

CULTURAL IMPACT ASSESSMENT
FOR
Auckland Prison Capacity Increase Proposal

PREPARED FOR
the Environmental Protection Authority
on behalf of
Department of Corrections
FTAA-2026-1179

July 2026

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TE KAWERAU IWI
TIAKI TRUST

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PEPEHA

Ko Hikurangi te maunga
Ko ngā Rau Pou ā Maki ngā tohu whakahī
Ko te Wao Nui ā Tiriwa te ngahere
Ko te Manukanuka ā Hoturoa me te Waitematā ngā moana
Ko Waitākere te awa
Ko Tainui te waka
Ko Tawhiakiterangi te tupuna
Ko Te Kawerau ā Maki te iwi

Hikurangi is the mountain
The many posts of Maki (Waitākere Ranges peaks) are the markers
Te Wao nui ā Tiriwa is the forest
Manukau and Waitematā are the harbours
Waitākere is the river
Tainui is the canoe
Tawhiakiterangi is the person
Te Kawerau ā Maki is the tribe

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INTRODUCTION

1.0 Project Background

Te Kawerau Iwi Tiaki Trust ('the Trust') have been commissioned by the Environmental Protection Authority (EPA) to prepare comments on a substantive application by the Department of Corrections ('the applicant') for works to enable a planned capacity increase of Auckland Prison at Pāremoremo. This application has been made under the Fast Track Approvals Act 2024 (FTAA).

The applicant seeks approval for designation changes, enabling works and offsetting/compensation to support an increase of the prisoner population to 1,220 at Pāremoremo.

The proposed development would involve the following works:

- Earthworks and vegetation removal within the expansion footprint
- Reclamation of streams within the expansion footprint
- Water take due to dewatering of the site and diversion of groundwater in the expansion footprint
- Discharge of treated stormwater to Pāremoremo creek
- Restoration planting in the buffer zone, riparian margins and wetlands at the perimeter of the prison complex
- Streamworks to replace culverts in the buffer zone
- Alteration of designated boundaries so as to remove the adjacent prison village

To convey the full context and analysis of our comments on the substantive application, we have prepared a Cultural Impact Assessment (CIA) provided the following documentation to inform the assessment:

- Overall site plans depicting earthworks, streamworks, vegetation removal and planting
- All of the lodged application materials, including specialist assessments, ecological report, lighting plans and AEE.

This CIA report has been prepared by the Trust as a legal entity of Te Kawerau ā Maki who are a mana whenua iwi of wider Tāmaki Makaurau (Auckland). The purpose of this CIA report is to provide the EPA, applicant and FTAA expert panel with documentation of Te Kawerau ā Maki's cultural values, interests, and associations with the project area and its natural resources, and the potential impacts of the proposed project activities on these. This impact assessment also provides recommendations as to how to avoid, remedy or mitigate any potential cultural effects that arise from the project.

Te Kawerau ā Maki engagement in statutory processes including provision of technical advice for impact assessments is guided by our tikanga (customs and protocols) and mātauranga (tribal knowledge) and framed by Te Tiriti o Waitangi, our Te Kawerau ā Maki Claims Settlement Act 2015, our Iwi Management Plan (IMP), and our organisational strategic values: Mana Motuhake (independence); Kaitiakitanga (guardianship and sustainable management); Whānaungatanga (people focused); Auahatanga (innovation); Mātauranga Māori (culture-driven).

2.0 Site Description

The project is located to the north of Auckland's metropolitan area in a rural area known as Pāremoremo. It is situated on the northern side of the upper Waitemata Harbour (Te Wai Roa o Kahu) within a valley framed by Pāremoremo creek, the harbour, and high forested ground to the north. The wider proposed project area (hereafter the Study Area) is hilly terrain covered in a mix of native vegetation, parkland, horticulture and pasture. The prison complex and adjacent village take up most of the valley. The nearest urban area is Albany, about 5km to the northeast.

For the purposes of this report, the proposed project site (hereafter the Site) is composed of multiple lots comprising the Auckland Prison Complex, excluding the prison village (see figure 2). The lot is

developed with a core of prison buildings surrounded by grassed areas incised by streams and overland flow paths. Some buffer and riparian planting exists already. Other vegetation consists of exotic trees planted in windrows and discrete areas of landscaping around prison administration and visitor buildings.

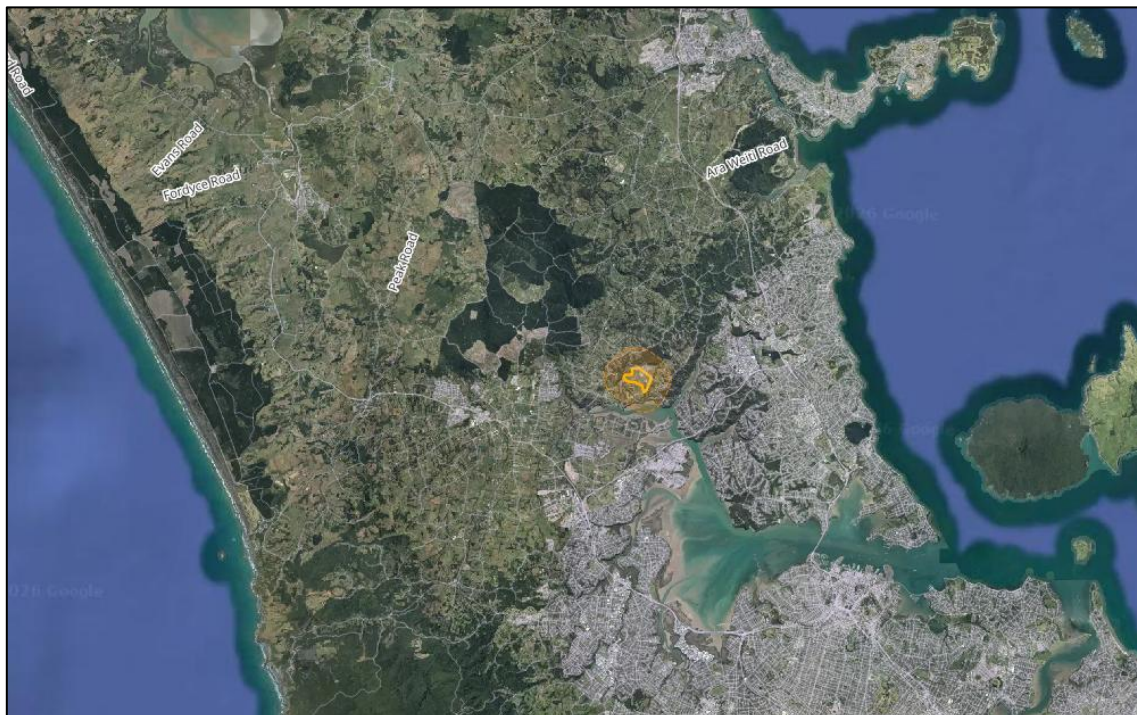


Figure 1: Plan showing Site within a regional context



Figure 2: Plan showing Site in orange outline with a 1km study area

3.0 Aims and Objectives

The aim of this CIA report is to document Te Kawerau ā Maki cultural values, interests, and associations with the Site; identify specific cultural sites and resources; assess the values of these sites and resources; identify the potential impacts that arise from project activities and assess the significance of effect; and provide recommendations as to how to avoid, remedy or mitigate the potential effects to Te Kawerau ā Maki.

This impact assessment will:

- provide a baseline of known environmental or natural features and resources that may hold cultural values;
- provide a statement of cultural association Te Kawerau ā Maki has with the Site and Study Area;
- identify any known cultural sites and resources within the Site or Study Area;
- describe the value or significance of such sites and resources;
- identify the potential for unrecorded cultural sites (i.e. buried Māori archaeology);
- identify the cultural constraints and risks associated with the Site and the potential significance of effects; and
- provide recommendations for further assessment where necessary and/or measures to avoid, remedy or mitigate adverse effects upon Te Kawerau ā Maki.

METHODOLOGY

4.0 Statutory Context

Te Tiriti o Waitangi

The key guiding document in any consideration of planning or practice that may impact upon the cultural values or wellbeing of Mana Whenua is Te Tiriti o Waitangi. The principles of the Treaty are recognised and provided for in the sustainable management of ancestral lands, water, air, coastal sites, wāhi tapu and other taonga, and natural and physical resources. The Treaty is articulated in law through an evolving set of principles. These include:

- a. reciprocity
- b. rangatiratanga
- c. partnership
- d. shared decision-making
- e. active protection
- f. mutual benefit
- g. right of development
- h. redress.

While Article 1 of the Treaty enables the Crown to govern and make laws, Article 2 guarantees Māori rangatiratanga over their people, lands and taonga (things of value). Māori values, associations and interests with their taonga applies regardless of property titles or other constructs, and the Treaty requires that the Crown actively protect these associations and interests (including through but not limited to statutes). Article 3 provides for equality and equity of citizenship and outcome.

Te Kawerau ā Maki Claims Settlement Act 2015

Te Kawerau ā Maki Claims Settlement Act (TKaMCSA) records the acknowledgements and apology given by the Crown to Te Kawerau ā Maki for historic grievances and breaches of Te Tiriti o Waitangi and gives effect to provisions of the Deed of Settlement that settles the historical claims of Te Kawerau ā Maki. The Act binds the Crown to Te Kawerau ā Maki to work together in accordance with Te Tiriti. The Settlement as delivered through the Act provided both cultural and commercial redress to Te Kawerau ā Maki. This includes binding protocols between Government Ministries and Te Kawerau ā Maki (Part 2, s21 to s26), a recognised and agreed area of interest (Part 1, s12(2b), Part 1 of attachments to Act), and statutory acknowledgements and deeds of recognition (Part 2, s27 to s40, and Schedule 1).

Statutory acknowledgements require relevant consent authorities, the Environment Court, and Heritage New Zealand Pouhere Taonga to: (a) have regard to the statutory acknowledgement; (b) require relevant consent authorities to record the statutory acknowledgement on statutory plans and to provide summaries of resource consent applications or copies of notices of applications to the trustees; and (c) enable the trustees and any member of Te Kawerau ā Maki to cite the statutory acknowledgement as evidence of the association of Te Kawerau ā Maki with a statutory area. The statutory acknowledgement supports Te Kawerau ā Maki trustees being considered as affected persons in relation to an activity within the area under s95E and s274 of the Resource Management Act (1991), and s59(1) and 64(1) of the Heritage New Zealand Pouhere Taonga Act (2014).

Te Kawerau ā Maki Statutory Acknowledgement Areas are:

- Taumaihi (part of Te Henga Recreation Reserve)
- Motutara Settlement Scenic Reserve and Goldie Bush Scenic Reserve
- Swanson Conservation Area
- Henderson Valley Scenic Reserve

- Coastal statutory acknowledgement
- Waitākere River and tributaries
- Kumeū River and tributaries
- Rangitōpuni Stream and tributaries
- Te Wai-ō-Pareira / Henderson Creek and tributaries
- Motutara Domain (part of Muriwai Beach Domain Recreation Reserve)
- Whatipū Scientific Reserve

Of particular note are the redress areas within and adjacent to the site. The Auckland Prison property is one of a number of properties in Crown ownership over which Te Kawerau ā Maki have a right of first refusal for a period of 170 years from the settlement date. Te Kawerau ā Maki also have a right to purchase “Paremoremo Housing Block” the area of land containing the prison village which is currently part of the same designation. These redress rights are jointly held with Ngāti Whātua o Kaipara.

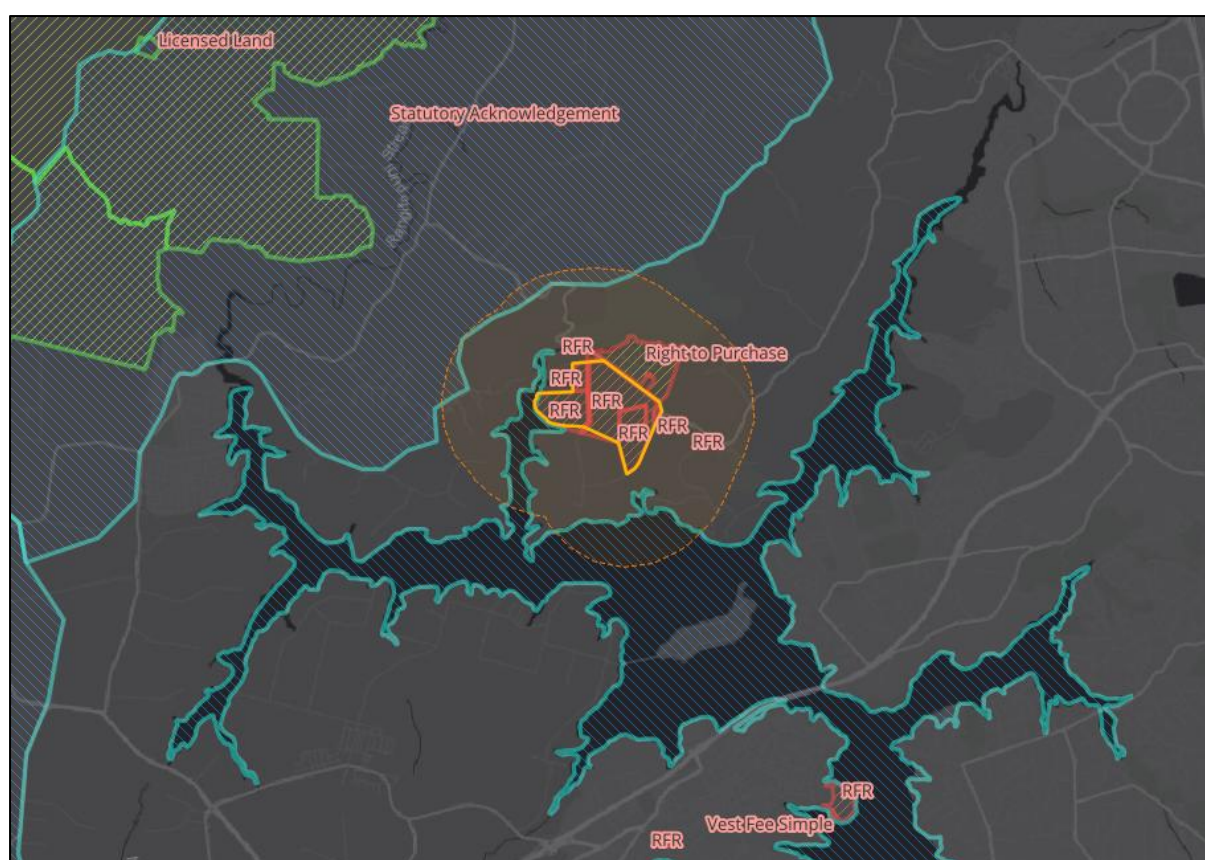


Figure 4: Statutory Acknowledgement Areas surrounding the Study Area (Source: Te Tari Whakataū)

Heritage New Zealand Pouhere Taonga Act 2014

Statutory protection of Māori archaeology and wāhi tapu is provided for under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA), which is administered by Heritage New Zealand Pouhere Taonga (HNZPT), an autonomous Crown Entity. Under the Act all *in situ* materials, sites, and features older than 1900AD are considered archaeological sites whether previously recorded or not and are afforded automatic protection from damage, modification, or destruction without first obtaining an Archaeological Authority from HNZPT. Moveable objects and artefacts that are not *in situ* but that are from an archaeological context, or are of Māori origin, are controlled under the Protected Objects Act (1975). The HNZ Act S45(2)b stipulates that works on sites of interest to Māori can only occur if (a) the practitioners can demonstrate they have the requisite competencies for recognising and respecting Māori values, and (b) the practitioners undertaking the works have access to appropriate cultural

support. Under the Act Mana Whenua are enabled to provide advice or assessment regarding the management or decision taking arising from impacts to their cultural sites, provided these meet the Act's criteria. It is noted that Te Kawerau ā Maki never ceded our sovereignty to govern our taonga to HNZPT and view the HNZPTA as overstepping its authority or role as the decision-maker over the taonga of Te Kawerau ā Maki, thus being in direct breach of Article II of Te Tiriti ō Waitangi.

Resource Management Act 1991

The Resource Management Act (RMA) 1991 provides statutory recognition of the Treaty of Waitangi and the principles derived from the Treaty. It introduces the Māori resource management system via the recognition of kaitiakitanga and tino rangatiratanga and accords Territorial Local Authorities with the power to delegate authority to iwi over relevant resource management decisions. The Act contains over 30 sections, which require Councils to consider matters of importance to tangata whenua. Some of the most important of these are:

- Take into account principles of the Treaty of Waitangi and their application to the management of resources (Section 8).
- Recognition and provision for, as a matter of national importance, the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga (Section 6(e)).
- Having particular regard to the exercise of kaitiakitanga or the iwi's exercise of guardianship over resources (Section 7(a)).
- Requiring the Minister for the Environment to consider input from an iwi/hapū authority when preparing a national policy statement (Section 46).
- The ability for local authorities to transfer their functions, powers or duties under the Act to iwi authorities (Section 33).
- Development of joint management agreements between councils and iwi/hapū authorities (Section 36B to 36E).
- Having regard to any relevant planning document recognised by an iwi/hapū authority (sections 35A(b), 61.2A(a), 66.2A(a), 74.2A).
- The obligation to consult with iwi/hapū over consents, policies and plans. (Combination of all the sections above and Clause 3(1)(d) of Part 1 of the first schedule of the Resource Management Act).

An assessment of impacts on cultural values and interests (CIA) can assist both applicants and the council in meeting statutory obligations in a number of ways, including:

- preparation of an Assessment of Environmental Effects (AEE) in accordance with s88(2)(b) and Schedule 4 of the Resource Management Act 1991 (RMA)
- requests for further information under s92 of the RMA in order to assess the application
- providing information to assist the council in determining notification status under ss95 to 95F of the RMA
- providing information to enable appropriate consideration of the relevant Part II matters when making a decision on an application for resource consent under s104 of the RMA, or when undertaking a plan change
- consideration of appropriate conditions of resource consent under s108 of the RMA.

It is noted that Te Kawerau ā Maki never ceded our sovereignty to govern our taonga to local authorities and view the RMA as enabling councils to overstep their authority or role as the decision-maker over the taonga of Te Kawerau ā Maki, thus being in direct breach of Article II of Te Tiriti ō Waitangi.

Reserves Act 1977 and Conservation Act 1987

Section 4 of the Conservation Act, which is invoked by the Reserves Act, states that the Act must be interpreted and administered as to give effect to the principles of the Treaty of Waitangi.

5.0 Planning Policy Context

UN Declaration on the Rights of Indigenous Peoples

New Zealand supported the UN Declaration on the Rights of Indigenous Peoples (2007) in 2010. This support was an affirmation of fundamental rights and the aspirations of the Declaration. Article 11 states that indigenous peoples have the right to practise and revitalise their cultural traditions and customs, including the right to maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artefacts, designs, ceremonies, technologies and visual and performing arts and literature (clause 1). States shall provide redress through effective instruments, which may include restitution, developed in conjunction with indigenous peoples, with respect to their cultural, intellectual, religious and spiritual property taken without their free, prior and informed consent or in violation of their laws, traditions and customs. (clause 2). Article 18 and 31 note that indigenous peoples have the right to participate in decision-making in matters which would affect their rights, through representatives chosen by themselves in accordance with their own procedures, as well as to maintain and develop their own indigenous decision-making institutions. Further that Indigenous peoples have the right to maintain, control, protect and develop their cultural heritage, traditional knowledge and traditional cultural expressions, as well as the manifestations of their sciences, technologies and cultures, including human and genetic resources, seeds, medicines, knowledge of the properties of fauna and flora, oral traditions, literatures, designs, sports and traditional games and visual and performing arts. They also have the right to maintain, control, protect and develop their intellectual property over such cultural heritage, traditional knowledge, and traditional cultural expressions.

ICOMOS New Zealand Charter 2010

The International Council on Monuments and Sites (ICOMOS) is UNESCO's principal advisor in matters concerning the conservation and protection of historic monuments and sites and advises the World Heritage Committee on the administration of the World Heritage Convention (which includes provision of nationally significant heritage). The New Zealand National Committee (ICOMOS NZ) produced a New Zealand Charter in 2010 which has been adopted as a standard reference document by councils. The Charter sets out conservation purposes, principles, processes and practice. The scope covers tangible and intangible heritage, the settings of heritage, and cultural landscapes. Of particular relevance the Charter states that tangata whenua kaitiakitanga over their taonga extends beyond current legal ownership wherever such cultural heritage exists. The Charter also states that the conservation of Māori heritage requires incorporation of mātauranga and therefore is conditional on decisions made in association with tangata whenua and should proceed only in this context.

National Policy Statement for Freshwater Management 2020

The NPS for freshwater management provides national policy settings that relevant statutory agencies including local authorities must comply with. Central to the NPS is the concept of Te Mana o Te Wai set out in s1.3. This is an aspirational concept that means that the integrity (physical and spiritual) of all water is upheld to its highest possible quality or state. The Crown's interpretation of the concept is that the fundamental importance of water is recognised and that by protecting the health of freshwater we protect the health and well-being of the wider environment, including by protecting wai mauri, and the restoration of the balance between water, the environment, and communities. It provides six principles for the management of water (s1.3(4)). Relevant to tangata whenua are: (a) Mana whakahaere: the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater; (b) Kaitiakitanga: the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations; (c) Manākitanga: the process by which tangata whenua show respect, generosity, and care for freshwater and for others. Policy 2.2(2) states that tangata whenua are actively involved in freshwater management (including decision-making processes), and Māori

freshwater values are identified and provided for. Policy 2.2(3) requires that freshwater is managed in an integrated way that considers the effects of the use and development of land on a whole-of-catchment basis, including the effects on receiving environments. Section 3.4 sets out how councils must actively involve tangata whenua in the management of fresh water.

New Zealand Coastal Policy Statement 2010

This NPS for coastal management provides national policy settings that relevant statutory agencies including local authorities must comply with. Policy 2 provides for the principles of Te Tiriti o Waitangi and kaitiakitanga through: (a) recognising the traditional and continuing cultural relationship with areas of the coastal environment; (b) involving tangata whenua in the preparation of regional policy statements and plans; (c) with the consent of tangata whenua incorporate mātauranga Māori in regional policy statements, in plans and in the consideration of applications for resource consents, notices of requirement for designations, and private plan changes; (d) provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance; (e) take into account any relevant iwi resource management plan and any other relevant planning document recognised by the appropriate iwi authority or hapū and lodged with the council; (f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment; and (g) in consultation and collaboration with tangata whenua, (i) recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape and cultural impact assessments, and (ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage.

Auckland Unitary Plan

At a Local Government level, the Auckland Unitary Plan (AUP) provides for the protection and management of matters of importance to Mana Whenua including the environment and cultural heritage. These matters are set out in the Regional Policy Statement Chapter B6, but are also embedded in the lower-order policies and rules throughout the Plan.

Policy B6.2.2 provides for the recognition of Treaty of Waitangi/Te Tiriti o Waitangi partnerships and participation. This includes Policy B6.2.2(1) that provides for Mana Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga.

Policy B6.3.2 deals with recognising Mana Whenua values and includes clause (1) that enables Mana Whenua to identify their values associated with ancestral lands, freshwater, biodiversity, and cultural heritage places and areas, and clause (2) that requires the integration of Mana Whenua values, mātauranga and tikanga in the management of natural and physical resources within the ancestral rohe. Clause (3) ensures that any assessment of environmental effects for an activity that may affect Mana Whenua values includes an appropriate assessment of adverse effects on those values. Clause (6) of the policy requires resource management decisions to have particular regard to potential impacts on: the holistic nature of the Mana Whenua world view; the exercise of kaitiakitanga; mauri; customary activities; sites and areas with significance spiritual or cultural heritage value; and any protected customary right under the Takutai Moana Act (2011).

Policy B6.5.2 provides for the active protection of Mana Whenua cultural heritage. Clause (2) sets out a framework for identifying and evaluating Mana Whenua cultural heritage using the assessment factors of: mauri; wāhi tapu; kōrero tūturu; rawa tūturu; hiahiatanga tūturu; and whakaaronui o te wā. Clause (4) requires the protection of places and areas listed in Schedule 12 Sites and Places of Significance to Mana Whenua from adverse effects. Clause (7) provides for the inclusion of a Māori cultural assessment in structure planning and plan change processes, and clause (9) encourages appropriate design, materials and techniques for infrastructure in areas of known historic settlement and occupation.

Iwi Management Plan

Te Kawerau ā Maki Resource Management Statement (1995) was lodged with Council explicitly as an iwi authority planning document under sections 66(c) and 74(b) of the RMA 1991 (since repealed). The IMP describes the continuing role of Te Kawerau ā Maki as kaitiaki (guardians) and provides policies to guide statutory authorities and applicants. Policy 2.2(2) promotes the integration of Te Kawerau ā Maki tikanga in resource management, while clause (3) requires engagement by all agencies within the rohe to help give effect to the kaitiaki role of the iwi. Policy 4.1.2(3) requires that cumulative effects upon Te Kawerau ā Maki are fully recognised and provided for. Policy 4.2.2 concerns Te Kawerau ā Maki cultural heritage and requires the protection of all heritage sites including access requirements (s4.2.2(1)); the involvement of Te Kawerau ā Maki in all instances where potential effects may arise (s4.2.2(2)); and the recognition of Te Kawerau ā Maki cultural and spiritual values (s4.2.2(3 and 4)). Policy 4.3.2 concerns the management of kōiwi, while s4.4.2 regards the management of water. Activities in the Coastal Marine Area are covered by s4.5.2. Waste management policies are described in s4.6.2 and land and landscape policies are set out in s4.7.2. Indigenous flora and fauna policy settings are described in s.4.8.2 including opposition to all destruction of native flora and fauna without Te Kawerau ā Maki written consent. Policy 4.9.2 concerns Te Kawerau ā Maki participation in design of the built environment and interpretation of heritage. The IMP also details formal support and adoption of the 1993 Matātua Declaration on cultural and intellectual property rights of indigenous peoples.

A new Te Kawerau ā Maki Environmental Management Plan is in the development stages and includes tikanga for topics relating to the management of whenua, wai, ngahere, and taonga tuku iho, as well as the social and economic wellbeing of the iwi.

6.0 Te Ao Māori

Our worldview is the framework by which we understand and navigate our physical and metaphysical environment. A full account of the cosmological underpinnings of Te Ao Māori is not offered here but in brief it recognises both the spiritual and the physical, is guided by different domains governed by atua or distinct spiritual entities, and involves several core concepts including whakapapa, mana, wairua, mauri, tapu, and noa. Te Ao Māori places emphasis on the holistic link between people and the environment. Mātauranga is the knowledge or wisdom about the world developed over generations and passed down from tūpuna, while tikanga is the evolving set of principles and customary practices by which Māori give effect to this knowledge to navigate the world safely.

Papatūānuku

The primordial goddess embodying the whenua or land. She is the earthmother to all living things. This whakapapa is one of the reasons why whenua is the name for placenta as well as land, and why in Te Ao Māori tangata whenua belong to the whenua and not the other way around. Papatūānuku is a source of rejuvenation and life.

Ranginui

The primordial god embodying the sky or heavens. He is the skyfather to all living things. When he was separated from his wife Papatūānuku by their children, his tears became the rain which is considered tapu until it reaches the ground (wai Māori).

Tūmatauenga

The god of war and human activities and a progenitor of humanity.

Tāwhirimātea

The god of weather including thunder, lightning, wind, clouds and storms. He was opposed to the forced separation of his parents Papatūānuku and Ranginui and therefore he wars with his brothers and their descendants to this day.

Tāne

The god of forests and animals and an originator and protector of humans. Responsible for separating the embrace of his parents and ushering in Te Ao Marama (the age of light).

Tangaroa

The god of the sea, lakes, rivers and animals that live in them. There is a close and sometimes contentious relationship between Tangaroa and Tāne reflected in creatures such as reptiles and whales and in the dynamic between the sea and the coastline.

Rongo

The god of cultivated plants and agriculture also associated with peace.

Haumia-tiketike

The god of uncultivated plants and wild foraging.

Matā-oho

The local god of volcanic activity and earthquakes that formed the Tāmaki volcanic field.

Whakapapa

The sacred genealogy linking all things. Humans whakapapa not only to human tūpuna (ancestors), but also to the whenua, atua and their respective lineages. All indigenous animals and plants have an interconnected whakapapa. Whakapapa is a prerequisite of mana whenua, whānaungatanga, and kaitiakitanga.

Mana

A core metaphysical concept regarding the inherent authority or power of people, places or objects. Mana is derived or delegated from atua and, in the case of humans, is both inherited and earned through actions. Everything including people has an element or degree of mana. A person or tribe's mana can increase or decrease depending on the success, failure or nature of actions (or inactions) and is directly tied to their wellbeing. Undertaking the responsibilities of manakitanga and kaitiakitanga successfully are examples of maintaining or enhancing mana and contribute to cementing mana whenua.

Tapu

A core metaphysical concept regarding a state or degree of sacredness, prohibition, being set apart or forbidden. Tapu is a state where a person, place or thing is under the protection of or dedicated to an atua and is thus removed from profane or normal or common things and uses. Tapu is closely linked to mana and governs the behaviour of individuals and the wider society. Everything including people has an element or degree of tapu that must be preserved and respected. It is a priority of rangatira, tohunga and kaitiaki to maintain tapu and to ensure it is not diluted by common things. As with mana, the maintenance of tapu is directly linked to the wellbeing of both individuals and the tribe.

Noa

A core metaphysical concept regarding a normal or common (and sometimes profane) state that is in essence the opposite of tapu. Noa actions and things (whakanoa) can dilute tapu.

Wairua

A core metaphysical concept regarding the immortal spiritual or non-physical element of people, places or things.

Mauri

A core metaphysical concept regarding the essence that binds the physical and the spiritual together to enable life to exist and to thrive. Mauri is a sacred element and can be weakened or enhanced. When damaged or diluted the binding between the physical and the spiritual realms is weakened and life begins to falter and fail. It is the sacred obligation of mana whenua, through the act of kaitiakitanga, to maintain the balance of mauri within people, places, objects, ecosystems, and the hapū or iwi.

Mātauranga

The body of knowledge or customary wisdom and skill embedded within the tohunga, whānau, hapū and iwi. Mātauranga is passed down the generations from tūpuna but is also added onto through successive generations of uri, and culturally encodes hundreds of years of observations, measurements, theory, and custom regarding Te Ao Māori and the environment.

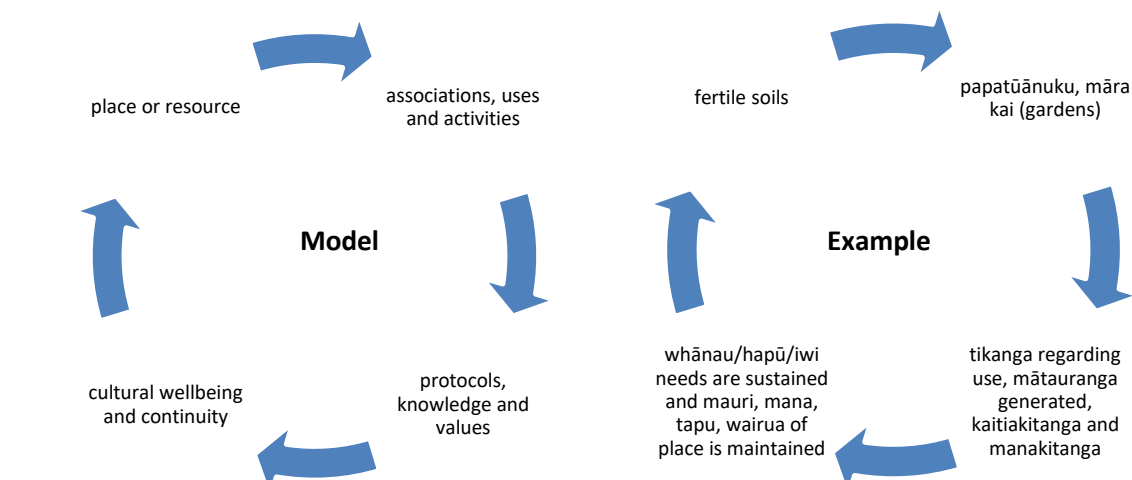
Tikanga

The lore, customs, practices, protocols, rules and methods that give effect to the application of mātauranga in navigating the natural and social world. There are different tikanga for different contexts and in different domains.

Cultural Values

Cultural values are the shared norms that govern the continuation of culture and provide the framework for social and individual actions. Key values include: rangatiratanga (chiefly authority or self-governorship), whānaungatanga (kinship and reciprocal connection through shared whakapapa), wairuatanga (spirituality), manakitanga (hospitality and showing care), and kaitiakitanga (guardianship or stewardship).

A model of how cultural values function is provided below.



7.0 Scoping and Consultation

The Study Area comprises a 1000m radius from the perimeter of the Site. Within this area all appropriate and known cultural sites, areas, landscapes and resources have been identified. Te Kawerau ā Maki however reserve the right to withhold certain information regarding wāhi tapu or sites that are culturally and spiritually sensitive to the iwi.

This report includes all known or appropriate-to-report elements of the natural and cultural environment within the Site and Study Area considered to hold cultural value for Te Kawerau ā Maki. This information forms the baseline of the assessment. This includes native biodiversity and ecology, geological and topographic features, natural resources including water bodies, built heritage such as marae, socio-cultural features such as papa kāinga, cultural landscapes, historic or cultural sites, Māori archaeological sites, pou whenua and significant cultural public art.

Mātauranga/cultural knowledge of the Site and Study Area has been obtained, where appropriate, from Te Kawerau ā Maki kaumatua, kuia and other holders of knowledge within the iwi. Readily available published and unpublished written records, illustrations, maps, archaeological and geological records were reviewed during preparation of this cultural assessment. Spatially referenced heritage asset data was reviewed from the Auckland Council Cultural Heritage Inventory (CHI) and the New Zealand Archaeological Association (NZAA) recording scheme database (ArchSite). Other information, reports, and impact assessments available for the Site that have been provided by the Client have been reviewed, in particular the ecological report, lighting plans, stormwater management plan and AEE. The opinions contained within this document may change and/or develop if new information and evidence comes to light.

This Cultural Impact Assessment involved a desktop study based on review of technical information, cultural knowledge of the area, and research. A site visit was undertaken on 27 May 2025.

8.0 Assessment Approach

Following standard Environmental Impact Assessment (EIA) methodologies and planning terminology, but adapted for CIA purposes, this report will:

- a. **Identify** the cultural sites, areas and resources (defined as both tangible and intangible cultural heritage, natural resources of cultural interest, and socio-cultural features) within a Study Area encompassing the proposed Site and a wider area that may be directly or indirectly impacted. The Study Area is defined as approximately 1000m radius of the Site to correspond with a likely area of setting impacts (e.g. noise, visual), indirect impacts, and a logical catchment of the cultural landscape.
- b. Provide comment on the cultural **value** of the identified cultural sites, areas and resources. Māori cultural value is not derived from national or local policy but is defined and determined by tangata whenua and their particular world view and culture. Māori values are distinct from historic, archaeological or other value-systems, and are recognised by the courts and statute as their own legitimate knowledge-system with tangata whenua being the experts. Māori values are informed by whakapapa and guided by tikanga and kawa, with emphasis placed on the associative and living connection to places and resources which sustain cultural knowledge (mātauranga), practices, and spiritual and physical wellbeing. All cultural sites, areas and resources are of value to Te Kawerau ā Maki, who hold a holistic view of the environment and the unique relationship of the iwi to the whenua. It is difficult to apply a Western paradigm of value hierarchy or significance ranking (i.e. 'low, medium, high') when using a Te Ao Māori lens. Nevertheless, the methodology here attempts to distinguish the relative importance of matters as determined by a number of criteria, including the degree of mana, tapu or mauri, the degree to which a resource has specific kōrero or mātauranga, its sensitivity to changes (ability to absorb impacts), and its relative scarcity. This approach recognises that a matters' value is intrinsic but relative to context.

This approach is supported by RMA Part II matters noting the relationship of tangata whenua with their lands, waters, and taonga as nationally significant. The approach is set out below:

- high: cultural sites/areas/resources that retain their integrity overall, are either rare or are common but hold specific customary uses or mātauranga, are considered a wāhi tohu or landscape indicator, or have a high sensitivity to change.
- medium: cultural sites/areas/resources that retain the key elements of their integrity, are either uncommon or are common but hold specific customary uses or mātauranga, or have a moderate sensitivity to change.
- low: cultural sites/areas/resources that have been significantly degraded or damaged, are common and do not hold specific current customary uses or mātauranga, or have a low sensitivity to change.

Value is also assigned against the cultural values identified in the AUP Policy B6.5.2(2):

- i. Mauri: the mauri (life force and life-supporting capacity) and mana (integrity) of the place or resource holds special significance to Mana Whenua;
 - ii. Wāhi Tapu: the place or resource is a wāhi tapu of special, cultural, historic, metaphysical and or spiritual importance to Mana Whenua;
 - iii. Kōrero Tūturu: The place has special historical and cultural significance to Mana Whenua;
 - iv. Rawa Tūturu: the place provides important customary resources for Mana Whenua
 - v. Hiahiatanga Tūturu: the place or resource is a repository for Mana Whenua cultural and spiritual values; and
 - vi. Whakaaronui o te Wa: the place has special amenity, architectural or educational significance to Mana Whenua.
- c. Identify the potential **impacts** to cultural resources and elements. Only Mana Whenua can define the impact to their cultural values, but guidance is noted below. Cultural impacts can be:
- no change
 - negligible: changes result in small impacts on integrity of the site/area/resource such that their function is reduced but not notably diminished, ability to understand/appreciate/use/access is impacted to a inconsequential degree, the ability to interpret the cultural landscape or setting is impacted but the change can easily be absorbed.
 - minor: changes result in small impacts on integrity of the site/area/resource such that their function is reduced but not significantly diminished, ability to understand/appreciate/use/access is impacted to a small degree, the ability to interpret the cultural landscape or setting is impacted to a small degree or change can otherwise be largely absorbed.
 - moderate: changes result in appreciable/significant impacts on the integrity of the site/area/resource such that their function is impeded, ability to understand/appreciate/use/access is impacted to a notable degree, the ability to interpret the cultural landscape or setting is impacted to a notable degree or change can otherwise not be absorbed.
 - major: changes result in large scale/total impacts on the integrity of the site/area/resource such that their function is effectively destroyed, ability to understand/appreciate/use/access is impacted to a significant degree/is no longer possible, the ability to interpret the cultural landscape or setting is impacted to a significant degree or change can otherwise not be absorbed and the landscape or setting is no longer recognisable/able to function.

Impacts can be either adverse or beneficial. Impacts can also be temporary or permanent. They can occur during the construction or the operational phase of a development. Impacts can be:

- i. direct (i.e. physical impacts resulting from a development, impacts to the settings of cultural sites or the character of cultural landscapes, visual, noise, odour, or culturally inappropriate land use activities).
 - ii. indirect (i.e. traffic congestion, erosion due to vegetation loss, or other secondary impacts that occur over time or in a secondary location to the original activity).
 - iii. cumulative (i.e. impacts which are caused by the combined result of past, current and future activities, or in-combination impacts).
- d. Define the **significance of effect** resulting from combining the value of a cultural site, area or resource and the level of potential impact to that site, area or resource. Significance of effect is assessed pre-mitigation but can also be assessed again post-mitigation to ascertain the *residual effect* and effectiveness of any proposed mitigation. Significant effects (within a planning framework) are those with moderate or large effects (either adverse or beneficial). This method is outlined below in Table 1. Note that positive effects will be coloured green.

Table 1: Significance of effect

		LEVEL OF IMPACT				
		No Change	Negligible	Minor	Moderate	Major
CULTURAL VALUE	High	Neutral	Minor	Moderate	Large	Large
	Medium	Neutral	Negligible	Minor	Moderate	Large
	Low	Neutral	Negligible	Negligible	Minor	Moderate

9.0 Assumptions and Limitations

Te Kawerau ā Maki are the experts of our own culture and tikanga. This expertise and the equal weighting of mātauranga Māori evidence is accepted in the courts and by statute. Through a necessity to work within a Western planning framework we utilise planning language where possible to aid in mutual understanding, however there is difficulty in the translation and application of some core cultural concepts to such a framework. This is particularly an issue when segmenting or demarcating value spatially, when ascribing a type of significance hierarchy, and when limiting value to tangible elements, whereas Māori hold a holistic perspective that operates differently to typical Western paradigms. This means that where there is doubt or confusion over a term or point of discussion, readers should contact Te Kawerau ā Maki directly for clarification.

Due to the sensitive nature of certain cultural knowledge, areas and sites (e.g. burial grounds), Te Kawerau ā Maki reserves the right not to identify the exact spatial extents or provide full information of such areas to retain and protect this knowledge within the iwi. In other situations, while a general area may be known to be of cultural significance the exact spatial extent or location of the site may have been lost over successive generations. Where possible and appropriate, sites are described and defined to enable discussion of the impacts while acknowledging these limitations.

The environmental and archaeological data relied upon for elements of this report are derived from secondary sources and it is assumed the data and opinions within these and other secondary sources is reasonably accurate.

The CHI/Tūtangi Ora and ArchSite databases are a record of known archaeological and historic sites. They are not an exhaustive record of all surviving historic or cultural sites and resources and do not preclude the existence of further sites which are unknown at present. The databases also utilise a site location point co-ordinate system rather than detailing site extents or cultural landscapes.

ENVIRONMENTAL BASELINE

10.0 Topography and Geology

The site is situated in a valley bordered on the north and east by hills and ridges. The underlying geology of the site are the clastic sediments of the Puketoka Formation, a deposit of the Tauranga Group which formed in the late Pliocene to middle Pleistocene (around 1 million years ago). The lower edge of the site and the higher ground surrounding the site consist of the alternating sandstone and mudstone of the East Coast Bays Formation, formed in the early Miocene (about 20 million years ago).

Pāremoremo creek and its tributaries have over time eroded the Puketoka sediments, creating a landform that gently slopes down toward the river and harbour, with steep rises to 75-100 meter ridgelines at the boundary with East Coast Bays rocks. This interaction shapes the character of the valley and its relationship to, hills, river and coastline.



Figure 5: Underlying contours and geology of site and surrounding area. (Source: GNS, Auckland Council)

11.0 Natural Resources and Ecology

The site would have historically been covered in ngahere, with the valleys containing pūriri forest (WF7) and the surrounding high ground ngahere comprising kauri, podocarp and other broadleaved species that were commonly seen in forests from Whangaparaoa to Te Wao Nui ā Tiriwa (WF11). Historically, the area would have been rich in plants and animals that are of cultural significance to Te Kawerau ā Maki. Vegetation that would have been found along the streams on the Site would have included ferns (ponga, wheki, and hymenophyllum spp); shrubs (five-finger, karamu, mahoe, pate); ground covers (parataniwha, kakaha); and climbers (kareao).

In the decades following European colonisation the forests were cleared and the land converted to pasture dominated by exotic grasses. Exotic trees were planted as a windbreak through the centre of the property.



Figure 6: Earliest available photograph of the site (from the 1940s), showing the site largely in pasture with very little vegetation. The dark shape at the south end of the site is shadowing from clouds (Source: Retrolens)

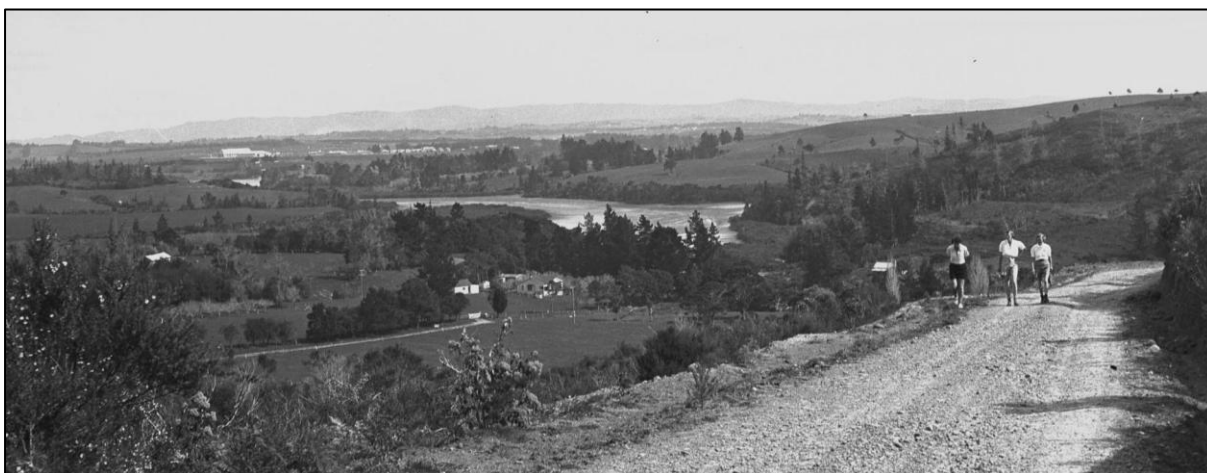


Figure 7: Cropped photograph from above Pāremoremo towards the Waitakere Ranges in the 1940s. (Auckland Libraries Heritage collections JTD-16N-05572)

On the site visit in July, kaitiaki travelled by car around the outer perimeter of the prison complex, observing areas of pasture and planting and noting the condition of streams. Vegetation still mainly consists of grass, with exotic shelterbelt trees, scrub (including gorse), small scale horticulture around minimum security facilities and landscaping around the curtilage of administrative buildings. Some native riparian planting exists along a southern watercourse and a western flow path to the main creek. Buffer planting has also been undertaken since the 1970s, filling in on the perimeter as the boundaries of the facility have expanded, with Some areas of more recent native vegetation are located in the northern end of the site around a watercourse; this was restoration planting done in conjunction with construction of the maximum security facility in 2016. The SEA along the riparian margin with Pāremoremo creek was not visited.

Overall, the mauri of the Site has been degraded for more than a century by historical land use as pasture and continued by the construction of the prison facility. With the exception of the small area in SEA, there is little in the way of native vegetation and many waterways are not shaded or protected from livestock.



Figure 8: View of the northeastern edge of the site showing one of the watercourses in pasture. A row of buffer planting features in the back. (Drone footage supplied by Corrections)



Figure 9: View from the west of the site looking east, showing shelterbelts and pasture (Drone footage supplied by Corrections)



Figure 10: View to the north showing riparian planting done in 2016. This portion is proposed to be retained. (Drone footage supplied by Corrections)



Figure 10: View west along the southern portion of the site. (Drone footage supplied by Corrections)



Figure 10: View east along the southern portion of the site. (Drone footage supplied by Corrections)

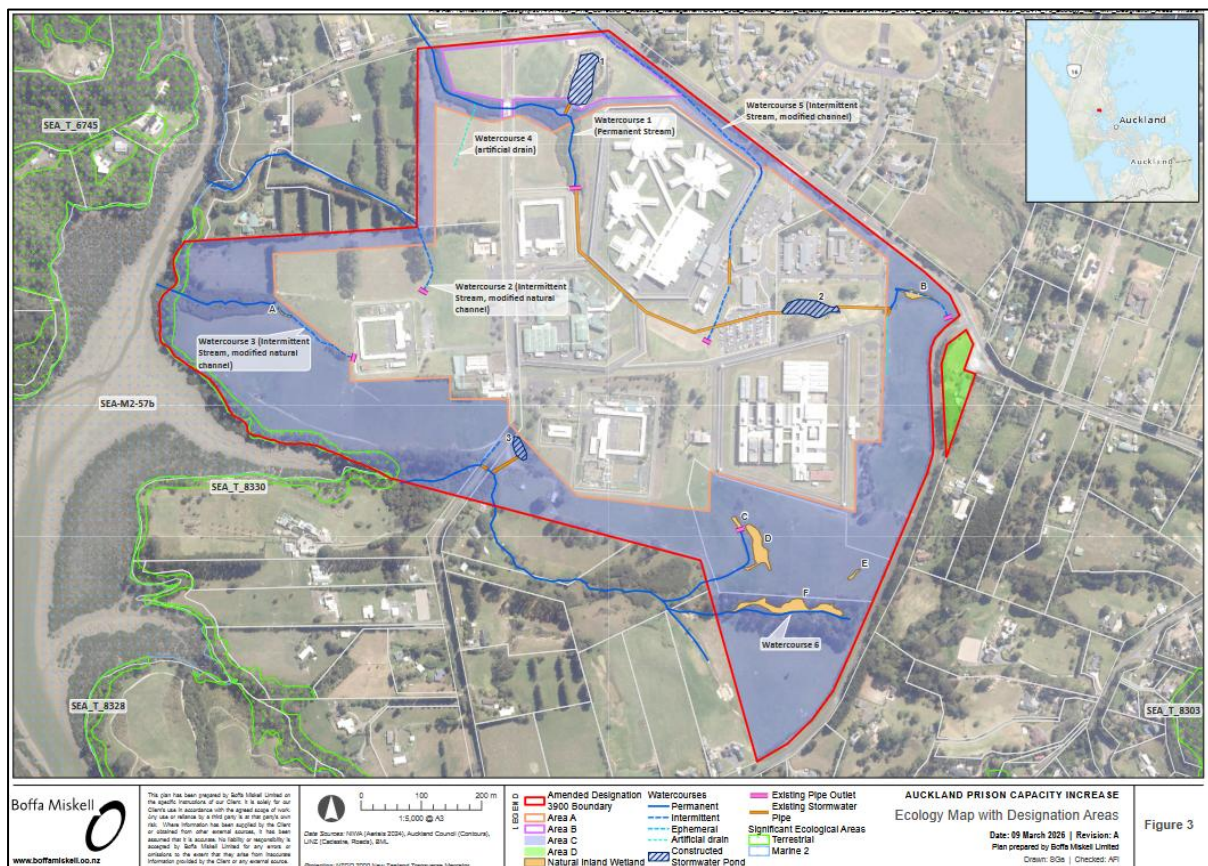
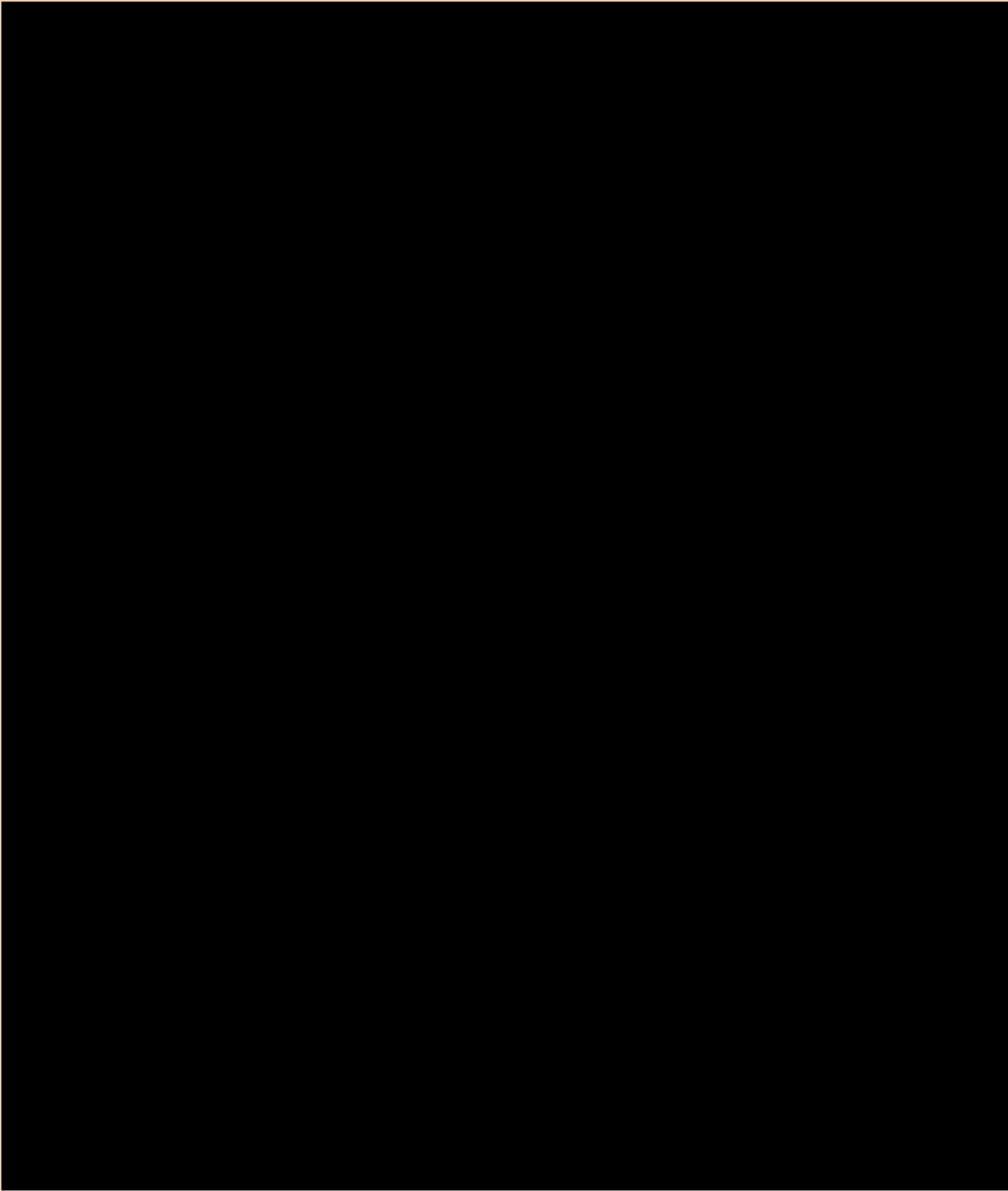
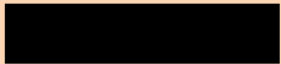
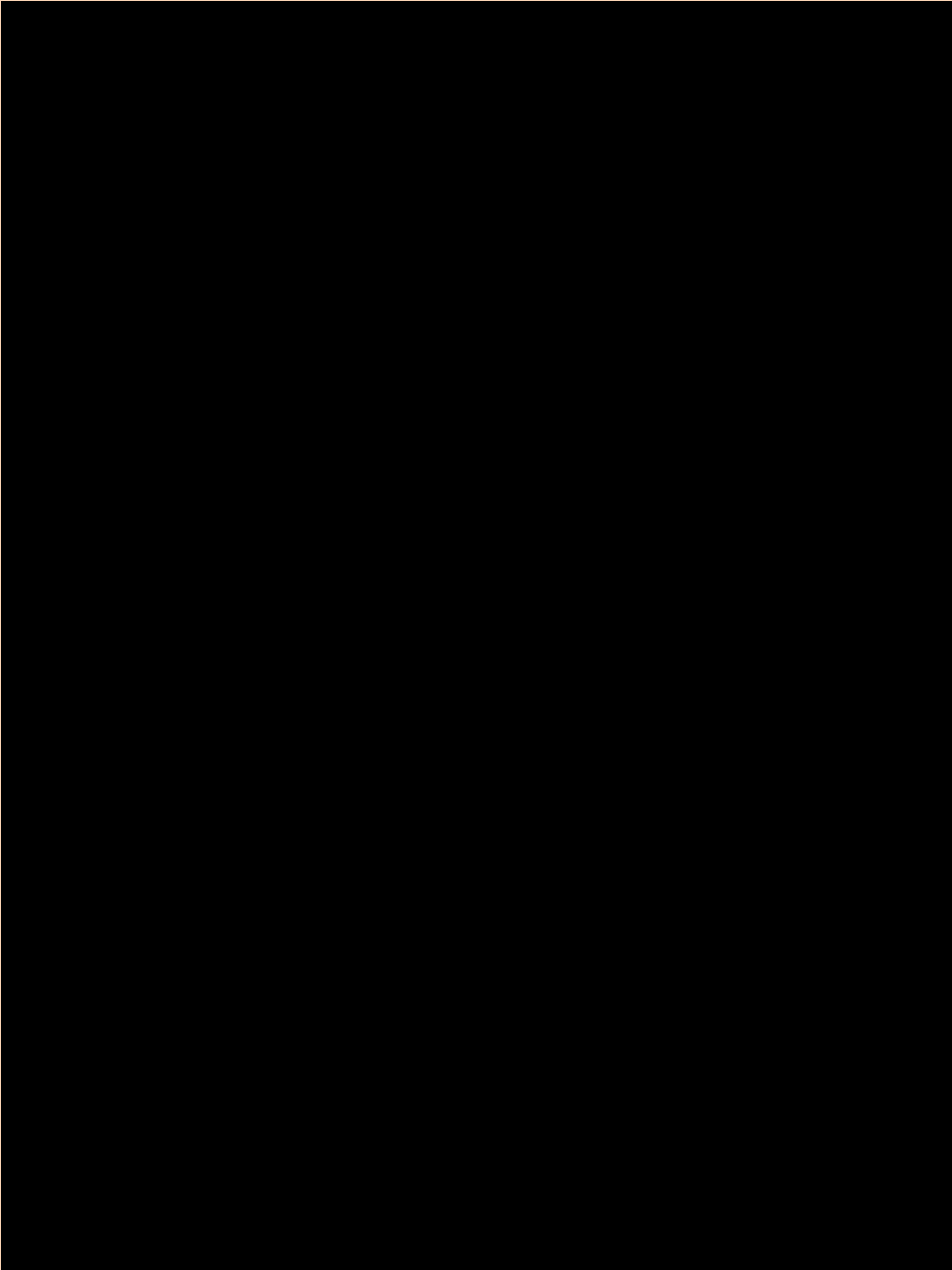
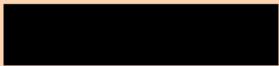
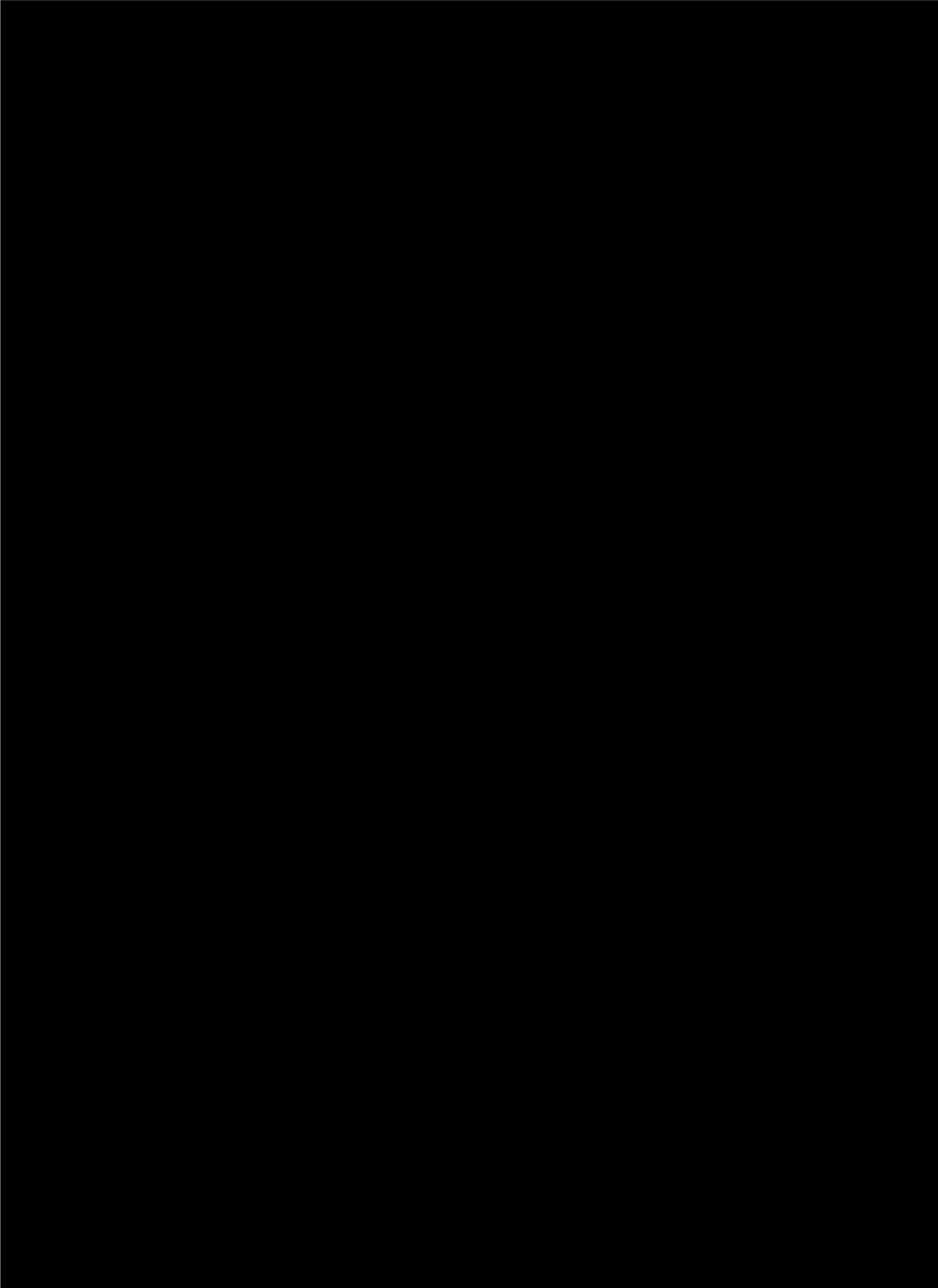


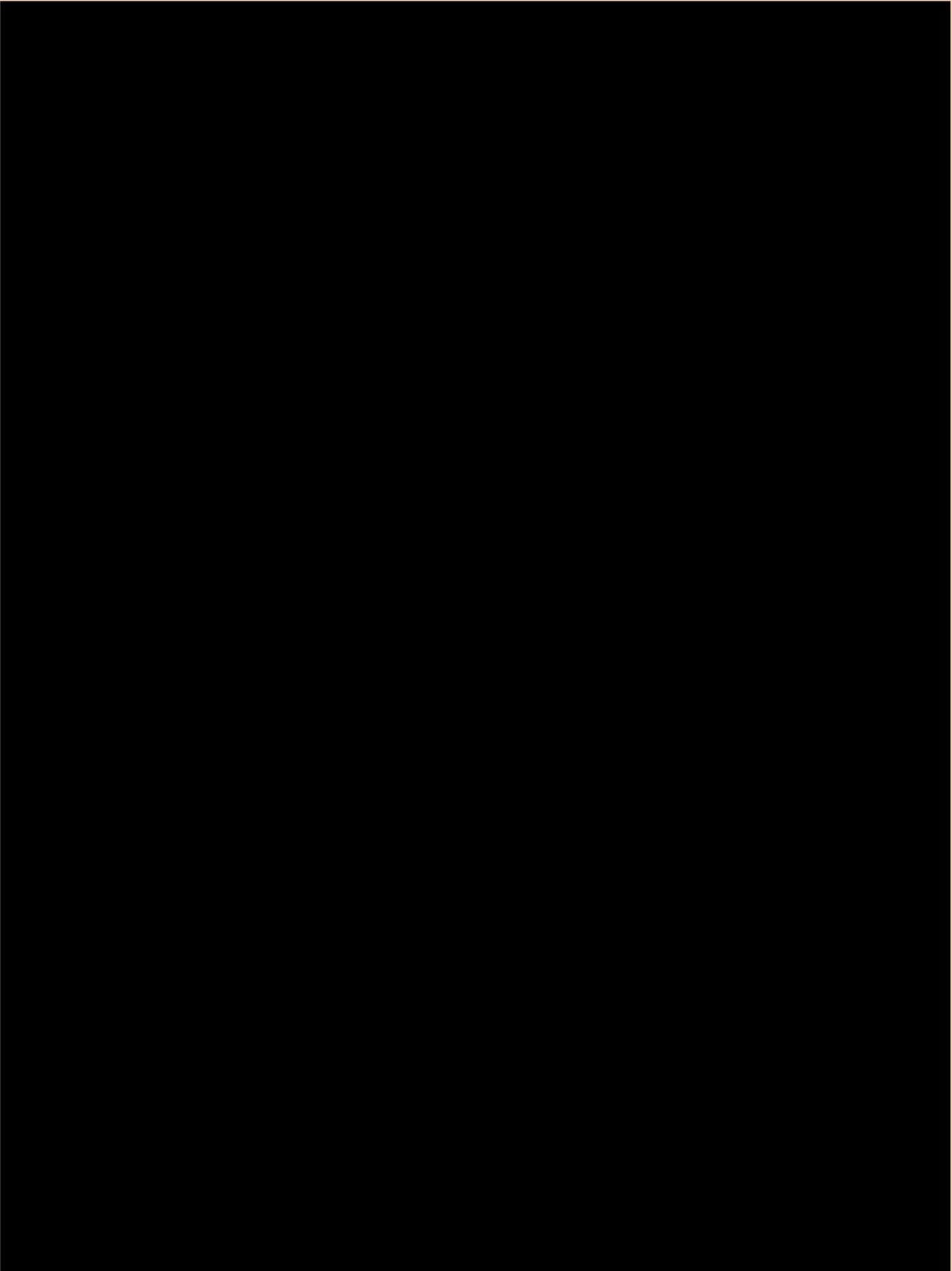
Figure 15: Map of vegetation, streams and wetlands on site. (source: Boffa Miskell Ecology Report)





[Redacted]





IMPACT ASSESSMENT

15.0 Potential Direct Impacts

Adverse impacts include those anticipated to derive mainly from the loss of vegetation and stream works and earthworks to clear and level the expansion area of the prison (Area A in the site plans). The earthworks have the potential for discharge of sediment to the Pāremoremo Creek during construction and will result in permanent alterations to the topography of the site. The Site will be further built-out with an increase in impervious surfaces, light pollution and population related stress to the awa.

Effects on freshwater values and taonga species arise from extending the length of piped watercourses running within the prison site, reclaiming the land over the stream-bed in two areas, the potential for pollution from sedimentation and stormwater discharge, and on the disruption and lack of ongoing protection for habitat for taonga species. Offsetting and compensation planting in the riparian areas of other watercourses on site is proposed to address the reclamation of these lengths of stream.

The mitigation proposed to address sediment and stormwater discharge is intended to be a high standard of sediment and erosion control during construction (following practice set out in GD05) along with stormwater retention in the development via rainwater detention tanks, filters and stormwater ponds before discharging to the awa. It is critical that this mitigation is implemented faithfully to ensure cultural values in freshwater are not adversely affected.

The proposal will also result in the loss of some native vegetation on site. One of these areas consists of a windrow of exotic trees (Eucalyptus), while the other two are restoration plantings started about ten years ago when the maximum security facility was built. The loss of the native vegetation is being offset by a significant amount of revegetation outside the expansion area.

The native restoration programme in Area C offers the opportunity to restore lost ngahere and reinforce the North-West Wildlink – a critical wildlife corridor linking the pest-free islands of the Hauraki Gulf with the nationally-significant forests of the Waitakere Ranges Heritage Area. We consider that this is a significant beneficial impact on the mauri of the cultural landscape and on the rohe of Te Kawerau ā Maki, which in effect reaches from Tikapa Moana (the Hauraki Gulf) to Nga Tai Whakatū ā Kupe (the West Coast) and extends the corridor for taonga species.



Figure 20: Diagram showing the North-West Wildlink. (Source: Forest & Bird)

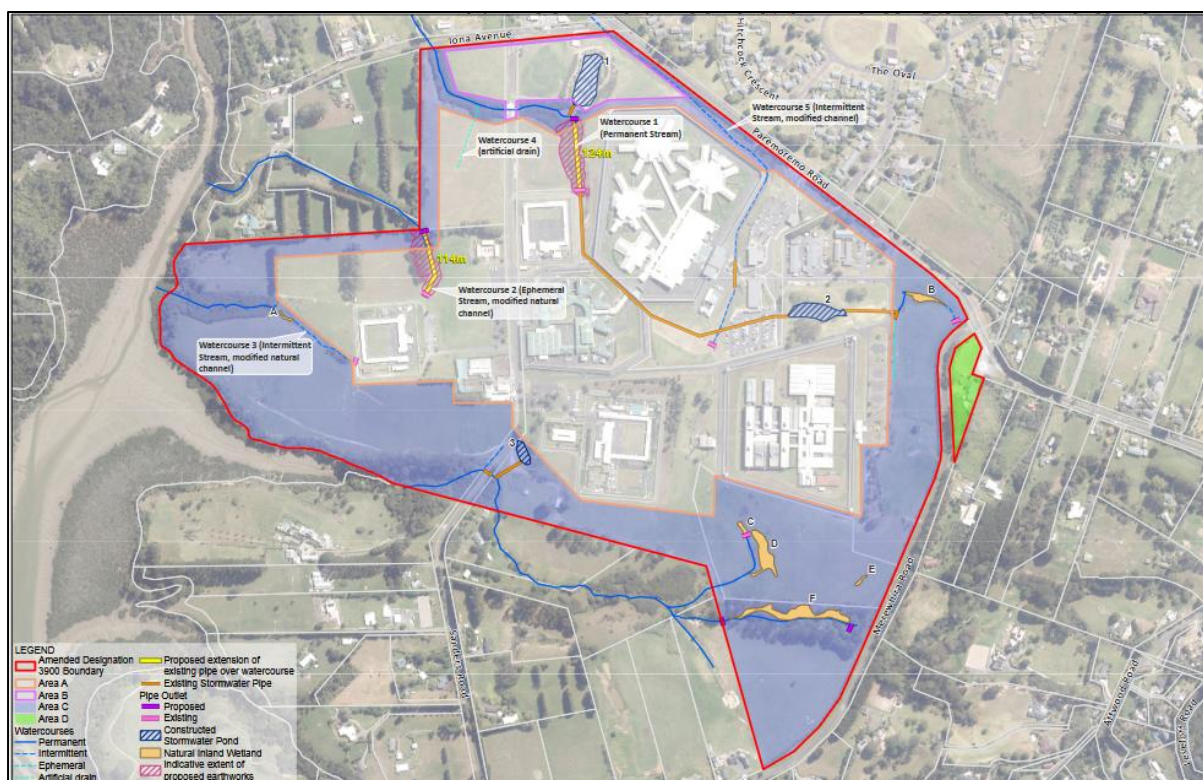


Figure 20: Site plan showing the indicative extent of earthworks and stream-works

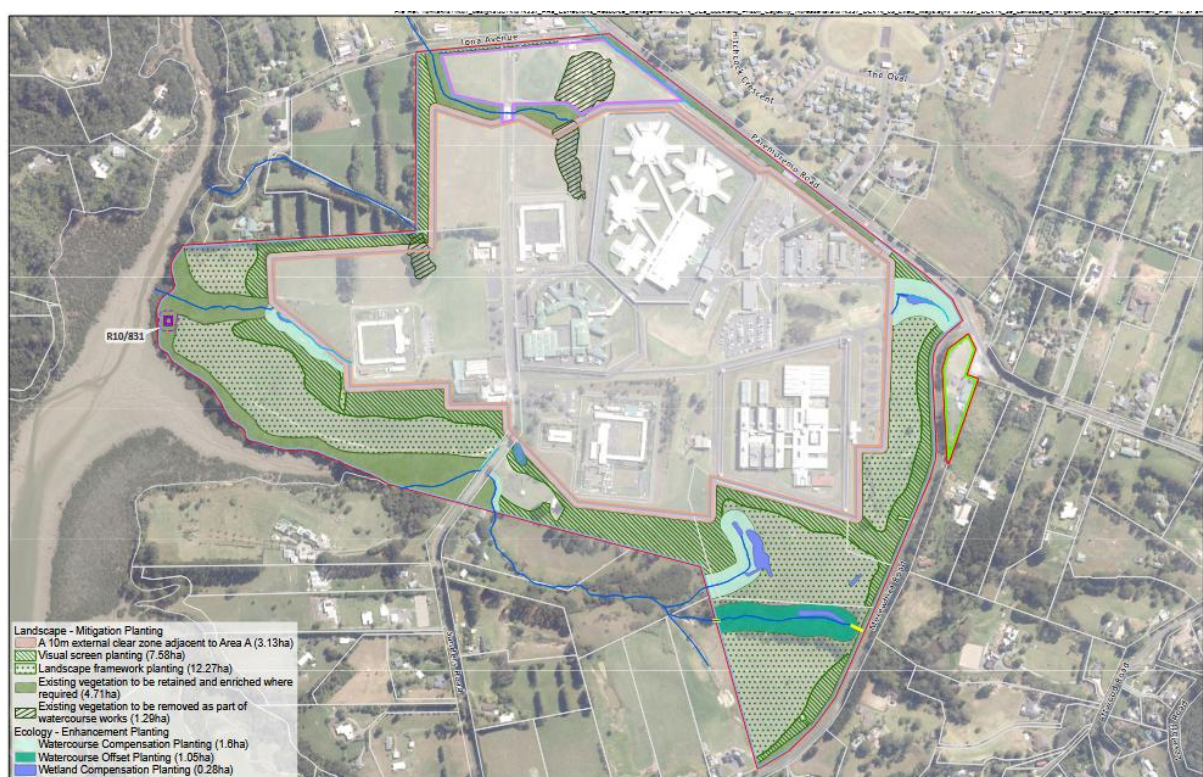


Figure 21: Site plan showing indicative extent of vegetation removal, as well as mitigation planting proposed.

16.0 Potential Indirect and Cumulative Impacts

Indirect and cumulative impacts include those from expanding urbanisation of a rural area. This will introduce permanent changes to ambient light levels in Pāremoremo catchment which will need to be addressed. Development of the site has indirect benefits as well, in the sense that it contributes to the overall supply of safe and sanitary prison accommodation across the corrections portfolio, increasing resilience of national infrastructure. These improvements align with the Kawerau value of manaakitanga in terms of providing for the wellbeing and dignity of prison population, possibly including some Te Kawerau uri from time to time.

The proposal will also result in the removal of Pāremoremo Housing Block (the prison village) from the designation, which is a beneficial impact on the durability of our Treaty settlement as it reduces the encumbrance on commercial redress.

17.0 Summary of Effects

Specific potential impacts identified as relating to the proposed project are included in Table 3 below:

Table 3: Summary of potential cultural impacts

Name	Summary of impact	Likelihood of impact	Significance of effect	Proposed mitigation	Residual effect	Additional action
Te Wai Roa o Kahu - Pāremoremo Cultural Landscape	Adverse cumulative and direct impacts from further urbanisation of the landscape, reducing the relationship between important places.	Moderately Likely	Moderate Adverse	The proposed mitigation indirectly mitigates effects on the cultural landscape by adding vegetation to the site, which will provide visual screening, block light spill and add native habitat to the cultural landscape. Height and building coverage limits will reduce the impact of new buildings on the landscape	Minor Adverse	Continued involvement of Te Kawerau ā Maki in mitigation measures, ensuring optimal outcomes for the cultural landscape
Te Marama me ngā whetu (the night sky)	Adverse direct and cumulative operational impacts due to Increased light pollution from an expanded site and a larger area needing security lighting. Spillover of light to ngahere, streams and the nearby Scenic reserve, disrupting nighttime ecology and bird migration. Increasing loss of access to the night sky in the landscape, loss of connection to culturally important tohu of time and seasons.	Highly Likely	Large Adverse	Applicant will expand the lighting control area to cover the entire site to align with AUP standards. No new lighting poles will be located within 40 meters of the Mean High Water Springs, reducing the potential for light spill into Pāremoremo inlet	Minor Adverse	Te Kawerau ā Maki involved in review of detailed lighting plan at OPW stage. Operational impacts managed long-term through periodic lighting audits to check for continued adherence to International dark sky principles and improvements with technological advances.

Name	Summary of impact	Likelihood of impact	Significance of effect	Proposed mitigation	Residual effect	Additional action
Whenua – soils	Direct/Cumulative loss contaminated soils from earthworks at site. Topsoil is a taonga, even when it is contaminated.	Certain	Minor Adverse	Applicant proposes to reuse stripped topsoil where possible, but some disposal of contaminated soils are likely.	Minor Adverse	Dispose of contaminated soil at a site within the northern part of the rohe. Te Kawerau ā Maki involved in cultural monitoring of topsoil stripping.
Whenua – Site landform	Adverse direct cumulative and construction impact from earthworks and recontouring of site	Certain	Minor Adverse	Nil	Minor Adverse	Continued involvement of Te Kawerau ā Maki in mitigation measures, ensuring optimal outcomes for the cultural landscape
Ngahere – Indigenous flora and biodiversity	Adverse direct – Proposal includes the permanent removal of native vegetation	Certain	Moderate Adverse	The proposed mitigation includes a 28 ha of restoration planting, well beyond our minimum recommendations of 2:1 restoration to removal.	Beneficial	Continued involvement of Te Kawerau ā Maki in the planting plan to maximise cultural benefits
Ngā Tamariki o Tāne – Terrestrial biodiversity	Adverse cumulative – the proposal will result in the reduction of some lower quality habitat for taonga species, potentially disrupt birds, bats and lizards in vegetated areas to be removed	Moderately Likely	Moderate Adverse	Restoration planting and ongoing pest management will add to the connecting habitat in the North-West wildlife link, resulting in a net increase in quality habitat and migration space. Wildlife management plans will include translocation of lizards, checking for birds and bats, seasonality of work and other measures to minimise disturbance to wildlife.	Beneficial	Continued involvement of Te Kawerau ā Maki in the planting plan to maximise cultural benefits

Name	Summary of impact	Likelihood of impact	Significance of effect	Proposed mitigation	Residual effect	Additional action
Wai Pāremoremo Te Wai Roa o Kahu (indirect/downstream)	Potential direct impacts on the mauri of the awa during construction from sediment pollution	Moderately Likely	Large Adverse	Applicant has proposed sediment control measures consistent with GD05, which, if maintained, will prevent sediment from entering streams during construction.	Minor Adverse	Provision for Te Kawerau ā Maki to undertake periodic monitoring of sediment control during construction
	Potential direct impacts on the mauri of the awa from stormwater discharge from the expanded site	Moderately Likely	Moderate Adverse	Applicant has proposed stormwater management devices with managed discharge to tributary streams and wetlands, which will control the entrance of unfiltered discharge into the awa	Less than minor	
	Potential direct impacts to the mauri of the awa due to reclamation and piping of tributary streams	Certain	Large Adverse	Loss of streams offset/compensated for through restoration planting of three watercourses in other parts of the site	Minor Adverse	Continued involvement of Te Kawerau ā Maki in the planting plan to maximise value of compensation/offsetting
	Potential direct impacts from wastewater discharge to streams from inadequate wastewater infrastructure	Low Likelihood	Large Adverse	Applicant will upgrade wastewater infrastructure prior to increasing capacity	Less than Minor	
Taonga Tuku Iho – protection of known cultural heritage	Potential direct impacts on R10/831 during construction or operation	Low Likelihood	Large Adverse	Applicant proposes to retain existing vegetated area and a 10m buffer around the site.	Less than Minor	Continuing awareness of the site needed when undertaking enrichment planting in and around the buffer.
Taonga tuku iho – potential for discovery of cultural sites	Potential direct adverse impacts from the accidental discovery of kōiwi or other sensitive cultural materials on site.	Low Likelihood	Large adverse	Area with any real likelihood of accidental discovery is included in the landscaped area, Designation conditions include a protocol that includes tangata whenua as a primary point of contact and cultural advisor in the event of an accidental discovery.	Less than Minor	Continuing awareness of sensitivity of coastal margin when undertaking enrichment planting.

CONCLUSION AND RECOMMENDATIONS

The proposal by the applicant is to expand the Pāremoremo prison to double the potential prison population, which will require reclamation of two watercourses, native vegetation removal around one of these watercourses, earthworks to flatten the expansion area and remove contaminated soils. Alongside these physical works there is a change to the designation boundary to remove the Pāremoremo housing block from the prison's designation. The design and construction of the expanded facilities will occur in accordance with the designation conditions on a timeline that follows the enabling works to prepare the site.

The proposal sits within a significant cultural landscape for Te Kawerau ā Maki, associated with an upper harbour coastline that was heavily populated by Te Kawerau people alongside other closely related hapū of Ngāti Whātua, with Pāremoremo awa, ancestral pathways and cultural sites associated with Poataniwha and other descendants of Maki.

The Cultural Impact Assessment demonstrates that the proposal would have potentially significant impacts on the cultural values of Te Kawerau ā Maki, including for impacts on cultural values associated with, landform, freshwater, ecology, cultural heritage and cultural landscapes. Cumulative adverse impacts also arise from historical land uses degrading the mauri of the site and the project's contribution to the broader changes to the landscape. Mitigation proposed in the application would reduce most of these effects to an acceptable level. The degree of restoration planting proposed for the area surrounding the prison site has a beneficial impact and has been developed to compensate for and offset residual impacts that could not be mitigated. We consider the proposed designation conditions will adequately address impacts on our cultural values arising from the expansion project.

We note that the most recent proposed designation conditions call for an Iwi Forum to provide for an ongoing relationship with the Requiring Authority and iwi and create a forum for ongoing discussion, input and collaboration on implementation of mitigation measures and monitoring management plans. The kaupapa included for the forum (DES50(5)) appear to cover all of the residual actions identified in the table. We support the creation of this forum and intend to participate for the duration of its existence.

However, we do not support the proposed membership of the Iwi Forum as set out in the proposed designation text. Te Rūnanga o Ngāti Whātua, Ngāti Whātua o Kaipara and Te Kawerau ā Maki all have clear whakapapa connections, histories, Treaty Settlement rights, and cultural values related to Pāremoremo and the prison site. The land here is subject to exclusive shared Treaty Settlement redress between Ngāti Whātua o Kaipara and Te Kawerau ā Maki, and the Panel risks overstepping its mandate and powers and risks breaching both tikanga and our Treaty Settlement.

Ngāti Whanaunga's connections are limited to resources along the coastline of Tikapa Moana (the Hauraki Gulf) and do not come into this area at all. It is not within their agreed area of interest with the Crown, and they are not, and have never held mana whenua status here. To suggest otherwise goes against tikanga and uses a Fasttrack process to roughride over tikanga, Te Tiriti, and common sense. If the applicant is of a mind to continue engaging with Ngāti Whanaunga for whatever reason, which we strongly suggest they do not, they should do this separate to the Forum. We are happy to collaborate with Ngāti Whātua rūpu in an Iwi Forum.

Our recommendations are intended to be adopted into the proposal, either as part of the client's consent application or, where appropriate, as conditions explicitly set out in the resource consents approved for the proposal. Lastly, we request that a copy of the decision is sent to us, so that we may monitor the uptake of our advice in the consenting process and track implementation.

Te Kawerau ā Maki appreciate having time to evaluate the proposal at the substantive application stage. We are open to further discussions on how our recommendations could be implemented and how the iwi could contribute further to maintaining and restoring the cultural values of the site.