

## **Appendix EE      Memo on landscape assessments**



**TO:** Fast-track Expert Panel

**DATE:** 24 November 2025

## ĀPITI HONO TĀTAI HONO AND LANDSCAPE ASSESSMENTS

### OVERVIEW

The Hananui Aquaculture Project (**HAP**) has employed two methodologies to understand land and seascape from two paradigms – a western and a Mātauranga Māori perspective. These two methodologies work alongside each other to gain greater insights into significance, appropriate use and development, and to manage and mitigate risks and effects.

To assist the Expert Panel in navigating these methodologies, this memo outlines:

1. the methodologies for Āpiti Hono Tātai Hono (released by Ngāi Tahu ki Murihiku in 2021) and Aotearoa New Zealand Landscape Assessment Guidelines Te Tangi a te Manu (published by Tuia Pito Ora New Zealand Institute of Landscape Architects (TPO NZILA) in 2022)
2. how the methodologies are read together.

By providing for this integrated approach, the Expert Panel can uphold cultural integrity while meeting statutory obligations, ensuring decisions are both legally robust and culturally grounded.

### BACKGROUND

In assessing how HAP impacts upon Ngāi Tahu ki Murihiku, Ngāi Tahu Seafood commissioned Ngāi Tahu ki Murihiku to undertake the following three assessments:

- **Cultural Values Assessment 2019** (Te Ao Mārama Inc) – This report outlines Ngāi Tahu ki Murihiku values with place.
- **Cultural Impact Assessment 2020** (Tipa and Associates) – This report assesses the impacts of the proposed activities on cultural values.
- **Ngā Hua o Āpiti Hono Tātai Hono updated 2025** (Te Ao Mārama Inc on behalf of Ngāi Tahu ki Murihiku) – This report applies a Ngāi Tahu ki Murihiku designed and applied methodology for a comprehensive understanding of place based on Ira Atua Ira Tangata.

Ngāi Tahu Seafood also commissioned a landscape assessment from Isthmus who have applied the landscape assessment guidelines outlined in Te Tangi a te Manu.

See Appendix 1 for the summary of these four assessments.

## TWO METHODOLOGIES

**Āpiti Hono Tātai Hono** it is not another name for a cultural values or impact assessment. Āpiti Hono Tātai Hono is a methodology that anchors the associations and relationships of manawhenua manamoana at place and directs what is appropriate within that context. It provides a korowai for the cultural impact assessment which bridges cultural context with Fast-track approvals and consent conditions.

Āpiti Hono Tātai Hono was developed by Ngāi Tahu ki Murihiku to guide understanding and decision-making. Rather than assessing significance, Āpiti Hono Tātai Hono considers what is held within a landscape, such as whakapapa, mana, tikanga, mātauranga, and future aspirations, and how these physical and metaphysical elements exert influence. The methodology blends Ngāi Tahu philosophical concepts with heritage and landscape practice, characterising landscapes through six layers based on Ira Atua and Ira Tangata.

Ira Atua, the tuakana (older, senior), represents metaphysical and timeless cultural dimensions, while Ira Tangata reflects human associations from 900 CE to the present and future. Together, they guide management and ensure that cultural integrity and appropriateness are central to land and seascape-related decisions. Importantly, Ngāi Tahu ki Murihiku view land and seascapes holistically, entwined with whakapapa, and do not define or classify “landscape” through Western paradigms.

**Te Tangi a te Manu** sets out a nationally consistent guideline for landscape assessment, designed to support robust and culturally inclusive decision-making. Developed by TPO NZILA, the guidelines integrate both Te Ao Māori and Te Ao Pākehā perspectives, reflecting a bicultural approach aligned with Te Tiriti o Waitangi. The methodology is principles-based rather than prescriptive, allowing flexibility across different contexts while promoting transparency, consistency, and respect for diverse landscape values. Each landscape assessment prepared using the guidelines should be tailored to the landscape and the project.

The framework covers the definition of landscape, assessment of character and values, evaluation of effects, and guidance for managing landscape change. Central to the methodology is a holistic view of landscape, encompassing physical, associative and perceptual dimensions, and a commitment to clear reasoning and inclusive engagement throughout the assessment process. It also includes specific approaches for identifying Outstanding Natural Features and Landscapes and assessing Natural Character.

## USE IN INTERPRETATION AND DECISION-MAKING

Āpiti Hono Tātai Hono and Te Tangi a te Manu methodologies have different purposes. Āpiti Hono Tātai Hono details how Ngāi Tahu ki Murihiku understand that place and what is and is not appropriate. Te Tangi a te Manu is a framework to undertake tailored landscape assessments within a statutory planning context. There are matters that Te Tangi a te Manu considers and

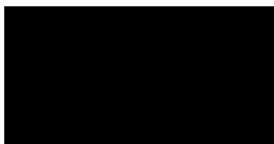
assesses, such as significance<sup>1</sup>, that sit outside the functionality of Āpiti Hono Tātai Hono, and vice versa.

These two methodologies work alongside each other; they do not misappropriate, isolate, or validate points raised in the other. They respectively identify and contextualise relevant matters and are clear as to how and why the respective assessments are undertaken. In reading them together, the two methodologies intersect at appropriateness and effects rather than cultural contexts and definitions.

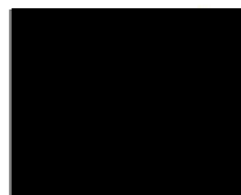
For example, for the understanding of whakapapa and whenua, the HAP Landscape, Natural Character and Visual Assessment by Isthmus borrows from Ngā Hau o Āpiti Hono Tātai Hono as the latter has the appropriate framing, mātauranga, and methodology to determine that understanding. Āpiti Hono Tātai Hono provides the whakapapa and understanding of whenua and moana from a Ngāi Tahu ki Murihiku perspective. That understanding has been taken into Te Tangi a te Manu Assessment as a given, derived from the cultural context of manamoana manawhenua for the project area.

With regards to appropriateness and effects, the Landscape, Natural Character and Visual Assessment examines the management considerations raised in Section 4 of Ngā Hua o Āpiti Hono Tātai Hono assessment as well as any relevant matters raised in other HAP technical reports. Section 4 of the Ngā Hua o Āpiti Hono Tātai Hono report lists management considerations based on what is tika or appropriate at place. The Landscape, Natural Character and Visual Assessment provides an additional professional perspective in which to consider these matters while retaining the foundational cultural context from which the management considerations were derived.

Where commentary or recommendations in either assessment may differ or introduce new/diverse information, Ngāi Tahu ki Murihiku appropriateness as defined by Āpiti Hono Tātai Hono should be treated as non-negotiable for matters relating to whakapapa, mana, tikanga, relationships, and values. In cases of conflict, the Expert Panel should prioritise cultural directives from Āpiti Hono Tātai Hono, while ensuring compliance with statutory requirements through adaptive consent conditions by cross-referencing other HAP reports (e.g. landscape, ecological, hydrological, planning).



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<sup>1</sup> Āpiti Hono Tātai Hono assessment does not consider significance as all whenua is culturally significant given that whakapapa and whenua are intertwined.

## APPENDIX 1: ASSESSMENTS USED

	Te Tangi a te Manu	Āpiti Hono Tātai Hono	Cultural Values Assessment	Cultural Impact Assessment
<b>Purpose</b>	A framework to undertake tailored landscape assessments within a statutory planning context in an Aoteroa context.	Details how manawhenua understand that place within their paradigm and what is and is not appropriate. It is not confined to describing and considering only values.	Cultural value assessment identifies and describes values pertaining to the project area.	The cultural impact assessment builds on the cultural values assessment through discussions on how effects of a proposed activity may be mitigated, drawing on the values of place.
<b>Features</b>	Alignment between Te Ao Māori and Te Ao Pākehā streams of landscape assessment. Recognises mātauranga Māori and the importance of tāngata whenua values alongside concepts and values inherited from Western and other cultural traditions. Landscape effects are considered in relation to biophysical, perceptual and associative values, which are assimilated into the consideration of the overall combined values of the landscape or seascape.	Āpiti Hono Tātai Hono assesses and considers what is held within a land or seascape, drawing on Ngāi Tahu ki Murihiku understanding from whakapapa, mana, kawa, tikanga, mātauranga, identity, connections, practices, history, and future aspirations. These considerations are the context in which to determine what is appropriate at place and the relationships Ngāi Tahu ki Murihiku have with their whenua and moana.	Cultural values assessments differ from cultural impact assessments in that they may not include a description of effects as they do not relate to a specific activity. They can provide a broad overview and direction as to the relevant issues and how these should best be addressed.	Cultural impact assessments are based on an international Western approach. They are a tool to facilitate meaningful and effective participation of Māori in impact assessment.  In RMA practice, cultural impact assessments should be regarded as technical advice, much like any other technical report such as ecological or hydrological assessments.
<b>Report</b>	Hananui Aquaculture Project Landscape, Natural Character and Visual Assessment, 2025	Ngā Hua o Āpiti Hono Tātai Hono, 2025	Te Ara a Kiwa Cultural Values Report, 2019	Cultural Impact Assessment for Hananui Aquaculture Project, 2020
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