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Auckland Council
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Victoria Street West
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Attn: Ian Bayliss - Principal Strategic Planner

Tēnā koe Ian,

**RE: RUB Investigations South & Cultural Heritage Assessment
Te Ākitai Waiohua Iwi Authority Engagement**

We understand that Auckland Council (**Council**) are investigating options for a Rural Urban Boundary (**RUB**) that will define where Auckland is to grow over the next 30 years. Council is currently looking at land in the south of Auckland including Karaka, Drury, Hingaia, Paerata and Pukekohe for possible future urban development. As part of this investigation, Council has commissioned a number of reports to identify where urban development is appropriate and consider potential effects associated with extending the RUB. This has included commissioning of transportation assessments, infrastructure capacity reports and the like.

The RUB South investigation area is of particular importance to Te Ākitai Waiohua as it is part of our rohe. The possible urbanisation of these greenfield areas is a significant planning project in the Auckland Region and has the potential to impact on our cultural values, cultural landscapes, and places/sites of significance. Therefore, the preparation of a cultural heritage/Māori values assessment is essential to informing urbanisation decisions made by Council.

As you are aware, we have only been involved in RUB South discussions with Auckland Council since June 2013 when Council first approached Te Ākitai Waiohua with regard to the commissioning of a cultural heritage overview report to inform the location of the RUB, identify knowledge gaps and further work required to address cultural heritage issues and urban development. Te Ākitai Waiohua were also made aware of the extremely tight timeframes the Council was working to and communicated to Council that it was unlikely that a comprehensive cultural heritage/Māori values assessment could be completed during that period. Council advised that decisions on the RUB extension would be made by the Auckland Plan Committee (**APC**) at the end of August 2013.

At this briefing, Te Ākitai Waiohua raised a number of matters of concern as follows:

- The tight timeframes will not enable a comprehensive assessment to be completed;
- Concern that a 'consultant' is preparing the assessment rather than local iwi;
- That the cultural heritage overview report would be very broad-brush and will more than likely miss important information;
- Once the RUB is established, the land becomes Future Urban Zone. There is an expectation on the part of landowners that this land will be urbanised (encouraging land speculation);

- The late stage in the process in which iwi engagement and a cultural heritage/Māori values assessment had been sought by Council.

Te Ākitai Waiohua acknowledged to Council that both parties are now in an impossible position with limited options open to us moving forward. There is a need to identify future land for development as Council are mandated to do so by the Government. If Te Ākitai Waiohua does not engage in the process, we risk development going ahead with no due consideration of our cultural values, cultural landscapes, and sites/places of significance.

On the flipside, if Te Ākitai Waiohua does engage in the short timeframes, there is a risk that the information provided is considered 'complete' by those making decisions, despite this not being the case (it would be an overview report only).

Having considered our options, Te Ākitai Waiohua has agreed to engage with Council to assist the RUB South investigation. In this regard, we have provided Council's consultant, Anne McEwan, with information to input into the cultural overview assessment. We have also reviewed and provided feedback on the draft cultural overview assessment.

Following our review of the overview assessment, we would like to ensure that Council are aware of the following caveats when reviewing the information:

- That Te Ākitai Waiohua has participated in this process in good faith;
- While we have been involved in the process, we wish to stress that our involvement has been very much a broad brush overview only;
- A detailed assessment has not yet been undertaken by our people;
- It is possible that areas which have cultural value may not have been identified in the overview investigation;
- That applying a RUB and Future Urban zone over part (or all) of the South will lead to expectations that this land will be urbanised when important cultural assessment work is yet to be completed.

Therefore, we ask that the decision making committee is made aware of these limitations and our request that a full cultural heritage/Māori values assessment should be completed by Te Ākitai Waiohua prior to the notification of any RUB extensions.

We trust that the above information is useful in your investigation of the RUB South. We look forward to hearing from you in due course with respect to the preparation of a detailed cultural heritage/Māori values assessment to inform the decision making.

Ngā mihi,



Karen Wilson
Te Ākitai Waiohua Iwi Authority
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