



2 February 2026

Swetha Maharaji
Senior Resource Planner
Far North District Council

Swetha.Maharaj@fndc.govt.nz

Dear Swetha

RE: 2260100-RMASUB – 52 ROTOKAWAU ROAD, WAIPAPAKAURI

HNZPT has considered the Cultural Impact Assessment (CIA) recently provided from Ngāi Takoto and the Moana Whenua Trust Limited, prepared for the proposed subdivision resource consent application at 52 Rotokawau Road. HNZPT notes the following:

- The CIA confirms that the proposed subdivision site is culturally significant to Ngāi Takoto (location of Pukengātu Pā).
- Ngāi Takoto state in the CIA they will be seeking to get the site scheduled within the District Plan as a Site or area of Significance to Māori
- The CIA discusses nominating the site for listing under the HNZPT Act 2014 as a significant cultural site.

HNZPT confirms that there has been an initial discussion with Northland HNZPT staff about the significance of the site with a representative of Ngāi Takoto. HNZPT Staff have also carried out a roadside visit to understand its location and prominence in the location. However, HNZPT advises that no formal listing nomination has been received to date and there is no process currently underway to assess the site for listing within HNZPT.

HNZPT acknowledges that the site is of cultural significance for Ngāi Takoto. A function of the HNZPT Act 2014 (Section 13 (1) (c)) requires HNZPT to advocate for the conservation and protection of sites of wāhi tupuna and wāhi tapu significance.

HNZPT also consider that when making any decision on the proposed subdivision resource consent application FNDC should be mindful of the following matters of National Importance as stated Section 6 of the RMA 1991.

(e) the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga:

(f) the protection of historic heritage from inappropriate subdivision, use, and development:

HNZPT recommends that any decision in relation to the subdivision proposal addresses the following

- How the cultural significance of this site can be formally acknowledged as part of this proposed subdivision application process. This will require the applicant and Ngāi Takoto working together to reach a suitable outcome. Examples of formal acknowledgement could include



- A general covenant or consent notice attached to the new titles that highlights the site significance?
- Identification of an area on the site that is covenanted to recognise the sites significance, with appropriate signage?
- Including as part of any decision, an advice note to the effect that the applicant and FNDC formally accept the need to add the site to the District Plan 'Schedule of sites and areas of significance to Māori' (SCHED3, Proposed District Plan), at the next appropriate District Plan change process?

HNZPT have reviewed the Archaeological Assessment completed by Geometria Limited (dated Dec 2025) for the proposed subdivision site. We note the following conclusions from the assessment.

- There are no recorded archaeological sites on the subject property.
- There are no scheduled sites or HNZPT listed sites on the subject property
- There was extensive Māori pre-European occupation of the location.
- There was early European activity and occupation (associated with gum digging) around the 1900's, in the location.
- There is no archaeological evidence that a pā was located on the site.
- Any activity involving the drying of bodies on the site is unlikely to have left any archaeological remains.
- An archaeological authority application is not required (under HNZPT Act 2014) as part of the subdivision process.
- An Accidental Discovery protocol will be sufficient for any earthworks on the site that may arise from the subdivision activity.

HNZPT accept the above conclusions in relation to the likelihood of undiscovered archaeology within the subdivision site.

HNZPT is available to work with FNDC, the applicant and Ngāi Takoto to ensure an appropriate cultural outcome is achieved as part of this subdivision proposal.

Yours sincerely

Stuart Bracey
Heritage Planner - Northland