ĀTIAWA KI WHAKARONGOTAI CHARITABLE TRUST

INTERIM CULTURAL IMPACT ASSESSMENT

Proposed urban development, New Central Park, 77 and 109 Kapiti Road, Paraparaumu



Date: 30/09/2026

Status: Interim

MAI I KŪKŪTAUĀKĪ KI WHARAROA, TATU ATU KI PARIPARI RERE WHAKAUTA NGĀ TINITAPU KO WAINUI, KO MAUNGANUI, PUKEMORE, KAPAKAPANUI, PUKEATUA, ŪNGUTU ATU KI TE POU WHAKARARO KI NGĀWHAKANGUTU

KO TE ĀTIAWA KI WHAKARONGOTAI E

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2 EXECUTIVE SUMMARY

Te Ātiawa ki Whakarongotai (Ātiawa) are recognised as ahi kā and mana whenua from Kūkūtauāki to Whareroa, inland to Pukemore and to Maunganui northward to Kapakapanui and Pukeatua to Ngawhakangutu, then westward to Kūkūtauākī, with overlapping interests with Ngāti Toa Rangatira to Paripari. It is from this whakapapa that Te Ātiawa ki Whakarongotai have inherited responsibilities as kaitiaki and formed an enduring relationship with Kapiti.

Te Tiriti o Waitangi provides for the relationships, values, rights and interests of the iwi toward their ancestral lands, and any developments that have the potential to negatively affect them must be carefully considered.

This Cultural Impact Statement (CIA) outlines the position of Ātiawa ki Whakarongotai Charitable Trust (the Trust) regarding the proposed urban development (the Application) at 77 Kapiti Road (the Site) put forward by the Wellington Company (the Applicant). It draws from the values described in our Kaitiakitanga Plan '*Whakarongotai o te moana, Whakarongotai o te wā'*, and has been prepared through consultation with our Taiao Advisory Kōmiti and Board of Trustees. This CIA is not rooted in the personal perspectives of the kaimahi at the Charitable Trust but is rooted in the mātauranga and collective voice of the Trust.

The ecological values of the Site have been degraded by nearly a century of human intervention, including stream channelisation, vegetation clearance, and grazing of livestock. Despite this, the sand dunes remain, there are wetlands on the Site, and there are taonga species living in the waterways flowing through the area. These environmental features are not beyond restoration. They have high cultural and environmental significance as they are now and have the capability to become highly valuable natural features.

The Application is for approximately 600 residential units, a commercial precinct, associated infrastructure, stormwater management systems, and ecological restoration works, including wetland offsetting.

Significantly, the works as proposed would require the demolition of two sand dunes. It is the position of the Trustees that this development should not progress on the basis that the sand dunes will be destroyed. We understand that the removal of the sand dunes is necessary for the Application to be financially viable for the Applicant. The Trustees do not view this as a significant enough justification for the destruction of a highly treasured and ecologically important natural feature. If the Panel was considering our views in respect of granting approval for the Application despite our opposition to the removal of the sand dunes, we request that consideration is given to the points of improvement we outline throughout this document.

The demolition of the sand dunes is the primary concern to the Trust with this Application, and the only concern we do not believe has a feasible pathway to result in the Trust's support. Additional concerns are outlined below, and will be discussed in further detail throughout this document:

- This Application is being progressed through the Fast-Track Approvals process. The Trust is opposed to the use of the Fast-Track Approvals process as it limits the Trust's ability to have meaningful engagement in the process. The limited time allowed to provide comments does not allow for meaningful input into technical documents as they are produced. The Trust's input into Fast-Tracked applications is often viewed as supplementary material, rather than a crucial expression of the tino rangatiratanga and kaitiakitanga of Ātiawa.
- This Application may contribute to ongoing alienation of Ātiawa to their ancestral lands through limiting access to natural resources, and reducing the opportunities for iwi input into Site design.
- This Application does not adequately recognise the authority that mana whenua have over this whenua, and does not provide for ongoing Trust governance and ownership of sites of significance.

- The Application would retain the Wharemauku within its current alignment, which was channelised in the early 1900s. The Trust recognises that the Fast Track process is one of few mechanisms to naturalise the channel of the Wharemauku to its historic alignment, prior to channelisation and we wish to discuss this further with the Applicant and Councils.
- There are currently nine wetlands at the Site, which the Application would see destroyed. The Trust are opposed to the destruction of any wetlands. Wetlands are an endangered habitat type that have high abundance and diversity of flora and fauna. Additionally, wetlands are important areas for the practises of mahinga kai, and with the harvesting of plant material for rongoā, weaving, and the production of textiles and building materials. Offsetting must be carefully planned and success must be guaranteed for the Trust to support this approach. The Application offers an off-site location for wetland restoration if on-site offsetting is unsuccessful. The Trust does not consider off-site offsetting as appropriate or adequate, as wetlands have crucial ecosystem functions within the location and water catchment that they occur.

The Trust recognises that the development may have some positive outcomes for the wider community of Paraparaumu. The Trust does not want to prevent these positive community outcomes, but we must stand by the values of Ātiawa and strive to protect the cultural values of Ātiawa and the significant and threatened taiao features on-Site.

We look forward to discussing this CIA with the Applicant and the Panel.

3 INTRODUCTION

3.1 ĀTIAWA KI WHAKARONGOTAI CHARITABLE TRUST

Ngā uri o Ātiawa comprise those who descend from Te Ātiawa, Ngāti Tama, Ngāti Mutunga and Ngāti Maru Wharanui and remained living in Kapiti after 1848. Since 2005, Ātiawa ki Whakarongotai Charitable Trust has been the mandated authority to represent the interests of Ngā Uri o Te Ātiawa ki Whakarongotai in all political, social, cultural, economic and environmental kaupapa. Our interests stretch from Kukutauaki to Whareroa (seaward) to Pukemore and to Maunganui northward tio Kapakapanui and Pukeatua to Ngawhakangutu, then westward to Kukutauaki.

For generations, Te Ātiawa ki Whakarongotai have looked to these tides.

The tide moves.
The river moves.
The sand moves.
The wai moves above and beneath the whenua.
The manu move between island, coast, river and ranges.

And through all of that movement there is whakapapa. There is relationship. There is life.

Ko Whakarongotai te manawa o te iwi.

Whakarongo ki ngā tai e kōrero ana (listen to what the tides are telling us) describes how we understand our responsibility as mana whenua. We listen. We observe. We remember. We learn from what has gone before. And then we act for those who are still to come.

That is the cultural lens the Trust brings through the production of this CIA.

The CIA does not simply identify individual cultural effects associated with the Application. It speaks about the relationship between an iwi and its ancestral landscape. For us, this whenua is not an assemblage of environmental features. It is a living cultural landscape.

It is onepū. Repo. Wai. Awa. Takutai. Te Moana-o-Raukawa. It is Kapiti before us and Tararua behind us. It is ngā manu travelling between them. And it is generations of our people who have lived within, travelled through, gathered from and cared for this landscape.

Standing upon the onepū with Kapiti behind us, we do not see an empty landscape awaiting development. We see whakapapa. The responsibility of Ātiawa as kaitiaki of this whenua will be fulfilled when, fifty years from now, we can look at this landscape again and see it is alive. The wai is healthy. The repo are flourishing. The dunes are regenerating. The connections are stronger. The manu are returning. The mauri has strengthened.

Our strategic direction is tūpuna inspired and mokopuna focused. Ko ngā mokopuna te pae tawhiti - Our mokopuna are the distant horizon towards which we navigate.

The transformation proposed for this whenua is significant. The Trust's response is also significant.

3.2 PUKETAPU KI PARAPARAUMU HAPŪ TRUST

The Trust wants also to acknowledge Puketapu ki Paraparaumu Hapū (Puketapu) and the relationship we share in this kaupapa.

This CIA primarily speaks from the perspective of the Trust representing Ātiawa. The Trust does not speak for Puketapu, just as they do not speak for us. But we share a commitment to the health of the whenua and wai, and a responsibility to ensure that development strengthens rather than diminishes the ability of mana whenua to exercise kaitiakitanga.

The wellbeing of the whenua requires us to work together.

3.3 ROLE OF THE CIA

This CIA has been prepared by the Trust to provide an assessment of the potential impacts associated with the Application. The Trust's positions have been guided by the iwi Kaitiakitanga Plan '*Whakarongotai o te moana, Whakarongotai o te wā'*. All concerns with the Application and opportunities for mitigating these concerns have been analysed using this Plan. Additionally, the positions in this CIA are guided by the strategic direction provided by the Trust's Board of Trustees, and cultural guidance provided by the Trust's Taiao Advisory Kōmiti. Collectively, in preparing this report, we have drawn on cultural knowledge held by the Trust, historical and environmental information relevant to the site, the Kaitiakitanga Plan, and discussions undertaken with the Applicant through the referral process.

This CIA was prepared in the absence of many of the Substantive Application documents, so all conclusions set out in the following sections are to be considered interim, subject to our final assessment of the Application (when the documents are made available) and ongoing discussions with the Applicant.

The primary Application documents that were available to use and that we have pulled from are:

- *77-109 Kapiti Road, Paraparaumu Stream and Wetland Loss Offset Report*, 2023, Bioresearches.
- *Memorandum 77 Kapiti Road – Remediation*, 2023, Bioresearches.
- *Memorandum - 77 – 109 Kapiti Road – Wharemauku Stream Restoration and Enhancements*, 2026, Bioresearches.
- *77-109 Kapiti Road and 1 Brett Ambler Way, Paraparaumu. Assessment of Ecological Effects for: New Central Park*, 2026, Bioresearches .
- *Wharemauku Stream Freshwater Ecological Baseline Study*, 2016, Jacobs
- *New Central Park Development, Paraparaumu: Archaeological Assessment of Effects*, 2026, Emily Howitt Archaeology.
- *77 and 109 Kāpiti Road, Paraparaumu New Central Park Limited. Application for Referral to the Expert Consenting Panel under the Fast-Track Approvals Act 2024*, 2026, Scope Planning.
- *Draft Greater Wellington Regional Council Consent Conditions*, 2026, Scope Planning

The CIA should not only be read and understood by the Applicant but should be used to inform the other technical reports that comprise the Substantive Application. It would be useful for the Applicant to outline how they have incorporated the CIA in future iterations of their Application.

4 POTENTIAL IMPACTS AND MITIGATIONS PROPOSED

The following categories summarise the actual and potential adverse cultural effects identified, categorised into Whakapapa (history and connection), Tino Rangatiratanga (governance), Whenua (land), and Wai (water).

4.1 WHAKAPAPA

4.1.1 Context

Ātiawa hold a unique whakapapa relationship with the whenua stretching from Kūkūtauākī in the north to Paripari in the south. As reflected in pepeha, the landscape itself provides the foundations of identity, with maunga, waterways, and other significant features serving as enduring markers of connection and belonging. As mana whenua, our identity is inseparable from te taiao, and it is through these unique tirohanga (viewpoints) that we understand, interpret, and engage with the world around us. The natural environment is not simply a physical landscape but a living expression of whakapapa, carrying the histories, relationships, and mātauranga of our tūpuna.

This relationship extends beyond a history of occupation and is embedded within the whenua itself, including the Site. As much as Ātiawa have influenced the lands and waters of the rohe, these environments have shaped who we are as a people. Our whakapapa is woven throughout the landscape, and the interconnected features of te taiao continue to affirm our identity and place within it. Through these connections, Ātiawa have long upheld, practised, and exercised our mana whenua and mana moana.

The history of this landscape is also a history of the progressive alienation of Ātiawa and Puketapu from our whenua. This is not simply loss of legal title but occurs when our people can no longer access the places where our tūpuna lived and gathered. It occurs when repo are drained, waterways altered and dunes removed, and with them the relationships and practices connecting our people to those places. It occurs when decisions about ancestral whenua are increasingly made by others and mana whenua are left responding rather than helping determine its future. And perhaps most importantly, alienation occurs when our mokopuna inherit a landscape in which their whakapapa remains, but their ability to live that whakapapa has been diminished.

With the continual loss of physical places through which whakapapa is expressed; naming, interpretation or consultation does not in itself adequately address that loss. The outcomes the Trust seeks through engagement in this Application is the restoration of relationship between people and whenua, dunes and repo, wai and awa, Kapiti and Tararua, tūpuna and mokopuna. The below sections will outline the aspects of this proposal that challenge these outcomes, and detail opportunities present to achieve these outcomes.

4.1.2 Concerns

The Application presents multiple challenges to the connection between Ātiawa and the whenua of the Site.

First, the development has the potential to cause separation of mana whenua from ancestral landscapes. The proposed loss of landscape features that embody the histories and narratives of Ātiawa may weaken the connection between mana whenua and their ancestral environment, reducing the ability of the landscape to visibly reflect and affirm the identity, presence, and enduring relationship of Ātiawa with the area.

Second, there is potential for the erosion of historical and cultural narratives associated with the area. Features such as sand dunes and wetlands carry the cultural narrative that reflects the relationship between mana whenua and the taiao. The alteration or removal of these features may erode the ability of the landscape to express these narratives, diminishing opportunities for cultural knowledge and history to be understood and shared.

Third, the removal of the Site's sand dunes has the potential to reduce the visible cultural associations present within the landscape. The significance of onepū extends beyond their physical form, reflecting enduring whakapapa connections between mana whenua and Te Taiao. The physical viewpoints that these dunes create allow mana whenua to understand, interpret and connect with the physical points of whakapapa connection. These tirohanga are part of the significance of onepū for Ātiawa. These dune systems support indigenous species and resources that have long contributed to cultural practices and the transmission of mātauranga. As these relationships are expressed and maintained through customary use and interaction with the environment, the loss of dune features may also diminish opportunities for the continued expression of these cultural connections and responsibilities as kaitiaki.

Finally, with the development of the site has the potential to reduce the ability of Ātiawa to exercise kaitiakitanga responsibilities. Kaitiakitanga relies on active relationships between mana whenua and Te Taiao with the ecosystems that sustain it. Where significant landscape features are removed and modified, opportunities to maintain customary relationships with those environments may also be reduced.

Below, we outline whether the Application in its current form satisfied the relevant huanga of the Kaitiakitanga Plan in relation to whakapapa.

Table five: Whakapapa concerns in relation to the huanga of the Kaitiakitanga Plan

KAUPAPA	HUANGA	SATISFIED?	DESCRIPTION
WHAKAPAPA	We maintain our way of life as Te Ātiawa ki Whakarongotai	No	This development would permanently alter how iwi interact with the site and te taiao.
WHAKAPAPA	All our people are connected to the environment, to their history, to the marae and to each other	Partial	Dividing the Site into private property parcels will limit the ability for Ātiawa to connect to the Site.
WHAKAPAPA	The unique relationships that certain whānau and hapū hold in connection to certain sites and taonga are respected and protected	No	The removal of natural features such as sand dunes is contrary to the protection and preservation of these taonga.
WHAKAPAPA	Whakapapa is respected and protected appropriately	No	Natural features such as wetland systems and the Wharemauku are physical embodiments of the whakapapa and pepeha of Te Ātiawa ki Whakarongotai. This objective could be achieved if naturalisation of the Wharemauku was explored further.
WHAKAPAPA	All sites of significance and associated names and kōrero within the rohe of Te Ātiawa ki Whakarongotai are respected and protected	Partial	The draft consent conditions go some way to identifying the role of the Trust in supplying road names for the Application. This should be extended to other named features of the Application.
TE AO TŪROA	People's behaviour, use and interaction with the environment is regulated by the collective respect for Te Ao Tūroa, for all the atua and for natural order and balance	No	The removal of sand dunes and natural features are used by the developer as key considerations to be financially viable for the Applicant. This is at odds with sustaining the natural order and balance of the environment.
MAURI	The land and waterways are safe for people to access	No	The removal of wetlands and sand dunes will impede the ability of mana whenua to access waterways and land safely. Without the guaranteed success of the offsetting, this huanga cannot be achieved.

4.1.3 Opportunities

As stated earlier, reconnecting Ātiawa to this whenua is broader than simply road naming, cultural design elements, or storyboards. It requires providing for ongoing relationships between people and place, and meaningful contribution to the Application at all stages of its development. Throughout this document we will refer to the creation of a Cultural Landscape Management Plan. This document would be prepared upon invite from the Applicant if the Application was approved by the Panel. This document would be used to inform other Site Management Plans (particularly taiao-focused ones) and would identify opportunities for mana whenua led restoration of cultural and ecological values. We perceive this as one opportunity for the Trust to have meaningful engagement with aspects of the development that are significant to Ātiawa.

Below, we outline further opportunities present to address issues raised above, in accordance with the relevant tikanga of the Kaitiakitanga Plan in relation to Whakapapa.

Table six: Whakapapa opportunities in relation to the tikanga of the Kaitiakitanga Plan

KAUPAPA	TIKANGA	HOW TO ACHIEVE THIS OUTCOME
WHAKAPAPA	Regular visits as whānau, hapū and iwi that take place to important sites (ie awa, marae) to maintain connections and foster kaitiakitanga are provided for and supported	This tikanga is reliant on the retention of the sand dunes on the Site and cannot be meaningfully achieved without that. Whānau, hapū and iwi require the presence of restored natural features to maintain connections and foster kaitiakitanga.
WHAKAPAPA	The Charitable Trust will develop and implement a naming policy for adoption by local government to ensure the rights to name roads and other sites	The naming of roading and sites are identified priorities of the trust. These are opportunities we would like to identify through active involvement in the creation of a Cultural Landscape Management Plan.
WHAKAPAPA	Where they exist, all original names of sites, features and areas will be given precedence	By elevating the role of the Trust in the production of a Cultural Landscape Management Plan, we will be able to directly input into the renaming of historic sites, features and areas in accordance with their original names.
WAIRUA	Access to places that are good for the wairua are protected and provided for. That includes both those that provide solace and serenity, and those that support mahinga kai, or other types of recreation	The production of a Cultural Landscape Management Plan will enable direct input into the addition of Ātiawa centred design elements to recognise and acknowledge the wairua of certain places within the site.
WAIRUA	The people of Te Ātiawa ki Whakarongotai are able to understand and practise tikanga that connect them to the atua and the environment, and protect their wairua, eg. karakia, whakawātea, pure, conflict resolution	By enabling adequate access for mana whenua to the site through the development of a Cultural Landscape Management Plan, Te Ātiawa ki Whakarongotai are able to connect to the atua and the environment and protect their wairua.
MANA	Connect with the taiao as whānau, hapū and iwi collectives through activities	The satisfaction of this huanga relies on the co-design of the Cultural Landscapee Management Plan, and that the Trust are enabled to carry out activities that would allow mana whenua to feel connected to the site.
MĀRAMATANGA	Knowledge transmission includes reconnecting iwi members with the environment to have lived experiences, to learn through being there and taking part in the action	These are opportunities we would like to identify through active involvement in the creation of a Cultural Landscape Management Plan.

4.2 TINO RANGATIRATANGA

4.2.1 Context

Alongside the mana whenua and mana moana held by Ātiawa, Te Tiriti o Waitangi confirms, protects, and guarantees the enduring exercise of tino rangatiratanga. Te Tiriti partnership recognises the distinct yet complementary roles of tino rangatiratanga and kāwanatanga, ensuring both are equally reflected in decision-making. For Te Ātiawa ki Whakarongotai, tino rangatiratanga must be meaningfully upheld across all levels of governance, planning, and implementation, supported by clear roles, capable representation, and a coordinated approach to protecting iwi interests. Within this authority is the responsibility of kaitiakitanga, derived through whakapapa as mana whenua.

Kaitiakitanga is an enduring responsibility to the mauri of the taiao. It is not simply the right to submit comments on somebody else's management plan. We need to be clear throughout this process:

Where are mana whenua consulted?
Where do we participate?
Where are decisions genuinely shared?
Where do we have an enduring monitoring role?
And where should mana whenua cultural authority carry greater weight?

These are not peripheral questions, they are expressions of kaitiakitanga and rangatiratanga. The outcomes that the Trust seeks through this proposal are more meaningful partnership, active participation, governance, and long-term authority over decisions relating to the taiao and other matters of cultural significance. The below sections will outline the aspects of this proposal that challenge these outcomes, and detail opportunities present to achieve these outcomes.

4.2.2 Concerns

The Trust's primary concern regarding the exercise of tino rangatiratanga in relation to the Application, is that there are few mechanisms proposed currently that allow Ātiawa to have an active and ongoing role as the development progresses.

Below, we outline whether the Application in its current form satisfied the relevant huanga of the Kaitiakitanga Plan in relation to tino rangatiratanga.

Table seven: Tino Rangatiratanga concerns in relation to the huanga of the Kaitiakitanga Plan

KAUPAPA	HUANGA	SATISFIED?	DESCRIPTION
WAIRUA	Our people feel a sense of pride and fulfilment about the capability of our iwi as kaitiaki	No	There are currently no mechanisms in the current Application to allow for Ātiawa to fulfil their role as kaitiaki over this whenua.
MANA	Te Ātiawa ki Whakarongotai have tino rangatiratanga, authority over resource use	No	There are currently no mechanisms in the current Application that allow Ātiawa to make decisions on the resource use on the Site.
MĀRAMATANGA	Decision-making is informed by iwi knowledge	Partial	The Applicant has tried to allow for co-design of technical reports, but this has not been achievable within the time constraints they have imposed. As such, the CIA is being produced at the same time as the Substantive Application documents, meaning it cannot be meaningfully incorporated in the Application. Additionally, there are few mechanisms present in the Application to meaningfully allow for an ongoing decision-making role for Ātiawa.

MĀRAMATANGA	Local specialist knowledges are respected and empowered to inform decision-making	No	As above, there is no indication that specialist iwi knowledges have informed the Substantive Application, and there are few mechanisms present to enable this in the future.
WHAKAPAPA	The unique identity and role of Te Ātiawa ki Whakarongotai as mana whenua and kaitiaki of their rohe is recognised and respected	Partial	The role of Ātiawa as mana whenua and kaitiaki of the rohe is built on the recognition of the Tino Rangatiratanga of the iwi. Authentic Tino Rangatiratanga requires active partnership in all levels of planning. The development of a cultural landscape plan could ensure the identity of Te Ātiawa ki Whakarongotai is recognised and respected.

4.2.3 Opportunities

As mana whenua and kaitiaki, Ātiawa have an enduring responsibility to protect and enhance the wellbeing of the whenua and te Taiao. Meaningful involvement throughout project planning, assessment, restoration, and environmental management is necessary to uphold these obligations. Ongoing partnership with Te Ātiawa ki Whakarongotai and Puketapu Hapū will support the exercise of kaitiakitanga, ensure iwi interests are appropriately represented, and provide opportunities for long-term stewardship and governance of restoration outcomes.

Additionally, our relationship with whenua requires whenua. And kaitiakitanga requires more than responsibility. It requires access and authority. That is why we are requesting the return of all open space ecological whenua. The transfer of these parcels has the potential to interrupt a history of alienation and move in a new direction.

Below, we outline further opportunities present to address issues raised above, in accordance with the relevant tikanga of the Kaitiakitanga Plan in relation to Tino Rangatiratanga.

Table eight: Tino Rangatiratanga opportunities in relation to the tikanga of the Kaitiakitanga Plan

KAUPAPA	TIKANGA	HOW TO ACHIEVE THIS OUTCOME
WHAKAPAPA	Iwi members are involved in kaitiakitanga of the natural environment through involvement in the protection, care, nurturing, growing and restoration of natural sites and systems	By elevating the role of the Trust in the production of a Cultural Landscape Management Plan, we will be able to have an active role as kaitiaki of the natural environment on the Site. We would like to discuss the opportunities to have ongoing governance roles for the on-Site natural environments.
WHAKAPAPA	Effort will always be made to involve whānau and hapū as leaders in environmental planning for places or areas they have special relationships to	Same as above
WAIRUA	The role of mana whenua as kaitiaki is recognised and upheld in any management of cultural heritage issues	Same as above
MANA	Freely express tino rangatiratanga through upholding our kawa and tikanga	Same as above, and particularly in regards to guidance around the cultivation and harvest of natural resources on the Site.
MANA	Increase iwi holdings of land	The Trust requests that all open space ecological areas are vested with the Trust for perpetual guardianship, and that resourcing is made available to the Trust to enable meaningful and appropriate management of these sites. We are open to exploring this opportunity with the District Council.
TE AO TŪROA	Implement adaptive management responses to	All environmental plans should include an adaptive management approach, so that they follow a robust and assessable criteria of success and there are planned approaches to failure if that occurs.

	changes observed in the environment	
TE AO TŪROA	Implement rāhui and other tikanga Māori tools when communities fail to self regulate behaviour and use to the detriment of the environment or sustainability of resources	The Trust should be enabled to carry out tools such as rāhui for the sustainable cultivation and harvest of natural resources on the Site.

4.3 WHENUA:

4.3.1 Context

The whenua on the site is a complex matrix of soil types and compositions. The primary visual features of the site currently are the two sand dunes either side of the modified watercourse. Below the surface are expected to be archaeological remnants of previous occupation on the Site.

Sand dunes

In Te Ao Māori the concept of potential is directly connected to whakapapa, genealogy and evolution. Pito mata signifies raw potential- shown by the 'uncooked portion' of what is to come. Ātiawa recognises the raw potential of the site and sees beyond what has been lost. Although in a currently degraded state, covered in exotic pasture grasses, the sand dunes and other ecological systems on site are foundations from which regeneration can begin.

Sand dunes are an integral part of the natural character of the Kapiti Coast and hold deep spiritual value to Ātiawa. Sand dunes provide tirohanga, viewpoints from which to understand the whakapapa and journey of Ātiawa. From the vantage point of these sand dunes, Ātiawa can see the waters, maunga, and significant sites that form part of their pepeha. Mai i Kūkūtauākī ki Whareroa, tata atu ki Paripari, these ancestral landmarks are woven together through whakapapa, history, and occupation. They are physical markers within a cultural landscape and hold both ecological and spiritual significance.

The cultural significance of sand dunes strongly overlaps with their important ecological function. Sand dunes do not exist in isolation. Their true value can be shown within their place in a deeply interconnected Taiao. The dune forms have helped determine how water moves across this coastal plain. Between them lie the repo, wet hollows, waterways and connections beneath the whenua. This system relies on balance, exchange and reciprocity and relies on the health and functionality of each individual part. The pre-existing environmental degradation within the site showcases this point. Waterways have been altered; indigenous vegetation has been diminished and wetlands have been drained. The fragmentation and fracturing of these environments show how each part of the site relies and is interconnected on each other.

Historically, the coast comprised an interconnected landscape of sand dunes, wetlands, repo and waterways. These habitats have since been extensively modified, and sand dunes are now a threatened habitat type. The dunes on the Site are remnant back-dunes, constrained by development on all sides and isolated from other dune systems along the coast. They are some of the last opportunities on the Kapiti Coast for meaningful restoration.



Locations on the dunes on-Site. Working Consultation Document, 2023

Archaeology and Scheduled Sites

The Kapiti Coast has a long and continuous history of Māori occupation, settlement, travel and resource use. As a result, there is a significant potential for previously unrecorded archaeological material to be encountered during earthworks, even where no surface evidence is presently visible. This risk is heightened within dune systems, which can preserve subsurface occupation deposits and are also known to contain urupā and isolated burials associated with generations of Māori occupation. The accidental disturbance of kōiwi tangata (human remains), wāhi tapu or taonga tūturu would give rise to serious cultural and spiritual effects, including impacts on tapu, wairua, whakapapa and the mana of the deceased, their descendants and mana whenua. Such effects cannot be treated solely as technical archaeological matters or remedied after disturbance has occurred. They require a precautionary approach founded on avoidance wherever practicable, early involvement of mana whenua, appropriate archaeological authority and management provisions, cultural monitoring of earthworks, and immediate implementation of the Trust's Accidental Discovery Protocols if material is encountered.

Within the Site, one recorded archaeological site has been identified: a shell midden. Several additional recorded sites are located nearby, including sites documented in association with the expressway works, comprising middens and ovens. Taken together, these records confirm that the Site sits within a broader archaeological landscape rather than being an isolated location. The presence of one known site should therefore not be interpreted as defining the full extent or density of archaeological values. Dune movement, historical land modification, vegetation cover and the burial of deposits below the present ground surface may all limit what can be identified before earthworks commence. Accordingly, the recorded sites provide a clear basis for treating the wider earthworks area as archaeologically sensitive and for ensuring that mana whenua are directly involved in determining monitoring locations, stop-work procedures, discovery responses and measures to protect any archaeological material, kōiwi tangata or taonga tūturu encountered.



Internal Trust maps using ArchSite and Greater Wellington Regional Council data indicating the location of the recorded archaeological sites (orange dots) and the Wharemauku stream (scheduled site of significance to mana whenua).

4.3.2 Concerns

The Application presents multiple challenges to the whenua on-Site.

First, and most importantly, the removal of the sand dunes is fundamentally at odds with the values of Ātiawa, for both spiritual and environmental reasons. Environmentally, the removal of sand dunes will change the natural character of the area, it will result in the reduction of an already threatened habitat type on the Kapiti Coast, it will alter the hydrogeology of the Site permanently and may increase flood risk, and it will restrict the ability of the whenua to regulate itself and carry out its natural functions. The Trust does not consider that the creation of an artificial mound adjacent to the motorway can offset the environmental and cultural impacts that the removal of the dunes will have.

Second, the Site is previously undeveloped and may contain archaeological discoveries. We acknowledge the work of Emily Howitt Archaeology that identifies an Archaeological Authority is needed for this Application. The effects of archaeological discovery will only be of concern if the Archaeological Authority, Management Plan, and associated consent conditions do not adequately provide for the co-design of Ātiawa in this process.

Below, we outline whether the Application in its current form satisfied the relevant huanga of the Kaitiakitanga Plan in relation to whenua.

Table three: Whenua concerns in relation to the huanga of the Kaitiakitanga Plan

KAUPAPA	HUANGA	SATISFIED?	DESCRIPTION
WAIRUA	Tikanga Māori and the mana motuhake of Te Ātiawa ki Whakarongotai is abided by in the active protection of wāhi tapu and kōrero tuku iho	Partial	The satisfaction of this huanga relies on the co-design of the Archaeological Authority and Management Plan, and that the Trust are enable to carry out meaningful Site monitoring throughout the project's lifespan in the areas the Trust identifies as meaningful and important. This can also be achieved by providing for a Cultural Landscape Management Plan
TE AO TŪROA	The natural order and balance of the environment is maintained to support the security of the people who rely upon it	No	The Application relies on the removal of natural features to be financially viable for the Applicant. This is at odds with sustaining the natural order and balance of the environment.

TE AO TŪROA	Native fauna are able to complete their full life cycle	Partial	Natural life cycles on-Site will be disrupted by the changes to the landscape. This huanga can only be achieved if the changes to the environment and subsequent restoration are successful, which is not guaranteed.
TE AO TŪROA	Ecological communities are well-structured and stable	No	The Application will have dramatic impacts on the ecological communities on Site and will change the structure of these communities and will create instability in the short term.
MAURI	Species are lively and in good condition	Partial	This huanga can only be achieved if the changes to the environment and subsequent restoration are successful, which is not guaranteed.
WAIRUA	The presence of native animals can be observed and heard in the environment	Partial	As above
WAIRUA	The people of Te Ātiawa ki Whakarongotai are free of stress and trauma brought about through environmental degradation and change	No	The removal of sand dunes will continue a long history of trauma induced by the degradation and change of sand dunes along the Kapiti Coast.

4.3.3 Opportunities

The Trust acknowledges that retaining the sand dunes on the Site is prohibitive to the Applicant's financial return through this Application. The peat in the soil is not load-bearing for the type of development proposed. The Trust does not perceive a way to offset the cultural and environmental harm done by removing the sand dunes. We welcome conversation with the Applicant to try and resolve this issue.

Below, we outline opportunities present to address issues raised above, in accordance with the relevant tikanga of the Kaitiakitanga Plan in relation to whenua.

Table four: Whenua opportunities in relation to the tikanga of the Kaitiakitanga Plan

KAUPAPA	TIKANGA	HOW TO ACHIEVE THIS OUTCOME
TE AO TŪROA	Protect understandings and memory of the natural character of the environment to inform habitat protection and restoration	This tikanga is reliant on the retention of the sand dunes on the Site and cannot be meaningfully achieved without that. The presence of restored natural features is the most effective and meaningful way to ensure they are understood and remembered.
MAURI	Revegetate the land with the right types of vegetation	By elevating the role of the Trust in the production of the Environmental Management Plan, or by providing for the creation of a Cultural Landscape Management Plan, we will be able to directly input into the vegetation types that we find appropriate for this whenua. Additionally, this will allow the Trust to prioritise species for rongoā and harvest and identify suitable eco-source seed providers.
WAIRUA	Kaitiaki determine measures for providing necessary protection for wāhi tapu, wāhi tūpuna and archaeological sites	The Kaitiaki Monitoring Strategy will allow for the Trust to satisfy this outcome. Further integration of the Trust in the development of the Archaeology Management Plan will enable this also. This relies on the Trust being able to design the Monitoring Strategy for issues we have identified and find important, rather than a prescribed approach where the Applicant limits the areas we can monitor. The identification of significant sites to monitor, as well as a Kaitiaki Monitoring Strategy and relevant tikanga would also be created as part of the proposed Cultural Landscape Management Plan.
WAIRUA	The Accidental Discovery Protocols are abided by in any earthworks undertaken in the rohe of Te Ātiawa ki Whakarongotai	The Trust has a pre-written set of Accidental Discovery Protocols that we would like to see included in this Application. These are Appendix A of the Kaitiakitanga Plan, and the Trust can provide these directly.

WAIRUA	Cultural monitoring of any earthworks is undertaken in accordance with the Cultural Monitoring Protocols	Cultural Monitoring Protocols are included in the Kaitiakitanga Plan (its Appendix B) and would be adapted for this specific Site. The Trust are happy to provide these protocols.
WAIRUA	Any response to an accidental discovery of kōiwi is undertaken through the guidance of kaumātua, and in a way that creates limited disturbance to people and the environment	Responses to accidental discovery would be an aspect of the Archaeological Management Plan and the Cultural Landscape Management Plan.
TE AO TŪROA	Maintain and protect ecological connectivity	Revegetation on the Site could create corridors for manu between Kapiti Island and Tararua. Strategic revegetation could also create large contiguous habitat for lizards on-Site. These are opportunities we would like to identify through active involvement in the production of the Environmental Management Plans or through the creation of a Cultural Landscape Management Plan.
MAURI	Eradicate invasive and pest predator species from our rohe	The Trust have a strong interest in the removal of terrestrial invasive species from the Site. New subdivisions give the opportunity for robust pest eradication prior to construction, and set the precedent for how pests will continue to be managed on the Site into the future. The Trust would like to see a pest management strategy included in the Environmental Management Plan and would support a no-cats covenant on new residences. Additionally, pest management would provide an opportunity for the people of Ātiawa to be engaged in the environmental restoration of the site, and the Trust would like to work with the Applicant on identifying work opportunities in this field.

4.4 WAI:

4.4.1 Context

The Trust acknowledges that wai is connected ki uta ki tai (mountains to sea) as well as travelling through whenua, above and below ground. On this Site, the water additionally flows through the sand dunes, through wetlands and waterways, into the Wharemauku and out to the estuary and Te Moana-o-Raukawa.

The health of the moana is connected to the awa. The awa to the repo. The repo to the wai. And the wai to the dune landscape through which it moves.

We can divide this landscape into hydrology, ecology, stormwater, earthworks and cultural values for assessment purposes. But Papatūānuku does not organise herself according to our technical reports. The wai does not stop at the boundary of the hydrologist's evidence. The manu do not recognise the edge of an assessment area. And whakapapa does not stop at a cadastral boundary.

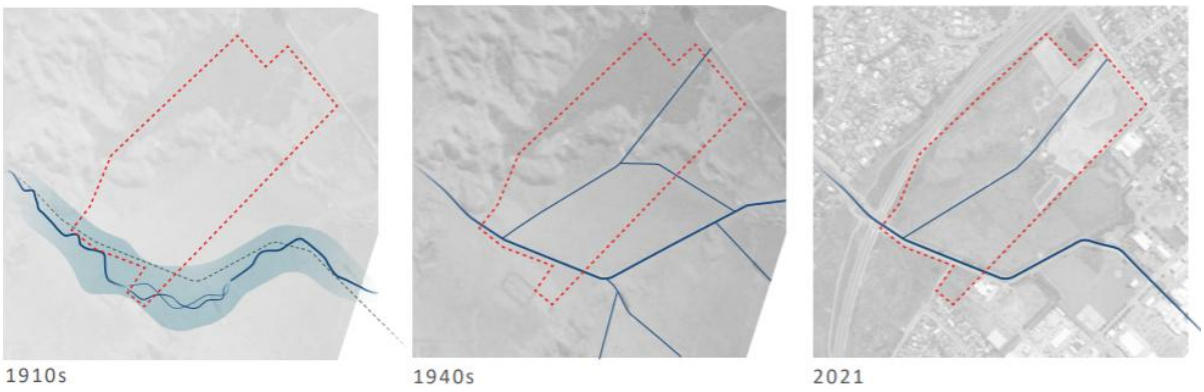
The whenua operates as a whole.

Our response to the matters of wai holistically consider the Site as part of the broader Wharemauku whaitua, or water catchment. There are three primary waterbody types present currently on the Site; a stream (the Wharemauku), wetlands, and a highly modified watercourse which feeds into the Wharemauku. Additionally, we consider the potentially overlapping role of ecological offsetting and stormwater management on-Site.

Wharemauku and highly modified watercourses.

For Ātiawa, inland waterways are regarded as the 'arterial network' of Papatūānuku, conduits and givers of life. The historic network of waterways through Kapiti connected the pā and papakāinga of Ātiawa and allowed nearby hapū and iwi to interact and trade with each other.

The Wharemauku Stream originates in the foothills of Tararua and covers an area of approximately 2,000 hectares. Prior to modification in the 1900s, the Wharemauku followed a natural, meandering alignment and was surrounded by wetland and forest habitats. These areas would have provided shelter and sustenance to the tupuna of Ātiawa and Puketapu and would have improved the resilience of the surrounding areas to flooding and weather events. These forests would have included species such as kahikatea, pukatea, swamp maire, rimu, tawa, kiekie and supplejack. Mature native forest has not been present on the Site since at least 1951, and the site is mostly vegetated currently with introduced pasture plants.



Indicative figures of the previous alignments of the Wharemauku. Working Consultation Document, 2023

Currently, the Wharemauku flows through the urban centre of Paraparaumu, through the residential area of Raumati, and out to Rauoterangi Channel, the strait between Kapiti Island and the mainland. Over time, the increased development in Paraparaumu has led to the straightening and channelisation of the Wharemauku. The flattened beds now exacerbate risks from storm events, and the removal of wetlands and riparian plants along the length of the Wharemauku has left the surrounding land vulnerable to erosion and flooding. IN fact, the Wharemauku requires continual management from Kapiti Coast District Council due to the build-up of sediment, which does not effectively address the cause of sediment buildup in the stream, and can have detrimental effects on wildlife.

A highly modified watercourse has been present on the site since at least the 1940s, inflowing on the site's northern boundary, and flowing through the site in a south-western direction, and discharging into the Wharemauku Stream. It is primarily a straightened channel and was likely dug out as a drain for farming. This watercourse is primarily fed by stormwater but is still a meaningful contributor to the water flow and quality of the Wharemauku. As such, the Trust considers that the water quality of the Wharemauku and the highly modified watercourse must be considered together, as they form part of the same network.

Wetlands

Historically, much of the Kapiti Coast would have been a dune-wetland landscape. Similarly to how inland waterways are regarded as the 'arterial network' of Papatūānuku, wetlands are also the way by which Papatūānuku cleanses herself of impurities. As such, wetlands are historically and currently culturally and environmentally significant ecosystems that historically supported important ecological functions, customary practices, and indigenous biodiversity.

Prior to 1840, wetlands made up 34% of the Porirua ki Manawatū land scape and now cover less than 3% of their historic range in the Wellington Region. There are nine wetlands on the Site. These wetlands are all palustrine, vary in size and are predominantly covered by exotic vegetation. Despite this, five of the nine wetlands are regarded as having moderate ecological value (wetland 2,3,4,5, and 7).



Location of the Wharemauku, Watercourse 1, and the nine wetlands. 77-109 Kapiti Road, Paraparaumu Stream and Wetland Loss Offset Report, 2023, Bioresearches.

Mahinga kai and resource harvesting

The people of Ātiawa have always been supported by the diversity of mahinga kai resources that the wetlands and stream habitats provided. This is evidenced by the number of pā sites and papakāinga strategically built near waterways. The Wharemauku was once rich in freshwater mahinga kai species, such as kokopū and koarō, kākahi, kōura, īnanga, pātiki, and other species migrating seasonally between the salt and freshwater. Inland wetlands provided habitats and breeding grounds for freshwater fish and abundant bird life. Several edible bird species such as pūkeko, pārera (grey duck), tētē (brown teal), and kawau (shag) all occupied dune wetland habitats.

Wetlands also provided Ātiawa with harakeke, used for textiles, kuta for thatching, dried moss for bedding, and mānuka for building structures. Finally, wetlands and waterways provided for the harvesting of materials for rongoā (traditional medicine).

Although the Wharemauku is in poor condition along much of its extent past Coastlands, there are a number of important native species that continue to occupy it. These include mahinga kai species such as tuna (*Anguilla australis* and *Anguilla dieffenbachia*), īnanga (*Galaxias maculatus*), and kōura (*Paranephrops planifrons*).

The practice of harvesting is integral to the way of life for Ātiawa both historically and currently. Therefore, access to healthy and abundant mahinga kai, rongoā, and textiles is fundamental to the spiritual and physical health of the uri of Ātiawa.

4.4.2 Concerns

The Application presents multiple challenges to the waterbodies on-Site.

First, the intentions to restore the on-Site section of the Wharemauku are restricted to the channelised and artificial layout that the stream is currently bound to. This perpetuates an alignment that may not be the best outcome for the Wharemauku in the long term. Previous iterations of the Application included the realignment and naturalisation of the on-site section of the Wharemauku to a roughly pre-channelised form. While this presents additional ecological and hydrological challenges to consider, the Fast-Track Approvals process presents one of the few opportunities for this kind of radical, large-scale work. Given the scale of the proposed development and the significance of the Wharemauku, the Trust considers it essential that opportunities for naturalisation are discussed between all parties. This also relates to ongoing discussions surrounding an airport link road through the Site. The Trust do not wish to see a road put through any natural features or any waterbodies that are being restored. We view this as a direct contract to the ideas of restoration. We view this as related to the discussion of the naturalisation of the Wharemauku, as ultimately the alignment will effect the options available for this road. We welcome a discussion with the Applicant and the Council roading team to resolve this issue.

Second, the highly modified watercourse on Site is proposed to be realigned and incorporated into the stormwater management system as a planted swale, which would feed into the newly created wetland system and then the Wharemauku stream. This confounds the ability of the wetlands on-Site to be solely ecological offsetting and would instead be a combined wetland offsetting/stormwater management tool. Additionally, this does not consider the watercourse to be a meaningful arm of the Wharemauku and would seek to separate it from that above-ground wider hydrological network.

Third, the reclamation of the natural wetlands and subsequent offsetting presents many risks. This primarily relates to the possibility of the offsetting being unsuccessful or incorporating other secondary management and stormwater functions. Many of the positive environmental effects put forward in this Application rely on the success of the offsetting to replicate the functions of a natural wetland. However, the current Application does not convincingly address how this will be achieved, and so remains a concern for the Trust. If untreated stormwater is coming into the wetlands via the planted swale, and runoff is entering the wetlands from the roads, this would compromise the overall wetland health and ability to provide quality habitat for fauna. If the offsetting is unsuccessful, an already endangered habitat type would be further reduced within the whaitua of the Wharemauku. The Applicant has offered an off-Site property to be used for offsetting if the on-Site offsetting is unsuccessful. Being outside of the Wharemauku whaitua, the Trust does not believe this would be meaningful, equivalent offsetting.

Fourth, there is currently no discussion of the effects on health, abundance, or access to mahinga kai, rongoā, and textile resources in the Application. We view the perpetual access of Ātiawa to these wetland resources as fundamental to the way of life of Ātiawa, particularly due to the currently limited number of wetlands on public land.

Fifth, the current consent conditions currently allow for the Trust to be invited to provide advice and input on Management Plans (e.g., Environmental Restoration Management Plan) but does not provide detail on what this pathway involves. Ultimately, this could result in a position where the Trust is not enabled to have meaningful participation in the co-design of these plans beyond providing input. Therefore the resulting environmental restoration may not be aligned with the outcomes the Trust seeks.

Below, we outline whether the Application in its current form satisfied the relevant huanga of the Kaitiakitanga Plan in relation to wai.

Table one: Wai concerns in relation to the huanga of the Kaitiakitanga Plan

KAUPAPA	HUANGA	SATISFIED?	DESCRIPTION
TE AO TŪROA	The natural order and balance of the environment is maintained to support the security of the people who rely upon it	Partial	The Application would fundamentally disrupt the natural order and balance of the environment in the short term. This would interfere with how people interact and engage with the environment. This huanga can only be achieved if the changes to the environment and subsequent restoration are successful, which is not guaranteed.
TE AO TŪROA	The natural character of the environment waterbodies is protected and enhanced	No	This Application would alter the natural character of the onsite wetlands permanently and would perpetuate the alignment of the Wharemauku as a channelised watercourse. This objective could be achieved if naturalisation of the Wharemauku was explored further.
TE AO TŪROA	Native fauna are able to complete their full life cycle	Partial	Natural life cycles on-Site will be disrupted by the changes to the landscape. This huanga can only be achieved if the changes to the environment and subsequent restoration are successful, which is not guaranteed.
TE AO TŪROA	Ecological communities are well-structured and stable	No	The Application will have dramatic impacts on the ecological communities on Site and will change the structure of these communities and will create instability in the short term.
MAURI	Land, waterways and mahinga kai are healthy, clean and free of pollutants	Partial	The interaction between the stormwater functions of the planted swale and the connectivity to the Wharemauku could mean that in times of heavy rainfall mahinga kai species may interact directly with untreated stormwater. Roading near to the proposed wetlands and Wharemauku may also result in pollutants entering the waterways.
MAURI	Species are lively and in good condition	Partial	Reclamation of waterways will impact species on the Site and may result in short term impacts on the condition of individuals.
WAIRUA	The wairua of people is supported through their ability to practise mahinga kai	No	There is currently no mechanism in the Application to allow for perpetual access to mahinga kai in this development.
MANA	People of Te Ātiawa ki Whakarongotai have access to mahinga kai sites	No	As above
TE AO TŪROA	Habitat that's required to support mahinga kai and other native species is available	Partial	Habitat is proposed to be created that would support native species. The success of this huanga can only be achieved if the changes to the environment and subsequent restoration are successful, which is not guaranteed.
MAURI	Mahinga kai is abundant	Partial	As above
MAURI	Biodiversity is strong in that the full suite of mahinga kai species can be found in our catchments	Partial	As above
WAIRUA	The presence of native animals can be observed and heard in the environment	Partial	As above
WAIRUA	The people of Te Ātiawa ki Whakarongotai are free of stress and trauma brought about through environmental degradation and change	No	The removal of wetlands will continue a long history of trauma induced by the degradation and change of wetlands along the Kapiti Coast.

4.4.3 Opportunities

Below, we outline opportunities present to address issues raised above, in accordance with the relevant tikanga of the Kaitiakitanga Plan in relation to wai.

Table two: Wai opportunities in relation to the tikanga of the Kaitiakitanga Plan

KAUPAPA	TIKANGA	HOW TO ACHIEVE THIS OUTCOME
WAIRUA	The qualities of the environment that restore, cleanse and heal wairua are protected and enhanced where possible	This outcome can be achieved by active collaboration and co-design of relevant Management Plans between the Trust and the Applicant or the development of the Cultural Landscape Management Plan. Currently, the draft consent conditions allow only for input from the Trust. We would recommend more explicit language about inviting the Trust to co-design the Environmental Management Plan and other taiao-focused Management Plans
MANA	Lead by example in the way we live in our rohe and utilise resources, particularly to ensure the regeneration of traditional food sources accessed by Te Ātiawa	This outcome, with particular focus on mahinga kai, can also be achieved by providing for a Cultural Landscape Management Plan which enables the Trust to identify opportunities for regeneration of mahinga kai stocks.
MANA	Employ valuation of the environment in terms of how it sustains and supports life to thrive, rather than in terms of financial value	As it stands, the Application in its current form states that the reclamation of natural wetlands to enable a financially viable development.
TE AO TŪROA	Protect and restore critical habitats such as riparian and fish spawning habitat	As above, providing for a Cultural Landscape Management Plan will allow the Trust to identify opportunities to enable this outcome to be achieved from a cultural perspective.
TE AO TŪROA	Maintain and protect ecological connectivity	See above regarding the Cultural Landscape Management Plan, which would identify further opportunities for ecological connectivity, not only of the wai, but of the corridors between Kapiti Island and the Tararua ranges.
TE AO TŪROA	Always prioritise the protection and enhancement of native species in ecological communities	Providing for a Cultural Landscape Management Plan will allow the Trust to identify opportunities to enable this outcome to be achieved from a cultural perspective.
MAURI	Prevent contaminants, excess nutrients and rubbish from entering all waterways	Robust sediment and erosion controls, as well as clear separation of stormwater networks, road run off, and other water bodies will achieve this outcome.
MAURI	Prevent activities that cause erosion and sediment entering our waterways	As above, this requires robust sediment and erosion controls, and careful staging of the works, so the newly created wetlands are not impacted by the adjacent on-Site earthworks.
MAURI	Eradicate invasive and pest predator species from our rohe	Providing for a Cultural Landscape Management Plan will allow the Trust to identify opportunities to eradicate invasive species from on-Site waterways and prevent their return.
TE AO TŪROA	Support resiliency to environmental changes or natural hazards	The Trust requests more information around flood risk due to change in soil composition, as well as the impacts that increased numbers of extreme weather events will have on waterbodies on the Site.
WHAKAPAPA	The right to carry out customary use and activities as mana whenua is provided for and protected	Perpetual access to mahinga kai and rongoā on the Site will need to be guaranteed through open space strategies. Also, see the Governance section for the requested outcome of open spaces being vested with the Trust.
MAURI	Ensure there is adequate flow in waterways to sustain diverse and abundant mahinga kai	This relies on robust hydrological modelling to guarantee that the necessary flows and water levels are adequate to support mahinga kai in the on-Site wetlands and the Wharemauku. A mahinga kai strategy would also be a part of a Cultural Landscape Management Plan.
MAURI	Protect, maintain and enhance all mahinga kai sites, including through reseeding stocks	As above, a mahinga kai strategy would also be a part of a Cultural Landscape Management Plan.

MAURI	Prevent mahinga kai species from being exposed to contaminated sites	Robust sediment and erosion controls, as well as clear separation of stormwater networks, road run off, and other water bodies will achieve this outcome.
MAURI	Heal people with clean and safe rongoā from our rohe	A rongoā strategy would be a part of a Cultural Landscape Management Plan.

5 CONCLUSION

This Interim Cultural Impact Assessment has considered the Application through the interconnected lenses of whakapapa, tino rangatiratanga, whenua and wai, guided by the Kaitiakitanga Plan *Whakarongotai o te moana, Whakarongotai o te wā*, the direction of the Board of Trustees, and the mātauranga and collective voice of the Trust. Although the Site has been substantially modified over time, it remains part of a living cultural landscape. Its dunes, repo, waterways, soils, indigenous species and unseen hydrological connections continue to carry whakapapa, sustain mauri and provide a foundation from which regeneration can begin.

The Trust recognises that the Application may provide housing, commercial activity and other benefits for the wider Paraparaumu community. We do not seek to prevent positive community outcomes. However, those outcomes cannot be secured by permanently removing the remaining features that give this whenua its cultural and ecological integrity. Cumulative loss does not diminish the significance of what remains; it magnifies it.

Accordingly, the Trust cannot support the Application in its current form because the proposed removal of the two sand dunes is fundamentally inconsistent with the cultural, spiritual and environmental outcomes sought by Ātiawa. The dunes are not isolated landforms or obstacles to development. They are part of the onepū–repo–wai system, they shape how water moves through the Site, they retain the memory of the natural coastal landscape, and they enable present and future generations to maintain a physical relationship with this whenua. An artificial mound cannot offset their loss. Any credible pathway towards the Trust's support must begin with redesigning the proposal so that the dunes are retained, protected and enabled to regenerate.

The Trust is also opposed to the loss of the Site's existing wetlands unless avoidance has been fully explored and any residual loss is addressed through restoration that is ecologically and culturally equivalent, located within the Wharemauku whaitua, and demonstrably successful before reliance is placed upon it. Wetland restoration must not be compromised by untreated stormwater, road runoff or incompatible secondary functions. The highly modified watercourse must be recognised as part of the wider Wharemauku system, and the opportunity to naturalise the Wharemauku towards a more resilient alignment must be investigated jointly by the Applicant, the relevant councils and mana whenua.

If the Application is to proceed, the consent framework must give effect to tino rangatiratanga and provide for an enduring role for mana whenua beyond consultation. The Trust must be enabled and resourced to co-design the Cultural Landscape Management Plan and all relevant environmental, archaeological, monitoring and restoration plans. Those plans must provide for cultural monitoring, the Trust's Accidental Discovery Protocols, mana whenua-led naming and interpretation, restoration using appropriate indigenous and eco-sourced species, pest management, mahinga kai and rongoā strategies, and safe and perpetual access for customary practices.

The consent framework must also clearly allocate enduring responsibility and authority for the repo, dunes, waterways and ecological systems. It must identify who receives monitoring information, who may intervene when agreed outcomes are not achieved, how adaptive management will be triggered, and how mana whenua will be resourced to undertake this work across generations. The Trust seeks meaningful governance and ownership pathways, including the vesting of open-space ecological areas with the Trust for perpetual guardianship, supported by appropriate long-term resourcing. These matters are not peripheral to the Application. They are expressions of kaitiakitanga and rangatiratanga.

Because this assessment is interim and has been prepared without access to all Substantive Application documents, the Trust reserves its position on matters that may arise from the complete technical information and any revised proposal. The Applicant should demonstrate clearly how this CIA has informed the design, technical assessments, proposed conditions and management plans. Ongoing engagement must occur early

enough for the Trust's input to shape decisions, rather than being sought only after key design choices have been made.

Ultimately, the Trust has assessed this Application with a view to the condition of the whenua twenty years from now and beyond. Success cannot be measured only by technical compliance with consent conditions. It must be measured by whether the wai is healthier; the repo are flourishing; the dunes are retained and regenerating; tuna, īnanga and piharau can move through connected freshwater systems; indigenous vegetation and manu are returning; mana whenua can practise mahinga kai and exercise kaitiakitanga; and effective intervention occurs when agreed outcomes are not achieved.

Whakarongo ki ngā tai e kōrero ana.

The tides remind us that landscapes change, but change does not have to mean further loss.

E kore te tai e hoki whakamuri.

The tide does not turn backwards. We cannot recreate every part of the landscape our tūpuna knew, but we can decide the direction we travel from here. We can continue to fragment. We can merely protect what remains. Or we can begin the long work of reconnection and regeneration, starting by protecting the dunes that remain.

We want our mokopuna to stand upon these dunes: to look towards Kāpiti and turn towards Tararua; to see living repo and indigenous vegetation returning across the onepū; to see healthy wai moving through the landscape; and to hear the manu returning. We want them to know these places are cared for by mana whenua — Te Ātiawa ki Whakarongotai working alongside Puketapu ki Paraparaumu Hapū, each standing firmly in our own mana and whakapapa, and working together where the wellbeing of the whenua calls us to do so.

The wai flows. The manu move. The mauri connects us.

At this crossroads, the Trust calls for the courage to look beyond mitigation: to return something to the whenua, reconnect what has been fragmented, interrupt the long history of alienation, and leave the relationship between tangata and whenua stronger than we found it.

We choose regeneration.

Kia hoki mai te mauri.
Kia hoki mai ngā manu.
Kia ora anō ngā repo me ngā wai.
Kia tupu anō te ora.
Kia manawa anō te whenua.



Helena Gerretzen Parata

Tumuaki – Board Chair



Richard Evans

Kaiwhakahaere Matura – General Manager