

**ENVIRONMENT COURT OF NEW ZEALAND
WELLINGTON REGISTRY**

**I MUA I TE KOOTI TAIAO O AOTEAROA
TE WHANGANUI-A-TARA**

ENV-2023-WLG-000005

Under the Resource Management Act 1991

In the matter of the direct referral of applications for resource consent and notices of requirement under sections 87G and 198E of the Act for the Ōtaki to North of Levin Project

By Waka Kotahi NZ Transport Agency

**STATEMENT OF EVIDENCE OF DEAN JAMES WILSON
ON BEHALF OF MUAŪPOKO TRIBAL AUTHORITY IN SUPPORT OF THE
APPLICATION BY WAKA KOTAHİ NEW ZEALAND TRANSPORT AGENCY**

**LAKE HOROWHENUA TRUST AND MUAŪPOKO TIKANGA AND
MĀTAURANGA**

Dated: 4 July 2023

TABLE OF CONTENTS

INTRODUCTION	2
BACKGROUND TO MUAŪPOKO IWI	4
BACKGROUND TO OUR CONNECTION WITH THE HOROWHENUA BLOCK AND PUNAHAU/LAKE HOROWHENUA	6
OVERVIEW OF THE LHT	11
Purpose, governance and structure.....	11
Lake Horowhenua Accord	11
PUNAHAU/LAKE HOROWHENUA VALUES	12
MY INVOLVEMENT AS A KAITIAKI IN THE PROJECT	16
Site visits, hui, workshops and investigations	16
USE OF MUAŪPOKO MĀTAURANGA IN THE PROJECT	17
OUTCOMES FOR OUR MĀTAURANGA.....	18
The Arapaepae spiritual pathway	19
Ohau Awa	20
Whakahoro.....	21
Pukehou.....	21
IMPLEMENTATION OF MUAŪPOKO TIKANGA IN THE PROJECT	22
APPENDIX A: MY WHAKAPAPA.....	25

Mānawa mai ai te rere o Punahau e
Mānawa mai ai te toiora o Punahau e
Mānawa mai ai te karekare o Punahau e
Mānawa mai ai te pupū o Punahau e
Manawatahi te Punahau ki taku manawa
E piki nei i te ora, e piki nei i te kaha o te manawa ora
Tina te manawa ora, tina te puna manawa ora Kia te punahauora ki tai, ki uta nei
Hui e, tāiki e!

INTRODUCTION

1. Tēnā koutou. Ko **Dean James Wilson** tōku ingoa. My full name is **Dean James Wilson**.
2. Ko Kurahaupō te Waka

Ko Tararua te Maunga

Ko Waipunahau te Moana

Ko Hokio te Awa

Ko Ngāti Pāiri te hapu

Ko Muaūpoko te iwi
3. I am a trustee of the Lake Horowhenua Trust (**LHT**), which operates in accordance with a trust order that was put in place by the Māori Land Court in 2012, and amended in 2014. LHT's purpose is to administer Punahau/Lake Horowhenua and associated land for the benefit of all Muaūpoko beneficial owners. I have been a trustee for three years and, since early 2023, I have also held the role of Deputy Chair of LHT.
4. I also hold the role of Kaiwhakahaere Taiao (environmental manager) for Muaūpoko Tribal Authority (**MTA**), the mandated iwi organisation for Muaūpoko Iwi. I have held this role since 2020. I have also, since 2020, represented MTA on the Manawatū River Accord along with Dianne Rump and Jonathan Procter.
5. I am authorised to give this evidence on behalf of LHT and MTA in relation to the application of Waka Kotahi New Zealand Transport Agency (**Waka Kotahi**) for resource consents and notices of requirement for designations (**NoRs**) in respect of the Ōtaki to north of Levin highway Project (**Ō2NL Project** or **Project**).
6. As a Project Partner, MTA has worked closely with Waka Kotahi on the Project's development, which has included participating in the shaping of the Ō2NL Project route selection and corridor refinement, communicating MTA's values associated with the Ō2NL environment and its position in terms of environmental effects of the Project, preparing a Cultural Impact Assessment (**CIA**), co-creating the Cultural and Environmental Design Framework (**CEDF**)

and continuing to work with Waka Kotahi and Ngā Hapū o Ngāti Raukawa ki te Tonga as the Project moves through the consenting process and beyond.

7. We have become a submitter and section 274 party under the RMA in order to secure effects management outcomes that our CIA recommends but have not yet been adopted in full into the Project and consent conditions. This includes:
 - (a) recognition of our fundamental relationship with the Horowhenua Block as our contemporary heartland;
 - (b) outcomes for our significant sites the Project interacts with across the Project landscape; and
 - (c) security that any narrative about Muaūpoko in the Project moving forward will be respectful to our unique history as tangata whenua with a connection that stretches back over 600 years.
8. MTA acknowledges both the Treaty partnership it has with the Crown (including through Waka Kotahi) and the Project partnership it has with the Ō2NL Project team. MTA recognises the journey ahead to delivering, firstly, the obligations and expectations as Te Tiriti partners, and secondly, the Ō2NL Project as a Project partners.
9. My evidence:
 - (a) provides a background to Muaūpoko Iwi;
 - (b) discusses the important connections Muaūpoko have with the Horowhenua Block as our contemporary heartland;
 - (c) provides an overview of LHT;
 - (d) summarises the Punahau / Lake Horowhenua values, as outlined in the CIA prepared on behalf of MTA and LHT, and gives examples of how these are implemented in practice;
 - (e) describes my involvement in the Project to date from a kaitiaki perspective, including:
 - (i) outlining my, and my team's, participation in various site visits, hui, and technical workshops and investigations; and

- (ii) providing some specific examples of how Muaūpoko tikanga and mātauranga has been incorporated in the Project to date; and
 - (f) addresses how Muaūpoko tikanga and mātauranga should be implemented in the Project going forward.
10. I am not giving this evidence in an expert capacity. However, I have the following qualifications and experience:
- (a) Three Years in the role of Environmental Manager for Muaūpoko Tribal Authority Incorporated;
 - (b) I hold governance positions on numerous Māori Iwi Boards and Trusts such as Mana o Te Tangata Trust, Hato Paora College Trust Board, Muaūpoko Lands Trust, Wirihana Whānau Ahu Whenua Trust; and
 - (c) I have a Master of Māori and Indigenous Leadership from the University of Canterbury.

BACKGROUND TO MUAŪPOKO IWI

11. The earliest origins of Muaūpoko Iwi can be traced back more than 1000 years to the first peoples, known to us as Mua o te Tangata. These early peoples existed on the land long before the waka migrations, and formed tribes all over the country, including the Horowhenua District.
12. Later, in the mid-14th century, the Kurahaupō waka (formerly known as Te Hāwai) landed in Aotearoa. A captain of the Kurahaupō Waka was Whātonga, who would later send his two sons Tara-Ika and Tautoki to settle in Te Whanganui-ā-Tara (Wellington), subsequently named for our ancestor Tara-Ika.
13. From Te Whanganui-a-Tara, descendants of Tara-Ika migrated up the North Island's west coast forming the base of who are now known as the Muaūpoko Iwi. Over time, our ancestors established their own hapū, areas of occupation, use and access to resources on the western side of the Remutaka and Tararua ranges.
14. Prior to 1820, Muaūpoko had traditional settlements at Arapaoa Island (Marlborough Sounds), Pukerua Bay, Waikanae, Kāpiti Island, Ōtaki, Ohau, Horowhenua, Poroutawhao/Waitarere, Awahou (Foxton) and along the lower Manawatū River and Rangitīkei River.

15. Our tūpuna had socio-political relationships and shared whakapapa with their neighbours in both the North and South Islands. These are Ngāti Apa, Rangitāne, Ngāti Ira, Ngāti Kahungunu, Whanganui iwi, Ngāti Kuia and Ngāi Tahu, with whom Muaūpoko had engaged in a number of marriages, alliances, and conflicts. Muaūpoko had interests through shared and separate areas of use and occupation with these iwi.
16. The eldest son of Whātonga, Tara-Ika, is also the ancestor of the Ngāi Tara iwi. This creates our shared whakapapa, Ngāi Tara ki te Mua Ūpoko o Te Ika a Maui. The area of Ngāi Tara was traditionally recognised as the Niho Mango (shark's tooth) and was marked by three locations named after their ancestor Tuteremoana: a rock outcrop near the modern-day Castlecliff, the highest peak on Kāpiti Island, and a rock outcrop near the modern-day Barrett's reef near Wellington.
17. The half-brother of Tara Ika was Tautoki, the father of our whanaunga Rangitāne.
18. Ngāi Tara ki Mua Ūpoko o te Ika a Maui is a name derived through shared whakapapa with Ngāi Tara and from our position as living at the head of the fish, the fish's head is the bottom of the North Island where Muaūpoko are born of the land, thus describing the takiwā in which our people have connected for more than 900 years.
19. Some Muaūpoko people today date their origins back to Mua-o-te Tangata and Kupe, while many feel a stronger connection to the arrival of the Kurahaupō (Hāwai) with Whātonga. Muaūpoko can also identify themselves with the Fleet migration where Pōpoto captained the Kurahaupō.
20. During the 1820s and early 1830s, invasions and migrations were made by Ngāti Toa, Te Āti Awa, Ngāti Raukawa and Taranaki tribes. These iwi settled themselves within the Muaūpoko takiwā.
21. Some Muaūpoko maintained Ahikā roa in parts of the traditional area after the arrival of these Iwi, and some Muaūpoko migrated out of the area and united with other Muaūpoko hapū and related communities. A core group of Muaūpoko remained at Horowhenua while others continued to live in the Manawatū, Te Waipounamu and Kāpiti Coast areas.
22. Muaūpoko, along with their allies, Ngāti Apa and Rangitāne, entered various arrangements with the incoming iwi to maintain an uneasy peace, including

an agreement with the Ngāti Raukawa rangatira Te Whatanui, involving a gift of land from the Muaūpoko rangatira, Taueki.

23. Customary marriages or takawaenga between the groups, to make peace agreements binding, were also arranged – something which the Ngāti Huia CIA refers to.
24. In 1840, Muaūpoko rangatira signed Te Tiriti o Waitangi; we engaged with the coming of Christianity as well as the arriving settlers and new economy.
25. Muaūpoko land was generally recognised by neighbouring Ahikā roa (longstanding) iwi; Rangitāne, Ngāti Apa, and Ngāti Kahungunu. This, however, did not always mean they agreed upon boundaries or the overlapping areas. While the invading and migrating iwi of the 1820s / 1830s identified Muaūpoko as being particularly rich in resources and thus proceeded to assert their interests based on perceived raupatu and tuku.
26. As discussed in the evidence of **Dianne Rump** and as described in the CIA, the traditional rohe of Muaūpoko extends from Rangitīkei River to Turakirae (Cape Palliser) down to Te Whanganui-ā-Tara. However, our contemporary heartland is the Horowhenua Block.

BACKGROUND TO OUR CONNECTION WITH THE HOROWHENUA BLOCK AND PUNAHAU/LAKE HOROWHENUA

27. The principal Muaūpoko Pā and settlements in the Horowhenua Block were located around Punahau/Lake Horowhenua. Occupation was traditionally concentrated along the western lake shore, in particular around the extensive Te Rae-o-te-karaka pā and kainga complex.
28. A number of tauranga waka (waka landing sites including Puke-aruhe, Motukowhai, Puapua, Te Rongo-ara-pawa, Kawiū, Te Kapa, Ngurunguru and Waituhi) were located on the eastern shores of the lake. These provided access to associated cultivations, cultivated forest clearings further inland, and a wide range of mahinga kai found in wetlands, forests, streams and waterways.
29. Six man-made islands exist on our lake: Moana-o-karapu, Wai-kiekie, Waipata, Namu-iti, Roha-a-te-kawau and Puke-iti.
30. The area east of the Lake was also traversed by a number of trails leading from Horowhenua to Manawatū and the Tararua Range. It was dotted with

forest clearings used as places of respite, seasonal camps, as mahinga kai and refuge by the old, young and infirm during times of war. The eastern area up into the ranges thus contains a number of waahi tapu.

31. The area east of the Lake, although forming a vital part of the Muaūpoko economy, was not permanently occupied. Rather, it was visited seasonally by those residing on the western shores of the Lake to gather resources or to cultivate cleared areas on the Lake shore and further inland. This was nevertheless a vital area for Muaūpoko. It was part of an integrated and complex system involving both coastal and inland resources. Cultivated forest clearings east of the Lake included Manawahi Paroa, Tiraho, Te Hawera, Te Waware, Tirotiro, Te Rua, Te Mekomoko and Weraroa, which was by far the largest. Taitoko/Levin currently sits across the former extensive Weraroa clearing and some Muaūpoko people believe Weraroa to be an appropriate name for Levin.
32. In the area to the west, between Punahau/Lake Horowhenua and the sea, Muaūpoko caught eels in the Hokio stream and in the many lagoons and dune lakes and fished and gathered shellfish along the coastal littoral zone. The dune lakes and all the major dunes were named, and many are wāhi tapu. Two sand-hill kaitiaki (guardians) – Komokorau and Parikarangaranga – stood on both sides of the Hokio stream. Komokorau was also an ancient urupā, the resting place of a number of important Muaūpoko chiefs. Other dune urupā complexes that interact with the Horowhenua Block are Moutere and O-hinga.
33. Between the late-1840s and the mid-1860s the Crown purchased a number of blocks surrounding Horowhenua, including Waikanae and Wainui, Muhunua, Ahuaturanga, Te Awahou, Tuwhakatupua/Taonui and Rangitīkei-Manawatū. In each case Muaūpoko customary interests were recognised by the Crown and other iwi, and they received a share of the payment. There was no mention of conquest or a lesser Muaūpoko status during these purchases.¹
34. Things changed after the advent of the adversarial ‘winner-takes-all’ Native Land Court. Because any acknowledgement in the Court by migrant iwi that Muaūpoko possessed customary rights and interests might result in an adverse finding, they and their European supporters began promoting a

¹ D.A. Armstrong. *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* History works - August, 2021, Page 3.

narrative of Muaūpoko conquest and enslavement. Claims of conquest were, however, rejected by the Native Land Court in a series of adjudications that took place in 1868, 1872 and 1873 (Himatangi, Manawatū-Kukutauaki and Horowhenua respectively),² and the vast bulk of the c50,000-acre Horowhenua block, stretching from the coast to the Tararua Range, including the Lake, was awarded to Muaūpoko. Some of these decisions relied in part on Ngāti Toa witnesses rejecting the notion that their invasion overturned all of the pre-existing interests of Muaūpoko and their allies.

35. Muaūpoko occupation of Horowhenua, our tribal heartland, was not disturbed for over 600 years until the 1880s when our resistance to land sales was finally broken.
36. One of the reasons for the 1886 sub-division of the Horowhenua Block was a strong desire of Muaūpoko to establish a European-style township on the eastern shores of the Lake. The establishment of such a township, on a proposed railway route would, in our ancestors' estimation, provide a range of significant economic and social benefits, including a market for their agricultural and horticultural produce and a substantial increase in the value of their surrounding lands, resulting in, among other things, higher rents for land leased to settlers. The township would also provide sought-after educational opportunities for Muaūpoko children and youth.
37. The township would not only secure Muaūpoko economic well-being, but also reflected the tribe's vision of a prosperous bi-cultural Horowhenua community, based on partnership and reciprocity. In 1884 the Muaūpoko leader of the time Keepa wrote that it was his "*earnest desire to see railway stations and a township established on the Horowhenua block... I am anxious by all means to improve the position of my tribe I am filled with delight about the proposed railway and if I were a rich man I would construct this part myself, and hand it over after the manner of a chief*".³
38. Prior to applying for a sub-division, Keepa proposed that some 4,000 acres – including much of the Weraroa and other forest clearings – be sold to the Crown for a township site under certain conditions. These were set out in a draft agreement, dated 25 June 1886. The terms are summarised below:

² D.A. Armstrong. *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* Historyworks - August, 2021, Page 3.

³ D.A. Armstrong. *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* Historyworks - August, 2021, Page 100.

- (a) 4,000 acres for the township would be sold to the Crown on both sides of a planned railway line at an agreed price (if the price could not be agreed it would be determined by arbitration);
 - (b) every tenth township section would be reserved for Muaūpoko;
 - (c) Lakes Horowhenua and Waiwiri (Papaitonga), the streams running from the lakes to the sea, and a chain of land around the lakes would be reserved for Muaūpoko; and
 - (d) there would be a shared local body and tribal trusteeship of public reserves (including a 100-acre 'garden' beside Lake Horowhenua), a town square, and land for schools to be attended by Muaūpoko and European children.
39. The Crown did nothing to disabuse Keepa and Muaūpoko of a belief that these conditions would be met, and made an advance payment of £500 for the township block. Keepa and Muaūpoko, believing that their terms had indeed been accepted, as confirmed by the cash advance, proceeded with a subdivision. The tribe used the £500 advance to pay for their attendance at the Native Land Court, and expected the balance of the purchase price to meet survey charges associated with other sub-divisions and to clear some pressing debts.
40. However, the Crown failed to support the innovative partnership proposal. Officials, despite an arbitration clause in the 25 June agreement, insisted on paying only £1/10/- per acre for the township land, which was less than half the valuation of the adjacent Horowhenua No. 10 block, and less than Surveyor-General McKerrow's estimate of the land's worth. His figure was particularly low because it did not include the value of timber growing on the land.
41. Because the Crown had made an advance on the land it was able to prohibit other private dealings, with the result that Muaūpoko, saddled with large expenses, including outstanding survey charges, were left with no other options. Keepa held out for seven months, repeatedly rejecting the Crown's offer until July 1887. By then he was, as Crown officials observed, 'helpless', and was finally forced to give in and take what he could get. In addition to paying less than half of what the land was worth, the Crown refused to honour the conditions under which the township had been offered, including

tenths reserves for Muaūpoko and an ongoing role for the tribe in managing large public reserves in the township.

42. Native Minister Ballance made it clear that a bi-cultural township was out of the question. He did not want 'Natives mixed up in the town with Europeans'.
43. To add insult to injury, the township block as finally determined went too close to the Lake and wrongfully included kainga and gardens around the Ngurunguru tauranga waka and cultivation area, and part of the Tiroiro clearing belonging to Hoani Puihi and Winara Te Raorao. Hoani's protests were rejected because the Crown did not want a kainga anywhere near the township. The demise of the Muaūpoko vision even extended to the name of the new township. Rather than carrying the appellation requested by Muaūpoko – Taitoko – it was instead named for W. H. Levin, a director of the Wellington and Manawatū Railway Company who had never set foot on the land.⁴
44. The crucially important 14,975-acre Horowhenua No. 11 block, including Punahau/Lake Horowhenua and most of Muaūpoko occupation areas, was awarded to Keepa and Warena Hunia in 1886. The intention was that they would act as trustees.
45. The Commission later provided a list of 140 Muaūpoko individuals entitled to the block. A separate schedule listed the names of 48 persons who had been inadvertently left off the list of registered owners of Horowhenua No. 11 in 1873. While the Commission had found that a trust existed, its recommendation meant that this arrangement would necessarily be overturned in favour of individual titles held by all the owners. The key Muaūpoko objective – land retention – was thus lost sight of, and title individualisation exposed vulnerable Muaūpoko owners to the predations of Crown and private purchasers. The result was a breakdown of tribal unity, cohesion and land loss.⁵
46. The Court proceeded to award shares in block 11 to 81 Muaūpoko individuals. The partition of Horowhenua 11 began a few days after the Court's judgment was handed down.⁶

⁴ D.A. Armstrong, *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* Historyworks - August, 2021, Page 100-102.

⁵ D.A. Armstrong, *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* Historyworks - August, 2021, Page 105.

⁶ D.A. Armstrong, *Muaūpoko Origins, Rohe, Customary Interests and Sites of Significance* Historyworks - August, 2021, Page 110.

OVERVIEW OF THE LHT

Purpose, governance and structure

47. Our purpose is to administer Punahau/Lake Horowhenua, and look after the mauri of our water, land and fishery, for the benefit of all descendants of the original Muaūpoko beneficial owners.
48. On 26 November 2012 the Māori Land Court put in place a Trust Order in respect of LHT, which was amended on 29 September 2014. LHT operates in accordance with that Trust Order.
49. LHT comprises 10 elected trustees who represent the Muaūpoko beneficial owners of Lake Horowhenua 11 (Lake) Block, as well as a court-appointed Chair.

Lake Horowhenua Accord

50. In 2013 LHT and a range of the Muaūpoko beneficial owners signed the Lake Horowhenua Accord (**Accord**), together with the Lake Domain Board, Department of Conservation, Horizons Regional Council and Horowhenua District Council. As set out in the CIA, the vision of the accord is:

Lake Horowhenua: he taonga tuku iho; he taonga mo te katoa.

A treasure handed down from our ancestors for the enjoyment of all

51. The primary purpose of the Accord is to work together to stop degradation of Punahau/Lake Horowhenua and put in place remedial and restoration measures that will begin to return the Lake to a taonga for the Horowhenua community.
52. In August 2014, one year after the signing of the Accord, the Lake Horowhenua Accord Action Plan was launched, providing detail on the key issues impacting Punahau / Lake Horowhenua and restoration management actions.
53. The Accord Action Plan identified a number of projects aimed at restoring Punahau/Lake Horowhenua. Recently completed (and now operational) projects include:
 - (a) the installation of a fish pass to enable upstream migration of fish species and restore habitat;

- (b) creating a sediment trap before the Arawhata Stream enters the Lake;
- (c) harvesting lake weed to support oxygen levels in the Lake (this project has been operational since 2021); and
- (d) a range of planting and pest control initiatives.

PUNAHAU/LAKE HOROWHENUA VALUES

54. An assessment of Muaūpoko values in relation to Punahau/Lake Horowhenua, and the potential effects of the Project's activities on those values, are set out in chapter 4 of the CIA (and discussed in the evidence of **Siobhan Karaitiana**). In relation to Punahau/Lake Horowhenua specifically, those values are framed in terms of:
- (a) our **rangatiratanga** over the Horowhenua Block, which stems from our whakapapa/Ahika roa (including Kupe, Tara-Ika, Kurahaupō waka and Mua o te Tangata, discussed above) and the longstanding role of the Horowhenua Block as Muaūpoko heartland; and
 - (b) the **mana** of Punahau/Lake Horowhenua and our fishery, recognising the interconnectedness of groundwater, surface water and wetlands, their connection to the sea and the need to manage these as an integrated whole.
55. Lake Horowhenua is privately owned by Muaūpoko owners. Traditionally known to Muaūpoko as Punahau (or Punahou), loosely translated as "*the freshwater spring of vitality*." The name highlights the once abundant life supporting life capacity of the Lake and the surrounding area. Punahau was shrouded with dense forest of pukatea, kahikatea, and rata on the Lake margin; surrounded by huge wetland areas with a plentiful supply of raupō, harakeke, kākahi (freshwater mussels), īnanga (whitebait), pātiki (flounder) and tuna (eels). Native birds such as kererū were found in the thousands. These species were main components of our ancestors' diets. From the Lake inland to the Tararua Range stood rangatira (chiefs of the forest) of nikau, miro, karaka, tawa and rimu, among other taonga, which provided food, shelter, and other necessities for survival.
56. Horowhenua means landslide/sloping lands in te Reo Māori and is now the name applied to the rohe and the Lake. "*Horowhenua*" was traditionally used by our ancestors to describe the gravel fan that starts in the Tararua Ranges and culminates at the Lake. Our people understand through their

mātauranga that Horowhenua linked the Tararua ranges with Punahau, that the gravels contain the headwaters or lifeblood of Punahau, and the land upon which the Project traverses is interconnected with the Lake. Understanding this is at the heart of understanding the Muaūpoko connection and significance of the cultural impact of this Project.

57. These waters are fed by our sacred lakes and sites within the Tararua Ranges. The gravel fan is highly porous and absorbs the majority of rainwater within the landscape. It is only in particularly heavy rainfall events that surface-runoff channels form. As a result, groundwater levels are highly dynamic across the landscape and freshwater springs, known as puna, are common. The movement of water through the Horowhenua fan is dynamic in both time and space. We value the natural movement of wai. We know of a number of springs that have been lost to us; Waihou, Te Wai o Haunga, Kaiporoporo and Hau Tū to name a few. Those that remain in our knowledge are extremely valuable.
58. Punahau, its waterways and connections are of great spiritual significance to our people as the Lake waters are seen as a connecting of the underground (Papatūānuku) with the sky (Ranginui) and the resting places of our ancestors in the ranges. The mauri of our rohe and people can be monitored and measured based on the health of our Lake. The wairua of our people is also connected, and it is well recognised that if the lake is not healthy or strong in mauri then the people will also suffer and vice versa. It is understood that the hauora and strength of our people will also feed the hauora of Punahau. Our people and our waterways are inextricably linked. Lake Horowhenua and the fishery are of great importance to Muaūpoko, who own the bed of the Lake as well as the fishery (this has been recognised by the Courts as being in Muaūpoko customary ownership for approximately 100 years).
59. As signalled above, Muaūpoko and LHT have spent a significant amount of time and resource on Punahau/Lake Horowhenua restoration projects; further projects are underway and include:
 - (a) redoing a full fishery and mahinga kai investigation (this has been funded and is underway currently through a MTA-LHT partnership initiative);
 - (b) undertaking a wetland health investigation (this has been funded and is underway currently through a MTA-LHT partnership initiative);

- (c) implementing stormwater interventions (this has received funding and planning is underway through a partnership with MTA, LHT and Horowhenua District Council);
 - (d) the Arawhata Wetland Project which is in the process of seeking resource consents; LHT has two seats on the governance group for this project with Horizons Regional Council (I currently hold one of those seats) and we are part of the project management team;
 - (e) undertaking effects assessments and submitting on urban development plan changes, for example Proposed Plan Change 4 to the Horowhenua District Plan, to ensure the Lake remains protected through these plan change processes; and
 - (f) pollution clean-up / restoration of the Lake following two botulism events over the past two summers (and likely now an ongoing requirement) which:
 - (i) required the removal of approximately 2,500 dead birds and 600 dead tuna from the Lake, which our kaitiaki did over the course of about six weeks (each season) with minimal support from the Crown agencies;
 - (ii) had a big effect on the native and local fauna and local biodiversity, as there were endangered species among the animals that were pulled out including shags and indigenous ducks; and
 - (iii) needed an urgent response from a biosecurity standpoint, because of the need to step in quickly before the cycle of contamination spread beyond Punahau/Lake Horowhenua to other dune lakes such as Waiwiri/Lake Papaitonga.
60. A lot of Muaūpoko time and resource goes into protecting and restoring Punahau/Lake Horowhenua, yet there is still much to be done to halt decline and begin to turn our taonga to health. Ideally, the majority of Muaūpoko resources would go into restoring the Lake rather than trying to protect it from further impacts, therefore large projects like Ō2NL do present challenges in terms of capacity as resources are required to be diverted from our day-to-day protection and restoration work.

61. For example, when the Ō2NL Project Team was investigating whether cutting into the Punahau/Lake Horowhenua gravel headwaters could be an option, we had to find resources to be able to participate in those processes to ensure our assets and rights were protected. Our involvement was critical as we needed to explain to Waka Kotahi, from our perspective as kaitiaki and drawing on Muaūpoko mātauranga, the connection (ki uta ki tai) between Lake Horowhenua/Punahau and the ranges, and the groundwater flow that feeds the Lake.
62. That is, the gravels of Punahau were formed by landslide and erosion events from the Tararua Ranges. These gravels transport the groundwater and interact with a local fault line which in turn creates the spring.
63. This is why the Lake is named Punahau. 'Puna' means freshwater spring and 'hau' means extremely clean water. 'Hau' also means breath of life, referencing the life-supporting capacity of the Lake for Muaūpoko people.
64. For Muaūpoko, the idea of a cutting into the headwaters of a lake that is already so degraded was extremely concerning, so we needed to participate to ensure our taonga would be protected and our mātauranga and history reflected.
65. In light of our concerns, the Ō2NL Project Team commenced an expensive winter groundwater monitoring regime that in turn triggered a multi-criteria analysis process. At the end of that process, the Project Team discovered that large parts of the cutting were unconstructable, confirming what we already knew (and had expressed to the Project team) through our mātauranga. Although there was some frustration around the time and money that could have been saved had these processes not been undertaken, what this work did demonstrate to us was that Waka Kotahi is committed to investigating serious concerns from iwi and addressing those concerns through Project design and conditions.
66. That is not to say that there will be no effects from the Project. As set out in the CIA, MTA considers there are actual and potential effects on these values arising from the Project, both in the construction and operational phase. For example, cutting the highway at a surface level will still have an effect on the cultural landscape and other significant sites. However the key point is that through these careful design measures, investigations, hui and other measures, any adverse effects of the Project have been considerably reduced compared to what they could have been.

67. Overall, despite the resourcing and capacity challenges that we have faced throughout the Project to date, we recognise the importance of the new road. It will have a number of safety, resilience, connectivity, economic and social benefits for our wider community of which we are a part. We are therefore committed to being the best Project Partners that we can be considering our resourcing constraints on this significant piece of mahi.

MY INVOLVEMENT AS A KAITIAKI IN THE PROJECT

Site visits, hui, workshops and investigations

68. I have been involved, in a kaitiaki capacity, in a number of site visits, hui, workshops and investigations throughout MTA's involvement in the Project to date.
69. This has included site visits on 3 November 2022 with a lizard specialist to monitor artificial habitat devices and participating in data collection and sampling using the Stream Ecological Valuation (**SEV**) methodology with the freshwater ecologist.
70. I also participated in the opening of the Levin Project office in December 2020 (discussed in more detail below).
71. I helped host the Council experts' site visit on 3 August 2021, sharing mātauranga about the landscape and information about Muaūpoko as an iwi.
72. I have also been involved in a number of investigations focussed on the geotechnical and archaeological components of the Project including:
- (a) February-May 2023 including borehole drilling, excavation of test pits and advancing cone penetration tests;
 - (b) January-March 2022 geotechnical investigations; and
 - (c) April- August 2021 test pitting.
73. In terms of the geotechnical investigations, I attended these investigations as lead kaitiaki, bringing with me junior and intermediate members of MTA to provide valuable training opportunities. Our key roles were to oversee the physical works that were being done (including topsoil stripping) in the event of archaeological finds, to perform karakia and to ensure the geotechnical investigations team were avoiding unnecessary impacts on waterways and wetlands.

74. I have also participated in various opening ceremonies that have taken place in our rohe over the course of the Project's development.

USE OF MUAŪPOKO MĀTAURANGA IN THE PROJECT

75. Mātauranga is a taonga for our people, and runs much deeper than just stories. The mātauranga that guides us has been passed on from kaumātua, kuia and our Kāhui Ārahi roopu. There is a deeper meaning behind the kōrero that has been passed down through the generations, and not everyone within our iwi (or even hapū or whānau) will have been passed down the exact same kōrero. I have a deep respect for the diversity of ancient kōrero out there in my iwi.
76. When I talk about mātauranga in the context of the Project, I am referring to the legacy that will be left behind, how this legacy will endure into the future, and mahi toi. The legacy for Muaūpoko will be positive if the Project properly uplifts and respects our mātauranga. Our mātauranga is inter-related with our sites of significance (in particular Whakahoro, Pukehou, Arapaepae and Ohau) and guides us on how we can incorporate our iwi's aspirations in the Project and maintains our connections with these important places.
77. Tikanga, on the other hand, I see as being more reflected through processes and people (discussed further below in my evidence).
78. As an example of how our mātauranga has informed our work as kaitiaki, about two years ago the Project team undertook a geotechnical (drilling) investigation on the foothills of Pukehou Maunga – an old, traditionally heavily forested area up on a ridge which falls within the Project Area. We were asked to participate in the investigation. Our connection with, and knowledge of, the area, topography and history led us to suspect there would be Muaūpoko archaeological artefacts in the area, so we took a special interest in the investigation.
79. We, led by the Project's archaeologist, used radar technology to assess the land and soils on the foothills of Pukehou Maunga and discovered what we believe to have once been the sites of Muaūpoko hunting camps used by our ancestors to move between Pukehou Maunga and settlements closer to the coast.
80. As another example of our mahi as kaitiaki, in April 2023 the Project team undertook a sand constructability / compaction trial at 170 Heatherlea East Road in Taitoko/Levin, which I attended with members of my team.

81. In the course of the investigations my kaitiaki team and the archaeologist on site found a number of historical items, including a stone pit with charcoal preserved remains, which were deemed to be of archaeological interest and historical interest to Muaūpoko. Having discovered that stone pit, the site was fenced off and the remainder of the site was stripped of topsoil under our kaitiaki supervision, where more stone was discovered.
82. These discoveries led to various actions being implemented, including:
- (a) following on-site tikanga practices and cultural protocols;
 - (b) shifting the sand constructability site to the alternative site lower on the hill; and
 - (c) ensuring any topsoil stripped at the new site would be undertaken under kaitiaki (and archaeological) supervision.
83. These are just two specific examples, however what they demonstrate is that most of the archaeology across the landscape that Ō2NL will traverse will have connections to Muaūpoko or Ngai Tara ki te Muaūpoko o te ika o Maui, simply because we have been in the area for over six centuries. More generally, where we have identified the potential for invasive practices, we have and will continue to perform karakia to mitigate the spiritual, or metaphysical, effects on the whenua and seek to learn about the movements and uses of our environment by our ancestors. This is a priority for us moving into main works of the Project.

OUTCOMES FOR OUR MĀTAURANGA

84. The mātauranga around our sites of significance and cultural landscapes shared by myself and our Kāhui Ārahi roopū is contained in our CIA and has been summarised in the Appendix of our expert **Ms Karaitiana's** evidence for inclusion in the CEDF. I reshare mātauranga about our key sites of significance below which are also referenced in our Muaūpoko Management Plan conditions schedule (Condition DTW3, schedule 3).
85. Because our mātauranga is a taonga, we as an iwi are very careful about how much we wish to share and with whom. It is important that some of our mātauranga be reserved solely for Muaūpoko people such as our waahi tapu and whakapapa connections, but equally it is important that this Project recognise Muaūpoko and reflect and celebrate our mātauranga around our

sites of significance. This will maintain their mana as the Project traverses and destroys the significant whenua. It has been a difficult balance to strike.

86. I am concerned that without our mātauranga, and the outcomes we are seeking for our mātauranga, recorded in enough detail in the Project's documentation, it will not be considered through the detailed design and construction phases of the Project to the degree it needs to be to protect our relationship with our historical sites and culture. It will fall to our kaitiaki team, Ahikā and our MTA delivery team to educate key managers, designers and constructors in the alliances on its existence and how to apply it in the Project, on top of managing tikanga in the Project's operations and all of our other responsibilities.
87. This is not a good model because as my colleague **Ms Rump** describes in detail we are extremely constrained by our capacity as an iwi due to past exclusions and Treaty breaches.
88. We have many responsibilities as iwi and the Ō2NL Project will continue to put strain on our resources. I believe the best way to secure the design outcomes that respond to our mātauranga and presence of our sites of significance is through its identification in the CEDF and conditions now. **Ms Karaitiana** gives advice in her evidence on what this could look like for MTA and LHT.
89. We have already worked with our people and know what type of management our significant sites and mātauranga needs. Our people will not accept ongoing uncertainty in the protection of the mana of these specific parts of our whenua. The potential effects on the culture and traditions of our people without appropriate management during construction and operation are too great.
90. We have four key waahi of significance that interact with the Project. Our four key sites, their associated mātauranga are described as follows. **Ms Karaitiana** discusses appropriate management in terms of conditions and design outcomes.

The Arapaepae spiritual pathway

91. Arapaepae was a trail that crisscrossed the Arapaepae ridge. This trail within the Horowhenua Block, extended from the many Waerenga/clearings on the eastern side of Punahau/Lake Horowhenua to the Tararua Range, adjacent to what is now known as Queen Street East was used by Muaūpoko bird-

snaring parties and those gathering mahinga kai. This trail is said to have been first marked out by our early ancestor Haere-Tu-Te-Rangi. It is a highly valued ancestral and spiritual pathway.

92. The Arapaepae trail is connected to Maunu Wahine and Waimārie. The Waimārie is both a surface water and groundwater feature that is fed by a natural spring close to Maunu Wāhine, the waterway extends the spiritual pathway Arapaepae connecting with Punahau/Lake Horowhenua. Waimārie is characterised by high groundwater levels (as confirmed by the material supply investigation workstream) and its connections to the Arapaepae bush remnants, Waiopehu Reserve and Maunu Wahine.
93. Ngārara (*Oligosoma ornatum*) have been found within the Arapaepae bush remnants connected to our spiritual pathway and ngata are traditionally known to be present. Ngārara or lizards are associated with the atua Whiro. Because of Whiro's reputation, ngārara can be bad omens and associated with death, however they can also be seen as guardians or kaitiaki to be released near the burial sites of loved ones and used as a talisman to provide protection. We see these ngārara as watching over our spiritual pathway. We believe the populations of ngārara in each of the remnants and our spiritual pathway is intimately interconnected and that the health of these populations will impact the strength of the wairua of our pathway.
94. Arapaepae is the lower ridgeline that consists of many sacred Puna, it is one of the main trails that guide and lead our people into the Tararua ranges.

Ohau Awa

95. We have direct whakapapa connections to Haunui a Nanaia from the Kurahaupō waka; he travelled through our region naming waterways and places along his journey. His journey for us represents discovery of the area whereby the Ohau River was named O-Hau 'of Haunui.' Our ancestor Te Rangitakoru sung a nursery rhyme for his daughter Wharaurangi featuring the journey of Haunui a Nanaia naming not only the Ohau Awa but many culturally significant landmarks namely Whanganui, Whangaehu, Turakina, Rangitikei, Manawatū, Hōkioi, Otaki, Waimeha, Waikanae, Mapu, Wairaka and across to Wairarapa.
96. The Ohau has many waahi tupuna, waahi tapu and waahi taonga which we still recognise and interact with today. Of particular importance is Make Retu in the upper Ohau valley which flows and connects through the awa. It is our

spiritual power centre. The Ohau Awa supports many taonga such as ngata and ngārara (indigenous lizard and snail populations), dotterels nest in the river gravels while tuna, banded kōkopu, kōaro, shortjaw kōkopu, torrentfish and pirahau (lamprey) thrive in the awa itself.

97. Ohau Awa is fed by our sacred Puna Hapuakorari and recent ground water modelling from Horizons Regional Council confirms our kōrero that the Ohau waters connect to Waiwiri, Arawhata and Punahau/Lake Horowhenua.

Whakahoro

98. Whakahoro included the expansive flat coastal area from the fore hills around Manakau to the coast (maunga to moana). The area had characteristically large and old birding trees and tree forts. These tree forts were often built in old-growth kahikatea rākau. Our ancestors lived in these tree forts as a means to move about the landscape quickly and hunt manu. Our connections with these tree forts in the land go back over 500 years. The tradition was carried on for many generations and was a great advantage to our people in times of traditional tribal warfare until the introduction of firearms. The tree forts stretched along the coastal area through to the Horowhenua area but none so well-crafted and numerous as those found in Whakahoro. The last remnant of these true engineering feats by our people was situated near the Waikawa Stream (another waterway fed by our sacred Puna Hapuakorari) and east of State highway.

Pukehou

99. Pukehou is the place where Haunui a Nanaia stopped and undertook a ritual to show respect for the important connections between maunga and moana, the ranges, Waitohu awa and repo complex. Puke being reference to the mound/hill. Pukehou features significantly in our whakapapa, our history and kōrero. The settlement and mahinga kai sites of Moutere and Kopureherehe are ancient, the names connected to our homelands in Hawaiki. It is an extremely significant and spiritual landscape to our people.
100. Pukehou is a Maunga of significance that provided our Tipuna a key navigational point and enabled them to view the lowlands of the Tararua and extending ranges. Our ancestor Te Hakeke composed a lament for his son from this point. This lament was composed with references to landmarks for Muaūpoko. It was a mahinga kai area for birding and berries. It also provided a safe refuge point from raiding taua.

Waitawa Pā and Roto

101. This lake near Pukehou had an Island Pā. The Lake and Pā were used by Muaūpoko for generations. The community here was also connected to the coastal communities
102. Our ancestors Rangihouhia, Kaewa, Rangihikaka and Puhi whakapapa to this area. They lived in the Moutere and Kopureherehe (forest lakes) areas and regularly travelled the region to collect resources and hunt. Such encampments have been found in the Project alignment adjacent to O Te Pua Swamp. Our ancestors collected freshwater resources from the Waiaute stream that has its headwaters in the east of Pukehou.
103. Pukehou is surrounded by waahi tapu, kainga tawhito, puna and roto namely Waitawa, Kopureherehe, Kahuera, Huritini, Roto Potakataka. All of these including the Otaki Awa are fed from our sacred Puna Hapuakorari.

IMPLEMENTATION OF MUAŪPOKO TIKANGA IN THE PROJECT

104. Muaūpoko tikanga is integral to the Ō2NL Project and guides everything that we do, including the investigations, site visits, ceremonies and sampling mentioned above.
105. As a Project partner MTA has a critical role in the design, development and construction – and ongoing operation – of the Ō2NL Project. One of the key roles for MTA to date, and going forward, is in ensuring that Muaūpoko mātauranga and tikanga are being implemented in a meaningful, respectful and appropriate manner. It is also recognised that there are other hapū and iwi involved in the Project whose mātauranga and tikanga may well differ from ours.
106. In terms of tikanga, it is critical for MTA to continue to take a leading role in the Project's archaeological investigations and practices going forward (including in terms of what samples are taken) to ensure that these processes are undertaken in accordance with Muaūpoko tikanga and under our kaitiaki supervision.
107. Likewise, because of our long history with, and deep connection to, the taiao in this area, and in our role as Project partner, MTA will continue to play a key role in other investigations, construction and detailed design discussions going forward.

108. Differences in tikanga practices (between iwi or hapū) will need to be factored into the Project's design, construction and operation. Nevertheless, we consider there are workable and flexible solutions, in terms of how tikanga will roll out throughout the Project's lifespan, provided Muaūpoko remains appropriately and meaningfully represented going forward.
109. This representation is critical. Our people are concentrated in Taitoko/Levin; they drive these roads every day. We lead in education, health, mahi toi, taiao and cultural projects. There is an expectation that we will be there to represent our iwi on this Project, and to do this meaningfully we need to have a strong visual presence and strong communication protocols.
110. This is why we need a whānau engagement process within the Muaūpoko Management Plan; we need to be able to give our people certainty that the effects of the Project will be managed in accordance with Muaūpoko tikanga. If this is done poorly, there is a risk of the Project losing the support of Muaūpoko community.
111. There also needs to be a good communication forum so that people can remain engaged and informed throughout the process. We want to avoid people being surprised by providing a place where they can come and ask questions, and where we can feed back to them on progress updates, what we are trying to achieve, and how we can address or alleviate any concerns raised by the Muaūpoko community.
112. It is important that we bring our people along on this journey. It is important for us as members and representatives of our iwi, and it is also important in terms of our Project Partner role, to ensure the Project can proceed smoothly with the community's support.
113. Fortunately, at present there is strong support from Muaūpoko for the Project, thanks in large part to all of the engagement sessions that have taken place (including through the Kāhui Ārahi and other whānau engagement sessions, discussed in the evidence of **Ms Rump**). But we need to make sure this support continues, and one of the key ways to do this is by uplifting the importance of Muaūpoko tikanga in the Horowhenua Block and providing recognition of our sites of significance, their mātauranga and values.
114. We also need to ensure there is a clear process, with parameters in terms of membership and dispute resolution, for an Iwi Partnership oversight group. It is understood that there will be differences in opinion at times, we just need

to ensure there are clear mechanisms for resolving any differences in a respectful and constructive manner with clear decision making processes that suit MTA structure and required way of working due to past exclusions by Waka Kotahi from other highway sections.

115. There have also been (and will continue to be) times where Muaūpoko lead the tikanga practices on developments in our rohe, and times where other iwi and hapū take more of a leading role. For example, MTA was recently involved in the opening ceremony held in Ōtaki for State Highway 1 safety improvements. The ceremony was led by Ngā Hapū o Ōtaki, whereas MTA played a more supporting role. That was the natural order in that situation, and we were therefore happy to support Ngā Hapū o Ōtaki.
116. In other situations, including the investigations, hui and site visits addressed above, MTA has taken more of a leadership role.
117. For example, there is an expectation amongst Muaūpoko people that we would lead such practices in Taitoko/Levin, and an example of this is the recent programme of State Highway 57 safety improvements. The cultural components of this project were led by Muaūpoko, which included design and installation of mahi toi components (including installation of pou). This is the natural order in Taitoko/Levin and must be maintained by the Project. The Project should not be used by other iwi to diminish Muaūpoko in their heartland due to differences in resourcing and capacity.
118. It should be acknowledged that although all efforts are made to remain respectful and constructive, these processes are not easy and there are some inherent challenges in working alongside Ngāti Raukawa hapū on projects such as Ō2NL with some of their views on our role as Tangata Whenua, or lack thereof. It is therefore important for MTA as a Project partner and all of Muaūpoko that the process going forward provides for robust conflict resolution mechanisms to ensure all partners are able to move forward in a fair, respectful and future-focussed manner.

Muaūpoko noho Ngāhere, Muaūpoko noho Mōana, Muaūpoko Haeerere wai

Dean James Wilson

4 July 2023

APPENDIX A: MY WHAKAPAPA

Highlighted in bold are the ancestors I talk about in my evidence.

Kupe

Matangiorupe
Karotaha
Taiatehouru
Taiatehotea
Amarunui
Amarupuhake
Ihingariki
Ratorua
Tupatunui
Amarumaori
Rereao
Tamakithau
Taingaruru
Whakarongotai

Ngataitoko

Pariri

Kupe

Haunui
Pōpoto
Haunui a Nanaia
Uehangaia
Kahukuraepa
Tamangenge
Awhirau
Rapa
Rongomaiwahine
Kahukuranui
Rakaihikuroa
Parea
Ruarakaia
Tupito
Manakihau

=

Hikatotaota

=
Tui

Te Aowhakupupu
Hinematahirangi
Himinga
Ritiararoraro
Rahira
Hori
Hera
Tommy
Trevor
Dean Wilson

Toi Te Huatahi
Rongoueroa
Whatonga
Tara Ika
Wakanui
Turia
Te Aohaeretahi
Tuteremoana
Moeteao
Maurea
Maiao
Hunga
Tuwharemoa
Tamarere
Te Aonui
Hinewaka
Angaiao
Rangiheke
Korangawhenua
Te Hukui