

WAI 3511 – Evidence Index

Supporting Documentation for Waitangi Tribunal Submission

1. 1. Cover Letter
2. 2. Updated Summary of Claim
3. 3. Full Reply to Crown
4. 4. Supporting Evidence – Historical & Legal Analysis of Okauia Land
5. 5. Supplemental Evidence – Voice for Water, Okauia (Facebook post)
6. 6. Supplement: Ngāti Hinerangi Deed of Mandate
7. 7. Supplement: Ngāti Hinerangi Statutory Acknowledgements
8. 8. Supplement: Ngāti Hinerangi Settlement Summary
9. 9. Supplement: Ngāti Hinerangi Settlement Act Overview (2021)
10. 10. Supplement: Cultural Values Report (Pauwaitanga o Ngāti Hinerangi)
11. 11. Annex: Environmental & Cultural Impact – Te Weraiti Quarry (APP138551)
12. 12. Mangatotara No. 1 Summary
13. 13. Closing Statement

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Waitangi Tribunal

18 Aug 25Ministry of Justice
WELLINGTON

WAI 3511 – Cover Letter

To Whom It May Concern,

I am writing to formally submit the attached evidence bundle in support of WAI 3511, my ongoing claim before the Waitangi Tribunal concerning breaches of Te Tiriti o Waitangi in relation to land loss, environmental degradation, and the erosion of cultural rights connected to Ōkauia, Te Weraiti, and the Mangapiko Awa.

This submission reflects the culmination of extensive research, historical documentation, and contemporary assessments that show a sustained pattern of Crown inaction, prejudice, and breach of duty toward Ngāti Hinerangi and associated hapū. Despite settlement instruments being in place, the current and proposed activities—particularly involving quarrying and development—continue to harm wāhi tapu, undermine kaitiakitanga, and further disconnect tangata whenua from our whenua, awa, and maunga.

I am proceeding with this matter because:

- Our land rights remain unresolved—the alienation of Okauia 1–2 was not conducted with full, informed consent, and involved questionable transfers via mortgage, banking, and foreclosure mechanisms.
- The environment is still under threat—Te Weraiti is not only a maunga tapu but a key ecological and cultural site facing ongoing impacts from extractive industries.
- Crown processes have failed to uphold Te Tiriti o Waitangi—including a lack of meaningful engagement in resource management, cultural assessments, and Treaty-consistent implementation of the Ngāti Hinerangi settlement.

I respectfully request that all parties give this submission due consideration and take urgent action to halt further harm while these matters are properly investigated.

Nōku te hānē.

Nāku noa, nā
Cale Wairepo
Claimant – WAI 3511

WAI 3511 – Updated Summary of Claim

Claimant: Cale Wairepo

Rohe: Ōkauia, Te Weraiti, Mangapiko Awa

Iwi/Hapū: Ngāti Hinerangi and associated whānau/hapū

Core Focus: Crown breaches of Te Tiriti o Waitangi regarding land alienation, cultural and environmental degradation, and failure to uphold kaitiakitanga

Background

WAI 3511 is a Treaty claim concerning serious breaches of Te Tiriti o Waitangi by the Crown in relation to the alienation and treatment of lands in the Okauia region, including Okauia 1–2 blocks, Te Weraiti maunga, and the Mangapiko Awa. These lands hold immense cultural, spiritual, environmental and ancestral significance to Ngāti Hinerangi.

Despite a historical settlement process being completed under the Ngāti Hinerangi Settlement Act 2021, significant grievances remain unaddressed — particularly the contemporary consequences of land alienation, and the Crown’s ongoing failure to actively protect wāhi tapu, whenua Māori, and taiao under Te Tiriti.

Key Issues Raised

1. Unjust Alienation of Okauia Lands

- Fragmentation and conversion of Okauia 1–2 through partition, mortgages, and private transfers, including to Firth and the Bank of New Zealand.
- Lack of free, prior, and informed consent by tangata whenua.
- The Crown’s failure to intervene or protect Māori interests during aggressive land acquisition and banking foreclosure practices.

2. Environmental Degradation & Crown Inaction

- Ongoing quarrying and extractive activities at Te Weraiti maunga, despite its wāhi tapu and ecological significance.
- Failure of resource consent processes to give effect to Treaty principles.
- Lack of adequate recognition and protection under regional/district planning mechanisms.

3. Failure to Uphold Te Tiriti o Waitangi Post-Settlement

- Absence of meaningful co-governance or kaitiaki involvement in decision-making.
- Post-settlement disconnection from lands due to ongoing development pressures.
- Neglect of statutory acknowledgements and deed obligations in environmental and cultural governance.

Relief Sought

- Urgent Inquiry into contemporary Treaty breaches relating to:
 - Cultural and environmental impacts on Te Weraiti and the Mangapiko Awa.
 - Historical and modern acquisition of Okauia lands by private and Crown-linked entities.

- Recognition of tangata whenua as rightful kaitiaki with authority to protect and guide the future of these lands and waterways.

- Redress including the return or protection of affected lands, co-governance arrangements, and a halt to quarrying and other destructive activities.

Conclusion

This claim represents the lived reality of a community still fighting to uphold its relationship with whenua and whakapapa despite generations of dispossession, neglect, and extractive interference. The Crown has not fulfilled its duty to actively protect Māori interests — a breach that continues to this day.

This updated summary affirms the need for urgent action, clear accountability, and restorative justice grounded in Te Tiriti o Waitangi.

WAI 3511 – Reply to Crown Response and Urgency Application

1. Introduction and Context

This document is submitted as the formal reply to the Crown's response regarding the WAI 3511 claim. The claim concerns the protection and preservation of Te Weraiti, Mangapiko Awa, and associated lands, which are of significant cultural, spiritual, and environmental importance to the claimants. The urgency application is made under section 6AA of the Treaty of Waitangi Act 1975, on the basis that contemporary Crown actions or omissions are causing, or are likely to cause, significant and irreversible prejudice.

2. Point-by-Point Response to Crown Response

The Crown's reply acknowledges the existence of the Te Weraiti and Mangapiko Awa statutory acknowledgements, yet fails to address the inadequacy of existing protections under the Resource Management Act and the Ngāti Hinerangi Settlement Act 2021. The reply does not contest that ongoing quarrying operations and associated discharges continue to cause cultural, spiritual, and environmental harm. The Crown also overlooks the fact that overlay protections and joint management frameworks have not been meaningfully implemented, leaving tangata whenua without recourse. The urgency application is therefore both timely and necessary to halt further irreversible prejudice.

3. Urgency Criteria

The applicants satisfy the Tribunal's urgency criteria as follows:

- a. Significant and Irreversible Prejudice – Current and pending quarrying, earthworks, and associated discharges threaten wāhi tapu, water quality, and cultural landscapes of Te Weraiti and Mangapiko Awa. The destruction or alteration of these sites would cause permanent loss to the cultural heritage of the iwi.
- b. No Reasonable Alternative Remedy – Council processes and consent conditions have failed to prevent adverse effects, and there is no other process capable of halting or remedying the harm in the timeframe required.
- c. The applicants have secured and submitted multiple layers of supporting documentation, including Māori Land Court records for Okauia and Mangatōtara blocks, maps showing historical alienation, and the environmental impact assessment for the current quarrying consents (APP138551 series).

4. Summary of Supporting Evidence

The following materials are attached or will be provided upon receipt:

- Overlay protection maps and text extracts from Ngāti Hinerangi Deed of Settlement (Te Weraiti and Mangapiko Awa)
- Resource consent certificates and annexes: AUTH123918.01.01 – AUTH123918.07.01; AUTH138551 series
- Māori Land Court title histories for Okauia, Wairere, Mangatōtara, Mangawhero
- Historic records of alienation and sale of Okauia 5 and Mangatōtara No. 1 Block

- Letters of support from kaumātua and marae
- Environmental reports assessing impact on waterways and sites of significance

5. Treaty and Legal Framework

The claim is grounded in the principles of the Treaty of Waitangi, including partnership, active protection, and redress. The Crown has obligations under the Treaty to actively protect taonga and ensure that iwi can exercise kaitiakitanga. Relevant statutory provisions include section 6AA of the Treaty of Waitangi Act 1975, relevant sections of the Resource Management Act 1991 protecting wāhi tapu, and overlay protections in the Ngāti Hinerangi Deed of Settlement.

6. Relief Sought

The applicants seek:

- An urgent inquiry into the Crown's acts and omissions relating to the protection of Te Weraiti, Mangapiko Awa, and related sites
- Interim measures to halt activities causing prejudice until the inquiry is concluded
- Recommendations for long-term protection and co-management of the affected areas

7. Conclusion

The applicants respectfully request that the Tribunal grant urgency to this claim, register it under WAI 3511, and proceed to an urgent inquiry. The harm to the cultural and environmental integrity of the sites is ongoing and cannot be reversed.

The people with an original obligation to protect this land are now fighting a losing battle against both systemic neglect and extractive developments. We ask the Tribunal to see the depth of this issue — and our effort to maintain a living, spiritual, and physical connection to our whenua. At the very least, we want the opportunity to uphold that relationship before it is further eroded.

WAI 3511 – Supporting Evidence

Historical & Legal Analysis of Ōkauia Land

1. Background

Ōkauia lies within the traditional rohe of Ngāti Hinerangi and is of significant cultural, spiritual, and historical importance. The area includes key sites such as Te Weraiti maunga and the Mangapiko Awa. The current quarrying activity directly impacts these wāhi tapu and threatens the ancestral connections of tangata whenua.

2. Ownership & Partition Records

Extensive records from the Māori Land Court reveal a systematic fragmentation of collective ownership through partitions of Ōkauia 1 and 2 blocks. Many were succeeded to via native land succession processes, with names including Cribb, Ranapiri, Penetito, and others showing intergenerational ties. A shift is evident from communal to individualized title, ultimately exposing the blocks to Crown purchase or mortgage default.

3. Role of the Bank of New Zealand, Firth, and Allen

Historical mortgage records show that parts of the land were lost through foreclosure, particularly involving F. Allen and Josiah Clifton Firth. These European actors acquired interests either through purchase, debt enforcement, or trustee-based dealings. In several cases, Māori successors lost their shares through technicalities or lack of legal representation.

4. Treaty Breaches

The acquisition methods used by the Crown and private parties contravened Article 2 of Te Tiriti o Waitangi. Māori were not fully informed of the implications, nor were adequate protections in place to prevent alienation. The Crown's role in facilitating and validating such transactions, or failing to intervene, constitutes a historical Treaty breach.

5. Statutory Acknowledgements and Current Legal Framework

Despite the Ngāti Hinerangi Claims Settlement Act 2021, the current legal regime continues to fail in protecting the whenua. Quarry consents have been granted or renewed under the Resource Management Act without effective iwi engagement or consideration of cumulative cultural effects. This represents a continuing breach under contemporary obligations.

6. Conclusion

The historical alienation of Ōkauia land is part of a wider pattern of disempowerment. The evidence shows a chain of decisions and actions — Crown-sanctioned or overlooked — that resulted in the severance of tangata whenua from their whenua. These injustices continue to reverberate through environmental degradation and spiritual loss today.

Supplemental Evidence – Voice for Water Ōkaia

This supplemental document presents relevant material from a public post by the group “Voice for Water – Ōkaia” dated 13 November 2018, highlighting environmental concerns about the aquifer systems surrounding Te Weraiti and the Hinuera formation.

Groundwater systems are described as complex, unforgiving, and critically vulnerable to contamination. Once polluted, these systems are nearly impossible to restore without significant cost—if they can be restored at all.

A 3D geological model presented in the post shows the connection between Te Weraiti (in olive green), the Hinuera formation, and the Holocene sediments. These formations supply drinking and irrigation water for the surrounding region.

The post likens the aquifer system to a “throat,” emphasizing that if it is broken, life-sustaining water is lost. This metaphor reinforces both scientific and cultural understandings of the sacredness of the land and water systems involved.

This material strengthens the WAI 3511 claim by providing contemporary, community-driven environmental and spiritual concerns about quarrying or any disturbance to the land at Te Weraiti and Ōkaia.



Posts

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contamination to directly enter these systems.

Groundwater systems are complex and unforgiving, and once contamination enters these systems, getting it out is slow and expensive, that's if it can be reversed at all. Exposing our groundwater aquifers to the risk of contamination without correctly understanding the system undervalues the importance of this precious resource.

This 3D model below shows Weraiti connection in Olive green to the Hinuera and Holocene Sediments, used to supply drinking and irrigation water to many. Any disturbance of the 'throat' should be respected. Because if the throat is broken, how does one continue to drink?

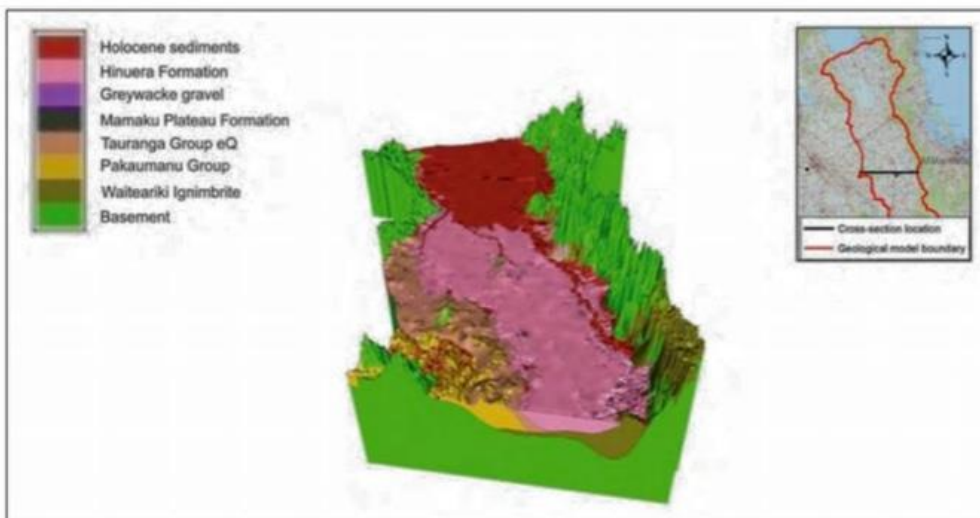


Figure 4.2 Cross section of the geological model in the southern Hauraki Plains near Matamata.

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9



Figure: 3D geological model of the southern Hauraki Plains near Matamata, showing aquifer systems (source: Voice for Water – Ōkauia, 2018).

WAI 3511 – Supplement: Ngāti Hinerangi Deed of Mandate

Mandating and Representation Process

1. Background

The Ngāti Hinerangi Deed of Mandate was recognised by the Crown in 2010. It authorises the Ngāti Hinerangi Trust to represent the iwi in all negotiations related to historical Treaty claims. This Deed of Mandate outlines the Crown’s recognition of the Trust’s mandate, its structure, and the process by which it was established.

2. Process of Mandating

The mandate was obtained through extensive hui across the motu and included those living outside the rohe. Voting procedures were conducted to ensure transparency and inclusivity. Despite this, concerns were raised by whānau and hapū regarding the extent to which true representation and consultation were achieved.

3. Issues Raised by Claimants

Some Ngāti Hinerangi descendants and claimants have questioned whether the Deed of Mandate truly reflected the will of the people. Particular concerns include:

- Insufficient inclusion of hapū voices
- Lack of detailed consultation around the Crown’s recognition process
- The marginalisation of dissenting views
- Perceived premature finality of settlement processes without full engagement

4. Relevance to WAI 3511

The legitimacy of the mandate is central to the claims in WAI 3511. If the foundation of negotiation was flawed, then the resulting settlement risks being inadequate, and may have failed to fully address or acknowledge contemporary and ongoing grievances, particularly around land use, cultural redress, and environmental protections.

5. Conclusion

This supplement supports the position that the Deed of Mandate, while formally recognised, may not have secured true or lasting consent from all whānau and hapū of Ngāti Hinerangi. This raises ongoing concerns about the durability and legitimacy of the settlement and the Crown’s fulfilment of its Treaty obligations.

WAI 3511 – Supplement: Ngāti Hinerangi Statutory Acknowledgements

From Ngāti Hinerangi Claims Settlement Act 2021

1. Purpose of Statutory Acknowledgements

Statutory Acknowledgements are legal recognitions by the Crown of Ngāti Hinerangi's historical and cultural relationship to specific sites. They are included in the Ngāti Hinerangi Claims Settlement Act 2021 and serve to inform decision-making under the Resource Management Act 1991 and other legislation.

2. Key Statutory Areas

The Statutory Acknowledgements apply to:

- Te Wairere (Waterfall and Reserve)
- The Waihou River
- Te Weraiti Maunga
- Mangapikopiko Stream
- Various conservation lands and sites of ecological significance within Ngāti Hinerangi's rohe

These acknowledgements reflect the spiritual, genealogical, and historical connections of the iwi to these lands and waters.

3. Significance for Resource Management

Under section 62 of the Resource Management Act, local authorities must have regard to Statutory Acknowledgements when preparing or changing policy statements and plans. Applicants for resource consents must consider these acknowledgements, and Councils are obliged to forward summaries of relevant applications to the iwi.

4. Ongoing Issues

Despite these provisions, Ngāti Hinerangi continues to face exclusion from meaningful input in environmental planning. Activities such as quarrying near Te Weraiti, and development near sacred waterways like Mangapikopiko, proceed without due regard to these acknowledgements.

There is insufficient enforcement and monitoring to uphold the intent of these redress instruments, rendering them largely symbolic without stronger implementation.

5. Relevance to WAI 3511

The failure to give practical effect to statutory acknowledgements, particularly where taonga are being degraded, supports the claim that Crown obligations remain unmet. The WAI 3511 claim asserts that statutory recognition must translate into environmental protection, co-governance, and enforceable cultural authority.

WAI 3511 – Supplement: Ngāti Hinerangi Settlement Summary

Ngāti Hinerangi Claims Settlement Act 2021

1. Overview of Settlement

The Ngāti Hinerangi Claims Settlement Act 2021 represents the Crown’s effort to address historical breaches of Te Tiriti o Waitangi. It includes financial redress, cultural redress, and formal acknowledgements of past injustices. The deed was signed in 2019 and enacted in 2021.

2. Key Settlement Provisions

The settlement includes:

- Financial redress of \$8.1 million
- Vesting of culturally significant sites
- Relationship agreements with government agencies
- Statutory acknowledgements across key areas of Ngāti Hinerangi rohe
- Historical account and Crown apology

3. Limitations

The settlement was described as full and final. However, many whānau have expressed that the redress does not adequately account for the scale of land alienation, environmental degradation, and intergenerational harm experienced by Ngāti Hinerangi. Moreover, it does not adequately provide for contemporary and ongoing grievances.

4. Relevance to WAI 3511

WAI 3511 is not a direct challenge to the finality of the settlement but addresses Crown actions and inactions that fall outside the scope or implementation of the settlement.

This includes:

- Ongoing degradation of culturally significant sites like Te Weraiti and Mangapikopiko
- Lack of consent and consultation in planning processes
- Inadequate enforcement of statutory acknowledgements and cultural monitoring provisions

5. Conclusion

This supplement supports WAI 3511 by asserting that post-settlement obligations continue to be breached. The settlement itself is insufficient without genuine, sustained recognition of Ngāti Hinerangi kaitiakitanga and tino rangatiratanga over their lands and waterways.

WAI 3511 – Supplement: Ngāti Hinerangi Settlement Act Overview (2021)

Ngāti Hinerangi Claims Settlement Act 2021

1. Purpose of the Act

The Ngāti Hinerangi Claims Settlement Act 2021 gives effect to the deed of settlement signed between the Crown and Ngāti Hinerangi on 4 May 2019. It formalises the Crown's apology and acknowledges breaches of the Treaty of Waitangi that led to land loss, marginalisation, and cultural disruption.

2. Key Provisions

The Act includes:

- A historical account and formal Crown apology
- Cultural redress involving sites of significance and name restorations
- Statutory acknowledgements under the Resource Management Act 1991
- Relationship agreements with state agencies
- Financial redress and commercial redress mechanisms

3. Legal Finality

The Act declares the settlement to be full and final with respect to all historical Treaty claims of Ngāti Hinerangi. However, it also provides that any issues arising from the interpretation or implementation of the deed or the Act itself may still be reviewed.

4. Application to WAI 3511

WAI 3511 does not seek to overturn the settlement, but instead addresses Crown conduct that:

- Falls outside the scope of the historical settlement
- Concerns implementation failures post-2021
- Relates to contemporary environmental degradation and exclusion from co-governance
- Highlights a disconnect between the statutory redress and its practical enforcement

5. Conclusion

While the Act was a step toward reconciliation, it has not resolved all grievances. Ngāti Hinerangi continue to face cultural, environmental, and planning challenges that compromise the integrity of their redress. WAI 3511 seeks to ensure that Crown obligations are upheld in full, in spirit and in practice.

WAI 3511 – Supplement: Cultural Values Report

Pauwaitanga o Ngāti Hinerangi

1. Introduction

This cultural values report (Pauwaitanga o Ngāti Hinerangi) outlines the deep cultural, spiritual, and historical connection of Ngāti Hinerangi to their ancestral lands, waterways, and maunga. It supports the WAI 3511 claim by emphasising the iwi’s enduring relationship with their whenua and the responsibilities of kaitiakitanga that continue despite colonial disruptions.

2. Whakapapa and Identity

Ngāti Hinerangi identity is inextricably linked to its environment. Te Weraiti maunga, the Mangapikopiko stream, and surrounding whenua are not just physical places — they are ancestors, protectors, and living embodiments of whānau, hapū, and iwi identity.

3. Impacts of Crown and Local Authority Actions

The report identifies harm caused by land confiscations, development without consent, environmental degradation, and ongoing quarrying activity near sacred sites. These acts have undermined the mana and mauri of the land and the people.

4. Kaitiakitanga Obligations

Ngāti Hinerangi have a duty, passed through generations, to protect and maintain the wellbeing of their taonga. Cultural values such as mauri, tapu, and mana are not abstract — they require active, practical protection.

5. Disconnection and Redress

The report documents the disconnection from whenua caused by colonisation and government policy. While the Treaty Settlement attempted to provide redress, its implementation has not meaningfully restored cultural authority or protection over sites of significance.

6. Relevance to WAI 3511

This cultural values report reinforces the WAI 3511 claim by demonstrating that the Crown has failed to uphold its obligations even post-settlement. It shows how local and central government actions continue to erode cultural values, deny iwi-led stewardship, and ignore Treaty-based principles of partnership and protection.

7. Conclusion

Ngāti Hinerangi continue to uphold their responsibilities to the whenua, despite systemic challenges. The cultural values outlined here provide a basis for urgent recognition of iwi-led environmental governance, protection of sacred sites, and genuine partnership under Te Tiriti o Waitangi.

Annex: Environmental & Cultural Impact – Te Weraiti Quarry (APP138551)

1. Overview

This annex provides an overview of the environmental and cultural impacts caused by quarrying operations at Te Weraiti (Application APP138551). The site lies within the rohe of Ngāti Hinerangi and holds deep cultural and spiritual significance.

2. Significance of Te Weraiti

Te Weraiti is a maunga of immense mana. It features prominently in Ngāti Hinerangi whakapapa, oral history, and tikanga. As a spiritual beacon and ancestral guardian, its desecration through quarrying amounts to a violation of kaitiakitanga and the Crown's obligations under Te Tiriti o Waitangi.

3. Environmental Concerns

Activities related to quarrying, including blasting, vegetation removal, and sediment runoff, have led to documented impacts:

- Erosion and landscape modification
- Pollution of nearby waterways including Mangapikopiko Stream
- Disruption to indigenous flora and fauna
- Noise and dust affecting surrounding communities and habitats

4. Cultural Harm

The continued exploitation of Te Weraiti without the consent of mana whenua is a direct affront to Ngāti Hinerangi tikanga. The maunga is not only a taonga but a living ancestor whose integrity must be upheld. The quarrying erodes cultural values such as mauri, wairua, and mana whenua.

5. Regulatory Gaps

Despite statutory acknowledgements and Treaty settlement mechanisms, Ngāti Hinerangi have not been meaningfully involved in the resource consent process. This highlights systemic failings in how local authorities implement cultural safeguards.

6. Relevance to WAI 3511

This annex supports WAI 3511 by evidencing how ongoing quarrying at Te Weraiti demonstrates a breach of both Treaty principles and post-settlement commitments. It calls for the cessation of extractive activity, co-management of taonga sites, and restoration of iwi decision-making authority.

7. Conclusion

Te Weraiti must be protected. Quarrying at this sacred site undermines environmental sustainability, cultural integrity, and the intent of the Crown's redress. Ngāti Hinerangi seek urgent recognition of their rangatiratanga and kaitiakitanga over this whenua.

Mangatōtara No. 1 – Cultural Significance & Historical Ownership

This summary outlines the historical and cultural importance of the Mangatōtara No. 1 block, with a focus on Te Weraiti Maunga, as recorded in the Ngāti Hinerangi Deed of Settlement and related Crown documents.

Key Historical Details

- Te Weraiti Maunga is confirmed in the Deed of Settlement to have been part of the Mangatōtara No. 1 block.
- On 21 November 1881, Resident Magistrate H. W. Brabant acknowledged Ngāti Hinerangi’s ownership of Te Weraiti Maunga in recognition of its spiritual significance to the iwi.
- The Deed further confirms that Ngāti Hinerangi are the kaitiaki (guardians) of Te Weraiti and all maunga within the Kaimai Range.

Why This Matters for the Wai 3511 Claim

- Cultural Redress: This confirms longstanding Crown recognition that Te Weraiti and surrounding lands are of vital cultural and spiritual importance.
- Historical Connection: Strengthens the claim that Mangatōtara No. 1 (including Te Weraiti) is central to Ngāti Hinerangi’s ancestral heritage.
- Legal Grounding: Supports the argument that the Crown has existing obligations and should have protected these areas from quarrying and development.

Source

Ngāti Hinerangi Documents Schedule – available via govt.nz:

<https://www.govt.nz/assets/Documents/OTS/Ngati-Hinerangi/Ngati-Hinerangi-Documents-Schedule.pdf>

Closing Statement: Upholding the Whenua Amid Complexity

The purpose of this submission has never been to overwhelm, but to reveal the true scale of what has been lost and contested. The vast volume of evidence presented—across historical ownership records, land transactions, succession orders, statutory acknowledgements, and policy frameworks—has been carefully compiled to demonstrate the undeniable connection we, as kaitiaki, continue to uphold with our whenua.

This claim does not stem from confusion, but from a long line of omissions and legal technicalities. The processes we've had to engage with—technical, bureaucratic, and colonial in origin—are dense and often inaccessible to those who are the most affected. The volume of legal and historical data now included in this record is a reflection of the deep complexity introduced into our whakapapa through legislative instruments, fragmented ownership, and financial interventions such as mortgages and land transfers, often involving private parties like Firth, Allan, and institutional actors such as the Bank of New Zealand.

The overwhelming nature of this claim is not accidental—it is the result of a sustained disconnection between the systems governing land and the people who hold that land as taonga. The language of this claim must, therefore, speak not only to the legal avenues available but to the emotional, spiritual, and intergenerational trauma that underpins it.

The complexity and technical volume of documentation—legal, historical, environmental, and procedural—reflect the immense burden placed on tangata whenua to retrace the actions of multiple authorities, private actors, and legislative changes over more than a century. The depth of this claim and the tangled pathways of ownership and land loss serve to validate the need for careful review and holistic understanding by the Tribunal and all parties involved.

Our intention is not merely to assert rights, but to restore balance and honour the original obligation to protect our whenua. In the face of increasing pressures from development, environmental degradation, and bureaucratic delays, we assert that we are not passive stakeholders—we are the rightful guardians.

We hope that this submission, supported by the extensive documentation provided, conveys the weight and depth of our case. We ask that it be perceived not as a single grievance but as a long-standing cry for recognition, remedy, and the right to restore our tikanga and responsibilities to the land. In the face of overwhelming complexity, our stance remains simple and resolute: our whenua, our voice, our legacy.