WRITTEN COMMENT

ON THE SUBSTANTIVE APPLICATION FOR THE PROPOSED ALTERNATIVE TO THE BRYNDERWYN HILLS

Written comment invited from the owners and occupiers of directly affected land under section 53(2) of the Fast-track Approvals Act 2024, within the comment period set under section 54

Property: [redacted]

Karen Cave (Landowner) and Joshua Preece (Landowner and Occupier)

Date: 11 August 2026

1. Introduction

This written comment is submitted by Karen Cave (landowner) and Joshua Preece (landowner and occupier) of [redacted], who are directly and significantly affected by the proposed Alternative to the Brynderwyn Hills.

We understand the need for a safe, resilient and reliable alternative to the existing Brynderwyn Hills route. However, we are deeply concerned about the permanent loss of significant native ecological habitat, mature native vegetation, native bird habitat and waterways that would result from the proposed route through our property.

Our property contains an established and interconnected natural environment: mature native bush including significant kauri, pūriri, tōtara, rimu and kahikatea (some potentially 200+ years old), a natural stream and waterfall, native bird habitat, and aquatic habitat supporting eels, fish, freshwater crayfish, green frogs and glow worms. These values have developed over decades and, in places, potentially more than two centuries. They are described in detail in the sections below.

This concern is not limited to our boundary. The proposed route passes through a wider landscape of native vegetation and habitat across multiple properties, and we ask that ecological effects be assessed across that landscape as a whole rather than property by property.

Our central concern, addressed fully in Section 2, is that the proposed route appears to prioritise a scenic outlook of Bream Bay harbour for highway users over the destruction and fragmentation of established native ecosystems and their waterways. We question whether that is the right balance.

2. Scenic Outlook Versus Ecological Preservation

This is our central concern. We understand the scenic qualities of the Brynderwyn landscape, and that the proposed route favours retaining a scenic outlook of Bream Bay harbour for highway users, the same outlook that was part of why we chose to purchase this property. We question whether providing that outlook justifies permanently removing established native habitat, mature trees, native bird habitat and functioning waterways to achieve it.

The existing State Highway 1 route already provides that outlook to anyone travelling through the area. There is no need to build a new road through established kauri forest, mature trees, bird habitat and a stream and waterfall simply to give travellers on a new road the same view.

We also question why the route has been drawn through established native bush and productive farmland rather than through the surrounding pine forestry blocks. If the outcome is a choice between clearing plantation forestry due for harvest and destroying irreplaceable native ecosystems and productive farmland, we do not understand why the latter has been preferred.

> ***A scenic view can be experienced elsewhere, including from the existing route. A mature kauri, kahikatea, pūriri, tōtara or rimu, established native bush, and a functioning stream and waterfall cannot; they cannot be recreated within our lifetime.***

We ask the Panel to weigh whether the scenic benefit of the proposed route has been given disproportionate weight against permanent, irreversible ecological loss, and whether the route through our property has in fact been drawn primarily to preserve that outlook rather than to meet the project's transport and safety objectives. In our view, the new highway should be designed around safety, resilience, efficient transport and engineering suitability, not a scenic experience already available on the existing route.

3. Ecological Values of the Property, Including the Kauri Forest

The ecological values of the property should be considered as a connected and functioning ecosystem, not as individual trees, plants, waterways or wildlife in isolation. Based on our understanding of the proposed designation, the route crosses the middle section of our natural stream, above the waterfall, and passes directly through the upper-left section of our established kauri forest: two features that function as a single interconnected system together with the surrounding native vegetation and mature trees.

Native vegetation on the property includes:

- Kauri – Agathis australis
- Pūriri – Vitex lucens
- Tōtara – Podocarpus totara
- Rimu – Dacrydium cupressinum
- Kahikatea – Dacrycarpus dacrydioides
- Nīkau – Rhopalostylis sapida
- Tī kōuka / cabbage tree – Cordyline australis
- Harakeke / flax – Phormium tenax
- Kānuka – Kunzea ericoides
- Mānuka – Leptospermum scoparium
- Kawakawa – Piper excelsum
- Tītoki – Alectryon excelsus
- and a range of native fern species

The kauri forest is not an isolated stand of trees: it is part of an established native forest ecosystem, with associated understorey vegetation and habitat that contributes to the wider habitat available to native birds and other wildlife on the property.

The mature kauri are the centrepiece of these values, but the property's other mature native trees (pūriri, tōtara, rimu and kahikatea) are also significant, with some individual trees potentially 200+ years old based on their size, maturity and our knowledge of the property. We are documenting and measuring these trees; measurements to date include:

Measurements recorded to date, together with an indicative age range for each tree, are set out below:

Tree	Circumference	Diameter	Indicative age range*
Pūriri 1 – Stem A	2.81 m	**0.895 m (89.5 cm)**	†
Pūriri 1 – Stem B	2.87 m	**0.913 m (91.3 cm)**	†
Pūriri 2	2.20 m	**0.699 m (69.9 cm)**	†
Tōtara 1	3.77 m	**1.200 m (120 cm)**	260–800 years*
Rimu 1	1.90 m	**0.605 m (60.5 cm)**	130–400 years
Kauri 1	2.00 m	**0.637 m (63.7 cm)**	140–420 years
Kauri 2	1.70 m	**0.541 m (54.1 cm)**	120–360 years

Tree	Circumference	Diameter	Indicative age range*
Kauri 3	1.80 m	**0.573 m (57.3 cm)**	120–380 years
Kauri 4	1.90 m	**0.605 m (60.5 cm)**	130–400 years
Kauri 5	2.20 m	**0.700 m (70.0 cm)**	150–470 years
Kauri 6	2.40 m	**0.764 m (76.4 cm)**	170–510 years
Kauri 7	2.75 m	**0.875 m (87.5 cm)**	190–580 years
Rimu 2	1.70 m	**0.541 m (54.1 cm)**	120–360 years
Rimu 3	1.95 m	**0.621 m (62.1 cm)**	140–410 years
Tōtara	2.95 m	**0.939 m (93.9 cm)**	200–630 years
Kauri	2.70 m	**0.859 m (85.9 cm)**	190–570 years
Rimu 4	2.10 m	**0.668 m (66.8 cm)**	150–450 years

**Indicative age ranges are estimated from trunk diameter using published mean annual diameter increment rates for mature native kauri growing in natural forest (approximately 1.5–4.6 mm per year, per Ecroyd (1982)/Ahmed & Ogden (1987)), applied here as a general guide across the property's slow-growing native conifers (kauri, rimu, tōtara). Diameter is a recognised but imprecise predictor of age in naturally grown native trees of this kind, and individual trees of the same diameter can differ in age by a century or more. These ranges are provided to illustrate the likely order of maturity of these trees and are not a substitute for a professional age assessment (e.g. increment coring or dendrochronological analysis), which we would support the Panel or its experts undertaking.*

†Pūriri is a broadleaf hardwood with a different growth habit to kauri, rimu and tōtara, and we have not located reliable published diameter-increment data for mature pūriri growing in natural forest. No age estimate is given for the pūriri measurements above; a professional assessment would be needed to estimate their age. Note all measurements have been made onsite.

A tree of this age represents an ecological asset built up over an extraordinary period: established canopy, root system, bark and cavities, food resources and shelter, contribution to soil and leaf litter, and a role in bird habitat and the wider ecosystem that a replacement sapling cannot replicate within a meaningful timeframe. The question is not whether another tree can be planted, but whether the ecological function of a tree that may be two centuries old can be replaced in any timeframe that matters. In our view, it cannot.

4. The Stream, Waterfall and Wider Catchment

The property contains a natural stream and waterfall forming part of the same ecological system as the surrounding native vegetation. The proposed route crosses the stream directly, above the waterfall, at a point that forms the upper portion of the property's water system.

The stream supports eels, fish and freshwater crayfish (kōura); the surrounding environment supports green frogs and glow worms. A crossing at this point risks affecting the stream's physical and ecological integrity through earthworks and vegetation clearance, sediment and altered drainage, stormwater and groundwater changes, riparian loss, construction disturbance, and long-term highway runoff.

The property also sits at the upper/headwater portion of a river system flowing through the wider Waipū area, so effects here are not confined to the property boundary: impacts at the top of a catchment can propagate downstream in water quality, sediment, aquatic habitat and flow.

The forest and the stream are not separate features. The native forest provides shade, shelter, organic matter and soil stability around the waterway; the waterway provides moisture and aquatic habitat to the surrounding ecosystem. Assessing vegetation loss and stream effects separately risks understating this combined impact, and the potential for the highway to form a permanent barrier through what is currently one functioning system.

5. Avoidance Should Come Before Mitigation

There is a fundamental difference between protecting an existing mature ecosystem and attempting to recreate ecological values elsewhere after it has been destroyed. The relationships between mature vegetation, wildlife and waterways that have developed over decades cannot simply be transferred to another location. Avoidance, selecting a route that avoids the loss in the first place, should therefore take priority over mitigation.

Replacement planting is not equivalent to replacing ecological function: it does not immediately provide mature canopy, established food resources, mature root systems, existing bird habitat, mature riparian habitat, or the accumulated soil and ecological relationships built up over decades. The relevant question is not whether replacement planting can occur, but how long it would take to provide comparable ecological function; for our oldest trees, well beyond the lifetime of those currently living on the property.

6. Habitat Fragmentation and Connectivity

Beyond the trees directly removed, a highway through established native vegetation can fragment habitat and create new edges, affecting wildlife and bird movement, access to food and shelter, nesting, vegetation health, microclimate, and exposure to weeds and pests. The relevant question is not simply how many trees are removed, but what ecological function is lost or disrupted.

> ***Native ecosystems do not recognise property boundaries.***

A stand of bush, a waterway or a network of mature trees may extend across several properties, so the loss of several such areas along one corridor can progressively fragment a system that currently functions as a whole, an effect only visible when assessed across the affected landscape, not property by property.

7. Native Bird Habitat

The native bush on the property is functioning habitat for established birdlife. We regularly observe kererū, tūī, pīwakawaka (fantail), kōtare (kingfisher) and ruru (morepork). Mature pūriri and tītoki in particular provide food resources used by kererū, and the wider diversity of native vegetation described in Section 3 contributes to the structure and complexity of that habitat.

Removing mature trees and fragmenting the surrounding bush would remove established food resources and habitat, with effects including loss of mature canopy, disrupted movement through the landscape, edge effects, construction disturbance, ongoing traffic noise, and increased exposure to weeds and pests.

This habitat also extends beyond our boundary: a mature pūriri or tītoki on one property may feed birds that move through neighbouring land, and native bush on one property may connect with vegetation elsewhere. Removing mature vegetation from multiple properties along the route risks fragmenting habitat that currently functions as one connected landscape.

8. Alternative Routes

We ask the Panel to satisfy itself that all reasonable alternative routes have been properly assessed, weighing the native vegetation and mature tree loss described above against bird habitat and food sources, habitat connectivity, stream and aquatic effects, headwater and downstream effects, cumulative effects across properties, loss of homes and productive land, construction impacts, and safety, engineering and resilience considerations.

We ask the Panel to specifically test whether an alternative route could avoid the complete loss of [redacted] and its ecological values, and whether the transport and safety objectives can be met without a route drawn primarily to preserve a scenic outlook.

9. Other Significant Effects: Home, Farm and Workshop

In addition to the ecological effects, the proposed route would result in the complete loss of our property: a productive lifestyle block carrying approximately 14 head of breeding beef cattle, our family home, an established mechanical workshop, grazing land, fencing and rural infrastructure. This is the loss of an entire functioning rural property, not a partial reduction in landholding, and it compounds the ecological effects described above.

10. Cumulative Effects

Taken together, the proposal would result in: the complete loss of our property, home, workshop and cattle operation; the loss and fragmentation of an established native ecosystem including the kauri forest and mature trees described above; a direct crossing of the stream above the waterfall affecting eels, fish, freshwater crayfish, frogs and glow worms; loss of native bird habitat; disrupted connectivity across affected properties; and potential headwater and downstream catchment effects. These effects are cumulative and, in many respects, irreversible.

The question for the Panel is not simply whether the road can be built, but whether this route represents the best overall outcome once what must be sacrificed to achieve it is properly accounted for.

11. Matters to Be Assessed and Requested Outcome

Our primary request is that the Expert Panel does not approve the proposed route in its current form without further consideration of reasonable alternative routes capable of meeting the project's transport and safety objectives while avoiding or materially reducing the loss of established native habitat and waterways. We ask that particular weight be given to avoiding irreversible ecological loss wherever a reasonable alternative exists.

Specifically, we ask the Panel to:

(a) Assess the full extent, age and significance of native vegetation on [redacted] and other affected properties, including the kauri forest, the mature trees identified above, and connectivity across the landscape, treating affected properties together rather than in isolation.

(b) Specifically assess the direct impact of the route on the kauri forest and the stream crossing above the waterfall, including habitat connectivity, aquatic habitat, riparian vegetation, water quality and flow, and the property's position in the upper/headwater Waipū catchment.

(c) Assess native bird habitat and food sources, and the cumulative loss and fragmentation of that habitat across affected properties.

(d) Assess construction effects on vegetation, wildlife and waterways, including sediment, erosion and stormwater.

(e) Properly compare alternative routes against the ecological values identified in this comment, and test whether the route through our property is necessary to meet transport and safety objectives, or whether it has been drawn primarily to preserve a scenic outlook that is already available on the existing route.

(f) Treat avoidance of ecological loss as the first priority, ahead of reliance on mitigation, compensation or replacement planting, and require any proposed mitigation to demonstrate how it would provide comparable ecological function within a meaningful timeframe.

If the proposed route is ultimately approved, we request stringent conditions to protect native vegetation, waterways, aquatic habitat, wildlife and the wider catchment, including independent ecological oversight and long-term monitoring.

12. Conclusion

We understand the need for a safe, resilient and reliable alternative to the Brynderwyn Hills route. But the assessment must recognise the difference between what can be recreated and what cannot.

A scenic outlook can be experienced by road users through the existing route. A mature kauri, kahikatea, pūriri, tōtara or rimu that may be 200 or more years old, an established native ecosystem, and a functioning stream and waterfall cannot; not within our lifetime, and not by planting young trees elsewhere.

At [redacted], the proposed route would directly cross our stream above the waterfall and pass through our established kauri forest. The issue for us is not whether some mitigation can be provided, but whether this permanent loss is necessary at all.

We ask the Expert Panel to consider whether preserving a scenic outlook for highway users justifies that loss, and whether a better route can meet the project's objectives without it. The priority should be to find the best road, not simply the best view from the road.

Appendix A: Supporting Photographs

The following photographs, taken on the property, illustrate the native vegetation, mature kauri forest, stream, waterfall and aquatic and terrestrial wildlife referred to in Sections 3 and 4 of this comment.



Figure 1: Mature Rimu in the forest area crossed by the proposed route, with a person included for scale.



Figure 2: Characteristic mottled bark of a mature kauri on the property.



Figure 3: Canopy of a mature kauri, showing the height and form typical of the trees measured in Section 3.



Figure 4: Native bush understorey on the property, including nīkau, tree ferns and mixed native canopy species.



Figure 5: The waterfall referred to in Section 4, on the stream crossed by the proposed route.



Figure 6: The natural stream on the property, running toward the waterfall.

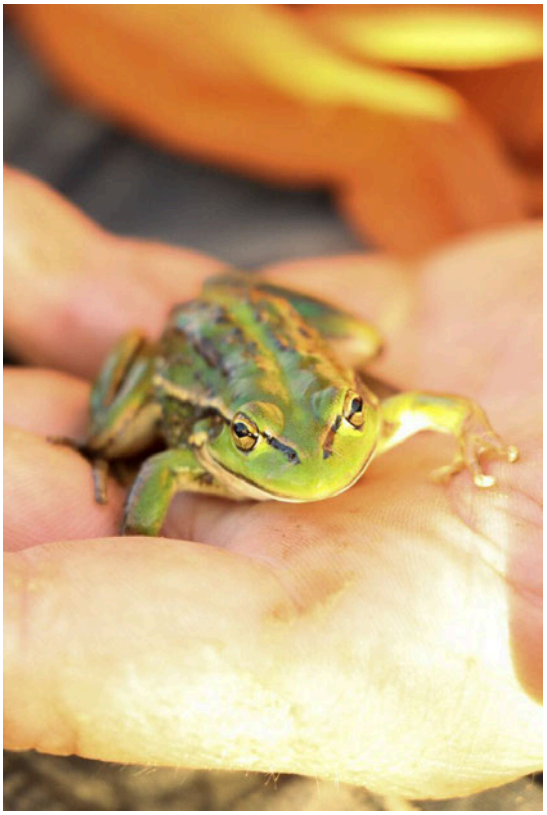

Figure 7: A green frog found in the stream habitat described in Section 4.



Figure 8: A freshwater crayfish (kōura) found in the stream on the property.

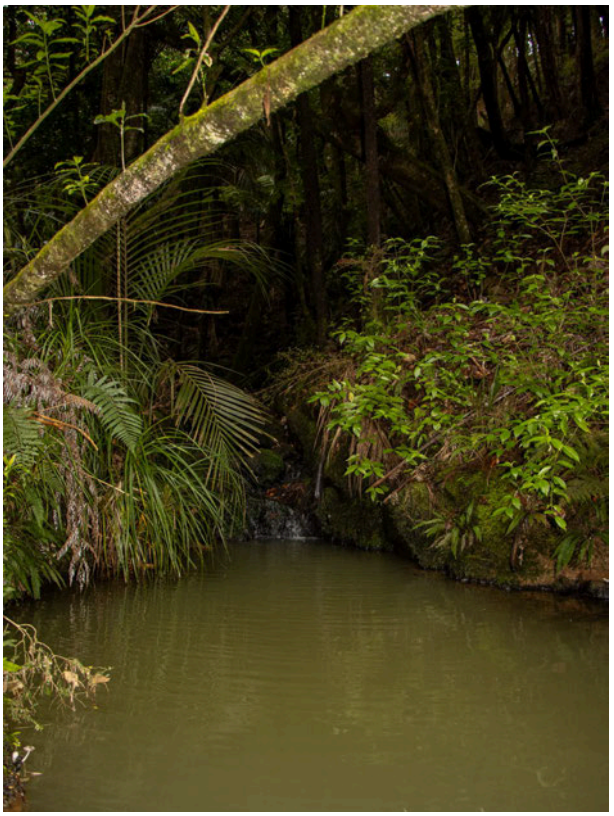

Figure 9: Natural waterhole found downstream



Figure 10: Further examples of the Kauri forest and undergrowth.

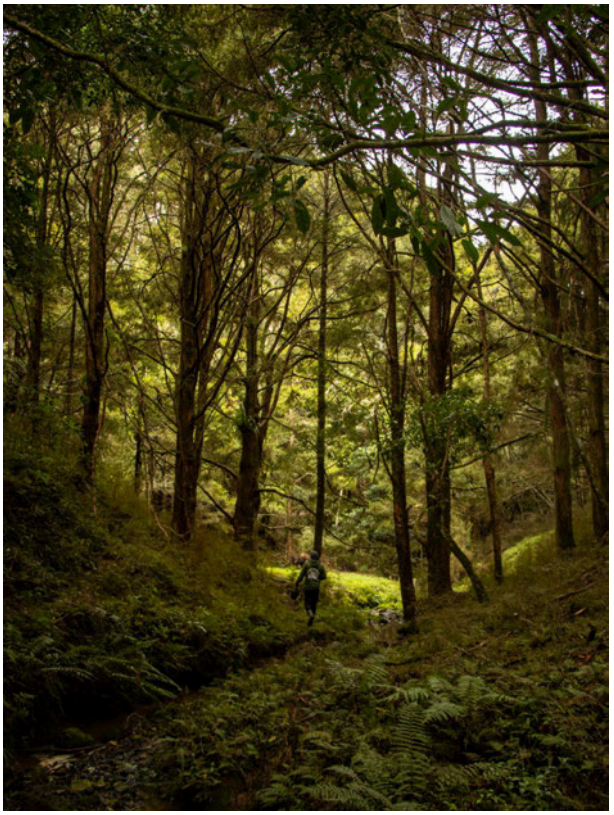

Figure 11: Forest downstream of the waterfall



Figures 12: The views from the property