application, AEE, and draft conditions", and it excluded freshwater matters from its own recommendations table as unresolved, pending the detailed stormwater and wastewater plans (CIA s6.1). The Trust's interest in water quality outcomes were conveyed and understood and have been addressed through the application documents – notably through the stormwater and ecology assessments. Wastewater concerns were also understood and have been addressed.
11. The document that carried the cultural material into the design and layout of the proposal is the Masterplan Design Report (Appendix 12). It quotes the Interim CIA directly and devotes dedicated sections to mana whenua values in design, kaitiakitanga in practice and pathways for abundance. The technical assessments were prepared, through late 2025 and early 2026, based on the masterplan, which was designed with subject matter expert inputs. Draft technical reports were provided to the Trust on 4 February 2026 and to NHOŌ on 16 February 2026, and a draft suite of iwi-related conditions to both on 18 March 2026. The application was lodged at the end of March 2026. Engagement has continued since as detailed in the section 53 comments response.

12. The integration pathway was therefore design-led. Not all reports explicitly reference the Interim CIA. There are three distinct reasons for this, identified in the table row by row:
 - (a) the cultural assessment raises no matter within the discipline – transport, flooding and geotechnical matters are examples;
 - (b) the matter was resolved in the design that the report assesses, rather than in the report – urban design, and in part ecology and landscape; or
 - (c) the matter was expressly left unresolved by the Trust pending the very report in question – three waters matters are examples. The CIA asked for the detailed plans before forming a view, but provided a clear understanding of the relevant issues. The response to these concerns and outcomes sought is in the design of the proposal and associated reporting.
13. The table identifies the points of iwi interest and states how each has been addressed and where it is secured. The table addresses the nine topic areas specified by the Panel. It does not address other reports, for instance the economic assessment or acoustic assessment, where no relevant matter of iwi interest was identified.

What has changed since the section 53 response

14. Two things have changed since the section 53 comments response. Table 1 reflects the current position rather than the position as at the section 53 response.
15. First, the measures the Applicant offered on the record in its section 53 response are no longer commitments awaiting drafting. They are drafted conditions in Version 2 as provided to the Panel in response to Minute 5. The transfer of the Peka Peka Road Swamp (Lot 5314, approximately 9,942 m²) and of the Dune Hilltop Site (Lot 5316, approximately 2,350 m²), each fully restored at WNDL's cost before transfer and with a registered access easement to the hilltop; a kaitiakitanga framework establishing an active, ongoing kaitiaki role in the wetland open space areas; a Mahinga Kai Access Protocol; cultural narrative, interpretation and naming; plant supply and restoration planting; and a fill and metal approval protocol.
16. Second, and directly relevant to the Panel's question about NHO, several measures that were framed for the Trust alone in the section 53 response have been extended to NHO in Version 2. The Mahinga Kai Access Protocol, the interpretation panel provisions and the plant supply and planting contract provisions now name both entities. The pou or tohu provision and the fill and metal protocol remain framed for the Trust; the Applicant is willing to discuss whether either should be extended.
17. More broadly, Version 2 of the draft conditions has adopted a consistent formula for iwi input across a range of management plan conditions: the draft plan must be sent to Ātiawa ki Whakarongotai Charitable Trust, Ngāti Raukawa ki te Tonga, Te Rūnanga o Toa Rangatira and Muaūpoko Tribal Authority for review and input, and the plan submitted for certification must be accompanied by a clear statement of how any recommendations received have been implemented and, where they have not been accepted, an explanation of why not. That formula now applies to the Ecological Restoration Management Plan, the Construction and Environmental Management Plan, the Streetscape Planting, Maintenance and Management Plan, the Groundwater Monitoring Plan and road naming.

Conclusion

18. The Applicant's position on the matter raised by Minute 9 [8] is as follows:

- (a) the values, interests, and concerns recorded in both cultural assessments have been considered, and where appropriate incorporated, at the masterplan design stage, through technical design (for example stormwater management or ecological restoration) and then through the extensive proposed conditions suite;
- (b) the disciplines that the cultural assessments engage most directly – ecology, landscape and urban design, archaeology and earthworks, and the freshwater and servicing assessments – show clear and traceable incorporation, set out in Table 1;
- (c) the Applicant has identified the points of iwi interest that nonetheless touch that discipline and stated how each is addressed; and
- (d) remaining disagreements comprise, first, alleged effects on natural and physical resources that have been assessed and addressed through design, technical evidence and proportionate conditions; and second, broader aspirations concerning housing allocation, papakāinga provision, ownership, governance, employment, procurement and relationship arrangements. The latter do not identify an adverse effect of the activities for which consent is sought, are not required by any identified planning provision or Treaty-settlement obligation, and are not matters the Panel needs to determine when deciding the approvals.

19. The Applicant looks forward to the mana whenua and cultural conferencing session scheduled for the morning of Thursday 17 September 2026, and remains willing to provide any further information the Panel requires in advance of it.

On behalf of Waikanae North Developments Limited



Mitch Lewandowski
Resource Management Consultant
Director
Building Block Planning Limited

Table 1 – Consolidated response to Minute 9: integration of the cultural assessment(s) into the technical assessments

Expert / author and report	Interim ĀKWCT Cultural Impact Assessment (6 August 2025) – how reviewed and considered, the points of iwi interest engaged, and how each is addressed	ĀKWCT invited comments (29 July 2026) – issue and response	NHoŌ CIA (28 July 2026) – issue and response	Where the response is recorded or secured (Conditions Version 2, 21 August 2026)
Masterplan Design Report (Appendix 12) McIndoe Urban and Local Landscape Architecture Collective, 13 March 2026	Expressly reviewed and relied upon. This is the document through which the cultural material was carried into the design that every other technical assessment then assessed. Key technical assessors had input into the Masterplan. - Part A, s1.3 “Cultural Opportunities” quotes the Interim CIA directly, cited as “Ātiawa ki Whakarongotai, Interim Cultural Impact Assessment, Section 5.4 Kaitiakitanga of te taiao”. - Dedicated commentary under “Mana Whenua Values in Design”, “Kaitiakitanga in Practice” and “Pathways for Abundance” addresses whakapapa, wāhi tapu protection, restoration of taonga species (tuna, harakeke, pīngao, watercress), Te Ātiawa-led monitoring during earthworks, and mātauranga Māori in planting, stormwater treatment and landscape design. - Design incorporation: retention of the dune landform and hilltop as open space; dune, wetland and stream restoration as an integral design element including realignment of the Paetawa / Ngārara Stream; separation of stormwater treatment wetlands from ecological restoration wetlands; provision for cultural narrative, pou/tohu and naming within the open space network.	No design change was sought. The comment is directed to title, governance, a secured kaitiaki role and process.	Recommendations 70(a)–(c) seek a reimagined design reflecting ūkaipōtanga and improved access to housing for uri, including affordable or shared-equity models. Not accepted – these are not matters capable of being addressed by condition.	Application - Appendix 12, Part A ss1.3, 2–3; Appendix 38. Section 53 Response - Attachment K, Topics C1, C13, C15.
Urban Design (Appendix 13 – Urban Design Assessment) McIndoe Urban Limited, 13 March 2026	The report records the KCDC Te Tupu Pai growth principle of “supporting Mana Whenua aspirations”, and assesses the masterplan that the Masterplan Design Report produced – so the cultural material had already been incorporated into the design under assessment, by the same authors. - Permanent transformation of the open cultural landscape and loss of cultural markers (CIA s5.2). Addressed in the design: the dune landform and hilltop are retained as open space rather than developed, and the wetland and dune network is retained and restored as the structuring element of the masterplan. - Risk of further alienation of hapū members where housing is unaffordable (CIA s5.2). The proposal provides a range of typologies and lot sizes at a range of price points, which is the extent of the response available on urban design grounds. - Provision for papakāinga (CIA s5.2). Not provided for directly. WNDL’s position is that this is not an applicant responsibility and that its absence is the absence of a positive benefit rather than an adverse effect; once the land is rezoned for its approved residential use, papakāinga can follow under the ordinary District Plan process. - Cultural narrative and identity in the built environment (CIA s5.3). Addressed through the naming, interpretation and streetscape planting conditions rather than in this report.	Comment 26.8 raises cumulative development, medium and high density typologies and “ad-hockery”. Answered on urban design grounds: a range of typologies avoids a homogenous outcome and supports the local centre; the majority of the proposal is standard residential across a range of lot sizes; density of itself does not generate significant adverse effects as matters such as stormwater treatment are nevertheless addressed.	Recommendation 70(d) (names and cultural narratives for places, spaces and features) is provided for by the road naming and streetscape planting conditions. Recommendations 70(a)–(c) are not accepted, as above.	Application - Appendix 13; KCDC condition 25 (Road Naming, Note 2); KCDC landscaping / SPMP condition; KCDC conditions 117–118 (cultural narrative, interpretation and naming). Section 53 Response - Attachment K, Topics C8 and C13.

Expert / author and report	Interim ĀKWCT Cultural Impact Assessment (6 August 2025) – how reviewed and considered, the points of iwi interest engaged, and how each is addressed	ĀKWCT invited comments (29 July 2026) – issue and response	NHoŌ CIA (28 July 2026) – issue and response	Where the response is recorded or secured (Conditions Version 2, 21 August 2026)
Landscape and Visual (Appendices 22 and 22A–22C – Landscape and Visual Assessment) Local Landscape Architecture Collective Limited, Revision 1.6, March 2026	Mana whenua values were considered, and expressly carried into the assessment, although the Interim CIA is not cited as a source document. - The assessment records that the wetland network “provides for local iwi, underpinning their identity and rights as mana whenua”. - It records that the proposed coastal walkway and beach access “will allow local iwi Te Ātiawa ki Whakarongotai to exercise their customary rights and freely access Te Harakeke Swamp” – a direct response to the CIA’s concern at s5.2 about loss of access to mahinga kai. - The statutory assessment is undertaken against NZCPS, Natural Resources Plan and District Plan objectives and policies expressly framed in Te Ao Māori, mātauranga Māori, ki uta ki tai and mahinga kai, and against Schedule C sites of significance to mana whenua. - Incorporation of mitigation measures at Appendix 22C; retention of dune landform legibility; and the streetscape and open space planting framework, for which iwi input is now required by condition.	No landscape matter was raised. The cultural landscape elements sought – interpretation panels, pou or tohu, naming – are proposed to be secured as conditions rather than left to the side agreement.	Recommendation 59(e) (a collaborative interpretation area) was committed to ĀKWCT alone in the section 53 response. The interpretation panel condition now requires content, design and placement to be agreed with both ĀKWCT and NHoŌ. Recommendation 59(f) (mahinga kai, harakeke and rongōā) is likewise now provided for both entities.	Application - Appendix 22, ss5.4, 7 and 10; Appendix 22C; KCDC landscaping / SPMP condition (draft landscape plans to the four iwi entities for review and input, with reasons where input is not adopted); KCDC conditions 114–116 and 117–118. Section 53 Response - Attachment I.
Transport (Appendix 15 – Integrated Transport Assessment) Stantec New Zealand, 24 March 2026	Neither cultural assessment identifies a transport effect or seeks a transport outcome. Two points of iwi interest nonetheless are relevant to the transport network: - Access to mahinga kai and to the coast (CIA s5.2 – “unfettered access to mahinga kai, rongōā and other taonga species”). The roading, walking and cycling network assessed in the ITA, including the coastal walkway and the connection across Te Harakeke Swamp, is the physical means by which customary access is exercised. The Mahinga Kai Access Protocol condition secures the right of access itself. - Cultural naming of the roading network (CIA s5.3 – street names “designed and approved by Te Ātiawa ki Whakarongotai kaumātua”). The naming condition requires input to be sought with reasons given where a name is not adopted. No adverse transport effect on cultural values has been identified by either mana whenua entity, and none is identified in the ITA.	No transport matter was raised.	No transport matter was raised. Recommendation 70(d) (naming) is addressed under Urban Design above.	Application - Appendix 15; KCDC condition 25 (Road Naming, Note 2); KCDC conditions 114–116 (Mahinga Kai Access Protocol). Section 53 Response - Attachment G.
Ecology (Appendices 23, 24, 25 and 26 – Assessment of Ecological Effects, Native Freshwater Fauna Salvage and Relocation Plan, Lizard Management Plan, Ecological Restoration Management Plan)	Ecology is the discipline most directly engaged by the Interim CIA (s5.4, kaitiakitanga of te taiao). The management and restoration package has been designed to address ecological outcomes sought by the CIA comprehensively. This relates to the ecological package as a whole, with specific instances including: Dune, wetland and stream restoration and enhancement including realignment of the Ngārara Stream.	No ecological dispute is raised. The Trust “recognises the ambitious effects management package set out by WNDL for wetland restoration” and “support[s] the programme for maintaining and enhancing those values”.	43(d) monitoring programme in partnership: satisfied in part – an eco-hydrological monitoring condition is sought, and iwi input into the final ERMP is already required. 59(a) fish salvage by NHoŌ and ĀKWCT: not accepted – capture and relocation must be undertaken by qualified ecologists.	Application - Appendices 23–26; GWRC conditions 37–38 (final ERMP and iwi review and input); GWRC KMS conditions; GWRC conditions 107–109 (fish passage); GWRC condition 79 (notification of streamworks to the four iwi entities); KCDC conditions 119–122 (plant supply) and 114–116 (mahinga kai).

Expert / author and report	Interim ĀKWCT Cultural Impact Assessment (6 August 2025) – how reviewed and considered, the points of iwi interest engaged, and how each is addressed	ĀKWCT invited comments (29 July 2026) – issue and response	NHoŌ CIA (28 July 2026) – issue and response	Where the response is recorded or secured (Conditions Version 2, 21 August 2026)
RMA Ecology Limited, 30 March 2026	• Participation of iwi in preparing the final ERMP. • Development of the Kaitiaki Monitoring Strategy and participation in monitoring under that strategy. • Enhancement of the Peka Peka Road Swamp and the proposed transfer of that site to the Trust. • Nursery supply. Addressed as preferred-supplier and invitation-to-quote conditions. • RMA Ecology records that the stream and wetland design “is consistent with the outcomes sought by the Interim CIA, which emphasises connected and resilient freshwater systems, habitat connectivity for species such as tuna, inanga and piharau” in its response to the section 53 comments (Attachment A, Topic Ec7).		• 59(b)–(c) nursery purchase and employment of kaimahi: implemented - the plant supply conditions name both ĀKWCT and NHoŌ as preferred suppliers. • 59(d) restoration plans in partnership: satisfied in part – input into preparation is secured through the finalisation of the ERMP; no active role in physical implementation is provided. • 59(f) mahinga kai - the Mahinga Kai Access Protocol provides for both NHoŌ and ĀKWCT.	Section 53 Response - Attachment A, Topic Ec7.
Hydrology (Appendix 17 – Hydrological Report) O’Callaghan Design Limited, March 2026	The CIA notes at s6.1 the Trust expressly recorded freshwater as an unresolved matter, excluded from its Table 1, because “until detailed information on wastewater and stormwater management plans for the site are made available, we cannot draw conclusions as to the likely or potential risk to freshwater”. This report is part of the detailed information the CIA asked for. Of relevance to the hydrology report, the CIA raised the following matters: • Mauri of the stream and of the wetlands (CIA ss5.1 and 5.4). The assessment, together with the ecological assessment, supports the hydrological design of the proposal and its impact on wetland restoration and enhancement. • Te Harakeke Swamp. The Western Zone assessment addresses drainage toward Te Harakeke and concludes that the changes in hydrology arising from the proposed stormwater management will not adversely affect it. Conditions can secure this outcome.	No hydrological matter was raised.	Recommendation 43(d) (monitoring of water quality, hydrology and ecological health in Te Harakeke Wetland, in partnership) is satisfied in part – an eco-hydrological monitoring condition is sought by GWRC and DOC.	Application - Appendix 17, ss7–10; Appendix 38, s6.1; GWRC condition 38; KCDC condition 39 (Groundwater Monitoring Plan). Section 53 Response - Attachment C.
Infrastructure – water, wastewater and stormwater (Appendices 14 and 16 – Engineering and Infrastructure Report, Stormwater Management Plan) O’Callaghan Design Limited and Landlink Limited, 25 and 26 March 2026	The CIA notes at s6.1 the Trust expressly recorded freshwater as an unresolved matter, excluded from its Table 1, because “until detailed information on wastewater and stormwater management plans for the site are made available, we cannot draw conclusions as to the likely or potential risk to freshwater”. These reports are part of the detailed information the CIA asked for. The reports address iwi concerns regarding freshwater impacts through: • “Appropriate management of any potential conflict between wetlands as stormwater treatment and wetlands as habitat and potential mahinga kai” (CIA s6.1). This is achieved by separating the stormwater detention and treatment wetlands from the ecological restoration wetlands, so that treatment function and mahinga kai function are not asked of the same water body.	Comment 26.8 records a concern that wastewater capacity is left to future processes. This is answered through the proposed servicing solution secured through consent conditions.	43(b)–(c) stormwater treated to maintain or enhance water quality, mauri and ecological health. This issues is satisfied through the design and conditions – treatment in dedicated wetlands is kept separate from the restoration wetlands, with the SMP designed to achieve best practice, and construction-phase erosion and sediment control secured by condition.	Application - Appendices 14 and 16; Appendix 38, ss5.1 and 6.1; the SMP certification conditions and the Lots 1–7 on-site servicing conditions. Section 53 Response - Attachment F.

Expert / author and report	Interim ĀKWCT Cultural Impact Assessment (6 August 2025) – how reviewed and considered, the points of iwi interest engaged, and how each is addressed	ĀKWCT invited comments (29 July 2026) – issue and response	NHoŌ CIA (28 July 2026) – issue and response	Where the response is recorded or secured (Conditions Version 2, 21 August 2026)
	• “Protection of waterways by ensuring that wastewater systems and stormwater treatment are not vulnerable to unintentional discharge to the waterways” (CIA s6.1). This is achieved by connection to the public wastewater network for the majority of the development, with Lots 1–7 self-serviced to permitted-activity standards, and by no direct discharge of untreated stormwater or wastewater to natural waterbodies. • Serious effects on taonga species and on the mauri of the Ngārara Stream from any discharge (CIA s5.1). This is achieved by the same design, and by construction-phase erosion and sediment control. • Support “in principle” for wetland treatment, subject to review of the actual plans (CIA s5.1). The Stormwater Management Plan is that plan, and is subject to certification by condition. The SMP demonstrates a best practice approach to stormwater management.			
Flooding (Appendix 20 – Flood Hazard Assessment of Effects) Awa Environmental, 16 March 2026	The Interim CIA identifies no flood hazard effect and seeks no flood-related outcome. Two points of iwi interest nonetheless intersect the flood design: • The land retained for flood storage is, in part, the same land retained for the wetlands and open space that carry some of the cultural restoration outcomes. The flood management design and the CIA’s abundance outcomes are therefore aligned rather than in tension. Development platforms are sited outside areas prone to ponding, which are kept within the open space, wetland and stormwater network.	No flooding matter was raised.	Recommendation 34–43(a) asks that residential development avoid, wherever practicable, areas naturally susceptible to ponding or flooding. This matter is largely satisfied by the project design –, flood ponding area are retained within the open space, wetland and stormwater network.	Application - Appendix 20; Appendix 16. Section 53 Response - Attachment B; Attachment L, item 34–43(a).
Earthworks and geotechnical matters (Appendices 21A–21E, 18 and 19 – Geotechnical Assessment, Erosion and Sediment Control Plan, Construction and Environmental Management Plan) CGW Consulting Engineers, 25 March 2026; ESCP and CEMP by Landlink Limited	The CIA raises no geotechnical matter per se. But earthworks are the subject of the CIA’s most specific concerns (s5.5, wāhi taonga and wairua), and those are incorporated through the CEMP, ESCP and the proposed conditions rather than through the geotechnical report. Earthworks also impact on the landform of the site, which has been discussed above in respect of landscape and urban design considerations. There is a crossover with archaeology, discussed below. Earthworks effects, as relevant to iwi interests, are managed through the proposed CEMP and ESCP, along with the proposed Kaitiaki Monitoring Strategy. Also relevant is the fill approval protocol which is secured by a condition of consent.	No earthworks or geotechnical matter was raised.	• 49(a) specifies a range of matters including kaitiaki monitoring, the tīmatanga condition, and the Kaitiaki Monitoring Strategy. Conditions of consent have responded to these matters. • 49(d) strict erosion and sediment control throughout all phases. Addressed through the proposed ESCP approach.	Application - Appendices 18, 19 and 21A–21E; GWRC condition 16 (tīmatanga); GWRC KMS conditions; CEMP and ESCP conditions; KCDC CEMP condition; KCDC conditions 123–127 (fill and metal approval protocol). Section 53 Response - Attachments D and E.

Expert / author and report	Interim ĀKWCT Cultural Impact Assessment (6 August 2025) – how reviewed and considered, the points of iwi interest engaged, and how each is addressed	ĀKWCT invited comments (29 July 2026) – issue and response	NHoŌ CIA (28 July 2026) – issue and response	Where the response is recorded or secured (Conditions Version 2, 21 August 2026)
Archaeology (Appendices 27 and 28 – Archaeological Assessment of Effects, Archaeological Management Plan) Emily Howitt, 18 March 2026	The assessment addresses the same subject matter as CIA s5.5 and reaches findings consistent with it, although it does not cite the CIA as a source. It explicitly records that it does not include or purport to be an assessment of Māori cultural values. That was the role of the Interim CIA. The archaeological assessment: - Records the iwi history of the area. - Identifies 21 recorded archaeological sites within the project area, predominantly shell middens consistent with transient seasonal occupation, and records no evidence of permanent occupation, wāhi tapu or battle sites within the project area. Neither cultural assessment contradicts that finding. - Addresses tikanga on accidental discovery (CIA s5.5). This is secured by conditions A note directs that the Ātiawa ki Whakarongotai accidental discovery protocol in their Kaitiakitanga Plan is the specific protocol to be used. - Protection of tūpuna, taonga and wairua from earthworks. Addressed by the Archaeological Management Plan, the tīmatanga ceremony, cultural monitoring under the KMS, archaeological supervision of cut earthworks affecting known sites, and the archaeological authority that must be obtained under the Heritage New Zealand Pouhere Taonga Act 2014 before works commence.	No archaeological finding is contested. The CIA matters are answered at Topic C1.	49(b) NHoŌ accidental discovery protocols as a consent condition. This is satisfied by Ngāti Raukawa ki te Tonga being a named notified party. 49(c) treatment and reinterment of archaeological material and kōiwi determined by mana whenua in accordance with tikanga. This is satisfied through consent conditions and will also be addressed through the required archaeological authority.	Application - Appendices 27 and 28; GWRC conditions 18–19 (Discovery of Artefacts) and 16 (tīmatanga); KCDC condition 128 (accidental discovery). Section 53 Response - Covering Report s6.1, Topics A1–A2.
Planning and policy (Appendix 36 – Objectives and Policies Assessment; substantive application Assessment of Environmental Effects) Mitch Lewandowski, Building Block Planning Limited, March 2026	Reviewed and relied upon throughout. The Objectives and Policies Assessment provides a comprehensive assessment against a range of planning instruments. Section 8.5.1 of the substantive application addresses the Ngāti Toa Rangatira Claims Settlement Act 2014; Ngāti Toa has deferred the cultural lead to Te Ātiawa and is not participating.	Addressed as part of the covering report ss4.4–4.5 and Attachment K, Topics C1–C19.	Addressed in full in Attachment L. Items 65(a)–(c) are planning and relational matters.	Application - Appendix 36; substantive application ss4.7, 8.5.1. Section 53 Response - Covering Report ss4.4–4.5; Attachments K and L.
Consultation record (Appendices 37, 37A and 37B – Consultation Summary Report and appendices) Mitch Lewandowski, Building Block Planning Limited, March 2026	Records the engagement through which the CIA was commissioned, funded and delivered, and how the matters it raises were carried into the proposal (ss10.2–10.4). The chronology is briefly summarised in the body of this memorandum.	Engagement chronology at Topics C9 and C11.	Engagement chronology specific to NHoŌ at Part 3 of Attachment L.	Application - Appendices 37, 37A, 37B. Section 53 Response - Attachment K, Topics C9 and C11; Attachment L, Part 3.