



31 August 2026

To: Alternative to Brynderwyn Hills Expert Panel

Attention: Mary Hill, Chair

RE: Response to minute 8 – Comments on Geotechnical Information

Tēnā koutou,

Te Uri o Hāu Settlement Trust is the Post Settlement Governance Entity (PSGE) for Te Uri o Hāu hapū and the recognised Treaty Settlement Entity for the project area. Te Uri o Hāu Environs is a subsidiary to Te Uri o Hāu 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 are provided by Te Uri o Hāu Environs on behalf of Te Uri o Hāu Settlement Trust in response to the additional geotechnical information supplied by the Applicant following Minute 6 of the Expert Panel.

1.Scope of Te Uri o Hāu Comments

Te Uri o Hāu limits these comments to the part of the Project within our rohe, extending to the top of the Brynderwyns. We do not seek to comment on geotechnical matters north of that area, which fall within the interests of Patuharakeke.

2. Future Geotechnical Investigation and Detailed Design

Te Uri o Hāu acknowledges the additional geotechnical information provided by the Applicant and does not seek to provide specialist geotechnical evidence. However, we note that the information confirms that further geotechnical investigations, analysis, and detailed design will continue through later stages of the Project.

The Applicant also confirms that matters including slope stability, earthworks design, retaining structures, drainage measures, ground improvement and construction methodologies may be further refined during detailed design.

Te Uri o Hāu remains concerned that later geotechnical investigation or detailed design may result in material changes to the Project footprint or the nature and scale of works within our rohe. Accordingly, where further investigation or detailed design results in a material change to earthworks, cut, and fill configurations, slope stabilisation, retaining structures, drainage, access arrangements or other works capable of altering environmental or cultural effects, Te Uri o Hāu requests that those changes and their consequential effects are assessed and provided to Te Uri o Hāu for review and engagement prior to implementation.



3. Slope Stability, Groundwater, and Effects on Te Taiao

The geotechnical information identifies areas of historical and active slope instability, including landslides, slumps, earthflows, and hummocky terrain. The Applicant also notes that detailed design may require batter slopes, erosion protection, drainage measures, ground improvement or other stabilisation measures.

Te Uri o Hau considers that the effects of these measures should not be treated solely as engineering matters. Changes to slope form, drainage pathways, groundwater movement or stabilisation works may have consequential effects on whenua, waterways, puna, wetlands, vegetation, and cultural landscapes.

Te Uri o Hau therefore requests that any material change to groundwater interception, drainage, dewatering, slope drainage or stabilisation measures within our rohe is assessed for potential effects on te taiao and on the cultural and environmental values identified by Te Uri o Hau.

4. Pukekaroro and Kauri Dieback Biosecurity Risk

Te Uri o Hau has a specific concern regarding the known presence of kauri dieback within the Pukekaroro area. The excavation, handling, transport, reuse or disposal of soil and spoil from within or near affected areas has the potential to create a pathway for the movement of contaminated soil and the spread of kauri dieback to currently unaffected areas.

The geotechnical information confirms that excavated material may be considered for reuse within engineered fills, embankments, landscape areas or other project earthworks, and that material classification and placement requirements will continue to be refined through later design stages.

Te Uri o Hau therefore considers that this biosecurity risk must be expressly addressed before earthworks or soil movement occurs within or near the Pukekaroro area. This should include, where appropriate, baseline testing and mapping, controls on the movement and reuse of soil, appropriate machinery and vehicle hygiene, identification of suitable disposal or containment locations, and measures to ensure potentially contaminated soil is not transferred into unaffected kauri areas.

Te Uri o Hau also considers that machinery hygiene alone is not sufficient where the soil or spoil itself may be contaminated.



5. Future Intrusive Investigations and Cultural Monitoring

The Ground Investigation Report records that mana whenua have already been involved in oversight of test pit excavation and inspection of material from borehole investigations, with cultural monitoring protocols applied during Stage 1 investigations.

Te Uri o Hau considers that this involvement should continue where further intrusive geotechnical investigation is required within our rohe. Any further boreholes, test pits, access formation or other ground-disturbing investigation should be undertaken in accordance with agreed cultural monitoring protocols and with appropriate Te Uri o Hau involvement.

6. Restoration, Enhancement and Residual Effects

Te Uri o Hau considers that the priority must remain the avoidance of adverse effects, including the avoidance of the spread of kauri dieback through soil movement and earthworks.

Where residual effects on kauri, kauri habitat, waterways, whenua, or cultural values within our rohe cannot reasonably be avoided, Te Uri o Hau considers that appropriate restoration, enhancement and/or compensation measures should be developed with Te Uri o Hau.

Any such measures must be additional to, and not a substitute for, the biosecurity controls and mitigation required to avoid or minimise adverse effects.

Nga mihi mahana
Environs Holdings Ltd
Te Uri o Hau