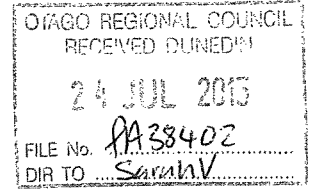


**Submission Date** 2015-07-24 00:59:10

**Name of submitter:** Terry Wilson

**Organisation (if applicable):** ratepayer

**Postal Address:** Street: Pine Hill Rd  
Suburb: Pine Hill  
City: DUNEDIN



**E-mail:** tww@slingshot.co.nz

**I wish / do not wish to be heard in support of my submission:** I do not wish

**If others make a similar submission, I will / will not consider presenting jointly with them at the hearing:** I will not consider presently jointly

**1. State what your submission relates to and if you support, oppose or want it amended:** The four main "outcomes" of the RPS are wrong.

**2. State what decision you want the Otago Regional Council to make:** Change the four outcomes to:

1. The people of Otago have equal opportunities to participate in the democratic processes of the decision making that affects their communities.
2. The infrastructure of the region and the management of the air, water and land enables the people to be prosperous and to enjoy the natural environment.
3. The management of the infrastructure, air, water and land is done in a cost-effective way.

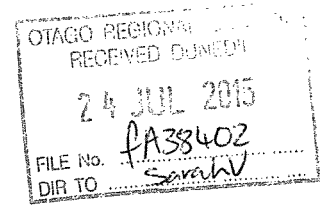
**3. Give reasons for the decision you want made:**

- My suggested changes give effect to the LGA purpose of local government.
- There should be no reference to "resilient" which to most has a vague meaning and to others it is a political "dog-whistle".
- The Kāi tahu values, rights and interests have no place in this RPS because it is undemocratic to give preference to any particular racial, political or commercial entity. Kāi tahu does not represent all Maori of the region and will have a tendency to take advantage of any democratically advantaged status to advance its corporate activities. Democracy should not be race-based and Maori should be consulted with only to the extent provided by the law.

**Submission Date** 2015-07-26 08:34:33

**Name of submitter:** Trevor Sangster

**Postal Address:** Street: 1 Ross St  
Suburb: Mosgiel  
City: Dunedin  
Postal Code: 9024



**E-mail:** tsappliances@tpg.com.au

**If others make a similar submission, I will / will not consider presenting jointly with them at the hearing:** I will not consider presently jointly

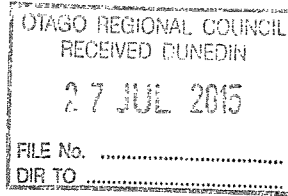
**Trade competitors declaration:** I could gain through trade competition from a submission, but my submission is limited to addressing environmental effects directly impacting my business.

**1. State what your submission relates to and if you support, oppose or want it amended:** Good morning,  
I have lodged my submission before the 5pm closing. However there are a couple of spelling mistakes which are corrected with this draft. Please accept this copy:

My submissions relate to PRS.  
Commendations for putting it out there to the people. However the documentation is questionable.  
With the statements provided you (council) don't volunteer supporting documents to how you propose to administer a framework for the process of methods to take place delivering a result to statement with economy to scale?  
Please amend & volunteer supporting documents to how you propose to administer a framework for the process of methods to take place delivering a result to statement with economy to scale?

**2. State what decision you want the Otago Regional Council to make:** I want the Otago Regional Council to:  
Complete a continual North South State Highway 1 with off/exit ramps to service the City of Dunedin. Including noise protection barriers placed road side?  
Commission a Sewerage Treatment Plant located close to State Highway 1, between Green Island & Saddle Hill. Providing reclaimed water for irrigation to the Taieri Farming Precent, which in turn manages Dunedin's growth?  
Establish Permanent Urban Growth Boundaries to recognise environmental productive soils for which subdivision is disallowed, which in turn will deliver good urban design to support healthy & happy living environments.  
Work & engage with Southland to promote the Southern Scenic Route:  
<http://www.southernscenicroute.co.nz/> maximizes its potential. Provide direct International Air Travel to arrive & depart Dunedin Airport?

**3. Give reasons for the decision you want made:** The reasoning for the decisions I want made are:  
To provide good solid foundation to the submissions I've made to lead Otago into the future. However there is no "Silver Bullet Plan".  
Much needed deliberation between the Councils & Communities to arrive at good management.  
With the arrival of the internet the world has become a smaller place.  
For which to most problems there is a solution, more than likely has taken place in another country for which we can become educated to learn of the possible mistakes to provide good management.  
I own & still operate a business which commenced 1987. If asked I may present myself to council



SUBMISSION	
TO:	Otago Regional Council
DATE:	27 July 2015
PLAN CHANGE:	Proposed Regional Policy Statement for Otago
KĀI TAHU KI OTAGO PAPATIPU RŪNAKA	Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu)
Kāi Tahu <b>supports</b> the Proposed Regional Policy Statement for Otago ( <b>PRPS</b> )	
Kāi Tahu <b>does</b> wish to be heard in support of this submission at a hearing, and requests an opportunity to expand on this submission. If others make a similar submission, we will consider presenting a joint case with them.	

## 1. Introduction

- 1.1 Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga (collectively Kāi Tahu) are Manawhenua within the Otago Region.
- 1.2 The takiwā of Te Rūnanga o Moeraki is based at Moeraki and extends from the Waitaki River to the Waihemo (Shag) River. The takiwā of Kāti Huirapa Rūnaka ki Puketeraki centres on Karitāne and extends from the Waihemo River (Shag River) to Purehurehu Point (north of Heyward Point). The takiwā of Te Rūnanga o Ōtākou centres on Ōtākou and extends from Purehurehu Point to Te Matau (the Clutha River). The takiwā of Hokonui Rūnanga centres on the Hokonui region and includes a shared interest in the lakes and mountains between Whakatipu-Waitai and Tawhititarere with other Murihiku Rūnanga and those located from Waihemo southwards.
- 1.3 Kāi Tahu has assessed the PRPS and recommends amendments to provide for their cultural values, rights and interests within the region. Kāi Tahu supports the PRPS provisions except where we ask for specific amendments or additions as listed.
- 1.4 Kāi Tahu appreciates the precautionary approach taken by the Otago Regional Council to the management of natural and physical resources within Otago.

## 2.0 Consultation with Kāi Tahu

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- 2.1 A Manawhenua Working Group was established to enable consultation with Ngā Rūnanga throughout the development of the Proposed Regional Policy Statement for Otago (PRPS). Ngā Rūnanga would like to acknowledge this process as a positive means of enabling their engagement early in the process. They would also like to acknowledge the positive work of the Council Planning Officers and KTKO Ltd throughout the development of the PRPS.

## 3.0 Submission

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- 3.1 Kāi Tahu acknowledges the provisions that have been included in the PRPS that seek to recognise and protect the ancestral relationship of Kāi Tahu and their culture and traditions with their lands, water, culturally significant sites, wāhi tapu and other taonga and the willingness of the Otago Regional Council to incorporate those matters in the PRPS.
- 3.2 The amendments and additions we seek to this plan are to better incorporate the broader interests and aspirations of Kāi Tahu in the management of natural and physical resources within Otago. These changes are considered necessary to:
- (a) Better achieve the purpose of the Resource Management Act 1991 (RMA), including the matters of national importance under section 6, the requirement to have particular regard to kaitiakitaka under section 7, and the requirement to take into account the principles of Te Tiriti o Waitangi (Treaty of Waitangi) under section 8 of the Act; and
  - (b) Take into account the relevant iwi management plan, the Kāi Tahu ki Otago Natural Resource Management Plan 2005, as required under s61(2A) of the RMA; and
  - (c) Give effect to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management; and
  - (d) Restore the social, economic, cultural, and environmental well-being of Kāi Tahu within Otago.
- 3.3 The specific decisions sought are listed in Appendices 1-3. Text to be deleted is shown as ~~strikethrough~~. Replacement text is shown underlined. We also seek any consequential amendments necessary to give effect to the decisions sought.

## 4.0 General Submissions

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### 4.1 Kāi Tahu make the following general points:

- (a) The layout of the document is difficult to navigate. A plan user needs to read the entire document rather than just one relevant chapter to understand how a particular resource must be managed. Due to the layout / structure of the document, there are objectives and policies that impact on the management of a particular resource located throughout the document. Cross references would assist plan users to navigate through the document.
- (b) The objectives and policies in Chapter 1 (the Kāi Tahu pillar) need to be better reflected and interwoven throughout the remainder of the document. Integration of Kāi Tahu values throughout the document has resulted in both a lack of visibility and a lack of detail. The references to Kāi Tahu values in the policies lack detail and the linkages to the Kāi Tahu chapter are not clearly articulated.
- (c) There is no description of the issues or needs at a resource specific level, or of the threats and challenges facing the region at a resource specific level. Other than objectives and policies pertaining to climate change, the document does not adequately address possible future changes or threats to the Otago region.
- (d) It is often unclear where responsibility lies or where there is overlap of responsibilities (Territorial authority or Regional Council).
- (e) Overall, the attempts to streamline the PRPS have gone too far. The text lacks the detail required to guide decision makers

## 5.0 Specific Submissions

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### 5.1 Kāi Tahu requests the specific amendments to the PRPS detailed in Appendices 1-3.

Nahaku noa, Nā



**Chris Rosenbrock**

Manager

**Address for Service:**

Tim Vial

Principal Planner

KTKO Ltd,

PO Box 446

Dunedin 9054

Phone Number: (DD) (03) 471 5480

E-mail: [tim@ktkoltd.co.nz](mailto:tim@ktkoltd.co.nz)

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

The specific amendments sought are listed below. Text to be deleted is shown as ~~strikethrough~~. Replacement text is shown underlined.  
We also seek any consequential amendments necessary to give effect to the amendments sought.

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Chairman's Foreword</b>	The Treaty partnership between the <del>Crown</del> <u>Otago Regional Council</u> and Kāi Tahu is a vital part of this collaborative effort.	The Otago Regional Council is the Crown's representative in the Treaty Partnership with Kāi Tahu.
<b>RPS Framework At a Glance</b>	<i>Reword the Kāi Tahu pillar:</i>  Kāi Tahu values, rights and interests are <del>protected upheld</del> and <u>the expression of kaitiakitaka is expressed</u> enabled.	This key Kāi Tahu 'Pillar' needs to be actively worded.
The Otago Region	Human activity has left its mark on the landscape, including Māori archaeological sites <u>and wāhi tūpuna</u> , hydro lakes, tailings and bridges from the gold rush era, pastoral landscapes, and historical architecture.	The Kāi Tahu, Kāti Mamoe and Waitaha imprint on the landscape is broader than archaeological sites and encompasses the full range of <u>Wāhi Tūpuna</u> from kāika to ngā tuhituhi o neherā (rock art). This imprint reflects the region's pre-European history.
<b>Kāi Tahu – The Treaty Partner</b>	Kāi Tahu considered that the Treaty bound the <del>whole tribe of Kāi Tahu and the Crown</del> irrevocably to an <u>mutual</u> agreement which imposed responsibilities on both signatories. <del>the Crown and Kāi Tahu.</del>	The proposed wording succinctly captures the mutual obligations that the Treaty imposes on the Crown and Kāi Tahu.
<b>Takata Whenua / Manawhenua</b>	Merge the Takata Whenua / Manawhenua sections into one section as outlined below.	This will provide greater clarity for plan users.

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for this Amendment Sought
<b>Takata Whenua</b>	<p><i>New Paragraph:</i></p> <p>Te Rūnanga o Ngāi Tahu (the iwi authority) is made up of 18 papatipu rūnaka. <u>Te Rūnanga o Ngāi Tahu encourages consultation with the papatipu rūnaka and takes into account the views of ngā rūnaka when determining its own position. The four Otago rūnaka are Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou, and Hokonui Rūnanga.</u></p> <p><u>Insert after this paragraph the Rūnaka map from the Manawhenua section on page 9.</u></p>	<p>The Te Rūnanga o Ngāi Tahu Act 1996 provides that, where any act requires consultation with any iwi, this shall be held with Te Rūnanga o Ngāi Tahu. In practice, Te Rūnanga accepts and encourages consultation with ngā rūnaka in the first instance.</p> <p>The Rūnaka names should be written throughout the RPS as: Te Rūnanga o Moeraki, Kāti Huirapa Rūnaka ki Puketeraki, Te Rūnanga o Ōtākou and Hokonui Rūnanga.</p>
<b>Takata Whenua</b>	<p><i>New paragraph:</i></p> <p><u>The interests of the Otago rūnaka are given in more detail in Schedule 1B (Interests specific to particular papatipu rūnaka). The Otago rūnaka share an interest in South Otago and the inland lakes and mountains with the Southland papatipu rūnaka.</u></p>	Text relocated from the Manawhenua section.
<b>Takata Whenua</b>	<p><i>Reword the following paragraph:</i></p> <p><del>In addition, there are whānau rōpū (whanau grouping) associated with the papatipu rūnaka. Located predominantly in traditional coastal settlements, papatipu rūnaka are a focus for whānau and hapū (extended family groups) who have takata whenua status within their area. Takata whenua hold traditional customary authority and maintain contemporary relationships within an area determined by whakapapa (genealogical ties), resource use and ahi-kā-roa (the long burning fires of occupation).</del></p>	The reference to whānau rōpū as a separate group may cause confusion to plan readers in terms of the iwi structure. It is recommended that the reference to whānau rōpu should be deleted from this section but retained within Schedule 1B.



## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Takata whenua</b>	<p><i><u>Delete the following paragraph:</u></i></p> <p><del>Seasonal trips would be made from the coastal settlements to inland Otago to visit relations, harvest various species and gather plants and stone resources. Journeys were also made along the coast, including trips south to the Titi (Mutton-Bird) Islands or north to trade. Trails along the Otago coast and inland became well established. Waterways and the coastal waters also provided transport routes.</del></p>	<p>The deletion of this paragraph is proposed to assist the restructuring of this section for clarity.</p>
<b>Takata whenua</b>	<p><i><u>Reword the final paragraph of this section:</u></i></p> <p><u>The papatipu rūnaka consultancy services, Kāi Tahu Ki Otago Ltd, representing the Otago rūnaka, and Te Ao Marama Inc, representing the Southland rūnaka, provide a first point of contact and facilitate Kāi Tahu engagement in resource management processes.</u></p>	<p>This amendment is proposed to clarify who Kāi Tahu ki Otago and Te Ao Marama represent.</p>
<b>Takata whenua</b>	<p>Include a Kāi Tahu resource management issues table either within this section or in a schedule. An issues table is attached to this submission as Appendix 2.</p>	<p>The inclusion of this table would assist plan users to understand the resource management issues of significance to Kāi Tahu.</p>
<b>RPS Framework</b>	<p><i><u>Reword the Kāi Tahu pillar and accompanying narrative:</u></i></p> <p><u>Kāi Tahu values, rights and interests are protected upheld and the expression of kaitiakitaka is expressed enabled.</u></p> <p><u>The Treaty partnership between takata whenua Kāi Tahu and the Crown Otago Regional Council, arising from Te Tiriti o Waitangi, provides a unique opportunity for resource management in New Zealand Otago.</u></p>	<p>This key Kāi Tahu ‘Pillar’ and the accompanying Treaty narrative need to be actively worded.</p>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Part B: Chapter 1: Kāi Tahu values, rights and interests are protected and the expression of kaitiakitaka is enabled		
Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Frontispiece</b>	The frontispiece to the chapter is unreferenced. If this image is 'Tamatea' from Ōtākou' Marae it requires a reference.	The use of a generic image as the frontispiece to the Kāi Tahu chapter is not supported.
<b>Introduction</b>	<del>The availability of</del> Having good resources <del>high quality natural resources and ecosystem services</del> enables Kāi Tahu to engage with the natural environment, and develop and use resources, for their cultural wellbeing and economic benefit.	The ability of Kāi Tahu to provide for the cultural and economic wellbeing is dependent on access to high quality natural resources and ecosystem services.
<b>Introduction</b>	<i>Amend as follows:</i> "Kaitiakitaka is an expression of <del>mānā</del> <u>rakatirataka</u> and the means by which the mauri (life supporting capacity) of taoka ..."	The proposed amendments capture the nature of Kaitiakitaka.
<b>Objective 1.1</b>	<i>Amend objective as follows:</i> The principles of Te Tiriti o Waitangi are taken into account in resource management <u>decision-making and relationships between local authorities and Kāi Tahu</u>  <i>Change 'issue'</i> The principles of Te Tiriti o Waitangi are <del>not formally codified and in many cases refer to</del> broad concepts that need further exploration when applied to specific circumstances. This can make it challenging to effectively incorporate the principles of the Treaty into planning documents, <del>as these principles are not formally codified in any way.</del>  <u>Effective planning tools and processes are required to give effect to the Treaty partnership between Kāi Tahu and local authorities.</u>	The objective should be broadened to clarify that the entire process of resource management decision making needs to occur within a Treaty partnership framework, not just the decisions themselves. Reword the objective to focus on the need for partnership in the relationship between local authorities and Kāi Tahu.  Remove references to 'codifying' and focus on the opportunities that a true Treaty partnership offers.

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter/Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Objective 1.1 Introduction</b>	<p><i>Reword as follows:</i></p> <p>However, as the principles are not codified <u>broadly expressed</u>, an amount of flexibility is also needed.</p>	<p>Remove references to ‘codifying’ and focus on the opportunities that a true Treaty partnership offers.</p>
<b>Policy 1.1.1 Promoting awareness of treaty obligations</b>	<p><i>Reword Policy as follows:</i></p> <p>Promoting awareness <u>and understanding</u> of <u>the</u> Treaty Partnership obligations</p> <p>Promote awareness and understanding of local authorities’ obligations regarding the principles of Te Tiriti o Waitangi, tikaka Māori and kaupapa Māori <u>among Council decision-makers, staff and the wider community.</u></p>	<p>Policy needs to go beyond promoting awareness and to identify the target audience.</p>
<b>Objective 1.2 Kāi Tahu values, rights and interests and customary resources are protected and enhanced.</b>	<p><i>Amend objective as follows</i></p> <p>Kāi Tahu values, rights and customary resources are <u>protected and enhanced</u> <del>sustained</del></p> <p><i>Amend issues as follows:</i></p> <p><u>The mauri (life supporting capacity) and wairua of some places, sites, resources and values of cultural, spiritual or historic significance to takata whenua have been destroyed or degraded.</u></p> <p>Sometimes, <u>there is limited or no access to important sites or mahika kai resources.</u></p> <p>Sometimes, <del>It has been</del> difficult to use <u>and develop</u> Māori land for the purposes for which it was originally granted.</p>	<p>The use of active wording is recommended.</p> <p>The expansion of the issues to recognise:</p> <ul style="list-style-type: none"> <li>• The impact of degradation on the mauri and wairua of places, sites, and resources.</li> <li>• Limits on access to sites or resources.</li> <li>• Constraints on the development of Māori Land.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<p><b>Objective 1.2 Kāi Tahu values, rights and interests and customary resources are protected and enhanced.</b></p>	<p><u>Add Issues</u></p> <p><u>There has been insufficient recognition of iwi management plans and use of Cultural Impact Assessments in resource management processes.</u></p> <p><u>Often there is a lack of capacity and resources to enable tangata whenua to effectively engage in resource management processes.</u></p>	<p>The use of Iwi Management Plans and Cultural Impact Assessments as a means of understanding the resource management issues of significance to Kāi Tahu is recommended.</p> <p>The building of capacity is a prerequisite for effective engagement by Kāi Tahu in resource management processes.</p>
<p><b>Policy 1.2.1 Managing the natural environment to support Kāi Tahu wellbeing</b></p>	<p><i>Reword policy as follows:</i></p> <p><b>Policy 1.2.1 (Managing) Protect and enhance the values of the natural environment to support Kāi Tahu well-being.</b></p> <p>Manage <u>Protect and enhance</u> the natural environment to support Kāi Tahu well-being by:</p> <ul style="list-style-type: none"> <li>a) <u>Ensuring resources are healthy, abundant and accessible to support their customary uses and cultural values as detailed in Schedules 1A and B).</u></li> <li>b) <u>Safeguarding the mauri (life supporting capacity) of natural resources.</u></li> <li>c) <u>Enabling the expression of kaitiakitaka in the management of natural and physical resources.</u></li> </ul>	<p>There is an overlap between Policy 1.2.1 and 1.2.3. Policy 1.2.3 refers to the values of the natural environment, as detailed in Schedule 1A. This should sit within Policy 1.2.1.</p> <p>The ability of Kāi Tahu to provide for their cultural and economic wellbeing is dependent on access to healthy and abundant resources. The reference to Schedules 1A and B is limiting and should be removed.</p> <p>The policy should actively enable the expression of kaitiakitaka.</p>
<p><b>Policy 1.2.2 Recognising important sites of cultural significance to Kāi Tahu</b></p>	<p><i>Reword policy as follows:</i></p> <p><b>Policy 1.2.2 Recognising and protecting sites and landscapes of cultural significance to Kāi Tahu.</b></p> <p>Recognising and protecting <u>important sites and landscapes of cultural significance to Kāi Tahu such as wāhi tapu and other elements, including those sites and landscapes as detailed in Schedule 1C.</u></p>	<p>There is an overlap between Policy 1.2.2 and Policy 1.2.3. The recognition and protection of sites and landscapes of cultural significance to Kāi Tahu should sit within Policy 1.2.2. This should then be followed by a policy that enables Kāi Tahu relationships with wāhi tūpuna and associated sites.</p>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<p><b>Policy 1.2.2 Recognising and protecting sites and landscapes of cultural significance to Kāi Tahu.</b></p>	<p><i>Relocate Policy 1.2.3 paragraphs a) – c) to Policy 1.2.2</i></p> <p>a) Avoiding significant adverse effects on those <del>values and sites and landscapes</del>, as detailed in Schedule 3; and</p> <p>b) Avoiding remedying or mitigating other adverse effects on those <del>values and sites and landscapes</del>; and</p> <p>c) <del>Managing</del> <u>Protecting</u> those <del>values and sites and landscapes</del> in a culturally appropriate manner.</p> <p><i>Add Method 1: Kāi Tahu Relationships and Method 2: Regional, City and District Council Relationships</i></p>	<p>The sites of cultural significance identified by Kāi Tahu are by definition important. The mapping and protection of wāhi tūpuna should be undertaken collaboratively with Kāi Tahu.</p>
<p><b>Policy 1.2.3 Protecting important sites and values of cultural significance to Kāi Tahu</b></p>	<p>Delete this policy.</p>	<p>This policy is now addressed by Policies 1.2.1 and 1.2.2.</p>
<p><b>Policy 1.2.4 Enabling Kāi Tahu relationships with wāhi tupuna and associated sites and landscapes</b></p>	<p><i>Reword policy as follows:</i></p> <p>Enabling Kāi Tahu relationships with wāhi tupuna and associated sites <u>and landscapes</u> by</p> <p>a) Facilitating Kāi Tahu access to sites <u>and landscapes</u> of cultural significance; and</p> <p>b) Recognising that relationships between <u>sites and landscapes</u> of cultural significance are an important element of wāhi tūpuna; and</p> <p>c) Recognising <u>and using</u> traditional place names</p> <p><i>Add Method 1 – Kāi Tahu Relationships.</i></p>	<p>Wāhi tūpuna encompass sites, landscapes and the relationships between them.</p>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<p><b>Policy 1.2.5 Enabling sustainable use and development of Māori land and resources</b></p>	<p><i>Amend as follows:</i></p> <p>Enabling sustainable use <u>and development</u> of Māori land <u>and resources</u></p> <p>Enable Kāi Tahu to protect, develop and use land <u>and resources</u> within native reserves in a way consistent with their culture and traditions, and economic, cultural and social aspirations, including for papakāika, <u>commercial uses</u>, marae and marae related activities, while: ...</p> <p><i>Add Method 1 – Kāi Tahu Relationships</i></p>	<p>Sustainable development of Māori land and resources is sought to enable Kāi Tahu to provide for their cultural, social and economic wellbeing. Some commercial activities are also customary activities</p>
<p><b>Part B Chapter 2 – Otago has high quality natural resources and ecosystems</b></p>		
<p><b>Objectives 2.1, 2.2, 2.3</b> <b>General comments</b></p>	<p>The issues for these important resources (air, land, water and the coast), including consideration of future threats, should be clearly articulated. This will enable an assessment of the effectiveness of the objectives in addressing those issues.</p> <p>Kāi Tahu values should be clearly integrated into the issues and visible within the objectives. It is not directly apparent how these objectives give effect to the Kāi Tahu objectives within Part B Chapter 1.</p>	<p>There is no description of the issues or needs at a resource specific level, or of the threats and challenges facing the region at a resource specific level. Therefore, the need for resource specific objectives for the air, land, water and coast cannot be assessed.</p> <p>Kāi Tahu values need to be integrated into each objective in order to clearly articulate the linkages between this chapter and Chapter 1.</p>
<p><b>Policies 2.1.1, 2.1.2, 2.1.3 (Water) General Comments</b></p>	<p>Include a reference to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management in the water and coastal specific objectives and policies.</p>	<p>There is no reference to the New Zealand Coastal Policy Statement and the National Policy Statement for Freshwater Management.</p>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

### Comments on Schedules

Chapter/Provision	Amendment Sought	Reasons for the Amendment Sought
<b>Schedule 1A</b> Kāi Tahu values	The nature of these relationships <del>defined</del> <u>defines</u> people's rights and responsibilities in relation to the use and management of resources in <del>in-land</del> Otago.	Correction
<b>Rakatirataka</b>	<i>Delete:</i> The Kāi Tahu ki Otago and Ngāi Tahu ki Murihiku Natural resource and Iwi Management Plans are an expression of rangatirataka. The active involvement of Kāi Tahu in resource management decision making processes is a practical means of giving effect to rakatirataka.	Correction
<b>Schedule 1B</b> Interests specific to particular Papatipu rūnaka	Delete caption <del>Kati</del> Huirapa Rūnaka Marae, Puketeraki. <del>REaplee with</del> <u>Puketeraki Marae</u> .	Puketeraki Marae is the correct name.
<b>Kāti Huirapa Rūnaka ki Puketeraki</b>	The kaimoana resources of the coast from Karitāne to Okahau/Blueskin Bay and Pūrākaunui and the kai awa of the Waikouaiti River <del>and estuary</del> are treasured and well utilised...	The estuary is equally important.
<b>Hokonui Rūnanga</b>	Change <del>Hokonui Rūnaka</del> and <del>Te Rūnanga o Hokonui</del> to <u>Hokonui Rūnanga</u> throughout. Add macrons to Rūnanga	Correct name is Hokonui Rūnanga. Rūnanga needs a macron on the u.
<b>Schedule 1C</b> Wāhi tūpuna	Reflect glossary definition in introductory text. Change last sentence to read: These <u>different elements of these sites of significance include:</u> ... Wāhi <u>kō</u> hatu – add macron on the o Wai Māori – no macron on wai	Improves accuracy. Macrons.

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

<b>Schedule 1D Māori land reserves</b>	Macron on Māori. Native Reserve excluded from the Ōtākou Land Purchases ( <del>1848</del> ) (1844)	Macron Correction
<b>Native Reserves located within the Otago Region</b>	South Island Landless Natives Act	Correction
<b>Applicable legislation</b>	Some lands, <u>such as</u> those at Port Chalmers, also fall under ...	Words missing
<b>Explanatory notes</b>	Ancillary claim blocks are Māori freehold land <u>granted under the South Island Landless Natives Act 1906 to those who were left landless when the original reserves were granted.</u> <del>and</del> There are a number located throughout Otago.	Further detail
<b>Schedule 2 Statutory Acknowledgement Areas</b>	Tokatā (add macron on the a)	Macron
<b>Schedule 4 Criteria for the identification of natural features and landscapes</b>	Biophysical features In b) include <u>wetlands</u> Associative attributes in b) correct spelling to <u>tikaka</u>	Addition Correction
<b>Schedule 6 Urban Form and Design</b>	2. A positive relationship between the community and its natural environment Add I) <u>recognises Kāi Tahu values</u> 4. a) Builds upon physical and cultural identity, <u>including Kāi Tahu identity</u>	Kāi Tahu values are often left out of urban design considerations. These changes specifically mention Kāi Tahu.
<b>Appendix 1 Statutory Framework</b>	It must also take into account any <u>iwi</u> planning document. Add iwi management plans to diagram.	Word missing. Iwi management plans missing from diagram.
<b>Glossary</b>	Native Reserve: Any property or site that is a: Native Reserve excluded from the Ōtākou Land purchases ( <del>1848</del> )(1844)	Correction.

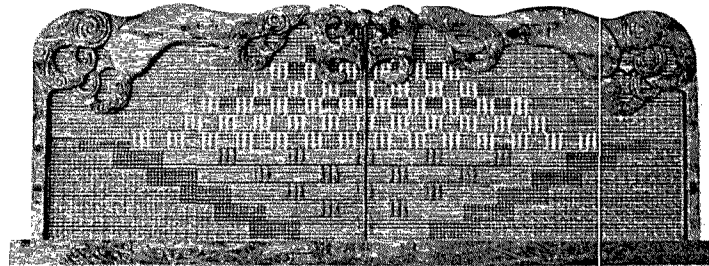


## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 1

<b>Glossary of Te Reo Terms</b>	<p>Mana Whenua: Customary authority or rakatirataka exercised by an iwi or hapū <del>within this rohe</del> <u>in an identified area</u>.</p> <p>Marae: add a macron to the a in 'urupā'</p> <p>Tōpuni: <del>rangatira</del> <u>rakatira</u> ... <del>rangatiranga</del> <u>rakatirataka</u></p>	<p>Reflects RMA.</p> <p>Correction to provide for local dialect.</p>
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# Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

## Issues of Significance for Kāi Tahu in Otago



	Issues	Outcomes desired by Kāi Tahu
<p><b>Kaitiakitanga</b></p>	<p>Historically, recognition of kaitiakitanga in resource management processes and decision making has been limited.</p>	<p>Recognise role of Kāi Tahu as kaitiaki and engage with Kāi Tahu in the spirit and intent of the Treaty and the RMA. This includes, but is not limited to:</p> <ul style="list-style-type: none"> <li>• Build on existing processes to facilitate engagement with Kāi Tahu, at operational and political levels</li> <li>• Implementation of iwi management plans</li> <li>• Use of Cultural Impact Assessments as part of assessing effects on the environment</li> <li>• Appointment of Kāi Tahu commissioners on hearings panels and planning committees.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

	Issues	Outcomes desired by Kāi Tahu
<b>Air</b>	<ul style="list-style-type: none"> <li>• Discharges to air can adversely affect health and be culturally offensive.</li> <li>• Discharges from crematoriums.</li> <li>• Impact of urban settlement and discharges to air on the visibility of cultural landscape features and the night sky.</li> </ul>	<ul style="list-style-type: none"> <li>• The life supporting capacity of air is maintained for future generations.</li> <li>• Higher standards of emission controls for crematoriums.</li> <li>• Require the minimisation of discharges to air</li> <li>• Require the minimisation of light pollution in rural area.</li> </ul>
<b>Built Environment</b>	<ul style="list-style-type: none"> <li>• The cumulative effects of land use change and development on whenua tūpuna (ancestral landscapes), wahi taoka sites, mahika kai &amp; indigenous biodiversity.</li> <li>• Loss of cultural associations with whenua tūpuna (ancestral landscapes).</li> <li>• Deteriorating water quality from storm water and wastewater discharges.</li> </ul>	<p>To encourage a holistic planning approach to urban development that takes into account:</p> <ul style="list-style-type: none"> <li>○ Protection of Kāi Tahu ki Otago cultural values.</li> <li>○ Protection of whenua tūpuna</li> <li>○ Maintenance and enhancement of water quality.</li> <li>○ Treatment and disposal of wastewater and storm water.</li> <li>○ Landscaping.</li> <li>○ Location of building platforms.</li> <li>○ Monitoring of consent conditions and development outcomes.</li> </ul>

	Issues	Outcomes desired by Kāi Tahu
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## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

<b>Climate Change</b>	<ul style="list-style-type: none"> <li>• Safe and resilient Kāi Tahu communities.</li> <li>• Impact of coastal erosion and changing sea levels on the relationship with land, the use of Māori land and on cultural values.</li> </ul>	<ul style="list-style-type: none"> <li>• The use of Māori land by beneficial owners according to cultural preferences is supported and the maintenance of relationships with the land facilitated.</li> <li>• Recognition of the constraints on Māori Freehold Land held under Te Ture Whenua Māori Act 1993.</li> </ul>
<b>Coast</b>	<ul style="list-style-type: none"> <li>• Coastal areas were integral to the way of life of the tūpuna and remain at the heart of Kāi Tahu communities and culture.</li> <li>• The land-sea interface requires holistic Ki Uta Ki Tai management. Implementation of holistic management requires a collaborative approach.</li> <li>• Inappropriate land-use and development affects valued whenua tūpuna (landscapes), wāhi taoka sites, mahika kai and kaimoana, and the relationship that Kāi Tahu has with these landscapes and resources.</li> <li>• Impact of point source and diffuse discharges on inlet and estuary health, on the coastal environment, and on kaimoana and taoka species.</li> <li>• Land development in upper catchments impacting on inlets, estuaries and the coast, including the effects of sedimentation on kaimoana and taoka species.</li> </ul>	<ul style="list-style-type: none"> <li>• The spiritual and cultural significance of taku tai moana me te wai maori to Kāi Tahu is recognised in management of the coastal environment.</li> <li>• Adverse effects on Kāi Tahu values in the coastal environment caused by inappropriate coastal land-use, subdivision and development are avoided.</li> <li>• To reduce the discharge of contaminants, including human waste to coastal waters.</li> <li>• Management of sediment to avoid deposition in river estuaries, inlets and the coastal environment.</li> <li>• River estuaries and a coastal environment that supports Kāi Tahu customs.</li> <li>• To recognise and protect the cultural integrity of coastal landscapes and seascapes (whenua tūpuna).</li> </ul>
	<b>Issues</b>	<b>Outcomes desired by Kāi Tahu</b>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

<p><b>Coast</b></p>	<ul style="list-style-type: none"> <li>• Loss of natural habitat for indigenous marine species.</li> <li>• Loss of access to wāhi taoka sites, and to mahika kai and kaimoana resources.</li> </ul>	<ul style="list-style-type: none"> <li>• Te Tai o Arai Te Uru supports the full range of healthy ecosystems and species.</li> <li>• Access to mahika kai, taoka species, and sites of significance is maintained or enhanced.</li> </ul>
<p><b>Ecosystems and Indigenous Biodiversity</b></p>	<ul style="list-style-type: none"> <li>• Loss of indigenous biodiversity and habitat.</li> <li>• Ability to safely access, gather and eat mahika kai and kaimoana (public health).</li> <li>• The ability to pass on mahika kai traditions to future generations.</li> <li>• Impact of dams and in-stream works on fish migration.</li> <li>• Widespread loss of wetlands and riparian areas and their life-supporting capacity and ecosystem services.</li> <li>• Importance of ecological corridors (blue &amp; green) as part of the management of flora and fauna remnants.</li> </ul>	<ul style="list-style-type: none"> <li>• Indigenous plant and animal communities and the ecological processes that ensure their survival are recognised and protected to restore and improve indigenous biodiversity.</li> <li>• Habitats and the wider needs of mahika kai and kaimoana taoka species and other species of importance to Kai Tahu are protected.</li> <li>• Mahika kai and kaimoana resources are healthy and abundant in Otago.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

	Issues	Outcomes desired by Kāi Tahu
<b>Energy</b>	<ul style="list-style-type: none"> <li>• Adverse effects of energy production and distribution infrastructure on the Kāi Tahu relationship with waterways and whenua tūpuna.</li> <li>• Damming affects the coastal environment and natural systems. The damming of waterways prevents flows from reaching their natural receiving waters, interrupting the continuity of flow from mountains to the sea.</li> <li>• Extractive uses and power generation may affect natural seasonal flow regimes resulting in bank erosion, sedimentation and damage to wāhi taoka sites.</li> <li>• Impact of dams and in-stream works on fish migration.</li> <li>• Impact of inefficient energy use on natural resources, particularly water.</li> </ul>	<ul style="list-style-type: none"> <li>• To promote to the Otago Regional Council minimum flow levels, flow regimes, lake levels and lake operating levels for lakes and rivers that recognise and provide for Kāi Tahu ki Otago cultural values and the healthy functioning of associated ecosystems.</li> <li>• The relationship of Kai Tahu with natural water bodies and water and the effects of energy generation on this relationship is addressed.</li> <li>• Significant cultural landscapes are protected from inappropriate placement of energy generation and distribution infrastructure.</li> <li>• Habitats and the wider needs of mahika kai, taoka species and other species of importance to Kāi Tahu ki Otago are protected.</li> <li>• Efficient energy and water use is encouraged as part of new developments.</li> </ul>
<b>Hazardous substances</b>	<ul style="list-style-type: none"> <li>• Discharges to land and water.</li> </ul>	<ul style="list-style-type: none"> <li>• Contaminants being discharged directly or indirectly to land or water are reduced.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

	Issues	Outcomes desired by Kāi Tahu
<b>Infrastructure</b>	<ul style="list-style-type: none"> <li>• Impact of infrastructure on fresh and coastal water quality and indigenous biodiversity.</li> <li>• Impact of inappropriately located infrastructure on historic whenua tūpuna, key views from marae, or other significant landscapes.</li> <li>• Placement of telecommunication structures on sensitive landscapes and landforms.</li> </ul>	<ul style="list-style-type: none"> <li>• Contaminants being discharged directly or indirectly to water are reduced.</li> <li>• To identify and protect the full range of landscape features of significance to Kāi Tahu ki Otago.</li> </ul>
<b>Land Use</b>	<ul style="list-style-type: none"> <li>• The utilisation of Māori Land is constrained by policy that does not take into account the multi-ownership nature of Māori Land.</li> <li>• Effects of sea level rise and coastal erosion on marae communities.</li> <li>• Provision for Papakāinga housing in rural areas.</li> </ul>	<ul style="list-style-type: none"> <li>• The use of Māori land by beneficial owners according to cultural preferences is supported and the maintenance of relationships with the land facilitated.</li> <li>• Recognition of the constraints on Māori Freehold Land held under Te Ture Whenua Māori Act 1993</li> </ul>
<b>Minerals</b>	<ul style="list-style-type: none"> <li>• Historic and continuing loss of wāhi tapu sites and landscapes of significance from mining, quarrying and earthworks.</li> <li>• Loss of historical associations and relationships with whenua tūpuna (ancestral landscapes). Landscapes such as Puke Makamaka and Turi Makamaka (Saddle Hill) no longer reflect the creation stories related to the Taniwha traditions.</li> </ul>	<ul style="list-style-type: none"> <li>• To identify and protect the full range of whenua tūpuna (ancestral landscapes) of significance to Kāi Tahu ki Otago.</li> <li>• To identify and protect wāhi tapu and wāh taoka sites.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

	Issues	Outcomes desired by Kāi Tahu
<b>Minerals</b>	<ul style="list-style-type: none"> <li>• Cumulative effects of gravel extractions on ecosystems and indigenous biodiversity.</li> <li>• All pounamu within the Otago Region is protected through sound management processes to provide for Kāi Tahu cultural practices.</li> </ul>	<ul style="list-style-type: none"> <li>• To require sustainable management of gravel extraction.</li> <li>• Consultation with Te Rūnanga o Ngāi Tahu and the Kaitiaki Rūnanga when pounamu is unearthed. Pounamu cannot be removed without the approval of Te Rūnanga o Ngāi Tahu and the Kaitiaki Rūnanga.</li> </ul>
<b>Natural Hazards</b>	<ul style="list-style-type: none"> <li>• The impact of altered natural erosion and deposition rates on the coast, bays, hapua (estuaries) and harbours.</li> <li>• Natural hazards and natural hazard mitigation can impact on values of importance to Kai Tahu.</li> <li>• Sedimentation discharged to water affects water quality, and in turn mahika kai.</li> <li>• Increased damage to archaeological sites.</li> <li>• Impacts of willow removal on water quality, water temperature and mahika kai habitat.</li> </ul>	<ul style="list-style-type: none"> <li>• The waters of the Otago Region are healthy and support Kāi Tahu ki Otago customs.</li> <li>• Effects on values of importance to Kāi Tahu considered as part of natural hazard management and planning.</li> <li>• The role of wetlands and riparian areas to help to avoid or reduce the impact of natural hazards is recognised in natural hazard management.</li> <li>• The use of Maori land by beneficial owners according to cultural preferences is supported and the maintenance of relationships with the land facilitated</li> <li>• Recognition of the constraints on Maori Freehold land held under Te Ture Whenua Maori Act 1993.</li> <li>• Integration of natural hazard and climate change considerations into all decision making in respect to Maori Freehold Land.</li> </ul>

	Issues	Outcomes desired by Kāi Tahu
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## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

<b>Soil</b>	<ul style="list-style-type: none"> <li>• Managing sedimentation and erosion from subdivision and development.</li> <li>• Managing discharge of contaminants to land and the associated effects on the soil.</li> </ul>	<ul style="list-style-type: none"> <li>• Contaminants being discharged directly or indirectly to water are reduced.</li> <li>• Habitats and the wider needs of mahika kai and kaimoana taoka species and other species of importance to Kai Tahu are protected.</li> </ul>
<b>Transportation</b>	<ul style="list-style-type: none"> <li>• Travel distances and limited public transport in rural areas adversely affect rural Kāi Tahu communities and marae.</li> <li>• Stormwater discharges from urban roads containing contaminants including hydrocarbons, heavy metals and wastewater from cross-connections.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensuring an equitable access to transport (all modes).</li> <li>• The waters of the Otago Region are healthy and support Kāi Tahu ki Otago customs.</li> <li>• Contaminants being discharged directly or indirectly to water are reduced.</li> </ul>
<b>Wahi Tāpu and Wahi Tāoka</b>	<ul style="list-style-type: none"> <li>• Increased damage to archaeological sites from coastal erosion and sea level rise.</li> <li>• Modification or damage to wahi tapu and wahi taoka sites from the direct and indirect effects of development.</li> <li>• The historic and continuing loss of wahi tapu sites from quarrying and earthworks</li> <li>• Access to sites of cultural significance.</li> <li>• Contamination of wahi tapu by discharges and other activities.</li> </ul>	<ul style="list-style-type: none"> <li>• Adverse effects on wāhi tapu and other sites of cultural heritage value as a result of inappropriate land-use, subdivision and development are avoided.</li> <li>• Wāhi tapu and wāhi taonga are given appropriate value in decision-making processes.</li> <li>• Wahi tapu are protected in a culturally appropriate manner.</li> <li>• Kāi Tahu has access to sites of significance.</li> </ul>
	<b>Issues</b>	<b>Outcomes desired by Kāi Tahu</b>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

<p><b>Wahi Tāpu and Wahi Tāoka</b></p>	<ul style="list-style-type: none"> <li>• Limited funding for ongoing recording by Kai Tahu of sites of significance.</li> <li>• Lack of understanding of statutory and non-statutory tools and processes for managing discoveries of taonga, accidental or otherwise.</li> <li>• The need for a coordinated and collaborative approach to wahi tapu and wahi taoka management.</li> </ul>	<ul style="list-style-type: none"> <li>• All sites of significance, including those not registered as New Zealand Historic Places Trust or New Zealand Archaeological Association sites, are protected.</li> <li>• Understanding of statutory and non-statutory tools and processes for managing discoveries of taonga, accidental or otherwise, is enhanced.</li> </ul>
<p><b>Wai Māori</b></p>	<ul style="list-style-type: none"> <li>• Effects of point source and diffuse land use discharges on water resources, including rivers, streams, wetlands, groundwater and riparian areas. This includes the effects of storm-water from urban roads, the lack of reticulated wastewater scheme in rural areas, and sedimentation from the construction of transport infrastructure.</li> <li>• The impact on mahika kai, taonga species and other indigenous species as a result of poor water quality.</li> <li>• Activities on riverbanks and coastal frontages can cause or increase erosion. Remediation is often ad hoc.</li> </ul>	<ul style="list-style-type: none"> <li>• The water resources of Otago are healthy and support Kai Tahu customs, values and practices.</li> <li>• Water resources are managed according to the philosophy and principle of Ki Uta Ki Tai including the unimpeded passage of water from mountain to sea.</li> <li>• Water quality is maintained, and where required, enhanced.</li> <li>• Contaminants being discharged directly or indirectly to water and Te Tai o Arai te Uru (the Otago Coast) are reduced.</li> <li>• There is no direct discharge of human waste to water bodies</li> <li>• Riparian areas are restored to improve water quality management.</li> <li>• Native riparian vegetation is protected, restored and enhanced to provide habitat for Kai Tahu species of importance.</li> <li>• Cultural monitoring tools are used to monitor the health of waterways.</li> </ul>

## Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago: Appendix 2

	Issues	Outcomes desired by Kāi Tahu
<b>Waste</b>	<ul style="list-style-type: none"> <li>• Effects of waste disposal on land, mahika kai and valued flora and fauna and on water quality, with consequential effects on Kāi Tahu cultural wellbeing.</li> <li>• The effects of poor management of landfill leachate on water bodies.</li> <li>• The effects on land and water of casual disposal sites and of tourism associated waste.</li> </ul>	<ul style="list-style-type: none"> <li>• Adverse effects on the environment and Kāi Tahu cultural wellbeing are avoided.</li> <li>• Cultural (tikanga) issues associated with waste disposal are provided for in planning and decision-making.</li> <li>• Support waste minimisation as an approach to waste management</li> <li>• Monitoring of leachate from disposal sites adjacent to waterways/coastal environments.</li> <li>• Encourage the development of a network of disposal sites for campervan and tourism associated waste.</li> </ul>
<b>Whenua Tūpuna (Ancestral Landscapes)</b>	<ul style="list-style-type: none"> <li>• Inappropriate use or development of whenua tūpuna adversely affects Kai Tahu values and relationships in these landscapes.</li> <li>• Modification of the landscape throughout Otago has resulted in a disassociation between the landscape, the stories and place names.</li> <li>• Inability to address indirect and/or cumulative effects means that many issues of significance to Kāi Tahu ki Otago, such as linkages between whenua tūpuna, are not addressed during resource management processes.</li> <li>• Recognition of Kai Tahu values in whenua tupuna is often poor.</li> </ul>	<ul style="list-style-type: none"> <li>• The cultural landscape that reflects the long association of Kai Tahu with Otago is maintained, enhanced and protected from inappropriate use and development.</li> <li>• The relationship Kai Tahu has with land is recognised in all resource management activities and decisions.</li> <li>• The use of Maori land by beneficial owners according to cultural preferences is supported and the maintenance of relationships with the land is facilitated.</li> </ul>

Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago:

Appendix 3: Additional Amendments Recommended by Te Rūnanga o Ngāi Tahu

Chapter / Provision	Amendment Sought	Reasons for the Amendment Sought
<p><b>Policy 2.1.1 Managing for freshwater values</b></p>	<p><i>Amend Sub-sections a) h) and m) as follows:</i></p> <p>Add estuaries.</p> <p><i>Amend Sub-section k)</i></p> <p>Protect Kāi Tahu values, <u>rights and interests</u>; and</p> <p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Preference of discharge to land over discharge to water where adverse effects of discharge to land are less than discharge to water.</li> <li>- Avoid discharges (point and non-point source) to water and those discharges to land, where such discharges will have adverse effects on the life supporting capacity of the land</li> <li>- Encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment.</li> <li>- Ensure the ability of Kāi Tahu to exercise kaitiakitanga over water resources</li> <li>- Manage water resources according to the philosophy and principle of ki uta ki tai</li> <li>- Prioritise customary use and instream values over abstractions</li> <li>- Establish sustainable environmental flow regimes that prioritise waterway health and estuarine values and where required, enhance water quality</li> </ul>	<p>Ngāi Tahu cultural values do not support the mixing of stormwater and freshwater/coastal waters</p> <p>Need greater policy guidance on water allocation, intensification, and discharges</p> <p>Need specific policies to protect Kāi Tahu interests</p>

Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago:

Appendix 3: Additional Amendments Recommended by Te Rūnanga o Ngāi Tahu

	<ul style="list-style-type: none"> <li>- Identify and manage catchments where water quality is at risk by establishing water quality standards and where appropriate catchment contaminant load thresholds.</li> <li>- Manage of the effects of rural land development (e.g. farming and mining) to ensure that water quality is maintained (or enhanced if it becomes degraded).</li> <li>- Prioritise efficiency in use of water</li> <li>- Protect, restore and enhance native riparian vegetation to provide habitat for taonga species and a buffer against intensive land use.</li> <li>- Recognise customary fishing tools such as mātaimai</li> <li>- Enhance freshwater biodiversity</li> <li>- Use cultural monitoring tools to monitor the health of waterways</li> <li>- Require a precautionary approach to the allocation of water or the intensification of land uses or discharges, in circumstances where the effects of these activities on freshwater bodies are unknown or uncertain.</li> <li>- Take a precautionary approach to consent duration</li> <li>- Avoid mixing of water from different catchments</li> </ul> <p>Cross reference Policy 2.3.3, and other freshwater policies.</p>	
<p><b>Policy 2.1.2 Managing for the values of beds of rivers and lakes, wetlands and their margins</b></p>	<p><i>Amend policies as follows:</i></p> <p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Manage water resources according to the philosophy and principle of ki uta ki tai and whole of catchment</li> </ul>	<p>Policies not specific enough to provide clear direction on outcomes sought.</p>

Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago:

Appendix 3: Additional Amendments Recommended by Te Rūnanga o Ngāi Tahu

	<p>management</p> <ul style="list-style-type: none"> <li>- Protect from inappropriate subdivision, use and development</li> <li>- Manage effects of gravel and vegetation removal on Kāi Tahu cultural values, ecological values, natural character, natural functioning of lakes and rivers, wellbeing (including cultural) of people and communities.</li> <li>- Specifically address access to and along river and lake beds, including: <ul style="list-style-type: none"> <li>o maintenance and enhancement of Kāi Tahu access to and along rivers and lakes, and sites associated with mahinga kai, wāhi tapu and wāhi taonga</li> <li>o recognise and provide for Kāi Tahu access in areas where public access is not appropriate</li> </ul> </li> <li>- Provide for fish passage and corridors for indigenous species</li> <li>- Protect and enhance riparian zones that provide spawning or other significant habitat for species such as inanga</li> <li>- Protect natural character of rivers and lakes</li> <li>- Cross reference other policies relating to integrated management</li> </ul>	
<p><b>Policy 2.1.3 Managing for coastal water values</b></p>	<p><i>Amend policies as follows:</i></p> <p>a) <u>protect support healthy coastal ecosystems and enhance degraded coastal ecosystems</u></p> <p>g) <u>Protect Kāi Tahu values, rights, interests and objectives,</u></p> <p><i>Add further policies to:</i></p>	<p>Concern at lack of issue identification and explanation in the PORPS, which will impact on its implementation. For example Policy 2.1.3(e) requires local authorities to: <i>Maintain or enhance coastal values</i>. But what are these values and how are they to</p>

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	<ul style="list-style-type: none"> <li>- Manage water resources according to the philosophy and principle of ki uta ki tai and integrated catchment management</li> <li>- Avoid discharge of contaminants (including wastewater) to coastal waters</li> <li>- Maintain and enhance Kāi Tahu access to and along the coastal marine area for mahinga kai and sites of significance</li> <li>- Avoid adverse effects on values of importance to Kāi Tahu as a result of inappropriate coastal land use, subdivision and development</li> <li>- Use cultural monitoring tools to monitor the health of coastal water bodies</li> <li>- Manage effects of siltation (particularly on mahinga kai and associated habitat)</li> <li>- Maintain or enhance coastal water quality to a shellfish gathering water quality standard</li> <li>- Recognise customary fisheries management tools such as mātaītai, taiāpure and rāhui</li> <li>- Ensure Kāi Tahu access to mahinga kai and sites of cultural significance</li> <li>- Recognise the unique environment the freshwater/seawater interface provides for species</li> <li>- Recognise effects of existing and future structures on cultural values</li> <li>- Increase knowledge of coastal environment and coastal processes</li> <li>- Share information between authorities and Kāi Tahu</li> </ul>	<p>be prioritised? The PORPS provides no guidance.</p> <p>Ongoing recognition is required of the significance to Kāi Tahu of activities occurring within, adjacent to, or impacting directly on the Statutory Acknowledgements contained within the Ngāi Tahu Claims Settlement Act (ie beyond the expiry of Ngāi Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999</p>
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	<ul style="list-style-type: none"> <li>- Recognise the increasing pressure being placed upon the coastal environment from the mining and petroleum industry which could have a negative impact on Otago's unique coastal environment. Provide guidance to assist in decision making around any applications for these activities.</li> </ul>	
<b>Policy 2.1.4 Managing for air quality values</b>	<p><i>Amend policies as follows:</i></p> <p>b) Protect Kāi Tahu values <u>including protection of mahinga kai areas, wāhi tapu sites and other sites of cultural significance to ensure these are not compromised by poor air quality</u></p> <p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Recognise and provide for specific cultural considerations when developing standards for air quality (eg Māori health, deposition of air pollutants on mahinga kai or marae)</li> </ul>	No reference to NESAQ standards
<b>Policy 2.1.5 Managing for soil values</b>	<p><i>Amend policies as follows:</i></p> <p>g) Protect Kāi Tahu values, <u>rights, interests and objectives;</u></p> <p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Avoid and remedy significant induced: <ul style="list-style-type: none"> <li>o soil erosion</li> <li>o nutrient loss</li> <li>o sediment loss (particularly where it results in siltation of water bodies)</li> </ul> </li> </ul> <p>Cross ref to Policy 2.2.14</p> <p>Cross ref siltation issues to freshwater and coastal policies</p>	Erosion, nutrient loss and sediment loss all have impacts on water quality and therefore Kāi Tahu values.
<b>Policy 2.1.6 Managing for ecosystem and indigenous</b>	<p><i>Amend policies as follows:</i></p> <p>g) Protect <u>ecosystems</u> and biodiversity significant to Kāi Tahu</p>	Does this include freshwater biodiversity and in-stream ecosystems Or coastal ecosystems?



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<p><b>biodiversity values</b></p>	<p><u>including those valued as mahinga kai and taonga species, in a manner consistent with Kāi Tahu values, rights and interests and principles; and</u>  <i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Restore ecosystems and indigenous biodiversity in locations where it will contribute to: <ul style="list-style-type: none"> <li>o Inherent biological diversity</li> <li>o Otago’s distinctive natural character</li> <li>o social, cultural, environmental and economic wellbeing of people and communities</li> <li>o greater connectivity between ecosystems and habitats</li> </ul> </li> <li>- Indicate priorities for protection</li> <li>- Require integrated and coordinated management across catchments, and land/sea boundary, between individuals, agencies, non-government organisations and Kāi Tahu</li> <li>- Provide policy direction and criteria on use of offsets (developed with Kāi Tahu)</li> <li>- Include a specific wetland protection and enhancement policy.</li> </ul> <p>Cross reference to Policy 2.2.1 and 2.2.2</p>	<p>This policy overlaps with Policies 2.2.1 and 2.2.2 and is very confusing.</p>
<p><b>Policy 2.1.7 Recognising the values of natural features, landscapes and seascapes</b></p>	<p><i>Amend policies as follows:</i></p> <ul style="list-style-type: none"> <li>- Provide policy guidance and methods for how the values of natural features, landscapes and seascapes will be ‘recognised’</li> </ul> <p>Cross reference with Policies 2.2.3 and 2.2.4 (identification and</p>	<p>Policy directs recognition of values of natural features, landscapes and seascapes – but does not provide any policy guidance as to how.</p>

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	management of outstanding natural landscapes) and Policies 2.2.5 and 2.2.6 (identification and management of special amenity landscapes and highly valued natural features)	
<b>Policy 2.1.8 Recognising the values of natural character in the coastal environment</b>	Cross reference to Policy 2.2.9 (Managing the natural character of the coastal environment)	
<b>Objective 2.2 Otago's significant and highly-valued natural resources are identified, and protected or enhanced</b>	Integrate Kāi Tahu issues throughout this chapter, including a policy specifically about Kāi Tahu water values (incorporating coastal and freshwater). Issues table (supplied earlier to ORC) sets out Kāi Tahu issues.  Refer to Kāi Tahu values in the Objective 2.2 description.	Need to ensure that the objectives and policies in Chapter 2 and 3 do not undermine those in Chapter 1.  It is not clear what the difference between Objective 2.1 and 2.2, and their corresponding policies, is.
<b>Policy 2.2.1 Identifying areas of significant indigenous vegetation and significant habitats of indigenous fauna</b>	<i>Add further policies to:</i> - Engage with Kāi Tahu to identify areas, vegetation and habitat that has particular significance to Kāi Tahu  <i>Amend Schedule 5 to:</i> - Recognise Kāi Tahu cultural values  <i>Add Method 1 - Kāi Tahu relationships to the Methods.</i>	<i>Overlap with Policy 2.1.6 – confusing</i>  <i>Schedule 5 outlines ecological significance criteria.</i>  <i>Indigenous vegetation and habitat of indigenous fauna may be significant to Kāi Tahu for reasons that are cultural rather than ecological, such as mahinga kai resource area or containing mahinga kai species.</i>
<b>Policy 2.2.2 Managing significant indigenous vegetation and significant habitats of indigenous fauna</b>	<i>Amend policy as follows:</i>  Protect and enhance the values of areas of significant indigenous vegetation and significant habitats of indigenous fauna.  <i>Add further policies to:</i> - Protect areas, species and habitats of particular significance to Kāi Tahu in a manner consistent with Kāi Tahu values and	Overlap with Policy 2.1.6 – confusing  Priorities for restoration or enhancement unclear.

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	<p>principles</p> <ul style="list-style-type: none"> <li>- Recognise Kāi Tahu as kaitiaki</li> <li>- Add a policy enabling Ngāi Tahu cultural use of indigenous biodiversity according to tikaka.</li> <li>- Add priorities for restoration or enhancement, eg restore or enhance ecosystem functioning and indigenous biodiversity, in appropriate locations, particularly where it can contribute to Otago’s distinctive natural character and identity and to the social, cultural, environmental and economic wellbeing of people and communities.</li> <li>- Add priorities for protection, including areas identified by Kāi Tahu as having significant cultural value.</li> <li>- Add a specific wetland protection and enhancement policy</li> <li>- Provide policy guidance on use of biodiversity offsets</li> <li>- Use of cultural monitoring tools developed by Kāi Tahu</li> </ul> <p>Cross reference to new Policy under Objective 2.3 regarding integrated and coordinated approach to indigenous biodiversity management</p> <p>Add Method 1 – Kāi Tahu relationships</p>	
<p><b>Policy 2.2.3 Identifying outstanding natural features, landscapes and seascapes</b></p>	<p>See comments on Policy 2.1.7</p> <p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Establish processes to engage with Kāi Tahu in the identification of outstanding features and landscapes including Kāi Tahu cultural landscapes</li> </ul> <p>Cross reference to Policy 2.1.7 and 2.2.4</p>	<p>Overlap with Policy 2.1.7</p>

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<p><b>Policy 2.2.4 Managing outstanding natural features, landscapes and seascapes</b></p>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Protect, enhance and restore Ngāi Tahu cultural landscapes</li> </ul> <p>Add Method 3 (Regional, City and District Relationships) Add Method 6 (Research monitoring and reporting) Cross reference to Policy 2.1.7 and 2.2.3</p>	
<p><b>Policy 2.2.6 Managing special amenity landscapes and highly valued natural features</b></p>	<p>Add Method 6 (Research monitoring and reporting) Add Method 3 (Regional, City and District Relationships)</p>	<p>Policy (d) –what are the ‘existing introduced species’ referring to? If existing introduced species are included here then indigenous species of significance to Kāi Tahu should be too.</p>
<p><b>Policy 2.2.9 Managing the natural character of the coastal environment</b></p>	<p><i>Amend policy heading:</i></p> <p><u>Preservation and restoration of</u> <del>managing</del> the natural character of the coastal environment.</p> <p><i>Amend policies as follows:</i></p> <p>Preserve, <u>restore</u> or enhance the natural character values of the coastal environment, by:</p> <p>e) Encouraging enhancement of those values <u>including efforts by Kāi Tahu to protect resources of the coastal environment through the use of customary management tools such as rāhui, mātaimai and taiāpure.</u></p> <p>Cross reference to Policies 2.1.3, 2.1.6, 2.1.7, 2.1.8</p>	<p>What is being referred to by (e)? Recognising and providing for contribution of existing introduced species to natural character of coastal environment?</p>
<p><b>Policy 2.2.12 Identifying outstanding water bodies and wetlands</b></p>	<p><i>Amend policies as follows:</i></p> <p>c) <del>Significant takata whenua</del> cultural values as identified by Kāi Tahu</p> <p>Need definition of water body added to Definitions</p> <p>Add Method 1: Kāi Tahu Relationships</p>	<p>Kai Tahu must be involved in identifying cultural values associated with outstanding water bodies and wetlands</p>

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	Cross reference to Policies 2.1.1, 2.1.2, 2.1.6	
<b>Policy 2.2.13 Managing outstanding water bodies and wetlands</b>	Add Method 1: Kāi Tahu Relationships	
<b>Policy 2.2.14 Identifying highly valued soil resources</b>	<p><i>Amend policies as follows:</i></p> <p><u>e) Kāi Tahu values</u></p> <p><u>f) Significance for supporting unique ecosystems, habitats and indigenous flora and fauna</u></p> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Cross ref to Policy 2.1.5</p>	
<b>Policy 2.2.15 Managing high valued soil resources</b>	<p>Combine Policies 2.1.5 and 2.2.15</p> <p>Ensure Kāi Tahu values are taken into account in managing soil resources</p> <p>Add Method 1 – Kāi Tahu relationships</p>	Overlap between this policy and Policy 2.1.5 as both about managing soil values.
<b>Page 41- New policy suggested</b>	- Add new policy requiring integrated and coordinated management across catchments, and land/sea boundary, between individuals, agencies, non-government organisations and Kāi Tahu	-
<b>Objective 2.3 Natural resource systems and their interdependencies are recognised</b>	<p><i>Amend objective to:</i></p> <p>Seek integrated management across catchments, between activities, and between agencies, Kāi Tahu and community interests in order to recognised the interconnected nature of</p>	Natural resource systems and their interdependencies should be more than ‘recognised’ – objective needs to incorporate integrated management

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	natural resource systems	
<b>Policy 2.3.1 Applying an integrated management approach among resources</b>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Require integration within and across catchments, between activities and between agencies, Kāi Tahu and people with interests in water management</li> <li>- Take into account the Kāi Tahu principle and philosophy of Ki uta ki tai</li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Add Method 2 – Regional, City and District Council Relationships</p>	
<b>Policy 2.3.2 Applying an integrated management approach within a resource</b>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Require integration within and across catchments, between activities and between agencies, Kāi Tahu and people with interests in water management</li> <li>- Take into account the Kāi Tahu principle and philosophy of Ki uta ki tai</li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Add Method 2 – Regional, City and District Council Relationships</p>	
<b>Policy 2.3.3 Applying an integrated management approach for freshwater catchments</b>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Add new policy as (c)(v) to protect Kāi Tahu values, rights and interests</li> <li>- Take into account the Kāi Tahu philosophy and principle of</li> </ul>	

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	<p>Ki Uta Ki Tai (from the mountains to the sea)</p> <ul style="list-style-type: none"> <li>- Require integration within and across catchments, between activities and between agencies, Kāi Tahu and people with interests in water management</li> <li>- Provide for kaitiakitanga</li> <li>- Recognise the interconnectivity between surface water and groundwater</li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Add Method 2 – Regional, City and District Council Relationships</p>	
<p><b>Policy 2.3.4 Applying an integrated management approach for the coastal environment</b></p>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Add new policy as b(iii) to protect Kāi Tahu values, rights and interests</li> <li>- Take into account the Kāi Tahu philosophy and principle of Ki Uta Ki Tai (from the mountains to the sea)</li> <li>- Require integration within and across catchments, between activities and between agencies, Kāi Tahu and people with interests in water management</li> <li>- Provide for kaitiakitanga</li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Add Method 2 – Regional, City and District Council Relationships</p>	

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<p><b>Objective 3.1 Protection, use and development of natural and physical resources recognises environmental constraints</b></p>	<p><i>Amend objective as follows:</i></p> <ul style="list-style-type: none"> <li>- Acknowledge that environmental constraints may change in the future</li> <li>- Amend <i>issue</i> to reflect that activities are undertaken without regard not just to their local environment but wider environment (for example, water extraction can have effects far downstream)</li> <li>- Amend <i>issue</i> to reflect that we need to take environmental constraints into account not just for resilience, but for the intrinsic values of environmental resources and cultural, social, environmental and economic wellbeing.</li> </ul>	
<p><b>Policy 3.1.1 Recognising natural and physical environmental constraints</b></p>	<p><i>Amend policy as follows:</i></p> <p>a) The availability of natural resources <u>now and in the future</u> necessary to sustain the activity; and</p> <p>Include a reference to the “life of the activity” within clauses b – d</p> <p><i>Add policies to:</i></p> <ul style="list-style-type: none"> <li>- Acknowledge that relevant information must be available to give effect to Policy 3.1.1</li> <li>- Review available information and identify current and future environmental constraints in the region</li> <li>- Include a clause that references the effect on Kāi Tahu values</li> <li>- Require decision makers to take environmental constraints (current and likely future state) into account</li> </ul>	<p>What is the level of understanding of current and likely future environmental constraints?</p> <p>This policy should provide more guidance for decision makers</p>
<p><b>Objective 3.2 Risk that natural hazards pose to</b></p>	<p>Add to description in objective that <u>Natural hazards and natural hazard mitigation may result in the loss of, or adverse effects</u></p>	<p>Description of issue under Objective heading does not</p>



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Otago's communities are minimised	<u>on, values of importance to Kāi Tahu</u>	acknowledge potential effects on cultural values.
Policy 3.2.1 Identifying natural hazards	Add Methods 3 and 4 (as natural hazards should be identified in planning documents) and 8 (as information should be shared)	
Policy 3.2.3 Assessing natural hazard consequence	<i>Add further policies to:</i> <ul style="list-style-type: none"> <li>- Include new sub point for "effects on Kāi Tahu values and sites of significance"</li> </ul> Add Method 1 – Kāi Tahu Relationships	Effects on Kāi Tahu values and sites of significance have not been included as a consequence by natural hazards
Policy 3.2.4 Managing natural hazard risk	<i>Add new policy to:</i> Require integrated and coordinated management of and preparedness for natural hazards	Confusing title – this policy is not about the management actions, it is about the approach to hazard management
Policy 3.2.9 Protecting features and systems that provide hazard mitigation	<i>Add or amend policies to:</i> <ul style="list-style-type: none"> <li>- Protect, restore, enhance and promote the use of natural or modified features and systems, which contribute to mitigating the effects of both natural hazards and climate change, whilst having regard for Kāi Tahu cultural values and potential effects on sites of Kāi Tahu significance.</li> <li>- Recognise and provide for the role of wetlands and riparian areas to help avoid or reduce the impact of natural hazards</li> </ul> Add Method 1 – Kāi Tahu Relationships	The potential flow-on effects of hazard mitigation on areas of Kāi Tahu significance and cultural values could be better considered in this policy
Policy 3.2.10 Mitigating natural hazards	<i>Add further policies to:</i> <ul style="list-style-type: none"> <li>- Avoid or mitigate adverse effects from hazard mitigation on people, property, the environment and Kāi Tahu values</li> </ul>	Hazard mitigation works have the potential to adversely affect values of importance to Kāi Tahu (including the natural environment such as taonga species, building environment and cultural landscapes such as marae, and other values such as wāhi tapu). Effects on Kāi Tahu values and sites of significance

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	<ul style="list-style-type: none"> <li>- Recognise the role of wetlands and riparian areas to help avoid or reduce the impact of natural hazards</li> </ul> <p><b>Add Method 1</b></p>	<p>should be considered when assessing the acceptability of physical works to mitigate hazards. For example, gravel extraction and other river works for flood management have the potential to adversely affect mahinga kai and taonga species (habitat for nesting birds, fish passage). Activities in the margins of rivers or coastal protection works may adversely affect wāhi tapu.</p>
<b>Policy 3.2.11 Locating hard mitigation measures</b>	<p><i>Add further policies to:</i></p> <ul style="list-style-type: none"> <li>- Avoid or mitigate adverse effects from hazard mitigation on people, property, the environment and Kāi Tahu values</li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p>	
<b>Objective 3.3 Otago’s communities are prepared for and able to adapt to the effects of climate change</b>		
<b>Policy 3.4.1</b>	<p><i>Amend policy as follows:</i></p> <ul style="list-style-type: none"> <li>b) <u>viii) Effects on Kāi Tahu cultural values including sites of significance</u></li> <li>c) Managing urban growth:             <ul style="list-style-type: none"> <li>i. Within areas that have sufficient infrastructure capacity; or</li> <li>ii. Where infrastructure services can be upgraded or extended efficiently and effectively</li> <li>iii. <u>supporting the development of papakāika; and</u></li> </ul> </li> <li>e) <u>Ensure new development includes land treatment of sewage</u></li> </ul>	<p>Infrastructure must be designed and located in a way that protects Kāi Tahu cultural values and significance sites.</p> <p>This policy does not clearly provide for papakāika and in some cases could be obstructive to their development due to their sometimes remote location (i.e. away from established infrastructure)</p>

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	<p><u>and stormwater, and encourage/require where appropriate progressive upgrading of sewage and stormwater discharge to water to include land treatment.</u></p> <p>Add Method 1 – Kāi Tahu relationships</p>	
<p><b>Policy 3.4.2</b></p>	<p>Reword policy as follows:</p> <p><i>Manage infrastructure activities, to:</i></p> <p><i>a) Maintain and enhance the health and safety of the community; and</i></p> <p><i>b) Maintain and enhance Kāi Tahu values and sites of significance</i></p> <p><i>b) Reduce adverse effects of those activities, including cumulative adverse effects on natural and physical resources, including mahinga kai; and</i></p> <p><i>c) Support economic, social, cultural, and community activities; and</i></p> <p><i>d) Improve efficiency of use of natural resources; and</i></p> <p><i>e) Protect infrastructure corridors for infrastructure needs, now and for the future;and</i></p> <p><i>f) Increase the ability of communities to respond and adapt to emergencies, and</i></p> <p><i>disruptive or natural hazard events; and</i></p> <p><i>g) Protect the functioning of lifeline utilities and essential or emergency services.</i></p> <p>Add Method 1 – Kāi Tahu relationships</p>	<p>This policy does not provide for the protection of Kāi Tahu values to the same extent that it protects other values</p>

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<p><b>Objective 3.5</b>  <b>Infrastructure of national and regional significance is managed in a sustainable way</b></p>	<p>Reword the explanation as follows:</p> <p><i>Infrastructure of national and regional significance, including roads, rail, electricity generation and transmission, and telecommunication, are part of a national network, and contribute to the economic and social wellbeing of the nation.</i></p> <p><u>Whilst these aspects are important, we must also ensure that environmental and cultural values are protected from the adverse effects that can arise from infrastructure development</u></p>	<p>It is important that cultural and environmental values are protected from adverse effects arising from infrastructure development.</p>
<p><b>Policy 3.5.2</b></p>	<p>Include new points:</p> <ul style="list-style-type: none"> <li>- (a)(v): <u>Areas of value to Kāi Tahu</u></li> <li>- (a)(vi) <u>Cultural landscapes</u></li> </ul> <p>Add Method 1 – Kāi Tahu relationships</p> <p>Cross reference other policies relating to natural resources in chapter 2 and wastewater management in chapter 4</p>	<p>This policy does not ensure that areas of significance to Kāi Tahu will be afforded enough protection.</p>
<p><b>Policy 3.5.3</b></p>	<p>Include a provision that the cultural values of land will be taken into account throughout this policy</p>	<p>This policy has the effect of giving the protection of infrastructure precedence over any existing Kāi Tahu values associated with locations</p>
<p><b>Objective 3.6</b>  <b>Energy supplies to Otago’s communities are secure and sustainable</b></p>	<p>Add to description of issue that energy generation and transmission must still avoid adverse effects on environmental and cultural values.</p> <p>Add new policy affording particular consideration to the relationship of Kāi Tahu with water resources and the potential effects on this relationship as a result of energy generation.</p>	<p>Kāi Tahu agrees that energy supply is important, however the objective needs to ensure energy supplies are managed in a way that protects environmental and cultural values.</p> <p>Of particular concern to Kāi Tahu are effects on the environment and Kāi Tahu values, including rivers and cultural landscape values, as a result of energy production, distribution and use.</p>
<p><b>Policy 3.6.1</b></p>	<p>Reword to:</p> <p><i>Give preference to the use of existing structures or facilities to</i></p>	<p>This policy does not provide for the relocation of structures and facilities that may currently be located</p>

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	<i>increase the region's renewable electricity generation capacity over developing new structures in new locations unless current locations are deemed to be culturally inappropriate.</i>	in culturally inappropriate locations
<b>Policy 3.6.2 Promoting small scale renewable electricity generation</b>	<p><i>Amend policy to:</i></p> <p><u>c) Protect Kāi Tahu values, rights and interests</u></p> <p>Add Method 1 – Kāi Tahu relationships</p>	Need to be clear that this policy does not advocate for electricity generation at the expense of cultural values
<b>Objective 3.7 Urban areas are well designed, sustainable and reflect local character</b>	<p><i>Amend description under objective to:</i></p> <p>Add reference to Kāi Tahu heritage as part of the distinctive character of Otago</p>	Kāi Tahu would like to see urban areas reflect Kāi Tahu cultural heritage – this should be integrated into the urban environment.
<b>Policy 3.9.2 Managing the use, storage and disposal of hazardous substances, and the storage and disposal of waste materials</b>	<p><i>Add policies to:</i></p> <ul style="list-style-type: none"> <li>- Address general waste management</li> <li>- Include specific reference to potential effects on values of importance to Kāi Tahu as a result of managing/disposing residual waste, and how such effects will be considered and assessed.</li> <li>- Recognise and provide for particular tikaka issues associated with waste disposal</li> </ul>	
<b>Policy 3.9.3 Identifying contaminated land</b>	<p><i>Add policy to:</i></p> <ul style="list-style-type: none"> <li>- Require information sharing between local authorities and Kāi Tahu regarding the location of contaminated sites, proposed land use changes and remediation or mitigation work.</li> <li>- Recognise that there may be specific cultural protocols, tikanga or processes associated with remediation of contaminated land that has wāhi tapu, or land with other significant cultural associations.</li> </ul>	Contaminated land can have impacts on land and water and values of importance to Kāi Tahu including wāhi tapu

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<p><b>Policy 3.9.4 Managing the use of contaminated land</b></p>	<p><i>Add policies to:</i></p> <ul style="list-style-type: none"> <li>- Recognise that there may be specific cultural protocols, tikanga or processes associated with remediation of contaminated land that has wāhi tapu, or land with other significant cultural associations.</li> <li>- Recognise the ecological value of wetlands (and specific native plant species) in resolving contamination issues</li> </ul>	<p>Policy needs amending to reflect Kāi Tahu interests in contaminated land and any remediation undertaken</p>
<p><b>Objective 4.1 Public access to areas of value to the community is maintained or enhanced</b></p>	<p>Amend <i>issue</i> to acknowledge that in some cases, public access is a threat to Kāi Tahu values of sensitive places.</p> <p><i>Amend 'need' to include:</i></p> <ul style="list-style-type: none"> <li>- Provide for Kāi Tahu access to their sites of significance</li> <li>- Protect all sites of significance including those not registered as NZ HPT or NZAA sites</li> </ul> <p>Finding opportunities to improve access (or limiting access where appropriate )</p> <p><i>Reword explanation as follows:</i></p> <ul style="list-style-type: none"> <li>- The use of natural and physical resources underpins <i>community, cultural and economic activity in Otago. However due to the dynamic and highly interconnected nature of the environment the sustainable management of our resources requires consideration of the adverse effects of resource use on the environment and on other resource users.</i></li> </ul>	<p>Concern that description of 'need' infers that public access can only be improved through subdivision or development.</p>
<p><b>Objective 4.2 Historic heritage resources are recognised and contribute to the region's character</b></p>	<p>Reword as follows:</p> <p><i>Objective 4.2</i></p> <p>Historic <u>and Kāi Tahu</u> heritage resources values, sites and <u>landscapes</u> are <u>identified</u>, recognised and <u>protected from</u></p>	<p>We consider it appropriate to acknowledge Kāi Tahu heritage values and landscapes within this objective alongside historic heritage.</p> <p>The explanation also needs to acknowledge cultural</p>

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<p><b>and sense of identity</b></p>	<p><u>inappropriate use, subdivision and development and continue to contribute to the region’s character and sense of identity</u></p> <p><i>Amend explanation:</i></p> <p>Otago is a province rich in <u>cultural and historic heritage</u>, and includes heritage places, areas <u>and landscapes</u> that are recognised as nationally, regionally and locally important.</p> <p>Our historic heritage <u>resources</u> places, areas and landscapes <u>and the cultures they represent</u> contribute to our regional identity and tourism economy. <u>The cumulative loss of these heritage places, areas and landscapes and their values can diminish that sense of identity.</u></p> <p><i>Amend issue:</i></p> <p>Sometimes, <u>inappropriate</u> subdivision, use, and development risk <u>loss or degradation of</u> <del>damage to</del> Otago's rich historic <u>and cultural heritage values and landscapes.</u></p> <p><i>Add additional issues:</i></p> <ul style="list-style-type: none"> <li>- There is a general lack of knowledge and understanding regarding sites of significance to Kāi Tahu.</li> <li>- Some sites of significance to Kāi Tahu are better not to be identified to ensure they are protected, and identification is a case by case issue.</li> </ul> <p><i>Need:</i></p> <p><u>Recognise and Protect of historic and Kāi Tahu heritage sites, values and landscapes from inappropriate activities is required under the RMA as a matter of national importance.</u></p> <p><u>Improve knowledge and understanding of sites of significance to Kāi Tahu.</u></p>	<p>heritage including cultural landscapes.</p> <p>Objective needs to be worded to match the ‘need’ which is to protect the values, not just recognise them.</p> <p>Don’t need to re-state the RMA requirements.</p> <p>An issue for Kāi Tahu is a general lack of knowledge and understanding by some councils regarding sites of significance to Kāi Tahu. Identification of sites of significance to Kāi Tahu is a sensitive and complicated issue. Listing of sites of cultural significance does not necessarily lead to protection, and may in fact lead to sites being degraded.</p> <p>A definition of cultural landscapes is required so everyone knows what it includes. Cultural landscapes are important for Kāi Tahu and all New Zealanders.</p>
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<p><b>Policy 4.2.1 Recognising heritage themes</b></p>	<p>Reword as follows:</p> <p>a) <u>Māori cultural and heritage values identified by Kāi Tahu including those identified in Schedule 1, iwi planning documents and including but not limited to mahinga kai, freshwater streams, springs and river, coastal environments, wāhi tapu including nohoanga, historic and contemporary pā sites, wāhi parekura, urupā; papakāika, taunga waka, taonga species, indigenous flora and marae</u></p> <p>Add Method 1 – Kāi Tahu Relationships</p>	<p>Reference to Māori cultural and heritage values are too vague</p>
<p><b>Policy 4.2.2 Identifying historic heritage</b></p>	<p>Add policies to:</p> <ul style="list-style-type: none"> <li>- <u>Work with Te Rūnanga o Ngāi Tahu and the appropriate papatipu rūnanga to identify items, places or areas of historic heritage significance to Kāi Tahu.</u></li> <li>- <u>Recognise that knowledge about some historic heritage may be culturally sensitive and support protection of those areas through the maintenance of silent files held by local authorities.</u></li> </ul> <p>Add Method 1 – Kāi Tahu Relationships</p>	<p>Information regarding takata whenua heritage values, sites and places must be obtained from papatipu rūnaka or Te Rūnanga o Ngāi Tahu.</p> <p>Some historic heritage values may be culturally sensitive to Kāi Tahu and provision must be made to account for this.</p>
<p><b>Policy 4.2.3 Managing historic heritage values</b></p>	<p>Reword as follows:</p> <p><i>Managing historic and cultural heritage values</i></p> <p>Protect and enhance the values of places and areas of historic and cultural heritage, by:</p> <p>d) Avoiding significant adverse effects on other values of areas and places of historic and cultural heritage; and</p> <p>h) Encouraging the integration of historic heritage values into new activities <u>including cultural heritage where appropriate and</u></p>	



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	<p>in consultation with Kāi Tahu; and</p> <p>i) Enabling <u>restoration</u>, adaptive reuse or upgrade of historic heritage places and areas where heritage values can be maintained.</p> <p>Add policies to:</p> <ul style="list-style-type: none"> <li>- <u>Recognise places of historic and cultural heritage significance to Kāi Tahu and protect their relationship and culture and traditions with these places from the adverse effects of inappropriate subdivision, use and development.</u></li> <li>- <u>Promote protection, appropriate access or restriction of access to historic heritage items, places and areas in accordance with tikaka Māori such as the values Kāi Tahu associate with those items, places and areas may be upheld.</u></li> </ul>	
<p><b>Objective 4.3 Sufficient land is managed and protected for economic production</b></p>	<ul style="list-style-type: none"> <li>- Make Issue description and explanations clearer so they relate to the policies.</li> <li>- Include wording in explanation that economic gain will not be at the expense of environmental and Kāi Tahu cultural values</li> </ul>	<p>Issue description is unclear, as is the explanation .</p> <p>-</p> <p>We consider it appropriate that environmental priorities are represented in this objective to balance out the economic focus</p>
<p><b>Policy 4.3.1 Managing for rural activities</b></p>	<p><i>Reword as follows:</i></p> <p>Manage activities in rural areas, to support the region’s economy and communities, by:</p> <p>a) Enabling <u>environmentally sustainable levels of farming and other rural activities that support the rural economy; and</u></p> <p>e) Provide for other activities that have a functional need to locate in rural areas, including <u>Kāi Tahu</u>, tourism and</p>	<p>Environmental sustainability should be considered within this policy when promoting farming activities</p> <p>The spread of existing or new pest species is a threat to the economy and indigenous species.</p>

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	<p>recreational activities that are of a nature and scale compatible with rural activities.</p> <p><i>Add additional policies to:</i></p> <ul style="list-style-type: none"> <li>- Minimise the effects of existing pests and avoid the establishment of new pest species</li> <li>- Cross reference this policy with environmental policies in Chapter 2 to indicate that rural activities must not degrade water quality</li> </ul> <p>Add Method 1 – Kāi Tahu Relationships</p> <p>Add Method 3 – Regional Plans</p>	
<b>Policy 4.3.2 Managing land use change in dry catchments</b>	<p><i>Add additional policies to:</i></p> <ul style="list-style-type: none"> <li>- Require a precautionary approach to the consenting of water takes and the duration of such consents</li> <li>- Set environmental limits (refer to our comments on Policy 2.1.1)</li> </ul>	Mention has not been made of water takes
<b>Policy 4.3.3 Recognising the values of Otago’s central business districts</b>	<p>Add a policy that recognises the opportunity in urban design to acknowledge the takata whenua and their enduring association with the region, which must be done in consultation with the relevant papatipu rūnaka.</p> <p>Add Method 1 – Kāi Tahu Relationships</p>	In some areas, Kāi Tahu presence is an important component of a CBD’s identity. We consider it important that Central Business Districts have a Kāi Tahu sense of place included within their design to reflect the takata whenua and their enduring association with the region
<b>Policy 4.3.5 Managing for industrial land uses</b>	<p>Add a policy that restricts industrial activities in areas of cultural or environmental sensitivity</p>	Policy needs to provide clear guidance that while industrial activities are important, adverse effects on environmental and cultural values must be avoided, remedied or mitigated.
<b>Policy 4.3.6 Managing</b>	<p><i>Amend policy as follows:</i></p>	The increasing pressure being placed upon both rural

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<p><b>locational needs for mineral and gas exploration, extraction and processing</b></p>	<ul style="list-style-type: none"> <li>- Recognise the needs of mineral exploration, extraction and processes activities to locate where the resource exists, and manage them by:</li> <li>- <del>Giving preference to</del> avoiding their location in:             <ul style="list-style-type: none"> <li>o Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</li> <li>o Outstanding natural features, landscapes or seascapes; or</li> <li>o Areas of outstanding natural character; or</li> <li>o Outstanding water bodies; or</li> <li>o Areas subject to significant natural hazard risk; and/or</li> <li>o <u>Areas of cultural significance to Kāi Tahu or where Kāi Tahu values will be adversely affected; and</u></li> </ul> </li> </ul>	<p>areas and the coastal environment from the mining and petroleum industry which could have a negative impact on environmental and cultural values.</p>
<p><b>Objective 4.4 Otago's communities can make the most of the natural and built resources available for use</b></p>	<p>Reword as follows:</p> <p><i>Need:</i></p> <p>We need efficient allocation and use of these resources to maximise socio-economic and cultural benefits, as well as sustain <u>cultural and</u> environmental wellbeing.</p> <p><i>Amend objective</i></p> <ul style="list-style-type: none"> <li>- To better reflect the policies which are about efficiency of use</li> </ul>	<p>We consider that cultural well-being is as important as the environmental well-being of the environment</p> <p>Policies do not match the objective.</p>

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<p><b>Policy 4.4.1 Ensuring efficient water allocation and use</b></p>	<p><i>Add policies to:</i></p> <ul style="list-style-type: none"> <li>- Require a precautionary approach to water allocation, particularly where science and information is uncertain</li> <li>- Apply a ki uta ki tai approach</li> <li>- Ensure that water efficiency measures such as storage do not compromise Kāi Tahu cultural values such as mahinga kai</li> <li>- Provide greater policy guidance for how to manage water allocation such as setting minimum flows</li> </ul> <p>Refer to our comments on freshwater policies in Chapter 2.</p> <p><i>Cross reference</i> this policy to policies relating to freshwater values and management</p> <p>Add Method 1 – Kāi Tahu Relationships</p>	<p>Kāi Tahu supports efficiency of water allocation and use, but seeks to ensure there is a framework in place that protects environmental and cultural values</p>
<p><b>Policy 4.4.3 Encouraging environmental enhancement</b></p>	<p><i>Reword as follows:</i></p> <p>Encourage activities which contribute to enhancing the natural environment, including to:</p> <p>b) Protect or restore habitat for indigenous species <u>and mahika kai</u>; and/or</p> <p>f) Improve the health and resilience of:</p> <p>i. Ecosystems supporting indigenous biodiversity; and/or</p> <p>ii. Important ecosystem services, including pollination; and/or</p> <p><u>iii. Mahika kai</u>; and/or,</p> <p>g) Improve access to rivers, lakes, wetlands and their margins <u>and the coast (unless deemed culturally inappropriate by Kāi Tahu)</u>; or</p>	

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<p><b>Policy 4.5.1 Avoiding objectionable discharges</b></p>	<p><i>Reword as follows:</i></p> <p>Avoid discharges that are objectionable or offensive to takata whenua and the wider community, including:</p> <p>a) Discharges of human or animal waste:</p> <p>i. <del>Directly to water</del> <u>freshwater, natural wetlands or coastal environments</u>; or</p> <p>ii. In close proximity to water <u>environments as listed in (a)(i)</u>; or</p> <p>iii. In close proximity to mahika kai <u>or sites of cultural significance to Kāi Tahu</u>; or</p> <p>b) Discharges of hazardous or noxious substances close to sensitive activities, including:</p> <p>i. Residential activities; or</p> <p>ii. Schools and other educational activities; or</p> <p>iii. Places of public access to the natural environment; or</p> <p>iv. In close proximity to mahika kai sites; or</p> <p><u>v. in close proximity to sites of Kāi Tahu significance</u></p> <p>Add Method 1 – Kāi Tahu Relationships</p>	<p>Support the intent, but with amendments as suggested to better reflect Kāi Tahu values in relation to discharge of contaminants to water and address wāhi tapu.</p>
<p><b>Policy 4.5.6 Managing adverse effects from mineral and gas exploration, extraction and processing</b></p>	<p><i>Amend policy as follows:</i></p> <ul style="list-style-type: none"> <li>- Recognise the needs of mineral exploration, extraction and processes activities to locate where the resource exists, and manage them by:</li> <li>- <del>Giving preference to</del> avoiding their location in: <ul style="list-style-type: none"> <li>o Areas of significant indigenous vegetation and significant habitats of indigenous fauna; or</li> <li>o Outstanding natural features, landscapes or seascapes;</li> </ul> </li> </ul>	

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	<p>or</p> <ul style="list-style-type: none"> <li>○ Areas of outstanding natural character; or</li> <li>○ Outstanding water bodies; or</li> <li>○ Areas subject to significant natural hazard risk; and/or</li> <li>○ <u>Areas of cultural significance to Kāi Tahu or where Kāi Tahu values will be adversely affected; and</u></li> </ul> <p>Add Method 1 – Kāi Tahu Relationships</p>	
<b>Policy 4.5.7 Enabling offsetting of indigenous biodiversity</b>	<p><i>Amend policy to:</i></p> <ul style="list-style-type: none"> <li>- Recognise taonga species and mahinga kai</li> <li>- Recognise Kāi Tahu rights as kaitiaki to be involved in any discussions and decision making about offsets for biodiversity</li> </ul> <p>Add Method 1 – Kāi Tahu Relationships</p>	This policy does not adequately recognise taonga species, mahinga kai or Kāi Tahu rights and interests as kaitiaki of indigenous species.
<b>Policy 4.5.8 Offsetting for indigenous biodiversity</b>	<p><i>Amend policy as follows:</i></p> <p><u>e) Work with Kāi Tahu to ensure takaka whenua values relating to indigenous biodiversity are protected and where possible enhanced</u></p> <p>Add Method 1 –Kāi Tahu Relationships</p>	This policy does not adequately recognise taonga species, mahinga kai or Kāi Tahu rights and interests as kaitiaki of indigenous species to be involved in decision making about offsets.
<b>Method 1: Kāi Tahu Relationships</b>	<p>1.1.1 Establish and maintain effective resource management relationships with <u>papatipu rūnaka and Kāi Tahu, based on a principle of partnership.</u></p> <p>1.1.2 Use and take into account Iwi Management Plans <u>and other iwi planning documents as a primary tool to:</u></p> <ul style="list-style-type: none"> <li>○ <u>Assist in the identification of issues of resource management significance to Kai Tahu and papatipu rūnaka.</u></li> </ul>	These methods need to be more specific in order to implement the policies.

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	<ul style="list-style-type: none"><li>○ <u>Provide cultural context and understanding of values underpinning the relationship between Kāi Tahu, papatipu rūnaka and the environment.</u></li><li>○ <u>Understand, acknowledge and account for the important of local knowledge and guidance about the environment at papatipu rūnaka level.</u></li><li>○ <u>Identify statutory acknowledgements, sites of significance and importance to Kāi Tahu and papatipu rūnaka, and understand why they are important.</u></li><li>○ <u>Assist in the determination of the nature and extent of consultation that may be required over particular activities or places of importance.</u></li><li>○ <u>Assist in the development of planning policy.</u></li><li>○ <u>Assist decision makers to make an informed decision with respect to a proposal or development of policy.</u></li></ul>	
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	<p><u>1.1.4</u> <u>Involve Kāi Tahu and papatipu rūnaka in the plan development process from inception to ensure values are integrated and principles of the RMA and Te Tiriti o Waitangi are given effect.</u></p> <p><u>1.1.5</u> <u>Provide papatipu rūnaka, and where appropriate, Te Rūnanga o Ngāi Tahu with opportunities to participate in the resource consent process as appropriate by:</u></p> <p>a) <u>notifying and consulting affected papatipu rūnaka, and where appropriate, Te Rūnanga o Ngāi Tahu on notified resource consent applications which are site-specific, resource –specific or issues of significance to Kāi Tahu as identified in iwi management plans and by papatipu rūnaka.</u></p> <p>b) <u>ensuring contact details of the district or region’s papatipu rūnaka are maintained, and iwi documents lodged with council by Te Rūnanga o Ngāi Tahu are recorded for applicant use and consultation purposes.</u></p> <p>c) <u>Encourage applicants to place applications on hold voluntarily to consult with rūnaka (where appropriate) in an effort to resolve issues at an early stage of proposals.</u></p> <p><u>1.1.6</u> <u>Endeavour to appoint tangata whenua as commissioners on resource consent hearing panels and during plan development processes, particularly when making decisions on issues of resource management significance to Kāi Tahu.</u></p>	
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	<p><u>1.1.7 Seek Cultural Impact Assessment or Cultural Values Assessment as part of an assessment of environmental effects under Schedule 4 of the RMA, where the application is likely to impact on a significant resource management issue for Kāi Tahu.</u></p> <p>1.2 Regional, city and district councils will collaborate with Kāi Tahu to:</p> <p><u>1.2.5 Use cultural monitoring tools when monitoring the state of the environment.</u></p> <p><u>1.2.6 Continue to provide for involvement of Kāi Tahu as tangata whenua in decision making processes, including Kāi Tahu representation on working parties, technical advisory groups or other forums that warrant representation.</u></p> <p><u>1.2.7 Consider providing capacity for Kāi Tahu (where parties consider this of mutual benefit) to be involved in studies and research to inform policy development.</u></p> <p><u>1.2.8 Encourage and support, where appropriate and when approached (on a case by case basis) the development or review of iwi management plans including the provision of technical advice, administrative support and funding options.</u></p> <p><u>1.2.9 Recognise the mana/importance and spirit of intent of statutory acknowledgements and regulations under the Ngāi Tahu Claims Settlement Act 1998 (NTCSA) and make provision for their embodiment, beyond their legally recognised expiry date, throughout council policy.</u></p>	
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	<p>1.3 Regional, city and district councils will:</p> <p>1.3.1 <del>Seek opportunities to a</del> Assess, improve <u>and demonstrate</u> knowledge of tikaka and the principles of Te Tiriti o Waitangi among staff <del>and</del> stakeholders <u>and the community.</u></p> <p>1.4.1 Delegate and transfer <u>any one or more of its functions, powers or duties to the iwi authority under section 33 of the RMA plan administration functions to an iwi authority,</u> where this provides an efficient and effective service <u>or provides for greater involved of Kāi Tahu in in the management of natural and physical resources. Any such transfer will be discussed and mutually agreed between the parties prior to any such transfer occurring.</u></p>	
<p><b>Method 2: Regional, City and District Council Relationships</b></p>	<p>Method 2 should be Regional, City and District Council <u>and Kāi Tahu</u> relationships, and should include the following methods:</p> <ul style="list-style-type: none"> <li>- Joint or co-management of a resource(s) between a local authority and iwi authority</li> </ul>	<p>Kāi Tahu as the Treaty Partner should be an integral part of relationships between local authorities.</p>
<p><b>Method 3: Regional Plans</b></p>	<p>Add additional methods:</p> <ul style="list-style-type: none"> <li>- Use and implementation of IMPs</li> <li>- Address concern over 35 year consents</li> </ul> <p>Freshwater:</p> <ul style="list-style-type: none"> <li>— Beds and margins of waterways:</li> </ul>	

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	<p>Coastal water values:</p> <ul style="list-style-type: none"> <li>- Recognise provisions in NZCPS for restoring natural character of coastal environment.</li> <li>- Advocate for and promote mechanisms and measures that protect natural character of coastal environment, including Kāi Tahu efforts to protect resources of the coastal environment through the use of customary management tools such as rāhui, mātaimai and taiapure.</li> <li>- Recognise importance of CMA Statutory Acknowledgements beyond the expiry dates as per the Ngāi Tahu Claims Settlement (Resource Management Consent Notification) Regulations 1999.</li> <li>- Recognise integrated community groups who may develop community led coastal strategies</li> <li>- Engage with Kāi Tahu to identify coastal areas of significance and ways to protect Kāi Tahu values in those areas. This process will be assisted by use of cultural monitoring tools, iwi management plans, and use of customary fisheries management tools.</li> </ul> <p>Natural hazards:</p> <ul style="list-style-type: none"> <li>- Add specific methods for management of natural hazards</li> </ul> <p>Soils</p> <ul style="list-style-type: none"> <li>- Identify Kāi Tahu cultural values in relation to soil for inclusion in regional plans, through engagement with Kāi Tahu and use of iwi management plans.</li> <li>- Will ensure information sharing with Kāi Tahu regarding the</li> </ul>	
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	<p>location of contaminated sites, proposed land use changes and remediation or mitigation work.</p> <ul style="list-style-type: none"> <li>- Will use cultural monitoring tools developed by Kāi Tahu to monitor effectiveness of these policies.</li> <li>- Should promote land use practices that maintain and improve soil quality</li> </ul> <p>Biodiversity</p> <ul style="list-style-type: none"> <li>- Local authorities will engage with Kāi Tahu and use iwi management plans to identify areas, habitats, species and ecosystems of particular significance to Kāi Tahu and to protect them in a manner consistent with Kāi Tahu cultural values and principles.</li> </ul> <p>Landscapes</p> <ul style="list-style-type: none"> <li>- Set objectives, policies or methods in relevant regional and district plans to protect outstanding natural features and landscapes (including cultural landscapes) from inappropriate subdivision, use and development, and avoid, remedy or mitigate adverse effects of subdivision use and development on outstanding natural features and landscapes.</li> </ul> <p>Heritage</p> <p>Work with Te Rūnanga o Ngāi Tahu and the appropriate papatipu rūnanga to:</p> <ul style="list-style-type: none"> <li>- Identify and manage significant or important historic heritage items, places or areas.</li> <li>- Use iwi management plans as just one of the tools to</li> </ul>		
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	provide cultural context in the identification of historic heritage items, places and areas of significance to Kāi Tahu.	
<b>Method 4 City and District Plans</b>	<p>Landscapes</p> <ul style="list-style-type: none"> <li>- Set objectives, policies or methods in relevant regional and district plans to protect outstanding natural features and landscapes (including cultural landscapes) from inappropriate subdivision, use and development, and avoid, remedy or mitigate adverse effects of subdivision use and development on outstanding natural features and landscapes.</li> </ul> <p>Heritage</p> <ul style="list-style-type: none"> <li>- Provide guidance on how 4.2.1 will be implemented.</li> </ul> <p>Papakāika</p> <ul style="list-style-type: none"> <li>- Amend district plans to implement policies relating to papakāika</li> </ul>	
<b>Method 6</b>	<p>Add additional methods:</p> <ul style="list-style-type: none"> <li>- Work with Kāi Tahu to use cultural monitoring tools when undertaking state of the environment monitoring</li> </ul>	
<b>Method 8 Education and Information</b>	<p>Add specific detail in Method 8 to:</p> <ul style="list-style-type: none"> <li>- Promote awareness and understanding of Treaty obligations.</li> <li>- Share information relevant to Kāi Tahu interests.</li> </ul>	
<b>Method 9 Funding</b>	<p>Add specific detail in Method 9 to:</p> <ul style="list-style-type: none"> <li>- Requiring local authorities to provide funding to enable</li> </ul>	

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	them to fulfil their responsibilities under Policies 1.1.1 and 1.1.2	
<b>Schedule 4 – Criteria for identification of natural features and landscapes</b>	Reference the importance of Kāi Tahu association with rivers, lakes and their margins.  Add wetlands and hāpua to 1(b)	
<b>AER 2.2 Otago’s water bodies support healthy ecosystems, are safe for swimming, and maintain their natural form and character</b>	Change title of AER 2.2 to read: Otago’s water bodies support healthy ecosystems, are safe for <u>mahinga kai gathering</u> <del>swimming</del> , and maintain their natural form and character.  <i>Amend indicators as follows:</i>  - Rivers, <u>lakes, wetlands, lagoons/hāpua</u> maintain natural character and form.  - Otago’s water bodies are safe for <del>swimming</del> <u>mahinga kai gathering</u>	In areas of importance to Kāi Tahu, water quality should be of a mahinga kai gathering standard (not just a swimming standard)
<b>AER 2.3 The quality of Otago’s coastal environment is maintained or enhanced</b>	<i>Add indicators as follows:</i>  - Maintenance and enhancement of Kāi Tahu access to mahika kai, wāhi tapu and wāhi taonga and other sites of cultural significance in the coastal environment will have occurred.  - The quality of coastal water in areas valued by Kāi Tahu for mahika kai is maintained (ie shellfish gathering standard)  - The natural, cultural, amenity and recreational values of coastal water will be protected from discharges of contaminants that could affect such values  - Adverse effects arising from occupation, use and development of the coastal environment have been	Indicators as currently drafted do not:  - measure protection of Kāi Tahu values, rights and interests in relation to the coast.  - only measure water quality for swimming (not mahika kai or ecological health)  - measure protection of natural, cultural, recreational, amenity values

Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago:

Appendix 3: Additional Amendments Recommended by Te Rūnanga o Ngāi Tahu

	<p>avoided, remedied or mitigated.</p> <ul style="list-style-type: none"> <li>- The natural, amenity, recreational, cultural, landscape and historic heritage values of the coastal environment will be maintained and enhanced.</li> <li>- Improved understanding of the coastal environment</li> </ul> <p><i>Measuring indicators</i></p> <ul style="list-style-type: none"> <li>- Use of cultural monitoring tools developed by Kāi Tahu.</li> </ul>	
<p><b>AER 2.4 The quality of Otago’s soils is maintained or enhanced</b></p>	<p><i>Add / amend indicators</i></p> <ul style="list-style-type: none"> <li>- <u>The quality, life-supporting capacity and mauri of Otago’s soils and their health and capability of providing for the social, cultural, environmental, and economic wellbeing of Otago’s people and communities will be maintained or improved the health and quantity of Otago’s highly valued soils are maintained or enhanced</u></li> <li>- <u>Significant induced soil erosion, nutrient and sediment loss is avoided or reduced.</u></li> </ul>	<p>Indicators need to more clearly articulate the need to maintain and protect soils for cultural use and cultural wellbeing.</p> <p>Need a specific indicator regarding erosion.</p>
<p><b>AER 2.5 The health and diversity of Otago’s ecosystems is maintained or enhanced</b></p>	<p><i>Add / amend indicators</i></p> <p><u>There are more areas of significant indigenous vegetation and significant habitats of indigenous fauna that are identified and protected</u></p> <p><u>There is an increase in the number and effectiveness of biodiversity-related initiatives in Otago that contribute to the protection and enhancement of indigenous biodiversity and to</u></p>	

Submission of Kāi Tahu ki Otago on the Proposed Regional Policy Statement for Otago:

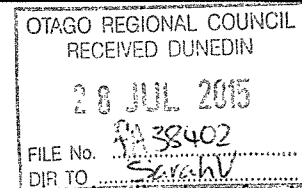
Appendix 3: Additional Amendments Recommended by Te Rūnanga o Ngāi Tahu

	<p><u>safe guarding the life supporting capacity and mauri of ecosystems generally.</u></p> <p><u>The relationship of Kāi Tahu with their sites, species, and habitats of cultural significance is enhanced.</u></p> <p><u>There is no further loss of the area, diversity or functioning of ecologically significant wetlands in Otago.</u></p>	
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**Sarah Valk**

**From:** Jason Gaskill <gm@tourismwaitaki.co.nz>  
**Sent:** Tuesday, 28 July 2015 5:29 p.m.  
**To:** RPS ORC  
**Cc:** Vance Boyd; 'Pat Garden'  
**Subject:** FW: CONFIDENTIAL: Board Consultation - Concession Applications for Aramoana Spit Crib/Houses - OCB advice requested by Friday 19 June 2015



Good Afternoon -

The below submission is supplied on behalf of the Otago Conservation Board with the approval of the Chairman and in consultation with the Vice Chairman.

Please contact me if you have any questions.

Regards,

Jason Gaskill  
 on behalf of the Chair of the Otago Conservation Board  
 021 724 454

To Whom It May Concern:

The Otago Conservation Board has read carefully the Otago Regional Council's General Policy Statement. We appreciate the opportunity to comment, and wish, if possible, to address our submission in person. What follows provides both a general statement, and specific feedback on particular sections of the General Policy.

First, the General Policy reads as a close companion to the Board's coming Conservation Management Strategy in setting a clear and consistent vision for environmental impact work throughout the region, and in particular in considering the broad connections between environmental stability and social development. The Board finds this reassuring. It will provide a strong foundation upon which the Board and the ORC can work proactively on conservation matters.

Second, the Board commends the ORC on the visionary tone of the document. The General Policy focusses on establishing and maintaining the necessary structure to ensure all aspects - cultural, social, ecological, environmental, and interpersonal - improve and are safeguarded.

Third, again, the Board commends the ORC on developing what appears to be an enabling document that encourages people and organisations to take responsibility for the role not they do play, but that they can and should play in the development of the region, and in creating a long-term sustainable format for growth and enterprise.

Fourth, though the Board's specific interest ranges across all aspects of the Strategy, the Board specifically encourages the implementation of the General Policy to consider and maintain three core outcomes:

- a. Enabling public access to and through the natural environment;
- b. Providing clear, consistent, and equal access rights to recourse and opportunities; and,
- c. Creating a bureaucratic structure that creates environmental flexibility over time.

I believe the document does well in providing for all three, and specific aspects outlined in the appendices bears this out. There are, however, some specific policy statements where modest adjustments to the wording will strengthen to the General Policy in delivering those core outcomes:

- a. 2.1.1(d)/2.1.2(d)/2.1.3(c): the wording emphasises protecting the migration. No mention is made of species, or of particular habitats. The Board feels the General Policy would be stronger, and more clearly applied, if emphasis was given to species and their habitats.
- b. 2.1.2: although other areas of the document specifically address particular land use interests, it would seem appropriate at this point to indicate that no preference for any specific land use is guaranteed a higher priority than another given environmental outcomes can be determined and guaranteed to an equal level.
- c. 2.2.5: Just a general point at this stage: relationships with the Board, and particularly addressing the potential relationship between the Policy and CMS, would strengthen the scope of the General Policy.
- d. The Board applauds the focus on research and scientific support for activities.
- e. 2.3: there may need be clarity around safeguarding farm activities. Though specific mention is made of farming in later sections of the General Policy, in order to ensure consistency, and avoid potential internal document conflict, it may make sense to make some explicit statement here.
- f. 3.1: The Board would like acknowledgement that not all constraints are permanent, nor are all constraints known. Some flexibility should be maintained to provide scope for movement in this area as some constraints fall away and others rise. Also, expressing the potential for constraints to have positive impacts in forcing development, driving research, etc, would provide clear foresight and further establish the enabling and proactive tone of the General Policy.
- g. Objective 4: The Board supports the tone of the document. It encourages people to make use of their resources, and appears to envision an environment unencumbered by strict bureaucratic controls, allowing people to take responsibility and ownership, and that what controls do exist are designed to foster, not derivate from, this general sense of public engagement and control. Policies 4.3.1 and 4.4 demonstrate this position.
- i. 4.4.1 - The Board would encourage an explicit expression that the document is not creating a hierarchy of rights, but instead acts as a levelling mechanism by which those with competing interests have equal claim to the available resources within a framework of environmental sustainability and enhancement.
- j. 4.4.3/4.5.7 - The Board feels both policies illustrate where and how a closer working relationship between the Board and the ORC could increase the likelihood sustainable environmental outcomes can be both identified and achieved.

Finally, the Board feels the document is impressive. The proof, of course, will be in the application. The Board therefore encourages the ORC to keep an open and proactive mind when considering how the policies and methods will play out in the real world. A sustained, encouraging dialogue with all environmental stakeholders and actors could be the result of this document. An improved sense of community ownership and greater consideration for the assets that exist could result in long-term intergenerational and organisationally neutral natural security. That is, of course, if this document is treated as the start of a joint conversation between the ORC structure and community intent. As an organisation in a similar position, with a similar charge, the Board empathises with this position. And we watch closely that the intention of the grand vision outlined in the General Policy does not become blurred by the obvious realities of bureaucratic expediency.

Regards,

The Otago Conservation Board  
Department of Conservation