



22 November 2019

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Tēnā Koe Craig

SUBMISSION BY TE KOTAHITANGA O TE ATIAWA TRUST (TKOTAT) TO THE NEW PLYMOUTH DISTRICT COUNCIL PROPOSED DISTRICT PLAN

On behalf of Te Kotahitanga o Te Atiawa Trust (TKOTAT), Ngā Hapū o Te Ati Awa Iwi and Te Atiawa Iwi Holding Limited Partnership (TAIHLP), we appreciate the opportunity to provide a submission on New Plymouth District Council's (NPDC) Proposed District Plan.

Te Ati Awa Iwi are tangata whenua over the lands, waters, sites, taonga species, wāhi tapu/wāhi taonga, urupā, sites of significance to Māori and other taonga within our Te Ati Awa rohe. The Te Ati Awa rohe extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Tahuna-a-Tūtawa, east to Whakangerengere, northeast to Taramoukou, north back to Te Rau o Te Huia and offshore out to 200 nautical miles. Te Ati Awa Iwi rohe encompasses much of the New Plymouth district.

Te Ati Awa has strong historical, cultural and spiritual connections within this rohe, our environment is a part of who we are. In return, we as kaitiaki, have the responsibility of ensuring the mauri of these environmental and cultural resources is protected and enhanced for future generations.

Today our Te Ati Awa hapū from north to south are:

- Ngāti Rahiri
- Otaraua
- Manukorihi
- Pukerangiora
- Puketapu
- Ngāti Tawhirikura
- Ngāti Tuparikino
- Ngāti Te Whiti.

TKOTAT is the mandated voice and representative entity for the collective interests of Te Ati Awa Iwi. TKOTAT was established on 31 March 2014 as the post-settlement governance entity by a Deed of Trust. Following this the Te Atiawa Deed of Settlement was signed on 9 August 2014 and the Te Atiawa Claims Settlement Act (2016) enacted on 5 December 2016. TKOTAT has a responsibility to ensure that the interests of Te Ati Awa are safe-guarded. This includes considering the extent to which proposed planning policy may impact on the historical, cultural and spiritual interests of Te Ati Awa within its rohe and those areas under statutory acknowledgement and/ or Te Atiawa Iwi Claims Settlement Act 2016.

TAIHLP is the commercial subsidiary of TKOTAT. The Directors role is to protect and grow the value of our Te Ati Awa settlement assets and to undertake all commercial activities of Te Kotahitanga group.

Te Ati Awa has rights and interests including, but not limited to:

- Rights and interests arising under the Te Atiawa Iwi Claims Settlement Act (2016);
- Rights and interests arising under the Te Atiawa Iwi Environmental Management Plan (IEMP) – *Tai Whenua, Tai Tangata, Tai Ao*; and
- Rights and interests
 - according to tikanga and customary law;
 - arising from the common law (including the common law relating to aboriginal title and customary law); and
 - under Te Tiriti o Waitangi and its principles.

Te Ati Awa seek to ensure that these rights and interests are recognised in proposed planning policy and there is alignment with the outcomes of Te Ati Awa's key iwi documents:

- a. Te Atiawa Iwi Claims Settlement Act 2016;
- b. Te Atiawa Deed of Settlement; and
- c. *Tai Whenua, Tai Tangata, Tai Ao*.

The following Statutory Acknowledgement Areas are recognised in the Te Atiawa Claims Settlement Act (2016), referred to in the Resource Management Act (1991) and are part of the area affected by the Proposed District Plan:

- Bayly Road Conservation Area
- Herekawe Stream and its tributaries
- Huatoki Stream and its tributaries
- Huatoki Stream Marginal Strip
- Huirangi Recreation Reserve
- Kowhangamoku Stream and its tributaries
- Mangahinau Esplanade Reserve
- Manganui River and its tributaries
- Mangati Stream and its tributaries
- Manu Stream and its tributaries
- Motukari Stream and its tributaries
- Ngahere Scenic Reserve
- Parahaki Stream and its tributaries
- Tapuae Stream and its tributaries
- Te Ati Awa Coastal Marine Area
- Te Henui Stream and its tributaries
- Te Henui Stream Conservation Area
- Waiau Stream and its tributaries
- Waihi Stream and its tributaries
- Waihowaka Stream and its tributaries
- Waiongana Stream and its tributaries
- Waiongana Stream Conservation Area
- Waipapa Road Conservation Area
- Waipapa Stream and its tributaries
- Waipu Stream and its tributaries
- Waitaha Stream and its tributaries
- Waitara River and its tributaries
- Waitara West Marginal Strip
- Waiwhakaiho River and its tributaries

TKOTAT and Ngā Hapū o Te Ati Awa have been involved in the Ngā Kaitiaki group through the District Plan review.

TKOTAT's submission to the provisions of the Proposed District Plan are included in the **attached** table. Throughout the table, TKOTAT, Ngā Hapū o Te Ati Awa Iwi and TAIHLP are collectively referred to as TKOTAT.

TKOTAT could not gain an advantage in trade competition through this submission. TKOTAT is affected by an effect of the subject matter of this submission that: adversely effects the environment; and, does not relate to trade competition or the effects of trade competition.

TKOTAT wishes to be heard in relation to this submission. We understand that our hapū may also individually submit on the Proposed District Plan and support their right to do so. If other related entities make a similar submission, TKOTAT will consider presenting a joint case with them at a hearing.

If you have any questions, please contact the undersigned at the following:

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Nāku me ngā mihi
Te Kotahitanga o Te Atiawa Trust



Hemi Sundgren

Pouwhakahaere/ Chief Executive
Te Kotahitanga o Te Atiawa Trust

Te Kotahitanga o Te Atiawa Trust (TKOTAT), Ngā Hapū o Te Ati Awa (Hapū) and Te Atiawa Iwi Holding Limited Partnership (TAIHLP) (for the purposes of this submission collectively referred to as TKOTAT)

The specific submissions and the decisions sought for New Plymouth District Council's Proposed District Plan are as follows:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
PART 1: INTRODUCTION AND GENERAL PROVISIONS			
INTRODUCTION			
DESCRIPTION OF THE DISTRICT			
Description of the District	Support in Part	Amending of wording to ensure statement in relation to iwi and hapū groups is succinct.	Amend wording of last sentence to <i>'There are several different Iwi, and many different hapū groups <u>that</u> have rohe <u>in</u> the New Plymouth District, as explained in the Tangata Whenua Chapter'</i>
HOW THE PLAN WORKS			
STATUTORY CONTEXT			
Part 2 of the Resource Management Act 1991	Support in Part	TKOTAT consider the Part 2 of the Resource Management Act 1991 (RMA) matters have not been addressed adequately throughout the Proposed District Plan. The Plan clearly outlines what matters the RMA requires the NPDC to consider specifically in relation to sections 6(e), 6(f), 7(a) and 8. These requirements have not been adequately addressed through the Strategic Objectives and the objectives, policies, rules and standards.	Require consistent wording throughout the Proposed District Plan to ensure it is specific to Part 2 of the RMA requirements.

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		There is also inconsistency in the wording around these matters throughout the plan which causes issues for Plan users. TKOTAT has made suggested improvements for how these matters can be better addressed throughout the Plan.	
Iwi Management Plans	Support in Part	At the time of preparing this submission, Te Ati Awa's draft Iwi Environmental Management Plan <i>Tai Whenua, Tai Tangata, Tai Ao</i> was being prepared for formal launch and adoption in December 2019.	Addition of references to <i>Tai Whenua, Tai Tangata, Tai Ao</i> throughout the Plan.
Kaupapa Māori Framework	Support in Part	TKOTAT support the inclusion of the Kaupapa Māori Framework – Iwi and Hapū Values. These identified values underpin and inform all activities and development covered by the Proposed District Plan. Notwithstanding the above, these values have been utilised to inform the policy development and are not an exhaustive list of tangata whenua cultural values.	Clearly articulated that the Kaupapa Māori Framework is not an exhaustive list of tangata whenua cultural values.

INTERPRETATION			
DEFINITIONS			
ADJACENT	Oppose	Defined as meaning lying near to, but not necessarily adjoining or contiguous to.	Remove in its entirety.

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		This definition is too limiting, and has implications for the interpretation of provisions which impact on Historic Heritage and SASM which is not consistent with the requirements of the RMA to protect Historic Heritage (including it's surrounding) noting that surrounding does not extend to 'cultural landscape'.	
AGRICULTURAL, PASTORAL AND HORTICULTURAL ACTIVITIES	Support in Part	The definition includes wood lots of up to 5ha. When applied in the rule framework this results in the ability to establish wood lots of up to 5ha on Historic Heritage/SASM. Production forestry (wood lots) can result in significant damage to Historic Heritage/ SASM.	Amend the definition to remove "wood lots of up to 5ha in area".
ARCHAEOLOGICAL SITE	Support	Consistent definitions with the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act) reduces duplication and uncertainty.	Retain as notified.
BANK (OF A SIGNIFICANT WATERBODY OR NATURAL WATERBODY)	Support in Part	This definition should apply to all waterbodies in line with our submissions above regarding waterbodies.	Amend the definition as follows: BANK (OF A SIGNIFICANT WATERBODY OR NATURAL WATERBODY)

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BIODIVERSITY OFFSET	Support in Part	An offset must only be available whence the ability to avoid, remedy or mitigate an effect, and then must achieve a net gain to be an offset.	Amend the definition as follows: <i>means a measurable conservation outcome resulting from actions designed to compensate for significant residual adverse biodiversity effects arising from activities after avoidance, remediation, and mitigation measures have been taken. The goal of biodiversity offsets is to achieve no net loss and preferably a net gain of indigenous biodiversity values.</i>
BUILDING PLATFORM	Support in Part	Additional features must be added to this definition to guide the implementation of rules/subdivision design around SASM, waterbodies and Historic Heritage.	Amend the definition as follows: <i>means land that is suitable and practical for accommodating a residential house, or other intended building having regard to soil conditions, gradient, access, natural hazards, <u>waterbodies, historic heritage, sites and areas of significance to Maori, indigenous vegetation and habitat, amenity, health and safety, all in terms of the Building Act 2004 the Development and Subdivision Infrastructure Standard based on NZS 4404:2010 incorporating NPDC and STDC Local Amendments Links.</u></i>
CUSTOMARY ACTIVITIES	Support		Retain as notified.
HISTORIC HERITAGE	Support		Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
IWI OR HAPŪ DEVELOPMENT PLAN	Support		Retain as notified.
MĀORI PURPOSE ACTIVITIES	Support in Part	TKOTAT acknowledges that the definition encompasses a broad range of activities; however, TKOTAT recommends that the definition provides for structures and buildings, commercial/ retail related activities and health care.	Amend the definition to include the provision for structures, health care and <u>commercial/ retail related activities</u>
NATURAL WATERBODY	Support in Part	Natural stormwater ponding areas should not be excluded from the definition of natural waterbody, acknowledging that natural ponding areas are a component of waterbodies and their catchments (Te Mana o te Wai).	Amend the definition as follows: <i>means a waterbody but excludes an aquifer, an <u>artificial</u> stormwater ponding area, or any part of a river or stream that is piped.</i>
OVERLAND FLOW PATH	Support in Part		Amend the definition as follows: <i>means the route along which stormwater flows overland. These routes carry water which cannot flow through the primary stormwater system (usually piped) due to the water flow exceeding the capacity of the network. It excludes permanent watercourses or intermittent rivers or streams.</i>

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PAPAKĀINGA HOUSING	Support		Retain as notified.
SILENT FILE	Support	Technical note – remove the hyperlink under <u>site</u> for this definition.	Retain as notified.
SITE AND AREA OF SIGNIFICANCE TO MĀORI	Support		Retain as notified.
STATUTORY ACKNOWLEDGEMENT AREA	Support		Retain as notified.
GLOSSARY			
Glossary	Support in Part	Encouraging to see Te Reo Māori kupu and terms are woven throughout the Proposed District Plan.	Amend to ensure correct kupu and spelling used, including use of tohūtō (macrons). Amend errors in use of kupu, spelling and ensure explanations are correct and all necessary terms are explained.
MĀTAURANGA MĀORI	Support in Part	Elevate this term from the glossary to the definition table. This term is defined in the NZCPS (2010), and is critical in the understanding of a number of provisions which tangata whenua and the Council will rely on to meet its obligations under the RMA in implementing this plan.	Elevate this term to the definition table.
MAURI / MOURI	Support in Part	Elevate this term from the glossary to the definition table. This term is important in the understanding of a number of provisions which tangata whenua and the Council will	Elevate this term to the definition table.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		rely on to meet its obligations under the RMA in implementing this plan.	
WĀHI TAPU	Support in Part	<p>Elevate this term from the glossary to the definition table. This term is important in the understanding of a number of provisions which tangata whenua and the Council will rely on to meet its obligations under the RMA in implementing this plan.</p> <p>Wāhi Tapu should be defined to mean the same as in the Heritage New Zealand Pouhere Taonga Act 2014 to avoid duplication and uncertainty.</p>	Elevate this term to the definition table, and define Wāhi Tapu to have the same meaning as given in the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPT Act) - a place sacred to Māori in the traditional, spiritual, religious, ritual, or mythological sense.
MAHINGA KAI	Oppose	Mahinga Kai is proposed to be a compulsory value that is forms a part of freshwater management under the Proposed National Policy Statement for Freshwater Management 2019. This value should not be defined as solely being in the past tense. Mahinga Kai and the restoration of these activities/areas continue to occur and will do so into the future.	Amend the definition to recognise that this activity/areas continue to be practised/used and will do so into the future.

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TANGATA WHENUA			
Spelling of Te Ātiawa, Te Ati Awa, Te Atiawa	Support in Part	The correct spelling does not appear to have always been utilised for Te Ati Awa and Te Ātiawa throughout the Proposed District Plan.	Amend to ensure the correct spelling is utilised throughout the Plan.
Statutory acknowledgement	Support in Part	This section notes that Statutory Acknowledgement interests are identified through the New Plymouth District Council's (NPDC) Geographic Information System (GIS). There are concerns that the GIS does not capture all the Statutory Acknowledgement interests. TKOTAT are also concerned about the process for engaging tangata whenua where Statutory Acknowledgements are identified.	Amend wording to correctly reflect the process for notification of resource consent applications to iwi/ hapū within, adjacent to, or directly affecting a statutory area and engagement of iwi/ hapū to inform the resource consent process. Suggestion that pre-application discussions are beneficial.
Treaty Settlement Interests	Support in Part	This section makes reference to ngā iwi o Taranaki settling their respective historic claims with the Crown. Ngā iwi o Taranaki are currently negotiating a cultural redress arrangement over Taranaki Mouna with the Crown which is of significance to NPDC.	Amend wording throughout the Proposed District Plan to reflect the Mouna negotiations being undertaken.
Mana Whakahono a Rohe Agreement	Support in Part	TKOTAT acknowledges that six iwi o Taranaki are continuing to work alongside the Taranaki territorial and regional authorities to develop a Mana Whakahono a Rohe Agreement. It must be noted that this	Amend wording throughout the Proposed District Plan to reflect that each iwi will have their own Mana Whakahono a Rohe agreement with each authority.

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		will not be a pan iwi and/ or common agreement.	
Engagement and Consultation with tangata whenua	Support in Part	<p>The Proposed District Plan recognises the need to consult with tangata whenua stems from the Treaty of Waitangi principle of partnership, requiring both parties to act reasonably and make informed decisions.</p> <p>The Plan also acknowledges that the RMA has different requirements for consulting with tangata whenua and that their contribution to assessing effects on Māori cultural values as set out under Part 2 of the RMA can be significant.</p> <p>Only tangata whenua can identify their relationship and that of their cultural and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga. TKOTAT consider it necessary that tangata whenua and their cultural expertise is engaged to inform any development and decision making process.</p>	Amend wording throughout the Proposed District Plan to reflect the statutory requirement to engage tangata whenua as a cultural expert to inform any development and decision making processes.
Iwi - Hapū - Activities table	Support in Part	The table mentions only five of the eight Te Ati Awa hapū.	Amend to include all eight Te Ati Awa hapū and their relevant activities.

PART 2: DISTRICT WIDE MATTERS

STRATEGIC DIRECTION

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
HC-2, HC-3, NE-7, TW-8 – TW-12, UFD-13, UFD-19	Support in Part	<p>Strategic objectives HC-2, HC-3, NE-7, TW-8 – TW-12, UFD-13 and UFD-19 are the key provisions that underpin the rest of the proposed plan in implementing the Council’s duties and obligations to recognise and provide for the relationship tangata whenua have with ancestral lands, waterbodies, sites, areas and landscapes, and other taonga; have particular regard to kaitiakitanga; and take into account the principles of the Treaty of Waitangi.</p> <p>These strategic objectives rely on policies, rules, standards and design guides in other sections of the Plan to be implemented. In all cases the expertise of tangata whenua is required to inform the implementation of these provisions noting that only mana whenua can identify the impact of a proposal on the cultural landscape it sits within. Further, it is important to note that seeking this expertise is consistent with Treaty principles around a duty of active protection and the duty to consult.</p> <p>Ensuring there is clear policy direction in relation to each of the issues managed throughout the plan that requires the engagement of cultural expertise, is necessary to implement these strategic objectives. There are several areas of the</p>	

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		<p>Proposed Plan that do not implement these Strategic Objectives.</p> <p>TKOTAT stress that a reliance on consultation alone in the resource consent and monitoring process is not considered sufficient to implement these Strategic Objectives; and the Council's obligations to recognise the relationship tangata whenua have with culture and traditions with the ancestral lands, waterbodies, sites, areas and landscapes, and other taonga; have particular regard to kaitiakitanga; and take into account the principles of the Treaty of Waitangi.</p> <p>There are several areas of the proposed plan that do not implement these Strategic Objectives. Submissions in relation to these points are included below.</p>	

HISTORIC AND CULTURAL			
HC-1	Support	Recognising and protecting historic heritage is a matter of national importance. Strategic provisions provide sufficient weight to this matter in the context of the district.	Retain the Strategic Objective as notified.
HC-2	Support in Part	TKOTAT supports the intent of the Strategic Objective; however, require that the Objective seeks to protect more than just the 'values' associated with historic heritage	Amend Strategic Objective wording to reflect submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		and sites and areas of significance to Māori. Intrinsic qualities, uses, resources, well-being, Mātauranga Māori, tikanga and interests are examples of the associations within historic heritage and sites and areas of significance to Māori.	
HC-3	Support in Part	Recognising and protecting the relationship tangata whenua have with the items listed in the Strategic Objective are matters of national importance. The strategic provisions provide sufficient weight to this matter in the context of the District and must inform issue specific provisions which guide the use, development and protection as they relate to ancestral lands, waterbodies, sites, areas and landscapes, and other taonga.	Retain the Strategic Objective as notified.

NATURAL ENVIRONMENT			
NE-4	Support in Part	TKOTAT supports the recognition of the significance of the natural environment as being critical for the District. However, as currently worded the qualifier 'contribution' undervalues the natural environment. TKOTAT require the Strategic Objective requires more than only a 'contribution' to the district's sense of place and identity.	Amend the Strategic Objective wording to: <i><u>The district's natural environment makes a critical and unique contribution to the district's..</u></i>
NE-5	Support in Part	Parts of our natural environment have been severely degraded. 'Sustaining' the natural	Amend the Strategic Objective wording to:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		environment does not go far enough and the requirement to protect needs to be strengthened. Require the Strategic Objective to restore, enhance, protect and sustain the natural environment.	<i>A well-function and resilient natural environment is <u>restored, enhanced, protected and sustained so that it is able to provide.</u></i>
NE-6	Support	TKOTAT acknowledges integrated management across development and agencies is critical to providing for all values associated with waterbodies and the coast.	Retain Strategic Objective as notified.
NE-7	Support	Allowing tangata whenua to protect and manage the natural environment as kaitiaki reiterates the section 7(a) of the RMA requirements.	Retain Strategic Objective as notified

TANGATA WHENUA			
TW-8	Support in Part	<p>TKOTAT support the intent of the Strategic Objective; however, it is considered that its intent could be strengthened.</p> <p>The Strategic Objective follows on from original advice from Ngā Kaitiaki. In this advice Ngā Kaitiaki supported this objective with a specific policy that implemented the objective. This policy reads as follows:</p> <p><i>Provide opportunities for Tangata Whenua to actively participate in the sustainable management of natural and physical</i></p>	<p>Require the Strategic Objective to be amended follows:</p> <p><i>Provide opportunities for Tangata Whenua to actively participate in the sustainable management of natural and physical resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following:</i></p> <ul style="list-style-type: none"> <i>a) recognises the role of Tangata Whenua as kaitiaki and provides for the practical expression of kaitiakitanga;</i> <i>b) builds and maintains partnerships and relationships with Tangata Whenua;</i> <i>c) provides for timely, effective and meaningful engagement with Tangata Whenua at all stages in the</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p><i>resources including ancestral lands, water, sites, wāhi tapu and other taonga in a way that does all of the following:</i></p> <ul style="list-style-type: none"> <i>a) recognises the role of Tangata Whenua as kaitiaki and provides for the practical expression of kaitiakitanga;</i> <i>b) builds and maintains partnerships and relationships with Tangata Whenua;</i> <i>c) provides for timely, effective and meaningful engagement with Tangata Whenua at all stages in the resource management process, including development of resource management policies and plans;</i> <i>d) recognises the role of kaumātua and pūkenga;</i> <i>e) recognises Tangata Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga;</i> <i>f) acknowledges historical circumstances and impacts on resource needs;</i> <i>g) recognises and provides for mātauranga and tikanga; and</i> 	<p><i>resource management process, including development of resource management policies and plans;</i></p> <ul style="list-style-type: none"> <i>d) recognises the role of kaumātua and pūkenga;</i> <i>e) recognises Tangata Whenua as specialists in the tikanga of their hapū or iwi and as being best placed to convey their relationship with their ancestral lands, water, sites, wāhi tapu and other taonga;</i> <i>f) acknowledges historical circumstances and impacts on resource needs;</i> <i>g) recognises and provides for mātauranga and tikanga; and</i> <i>h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p><i>h) recognises the role and rights of whānau and hapū to speak and act on matters that affect them.</i></p> <p>Without this policy (or one that achieves the same level of guidance) then the objective as currently drafted lacks the specificity to positively impact on resource management processes.</p>	
TW-9	Support	<p>Only tangata whenua are qualified to identify the impacts of the protection, use and development of resources and the relationship they hold with the environment.</p> <p>TKOTAT acknowledge that this Strategic Objective reiterates the importance of engaging cultural expertise at the beginning of the development process.</p>	Retain Strategic Objective as notified.
TW-10	Support in Part	<p>Māori land is a limited resource in the district. Provisions enabling the use, development and protection of this resource in accordance with tikanga and kawa are supported.</p> <p>There are concerns that the definition of Māori land in the Te Ture Whenua Act 1993 does not encompass all Māori land including Treaty settlement land.</p>	Amend definition of 'Māori land' to encompass all types of Māori land including Treaty settlement land considering section 129 of the Te Ture Whenua Act 1993.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		TKOTAT considers that section 129 of the Te Ture Whenua Act 1993 is a better description of Māori Land.	
TW-11	Oppose	TKOTAT considers this Strategic Objective is a duplication of HC-3.	Remove the Strategic Objective.
TW-12	Support	TKOTAT acknowledge that tangata whenua and their relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance contribute to the district's identity and sense of belonging.	Retain the Strategic Objective as notified.

URBAN FORM AND DEVELOPMENT			
UFD-13	Support in Part	This objective must prioritise managing impacts on the natural and cultural environment over enabling greater productivity and economic growth. Without a clear outcome regarding issues that cannot both be achieved in all instances, TKOTAT consider this objective to be ambiguous.	Amend the objective to read as follows: <i>The district develops in a cohesive, compact and structured way that:</i> <ol style="list-style-type: none"> <i>1. maintains a compact urban form that provides for connected, liveable communities;</i> <i>2. recognises the relationship of tangata whenua with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance;</i> <i>3. enables greater productivity and economic growth;</i> <i>4. enables greater social and cultural vitality;</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p>5. takes into account the short, medium and long-term potential impacts of climate change and the associated uncertainty;</p> <p>6. utilises existing infrastructure and/or can be efficiently serviced with new infrastructure; and</p> <p>7. meets the community's short, medium and long-term housing and industrial needs.</p> <p>Where all activities are managed in a way that restores the natural environment.</p>
UFD-15	Support in Part	TKOTAT support the provision of papakāinga housing being made available throughout the district. For consistency, TKOTAT requires the relationship of tangata whenua with their culture and traditions to be reflected in the Strategic Objective.	<p>Amend the Strategic Objective as follows:</p> <p><i>..5. Papakāinga housing that provides for the ongoing relationship of tangata whenua <u>with their culture and traditions and with their ancestral lands and for their.</u></i></p>
UFD-19	Support in Part	<p>Sub-clause 5 references a requirement to incorporate mātauranga Māori principles by involving tangata whenua in the design, construction and development of the built environment. The qualifier through using the word 'principles' following mātauranga Māori must be removed – mātauranga is broader than principles alone.</p> <p>The second part of this objective relates to the involvement of tangata whenua in urban development. This is inherent in the</p>	<p>Amend sub-clause 5 of the Strategic Objective as follows:</p> <p><i>..5. incorporate mātauranga Māori principles in the design, construction and development of the built environment;.. and elsewhere throughout the plan where this same reference is made.</i></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		reference to mātauranga Māori as tangata whenua hold this knowledge.	
UFD-20	Support	Greenhouse gas emissions can have impacts on tangata whenua's relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance and cultural values.	Retain Strategic Objective as notified.
UFD-22	Support	Industrial activities can have impacts on tangata whenua's relationship with their culture and traditions with their ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance, as well as cultural values. Ensuring that there is sufficient land for industrial activities 'in appropriate locations' will ensure this relationship is protected.	Retain Strategic Objective as notified.
UFD-24	Support	The productive, versatile land and natural, physical and cultural resources located within rural areas that are of significance to the district and their protection and maintenance offers further protection to tangata whenua's relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance and associated cultural values.	Retain Strategic Objective as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
ENERGY, INFRASTRUCTURE AND TRANSPORT			
ENERGY			
ENGY-O1 and ENGY-O2	Oppose	TKOTAT consider the objectives conflict with the Strategic Objectives, particularly UFD-20.	Amend wording to ensure consistency with Strategic Objectives.
ENGY-P1	Support	TKOTAT support the use of petroleum prospecting excluding seismic surveys using explosives in all zones.	Retain policy wording as notified.
ENGY-P2	Support in Part	Support the restriction of seismic surveys using explosives to the Major Facility Zone and Rural Production Zone. TKOTAT are concerned about the trigger requirements for resource consent in proximity to historic heritage. Adverse effects should be avoided, remedied or mitigated instead of appropriately manage.	Amend policy wording in line with submission points.
ENGY-P3	Oppose	This policy appears to be a duplication of policy ENGY-P6.	Remove policy.
ENGY-P4	Oppose	This policy appears to be a duplication of policy ENGY-P6.	Remove policy.
ENGY-P5	Support in Part	TKOTAT support the avoidance of adverse effects on identified features; however, extrapolation of identified features is required. Remove the 'significant' qualifier in relation to adverse effects.	Amend the policy to the following: <i>Avoid petroleum exploration and petroleum production activities which have significant adverse effects on <u>areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<u>areas of significance to Māori</u> ... and elsewhere throughout the plan.
ENGY-P6	Support	TKOTAT support that this policy seeks to avoid petroleum exploration and production in all zones other than the Rural Production and Major Facility Zones. TKOTAT supports that these activities are not compatible with any other zones in the District. This must be read in conjunction with policy ENGY-P5.	Retain policy as notified.
ENGY-P7, ENGY-P17 and ENGY-P22	Support in Part	As drafted these policies do not implement the strategic objectives of the plan as they relate to engagement of cultural expertise to inform the management of energy activities.	Require the addition of a clause in each of these policies worded as follows: <i>Any expert advice received from tangata whenua with respect to mitigation measures and or opportunities to incorporate Mātauranga Māori.</i>
ENGY-P7 and ENGY-P8	Support in Part	These policies would provide clearer direction to Plan Users if some of the meanings of the words used in this policy were more specific e.g. the use of words such as <i>proximity</i> , <i>adequate</i> and <i>adequate separation</i> , which are not as specific as other parts of the Plan and it is unclear how they would be triggered in the Resource Consent process. A distance of 500m has been recommended as this accords with Te Ati Awa's IEMP. This policy could also be more effective if it specifically mentioned all activities and structures involved with petroleum	Require that alternative wording is used as follows: ENGY-P7 <u>5. Adequate separation Ensure there is a minimum separation of 500 m from areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori and sensitive features</u> ENGY – P8 <u>1. Ensuring adequate setbacks Ensure there is a minimum separation of 500 m from areas of significant natural features and landforms, waterbodies, indigenous</u>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>prospecting and production e.g. pipeline routes (including construction etc) and disposal of any waste materials.</p> <p>Support that policy ENGY-P 8 specifically requires that the cumulative effects of oil production and exploration are considered. The failure to do this with past consenting of these activities has resulted in the quality of life in some parts of the New Plymouth District being severely affected due to the number of sites close to where people are residing and working.</p>	<p><u>biodiversity, historic heritage and sites and areas of significance to Māori and sensitive features</u></p>
ENGY-P9	Oppose	Where the location of oil and gas activities is constrained by the location and/ or accessibility of the natural resource to be used or extracted, the activity should be required to comply with all Proposed District Plan requirements; avoid, remedy or mitigate effects; and not be required to only demonstrate compliance with a list of arbitrary requirements.	Remove the policy in its entirety
ENGY-P10, ENGY-P18 and ENGY-P23	Support in Part	The retention of oil and gas sites, renewable and non-renewable electricity generation structures which are redundant or unused can have adverse effects on tangata whenua's relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance and associated cultural values. The remediation of these	Amend the policy to require the sites' reinstatement back to its original state prior to it being used as an oil and gas site.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		sites back to its state prior to it being an oil and gas site can restore and enhance this relationship and these values.	
ENGY-P11 and ENGY-P24	Support in Part	Existing oil and gas and non-renewable electricity generation activities are known to be in close proximity to iwi and hapū owned land which may be developed in the future and provide for the relationship with culture and traditions with their ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance and associated cultural values. In the event iwi and hapū wished to develop for example a marae and/ or papakāinga housing (sensitive activities) within close proximity to existing oil and gas activities, it is considered that amendments to this policy would enable potential reverse sensitivity effects to be addressed.	Amend the policy to read as follows: <i>Ensure sensitive activities do not compromise or restrict the efficient operation and/or maintenance of existing lawfully established [oil and gas/ non-renewable electricity generation] activities and require that new sensitive activities be appropriately <u>designed, constructed, located and/or separated</u> from [oil and gas/ non-renewable electricity generation] activities to minimise conflict, unacceptable risks and/or reverse sensitivity effects.</i>
ENGY-P13	Support in Part	TKOTAT support the allowance of ongoing operation, maintenance and upgrading of existing renewable electricity generation activities. It is considered that the 'appropriately' qualifier needs to be removed. The definition of 'upgrading' relates to network utilities. It is unclear how this relates to the upgrading of renewable electricity generation activities.	Amend the policy to read as follows: <i>... and upgrading of existing renewable electricity generation activities, provided adverse effects are appropriately avoided, remedied or mitigated.</i> Amend the definition of 'upgrading' so it applies to all activities and/ or development.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
ENGY-P14	Support in Part	TKOTAT support the policy intent subject to removal of the reference to adverse effects only being 'on the environment'. Restriction to this would not capture all adverse effects.	Amend the policy to read as follows: <i>...including the export of any surplus electricity to a local distribution network, while avoiding, remedying and mitigating their adverse effects on the environment.</i>
ENGY-P16	Support in Part	The intention of this policy to avoid locating these activities to the features listed in sections 1 to 3 is supported. Providing a site specific distance is required to be consistent with our submissions in relation to sites and areas of significance to Māori, Historic Heritage and other features.	Amend the policy wording as follows: <i>Avoid locating renewable electricity generation activities within 500m of..</i>
ENGY-P17	Support in Part	TKOTAT support the intent of this policy subject to a site specific distance being provided to be consistent with our submissions in relation to sites and areas of significance to Māori, Historic Heritage and other features.	Amend the policy wording as follows: <i>..7. A separation distance of 500m from sensitive activities and <u>areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori</u> to ensure conflict between activities..</i>
ENGY-P19	Oppose	Whilst TKOTAT understand the intent of this policy, it is unclear how the adverse effects of an activity can be avoided, remedied or mitigated if their on-going operation, maintenance and upgrading is allowed.	Amend the policy wording to address the submission point.
ENGY-P21	Support in Part	TKOTAT support the intent of the policy subject to the recommended amendments for policy ENGY-P17.	Amend the policy wording to address the submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
ENGY-P22	Support in Part	TKOTAT support the intent of the policy subject to the recommended amendments for ENGY-P17.	Amend the policy wording to address the submission point.
ENGY-R1	Oppose	The Effects Standards for the underlying zones do not give consideration to the actual and potential effects from petroleum prospecting including in relation to historic heritage, SASM and other features.	Amend Effects Standards in all underlying zones to give consideration to the actual and potential effects from petroleum prospecting including in relation to historic heritage and scheduled features.
ENGY-R2	Oppose	TKOTAT object to a rule that allows seismic surveys using explosives to be a permitted activity on or within proximity of SASM. This would allow this type of activity to take place in areas such as urupā and pā sites without the ability of tangata whenua to inform the consent process.	Rule activity status amended to a discretionary activity. Effect standard ENGY-S5 amended.
ENGY-R3 ENGY-R4 (1)	Oppose	TKOTAT object to rules ENGY-R3 and ENGY-R4 (1) in relation to allowing petroleum exploration and production activities as a permitted activity within the Major Facility Zone where it is reliant on rules in another chapter, this is considered to be ultra vires. The Major Facilities Zone rules are silent on petroleum exploration and petroleum production activities as well as consideration of their effects in the effects standards for rules under the Major Facility Zone.	Remove rules because they are ultra vires.
ENGY-R5	Support in Part	To relate to the policy context, the matters over which discretion is restricted should	Addition of an effects standard requiring no activities within 500m of historic heritage, SASM and other features.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		consider effects on historic heritage, SASM and other features. An effects standard should require no activities within 500m of historic heritage, SASM and other features to protect these features.	Addition of a matter over which discretion is restricted requiring the consideration of adverse effects on historic heritage, SASM and other features.
ENGY-R6	Support in Part	TKOTAT has no objection to the proposed permitted activity status; however, an additional effects standard requiring a setback from historic heritage, SASM and other features is suggested to protect these features. In addition, matters over which discretion is restricted should consider these effects.	Addition of an effects standard requiring no activities within 500m of historic heritage, SASM and other features. Addition of a matter over which discretion is restricted requiring the consideration of adverse effects on historic heritage, SASM and other features.
ENGY-S1	Support in Part	TKOTAT consider the effects standard and matters of discretion if compliance not achieved should require consideration of effects on historic heritage, SASM and other features.	Amend effects standard and matters over discretion if compliance not achieved to address submission point.
ENGY-S2	Oppose	The effects standard and matters of discretion if compliance not achieved do not give consideration to actual and potential effects on historic heritage and scheduled sites including SASM, neither to the effects on the waterbody within which it would be located including effects on biodiversity and ecology.	Amend effects standard and matters over discretion if compliance not achieved to address submission point. Remove Effects Standard ENGY-S2 (3).

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>No buildings or structures associated with small-scale hydro turbines should be exempt from the building setback requirements from waterbodies. If the setback from waterbody rules are triggered, this will allow consideration of effects associated with the land use adjacent to the waterbody, applying an integrated management approach.</p> <p>'Priority waterbodies' under point 3 does not appear to be a term utilised throughout the Proposed District Plan.</p>	
ENGY-S3	Support in Part	<p>Solar panel farms are becoming a common feature in Aotearoa. TKOTAT seek that tangata whenua and our relationship with our culture and traditions with ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance and associated cultural values are protected. The effects standard does not give consideration to actual and potential effects on historic heritage, SASM and other features. The Effects Standard and/ or matters of discretion if compliance not achieved must provide for this.</p>	<p>Amend effects standard.</p> <p>Amend Matters of discretion if compliance not achieved (1) to '<i>The effects on historic heritage</i>'.</p>
ENGY-S4	Support in Part	<p>TKOTAT seek that tangata whenua and their relationship with our culture and traditions with ancestral lands, waterbodies, sites, areas and landscapes and other taonga of</p>	<p>Amend effects standard and Matters of discretion if compliance not achieved to provide for the submission point.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		significance and associated cultural values to be protected. The effects standard does not give consideration to actual and potential effects on historic heritage, SASM and other features. The Effects Standard and/ or matters of discretion if compliance not achieved must provide for this.	
ENGY-S5	Support in Part	As articulated against ENGY-P2.	Amend the effects standard as follows: <u>That the explosives are not located on or within 500m of the extent of a site or area of significance to Māori or Historic Heritage sites.</u>

NETWORK UTILITIES			
Overview, Objectives, Policies and Rules	Support in Part	Network utilities are provided for at different parts of the proposed plan. The network utilities section provides the general guidance for the management of this activity in the district. Other relevant provision include the use of special purpose zones. The establishment of network utilites (especially three waters, roading, telecom etc) through the identification of Development Areas (and associated structure planning), subdivision process and reliance on the Land and Infrastructure standard provision all include provision which manage the design, construction,	

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>maintenance, repair and upgrading of infrastructure.</p> <p>Ensuring that these provisions are integrated to avoid, remedy or mitigate the effects of network utilities over time, and in relation to historic heritage, waterbodies, indigenous biodiversity, the coastal environment, outstanding natural landscapes and features, Māori land and provide for the relationship of tangata whenua this these areas/items/features.</p> <p>UFD-13 and UFD-19 are two of the strategic objectives applicable to network utilities. These objectives rely on the policies, rules and NZS4404:2010 Land and Infrastructure standard with local amendments version 3 to be implemented. The following submissions are made in relation to those provisions:</p>	
NU-O1	Support in Part	The installation, maintenance and upgrading of network utilities can have an adverse effect on sensitive natural and physical resources. This must be recognised in the objectives of the NU chapter.	Add <i>'are located to avoid impacts on sensitive natural and physical resources'</i> as a new sub-clause to the objective.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		This would add clarity to NU-O2 which requires adverse effects to be avoided, remedied or mitigated. Clarification that adverse effects are to be avoided where in relation to sensitive natural and physical resources like SASM or waterbodies is required.	
NU-P2	Support in Part	The integrated management of network utilities across development planning, subdivision, designation, land use and other resource management processes, including those governed by Territorial Authorities (e.g. stormwater discharge, waste water discharges and the like) is critical to avoid, remedy or mitigate the adverse effects of the design, development, construction, maintenance, repair and upgrading of network utilities over time.	Amend the policy to read as follows: <i><u>Require</u> the coordination of network utilities planning and delivery with land use, subdivision, development and urban growth so that future land use and network utilities are integrated, efficient and aligned.</i>
NU-P4	Support in Part	Engaging the expertise of tangata whenua to provide mātauranga in regards to managing the adverse effects of network utilities is required, especially where these activities are undertaken in relation to historic heritage, waterbodies, outstanding natural landscapes, areas of indigenous biodiversity, the coastal environment and on Māori land.	Amend the policy to read as follows: <i>Manage the adverse effects of network utilities, including effects on natural and physical resources, amenity values, sensitive activities, and the health, safety and wellbeing of people and communities by:</i> <i>1. controlling the height, bulk and location of network utilities;</i> <i>2. requiring compliance with recognised standards or guidelines for the potential adverse effects of noise,</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Amending the policy to include this reference is required to ensure that the strategic objectives referred to above are implemented.	<p><i>vibration, radiofrequency fields and electric and magnetic fields;</i></p> <p><i>3. requiring the undergrounding of network utilities in new areas of urban development;</i></p> <p><i>4. mitigating adverse visual effects through landscaping and/or the use of recessive colours and finishes;</i></p> <p><i>5. requiring network utilities to adopt sensitive design to integrate network utilities within the site, existing built form and/or landform and to maintain the character and amenity of the surrounding area;</i></p> <p><i><u>6. avoiding historic heritage;</u></i></p> <p><i><u>7. avoiding, remedying or mitigating adverse effects on waterbodies, indigenous biodiversity, outstanding natural landscapes or features and Māori Land; and</u></i></p> <p><i><u>8. engaging the expertise of tangata whenua to inform the design, development, construction, maintenance, repair or upgrading of network utilities.</u></i></p>
NU-P5	Oppose	This policy as drafted elevates the requirements of a network utility above those of the natural environment. This policy undermines the intent of the Strategic Objectives of the Proposed District Plan.	Remove the policy in its entirety.
Rules NU-R1 to NU-R41	Support in part	The wording within this section of the plan and between it and other sections is inconsistent. TKOTAT request that the	Amend wording used throughout the rules in this section of the plan:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		wording described is used in all the rules indicated.	Matters over which discretion is restricted <u>Effects on areas of significant natural features and landforms, waterbodies, indigenous vegetation, historic heritage values and on or within 500 m of the extent of the schedules sites and areas of significance to Māori or any particular spiritual and or heritage values, interests or associations of importance to tangata whenua as kaitiaki and mana whenua ...</u>

TRANSPORT			
Overview, Objectives, Policies and Rules	Oppose	<p>Te Ati Awa's iwi environmental management plan <i>Tai Whenua, Tai Tangata, Tai Ao</i> seeks to promote initiatives to reduce greenhouse emissions.</p> <p>TKOTAT consider that this chapter places significant weight on single mode private vehicle transport, rather than encouraging and promoting provision for sustainable, public and active modes of transport in developments in the first instance. This would accord with Te Ati Awa's IEMP and Proposed District Plan Strategic Objective UDF-19.</p>	The chapter wording is amended to place significant weight on the provision of sustainable, public and active modes of transport.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
TRAN-R1	Support	Support activity status, effects standards TRAN-S1 – TRAN-S25 and TRAN Table 1.	Retain as notified.
TRAN-R8	Support	Support activity status, effects standards TRAN-S1 – TRAN-S25 and TRAN Table 1.	Retain as notified.

HAZARDS AND RISKS			
CONTAMINATED LAND			
CL-01	Support in Part	It is acknowledged that the NESCS responds to the risks to human health from contaminated land. It should be noted that contaminated land can also have adverse effects on tangata whenua's relationship with their culture and traditions with their ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance and cultural values. This is reiterated in Te Atiawa's iwi environmental management plan <i>Tai Whenua, Tai Tangata, Tai Ao</i> .	Amend objective CL-01 and policies CL-P1 and CL-P2 to ensure the relationship and effects areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori are considered.

HAZARDOUS SUBSTANCES			
HAZS-P6	Oppose	TKOTAT support the use of the avoid mechanism in relation to potential and actual effects on identified features; however, the extrapolation of identified features is required.	Amend policy wording as follows: <i><u>Avoid locating significant hazardous facilities on or within any identified feature areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		These policies would provide clearer direction to Plan Users if some of the meanings of the words used in this policy were more specific e.g. the use of words such as <i>sufficiently setback</i> which are not as specific as other parts of the Plan and it is unclear how they would be triggered in the Resource Consent process. A distance of 500m has been recommended as this accords with Te Ati Awa's IEMP.	<u>Māori or identified natural hazard areas and ensure that significant hazardous facilities are sufficiently set back 500m from significant areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori scheduled archaeological sites, so as to avoid adverse effects on identified features areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori or identified natural hazard areas.</u>
HAZS-P7	Support in Part	Whilst TKOTAT acknowledge the intent of this policy, there are concerns that iwi and hapū owned land may be located in close proximity to these significant hazardous facilities. This could have impacts on future marae and/ or papakāinga housing developments given the proposed definition of sensitive activities encompasses living activities. As per section 6(e) of the RMA the requirement is to provide for the relationship of tangata whenua which avoiding these types of activities would not provide for.	Amend policy wording to address submission point.
HAZS-P8	Support in Part	As per the submission points to HAZS-P6, identified features should be extrapolated and a specific setback distance from those features should be provided for. As per TKOTAT submission point to the Strategic Objectives, the expertise of tangata whenua	Amend the policy wording as follows: <u>..5. engaging the expertise of tangata whenua to inform proposals for significant hazardous facilities whether the activity has the potential to compromise tangata whenua's relationship with their ancestral lands, water, sites, wāhi tapu, and other taonga and if so, the outcomes</u>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		is required to inform developments and decision making.	of any consultation with tangata whenua, including with respect to mitigation measures; minimisation of long term visual and landscape effects through site selection, screening and landscaping; 6. <u>adequate separation a 500m setback from identified features areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori and sensitive activities to ensure conflict between activities, adverse effects and reverse sensitivity effects are minimised;..</u>
HAZS-R1(2)	Support in Part	Tangata whenua's relationship with our culture and traditions with ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance and associated cultural values to be protected. The permitted activity standards do not give consideration to actual and potential effects on historic heritage, SASM and other features. The permitted activity status requirements must provide for this.	Addition of a Matter over which discretion is restricted requiring consideration of effects on historic heritage, SASM and other features.
HAZS-R1(3)	Support	Support proposed non-complying activity status in the underlying zones.	Retain as notified.
HAZS-R2 – R12	Support in Part	Support proposed activity statuses.	Retain activity statuses as notified.

NATURAL HAZARDS

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies, Rules, Matters over which Discretion is Restricted	Support	TKOTAT support the intent of this section of the Proposed District Plan.	Retain as notified.

HISTORIC AND CULTURAL VALUES			
ENTRANCE CORRIDORS			
Overview, Objectives, Policies, Rules, Matters over which Discretion is Restricted and Effects Standards	Support in Part	TKOTAT support the intent of the entrance corridors chapter; however, suggest extending the entrance corridors to the outer boundaries of the District. Clarification is sought as to why the section only relates to the urban areas.	Clarification sought. Amend overview and entrance corridors on planning maps.
ECOR-P2	Support in Part	TKOTAT consider that features appropriate to tangata whenua can contribute to the visual amenity, attractiveness and quality of the arrival along entrance corridors including pou. These features can recognise the relationship of tangata whenua with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga. The policy should reflect this.	Amend policy wording as follows: <i>.. 2. the erection or use of structures that specifically <u>provide for and recognise tangata whenua's relationship with their culture and traditions with their with their ancestral lands, water, sites, wāhi tapu, and other taonga and association with the area, including pou; and..</u></i>
ECOR-P5	Support	TKOTAT support the intent of this policy in particular in section 5 which requires cultural values to be considered.	Retain the policy as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
ECOR-R1 – R5 and ECOR-S1 – S3	Support in Part	To ensure the rules and effects standards support the Strategic Objectives of the Proposed District Plan, the permitted activity standards, effects standards and matters over which discretion is restricted should give consideration to the effects on tangata whenua's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.	Provide permitted activity status standards, effects standards and matter over which discretion is restricted which address the submission point.

HISTORIC HERITAGE			
Overviews, objectives, policies and rules	Support in Part	<p>Acknowledge the importance that the New Plymouth District Council places on historic heritage including through the on-going work done on the Wāhi Taonga and Archaeological Sites Review project, initiated in 2007.</p> <p>It is important to note that historic heritage is defined in section 2 of the RMA. TKOTAT consider it is worth noting that this section of the Proposed District Plan covers Heritage Buildings and Items, Heritage Character Areas and Archaeological Sites. Sites and Areas of Significance to Māori (SASM) are addressed in their own section. Clarification is sought regarding this.</p>	Amend overview wording.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Whilst TKOTAT support the intent and majority of this section of the Proposed District Plan, amendments to wording would make the intent of the chapter clearer in the specific areas we have outlined below:	
HH-R1, HH-R2, HH-R5	Support	Support the activity status of the proposed rules.	Retain as notified.
HH-R8	Oppose	TKOTAT oppose the discretionary activity status as this is overly restrictive and onerous. Policy HH-P5 seeks to manage, amongst other matters, subdivisions that occur on or in proximity to heritage buildings that have the potential to adversely impact on the building's historic heritage values. Subdivisions that occur on or in proximity to heritage buildings and can be easily managed as a restricted discretionary activity with specific areas of concern detailed in the matters of discretion, rather than an all-encompassing discretionary status.	Amend consenting status to restricted discretionary with specific areas of concern detailed in matters of discretion. The inclusion of matters of discretion relating to effects on historic heritage will still enable Council to make a determination of whether historic heritage is protected from inappropriate subdivision, use and development (as per S6(f) of the RMA).
HH-R9	Oppose	Oppose the non-complying activity status as there should be provision for buildings that have suffered significant disrepair and that are unfeasible to remediate. Where it can be demonstrated that it is economically unviable to repair the building, then a lower consenting status should be applied.	Amend consenting status to RDIS with the following specific matters of discretion: <i>1. The building or item is a risk to safety or property or is in a significant state of disrepair; and</i> <i>2. The cost of remedying the risk is prohibitive; or</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p>3. The building or item can be demolished in part without adverse effect on the heritage values for which the item was scheduled.</p> <p>The inclusion of matters of discretion relating to effects on historic heritage in the RDIS activity and associated objectives and policies will still enable Council to make a determination on whether historic heritage is protected from inappropriate subdivision, use and development (as per S6(f) of the RMA).</p>
HH-R10 – HH-R18	Support in Part	<p>These rules are critical in implementing strategic objective HC-1 and HC-2. In general, non-intrusive archaeological methods alongside tangata whenua have been utilised to identify the extent of an archaeological site (most sites are also identified as SASM), as notified in line with best practise site identification practise. Site extents cannot be treated as being definitive, as has been shown over time additional features or information becomes available which modifies these extents. For this reason, a rule provision that manages all development within 50 metres of a site (included in Schedule 3) is required.</p> <p>It is important to note that despite best endeavours an extent is not available for all sites. Where this is the case, the site location is only considered to be accurate to +/- 200 metres. Although every effort has been</p>	<p>Require HH-R10 to HH-R18 to be amended to three rules only HH-R10 to HH-R12 as follows:</p> <p>HH- R10 – Any activity on or within 50 m of the extent of an archaeological site:</p> <ol style="list-style-type: none"> 1) Gardening; 2) Maintaining existing fence lines outside of the extent of an archaeological site; and <p>HH-R11 – Over height buildings between 100m and 50m from the extent of an archaeological site; and</p> <p>HH-R12 – Subdivision of land containing all or part of an archaeological site.</p> <p>s.33 transfer of powers to an iwi authority for the consideration of these rules.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>made to ensure that the extents mapped in Schedule 3 cover the whole of the known site there is a higher probability for uncovering archaeological material in the immediate vicinity of the extent of a site.</p> <p>Ambiguity of definitions between earthworks and land disturbance from the National Planning Standards. Activities falling between the cracks. NESET – RDA r.e. earthworks.</p> <p>There also appears to be ambiguity in the rules, particularly in relation to when consent is triggered for stock grazing.</p> <p>This chapter accords with Te Kotahitanga’s aspirations for archaeological sites in Te Atiawa’s iwi environmental management plan <i>Tai Whenua, Tai Tangata, Tai Ao</i>.</p>	
<p>Schedule 1</p> <p>Item 3 – The Eastern Wing of the Barrett Street Hospital Nurses Home</p>	<p>Oppose</p>	<p>Oppose the inclusion of The Eastern Wing of the Barrett Street Hospital Nurses Home in Schedule 1 of the Proposed District Plan.</p> <p>Policy HH-P1 seeks to “<i>identify, map and schedule significant heritage buildings and items having regard to the following matters:</i></p> <p><i>1. Historical values;</i></p>	<p>Clarification sought in relation to the assessments that have determined the Eastern Wing of the Barrett Street Hospital Nurses Home to be a significant heritage building that would warrant identification in Schedule 1.</p> <p>If no supporting assessments can be provided that clearly identifies the Eastern Wing of the Barrett Street Hospital Nurses Home as a significant heritage building and to justify the building’s inclusion in Schedule 1, we request the removal of the Eastern Wing of the Barrett Street Hospital Nurses Home from the Schedule of Heritage Buildings and Items (Schedule 1).</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>2. Importance to the community; 3. Architecture and construction features; 4. Setting and context; 5. Archaeological values; and 6. Rarity, representativeness and integrity'.</p> <p>The s32 Report and supporting technical reports do not provide an assessment or supporting arguments in relation to abovementioned matters in relation to the Eastern Wing of the Barrett Street Hospital Nurses Home that support the inclusion of this building in Schedule 1. Clarification is sought in relation to the assessment matters that have determined the Eastern Wing of the Barrett Street Hospital Nurses Home to be a significant heritage building that would warrant identification in Schedule 1.</p> <p>It should be noted that Eastern Wing of the Barrett Street Hospital Nurses Home building has fallen into significant disrepair, both internally and externally, and has significant presence of asbestos throughout the structure, consequently being a health and safety risk to the public. In addition to this, the cost of remediating this building to some</p>	<p>Should Council not accept the relief sought in relation to the Eastern Wing, as outlined in a submission point below, TAIHLP seeks that the removal or relocation of a heritage buildings be a RDIS activity not a NC activity. The inclusion of matters of discretion relating to effects on historic heritage in the RDIS activity and associated objectives and policies will still enable Council to make a determination on whether historic heritage is protected from inappropriate subdivision, use and development (as per S6(f) of the RMA).</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		form of usable standard is economically unfeasible.	

NOTABLE TREES			
Overview, objectives, policies and rules	Support in Part	<p>TKOTAT support the intent and wording of this chapter as it allows for the protection of trees that are valued by the community. The specific recognition of the need to protect trees of historic heritage and cultural value to tangata whenua is important, as those trees can provide for tangata whenua's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>TKOTAT support the use of the 'root protection area' rather than dripline to reflect the differences between spreading canopies and columnar canopies.</p> <p>It is suggested that policies TREE-P2 and TREE-P5 should also take into account the ability for people to maintain and/or provide an appropriate level of internal residential amenity, including sunlight access to private outdoor areas and internal habitable rooms, or a residential zone. TKOTAT recommend this is reflected in the permitted activity status standards for rules TREE-R2 and TREE-R5.</p>	<p>Amend policies TREE-P2 and TREE-P5 and permitted activity status standard wording for TREE-R2 and TREE-R5 and matters over which discretion is restricted for TREE-R2.</p> <p>Amend the wording of policy TREE-P2 as follows:</p> <p><i>Allow trimming and maintenance, earthworks and root pruning in the root protection area of a scheduled notable tree where it is necessary to:</i></p> <ol style="list-style-type: none"> <i>1. prevent a serious threat to people or property; or</i> <i>2. enable the ongoing provision of essential infrastructure; or</i> <i>3. comply with the Electricity (Hazards from Trees) Regulations 2003; or</i> <i>4. improve, maintain or monitor tree health; and or</i> <i>5. <u>enable the maintenance or ability to provide an appropriate level of internal residential amenity, including sunlight access to private outdoor areas and/or internal habitable rooms, or a residential zone; and</u></i> <i>6. any adverse effects are avoided or, where avoidance is not practicable, appropriately remedied or mitigated.</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p>Amend the wording of policy TREE-P5 as follows:</p> <p><i>Avoid the removal, partial removal or destruction of a scheduled notable tree, unless:</i></p> <ol style="list-style-type: none"> <i>1. it is necessary to prevent a serious threat to people or property;</i> <i>2. it is necessary to enable the ongoing provision of essential infrastructure;</i> <i>3. it is necessary to ensure compliance with the Electricity (Hazards from Trees) Regulations 2003; and/or</i> <i>4. the tree is rendering the site incapable of reasonable use; and/or</i> <i>5. <u>the tree is adversely impacting on the maintenance or ability to provide an appropriate level of internal residential amenity, including sunlight access to private outdoor areas and/or internal habitable rooms, of a residential zoned site.</u></i>
TREE-R10	Oppose	As drafted, TKOTAT consider the proposed rule framework does not provide for the ability for people to maintain and/or provide an appropriate level of internal residential amenity, including sunlight access to private outdoor areas and internal habitable rooms, or a residential zone.	Amend the rule or create a new rule.
Schedule 4	Support in Part	Schedule 4 – Schedule of notable trees lists the notable trees in the district that are protected.	Work alongside tangata whenua to identify trees of cultural significance and add the trees to Schedule 4 and the Planning Maps.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Te Kotahitanga and Ngā Hapū o Te Ati Awa have not had the opportunity to identify trees of cultural value to be included in the schedule.	

SITES AND AREAS OF SIGNIFICANCE TO MĀORI (SASM)			
SCHED3	Support in Part	<p>Ngā Hapū o Te Ati Awa have worked with NPDC for over ten years through the Wāhi Taonga and Archaeological Sites Review project to identify sites are areas of significance. Our rohe extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Tahuna-a-Tūtawa, east to Whakangerengere, north east to Taramoukou, north back to Te Rau o Te Hui and offshore out to 200 nautical miles.</p> <p>Collectively these sites are generally representative of:</p> <ul style="list-style-type: none"> • important or representative aspects of New Zealand history; • events, persons, or ideas of importance in New Zealand history; • knowledge of New Zealand history; • important places to tangata whenua; • places of technical accomplishment, value and design; 	<p>Adopt Schedule 3 and add those sites omitted that are within the rohe of Te Ati Awa that have been subject to the Wāhi Taonga and Archaeological Sites Review project; and make consequential amendments to the remainder of the plan.</p> <p>In partnership with tangata whenua, correct inconsistencies and errors associated with the review project and all information associated with the SASM notified in the Proposed District Plan.</p> <p>NPDC commit to continuing to work with those hapū o Te Ati Awa who are yet to progress their Wāhi Taonga and Archaeological Sites Review projects.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<ul style="list-style-type: none"> • are historic places known to date from an early period of New Zealand settlement; • rare types of historic places; and • sites which form part of a wider historical and cultural area. <p>There are a number of sites that have not been notified in the proposed plan that have been subject to the review project.</p>	
SASM Introductory text & SCHED3 – Silent files	Support in Part	<p>'Silent files' are a critical tool to ensure those SASM that are sensitive are able to be afforded the highest level of protection available, whilst keeping their specific nature in confidence. The proposed plan accommodates this requirement; however the introductory text to the SASM chapter includes the following:</p> <p><i>The location of sites that have a "silent file" status are accurate to the land parcel and the extent of the site will be treated as the area within a 200m radius of the site's centroid marker.</i></p> <p>The location of a silent file is only accurate to the parcel of land the symbol is located within; the +/- 200m is not relevant or</p>	Remove "The location of sites that have a "silent file" status are accurate to the land parcel and the extent of the site will be treated as the area within a 200m radius of the site's centroid marker" from the text at the start of the chapter.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		accurate for silent files and this note should be removed for clarity.	
SASM Objectives and Policies	Support in Part	<p>Objectives SASM-O1 to SASM-O3 and Policies SASM-P1 to SASM-P8 are critical provisions to implement the strategic objectives referenced above.</p> <p>SASM are a component of historic heritage that are required to be protected as a matter of national importance. In our view this is an absolute that must be provided for through resource management processes.</p> <p>Please note that these comments apply equally to the Historic Heritage section of the proposed plan as those archaeological sites relate to SASM.</p> <p>For this reason the following changes to objectives and policies are required:</p>	
SASM-O1	Support in Part	<p>Amend SASM-O1 to read as follows:</p> <p>Sites and areas of significance to Māori are recognised <u>and protected.</u></p>	<p>Amend SASM-O1 to read as follows:</p> <p>Sites and areas of significance to Māori are recognised <u>and protected.</u></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		The inclusion of 'maintenance' in this objective is not considered appropriate. In many instances the mauri of sites and areas of significance has been severely impacted through the development of the district. The adverse impact of development on the relationship mana whenua are able to have with these sites in many instances are effects that require remediation through resource management processes. Maintenance implies that status quo is an acceptable outcome in relation to SASM; this is unequivocally not the case.	And make consequential amendments throughout the plan.
SASM-O2	Support	This objective aligns with the Council's obligations under the RMA in relation to historic heritage, and the relationship of tangata whenua with their lands, sites, waters, wahi tapu and other taonga.	Retain provision as notified.
SASM-O3	Support	Support the wording of this objective as notified.	Retain provision as notified.
SASM-P1	Support in Part	Te Kotahitanga o Te Ati Awa and Ngā Hapū o Te Ati Awa recognise the need to map and schedule SASM as they are known. It is important to recognise that not all SASM in the district are mapped, and that objectives and policies of this chapter should apply to all sites or areas of Historic Heritage, not just those mapped or listed in Schedule 3.	

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
SASM-P2	Support	Support the wording of this policy as notified.	Retain this provision as notified
SASM-P3	Support in Part	<p>Use of the wording 'or adjacent' lacks specificity and direction. Replace with wording 'in proximity to'.</p> <p>SASM-P3 includes a number of activities that are out of step with the objectives for SASM. Specifically 'land disturbance' and 'maintenance and repair or upgrading of exiting network utilities'. These must be removed from the list set out in SASM-P3 as notified.</p> <p>'Land disturbance' and 'Earthworks' are defined by the National Planning Standards. These definitions introduce ambiguity as to when consent may be required, and the scale of activity that constitutes that activity. In the experience of tangata whenua this ambiguity has resulted in the on-going disruption of SASM through the life of the operative plan. In our view these are not fit for purpose in the context of SASM, and as the proposed plan is an activities-based plan and amended rule framework is recommended below that removes this risk.</p> <p>While it is acknowledged that network utilities are important to community well-</p>	<p>Amend the policy to read as follows:</p> <p>Allow the following activities to occur on, or <u>in proximity</u> to scheduled sites and areas of significance to Māori, while ensuring their design, scale and intensity will not compromise cultural, spiritual and/or heritage values, interests or associations of importance to tangata whenua:</p> <ol style="list-style-type: none"> 1. <u>demolition or removal of existing buildings and structures;</u> 2. <u>alterations to existing buildings and structures excluding earthworks; and</u> <p><u>erection of signs.</u></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>being; the protection of historic heritage is a matter of national importance. Undue weight is given to network utilities in SASM-P3 above the protection of historic heritage which in our view is out of step with the strategic objectives of the plan, the direction of the Regional Policy Statement for Taranaki 2010, and Part 2 of the RMA. There are numerous examples where 'maintenance or upgrading' works associated with Network Utilities are undertaken without input from tangata whenua, and historic heritage is disrupted, destroyed or interfered with.</p> <p>Network Utilities are provided for in the policies of the Network Utilities chapter and these activities can fit within policy SASM-P4.</p>	
SASM-P4	Support in Part	Use of the wording 'or adjacent' lacks specificity and direction. Replace with wording 'in proximity to'.	<p>Amend the policy to read as follows:</p> <p><i>Manage activities that occur on, or <u>in proximity</u> to scheduled sites and areas of significance to Māori that have the potential to compromise cultural...</i></p>
SASM-P5	Support in Part	Use of the wording 'or adjacent' lacks specificity and direction. Replace with wording 'in proximity to'.	Amend the policy to read as follows:

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			<i>Ensure that activities on, <u>in proximity</u> to or affecting sites and areas of significance to Māori avoid adverse effects on the site or area, or where avoidance...</i>
SASM-P6	Support in Part	Use of the wording 'or adjacent' lacks specificity and direction. Replace with wording 'in proximity to'.	Amend the policy to read as follows: <i>Ensure that any structures that exceed permitted height limits <u>in proximity</u> to sites and areas of significance to Māori are appropriately located...</i>
SASM-P7	Support in Part	Landowners are best placed to protect historic heritage. Whilst management, maintenance and preservation are also important it is considered that 'protection' must also be an outcome this policy references.	Amend the policy to read as follows: <i><u>Support landowners to manage, maintain, preserve and protect sites and areas of significance to Māori...</u></i>
SASM-P8	Support in Part	SASM-P8 looks to promote access to SASM. Promotion of access does not go far enough to provide for the relationship tangata whenua with SASM. Amending policy SASM-P8 to provide for access to sites is required to implement the strategic objectives of the proposed plan, in particular Objective TW-11.	Amend the policy to read as follows: <i><u>Provide for the provision or development of access for tangata whenua to sites and areas of significance to Māori, including...</u></i>
Rules: SASM-R1 to SASM-R9	Support in Part	<u>Appropriateness of the definitions of Earthworks and Land Disturbance for rule parameters:</u> The recent National Planning Standards have introduced definitions for 'earthworks'	Replace rules SASM-R1 to SASM-R9 with rules SASM-R1 to SASM-R3:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>and 'land disturbance' both of which are not considered appropriate to be used as rule triggers in the context of SASM. It has been the experience of tangata whenua where there is ambiguity around the interpretation of what activities constitute earthworks or land disturbance historic heritage can be destroyed, interfered with or damaged.</p> <p>Rules SASM-R4 looks to provide for the maintenance, repair or upgrading or a network utility structure, with the rule parameters allowing a level of earthworks in ground that has been previously disturbed by the existing network utility, as well as the provision of notice to tangata whenua 10 working days prior to . This allowance was introduced into the operative district plan through PLC13/00040 and has been operative since 2016. To date we have not received notice from any network utility operator prior to maintenance, repair or upgrading works in proximity to a SASM. Similarly, it is not clear how the area 'previously disturbed by the existing network utility' can be reasonably determined. Historic disturbance of sites of significance to Māori should not be used as justification to further disturb a site.</p> <p>Ambiguity when a rule in the plan requires consent or not is neither efficient nor</p>	<p><i>R1 – Any activity on or within 50 metres of the extent of a site or area of significance to Māori excluding:</i></p> <ol style="list-style-type: none"> <i>1) Gardening;</i> <i>2) The grazing of livestock; and</i> <i>3) Maintaining existing fence lines outside of the extent of a SASM.</i> <p><i>R2 – Over height buildings between 100m and 50m from the extent of a site.</i></p> <p><i>R3 – Subdivision of land containing all or part of a site or area of significance to Māori</i></p> <p>The activity status where there is non-compliance with these rules to be discretionary.</p> <p>A s.33 transfer of powers to an iwi authority for the implementation of these rules is recommended.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>effective for plan users, is difficult to enforce; and in our view is not sufficient to meet the certainty requirements for rule drafting.</p> <p>For these reasons, a clearer rule requiring the consideration of all activities on or within 50 metres of a SASM is necessary; noting that these rules are critical to protect historic heritage as a matter national importance.</p> <p><u>Location of rule trigger in relation to SASM</u></p> <p>Archaeological methods alongside the expert advice from tangata whenua have been utilised to identify the extent of a SASM as notified in line with best practise site identification practise, and the Council's site recording guide. Site extents cannot be treated as being definitive, as has been shown over time additional features or information becomes available which modifies these extents. There is a higher probability (especially adjacent to urupā) for uncovering archaeological material in the immediate vicinity of the extent of a site. For this reason a rule provision that manages all development within 50 metres of a site included in Schedule 3) is required.</p>	

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		It is important to note that despite best endeavours an extent is not available for all sites. Where this is the case, the site location is only considered to be accurate to +/- 200 metres.	

VIEWSHAFTS			
Overview, objective, policies and rules	Support in Part	<p>TKOTAT are supportive of the protection of viewshafts and recognition of importance to the District. However, these are limited mostly to only a number of specified landmarks from a number of public locations.</p> <p>TKOTAT request that the objective and policies be widened so that it could be used to protect view shafts that are important to iwi and hāpu for example viewshafts from Marae to the Mounga or to the sea, waterbodies or pā sites; or between pā sites. This re-affirms the interconnectedness of the cultural landscape as well as recognising and providing for to the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p>	To capture those viewshafts of significance to tangata whenua, engage and collaborate with tangata whenua to identify viewshafts of significance to them; amend the wording of VIEWS-01; reference in policy VIEWS-P1 and include and indicate viewshafts on the Planning Maps; include additional effects standards where necessary.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		The scope of the objectives and policies should be broadened to protect viewshafts that are of significance to tangata whenua. Whilst policy VIEWS-P3 acknowledges the importance of views to tangata whenua, the list of viewshafts in policy VIEWS-P1 which may protect views of importance to tangata whenua are limited.	
VIEWS-P2	Support in Part	TKOTAT seek that the height of trees as well as structures and buildings to be maintained should be provided. Trees can have an influence on the visual amenity of a viewshaft.	Amend policy wording to restrict the height of new trees planted within viewshafts as well as buildings and structures.
VIEWS-P3	Support in Part	TKOTAT support the incorporation of mātauranga Māori into the overall scale, form, composition and design of proposed structures; however, there must be a requirement for tangata whenua's cultural expertise to be engaged to inform the development, rather than the lesser requirement to consult.	Amend policy wording to address submission point.

NATURAL ENVIRONMENTAL VALUES			
ECOSYSTEMS AND INDIGENOUS BIODIVERSITY			
Overview, Objectives, Policies, Rules, Effects Standards, Matters over which Control is Reserved	Support in Part	TKOTAT support in principle the importance that the protection and enhancement of ecosystems and indigenous biodiversity is given. We acknowledge the mahi NPDC has	

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
and Matters over which Discretion is Restricted		undertaken to identify the extensive amount of indigenous biodiversity and the specific recognition of tangata whenua's relationship with these areas. This is supported in principle subject to the following suggestions:	
ECO-03	Support in Part	It is considered that the proposed objective should reflect not only the relationship of Māori with their traditions associated within indigenous vegetation and fauna, but also their culture (to accord with section 6(e) of the RMA).	Amend policy wording to address submission point.
ECO-P01	Support in Part	TKOTAT are supportive of the identifying and mapping of significant indigenous vegetation and indigenous habitat. The use of mātauranga māori could be identified as a criteria to accord with objective ECO-03.	Amend policy wording to address submission point.
ECO-P2, ECO-P3, ECO-P4, ECO-P7	Support	Support the proposed policies as notified.	Retain policies as notified.
ECO-P5	Support in Part	It must be reiterated that only tangata whenua can identify their relationship and that of their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga. Therefore it is necessary that tangata whenua cultural expertise is engaged to inform developments and decision making.	Amend policy wording to address submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
ECO-P6	Support in Part	TKOTAT support that any proposed offsets achieve a net gain of biodiversity; however, we suggest the removal of wording 'is no net loss'. To ensure the ecological values of the indigenous vegetation is enhanced, eco-sourced plants should be utilised.	Amend policy wording to address submission point.
ECO-R1	Support in Part	TKOTAT are supportive of the vegetation disturbance being permitted for Māori customs and values. We consider the following wording would offer consistency: <i>'gathering plants to recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga'</i> . TKOTAT are concerned about the removal of manuka and kanuka younger than 25 years old as a permitted activity. Both species are known to provide an important nursery stage in the regeneration of important forest ecosystems. It is unclear from the s32 reports how this arbitrary 25-year figure has been proposed. Clarification is sought.	Amend policy wording to address submission point. If clarification cannot provide justification for why manuka and kanuka younger than 25 years is permitted to be removed, point no. 6 shall be removed from the permitted standards of the rule.
ECO-R6	Support in Part	TKOTAT support the proposed activity statuses for the rule. However, there are concerns that the matters over which control is reserved seeks only to avoid, remedy or mitigate adverse effects on the cultural	Amend matters over which control is reserved to be consistent with matters over which discretion is restricted.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>significance to tangata whenua, yet the matters over which discretion is restricted seeks to avoid, remedy or mitigate adverse effects on particular cultural, spiritual and/or heritage values, interests or associations of importance to tangata whenua as kaitiaki and mana whenua that are associated with the significant indigenous vegetation and/or significant habitats of indigenous fauna and the potential impact on those values, interests or association.</p> <p>TKOTAT seek that the matters over which control is reserved is strengthened by using the matters over which discretion is restricted wording in relation to tangata whenua considerations.</p>	

NATURAL FEATURES AND LANDSCAPES			
Overview, objectives, policies and rules	Support in Part	Support the intent of this section of the Proposed District Plan; however, suggest that the relationship with the strategic objectives, namely HC-3, NE-7, TW-9 and TW-11 and the proposed policies is enhanced by the addition of an objective acknowledging that natural features and landscapes can have historic heritage values and recognise and provide for the relationship of tangata whenua and their	Addition of an Objective NFL-02.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		culture and traditions with their ancestral lands, water, sites, wahi tapu, and other taonga.	
NFL-P1 – NFL-P8	Support	TKOTAT support the provision made for tangata whenua and the value of the natural features and landscapes being acknowledged; the specific requirement to engage with tangata whenua to inform decision making; and the recognition of mātauranga Māori and providing tangata whenua with the opportunities to implement kaitiakitanga.	Retain policies as notified.
Section 33 of the RMA	Support	Te Tai o Rua Taranaki is the life force of Taranaki Maunga and its surrounding landscape. Taranaki Maunga is a much-revered peak at the centre of our Te Ati Awa rohe. It is adorned with a korowai (cloak) of native vegetation which resides over its shoulders and spreads down its steep cone, over the ranges of Pouākai and Kaitake, and extending to the coast and out to sea over Ngā Motu. Its forests are thick with kahikatea, tawa, tōtara and rātā that give way to mountain cedar and red tussocks in the alpine zone. Its species are rare native birds such as the North Island brown kiwi, whio and occasionally pateke. However, the introduction of predators like wild goats, weasels, stoats, possums and rats has impacted immensely on Taranaki Maunga	A s.33 of the RMA transfer of powers to an iwi authority for the implementation of Taranaki Mounnga.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>and its biodiversity. Te Ati Awa, as kaitiaki of Taranaki Maunga, aspire to enhance, protect and restore the maunga. Taranaki Mouna – He Kawa Ora – Back to Life, is an ambitious restoration project focused on transforming the mountain, ranges and islands of Taranaki, aligns with Te Ati Awa’s aspirations and Tai Whenua, Tai Tangata, Tai Ao.</p> <p>Te Kotahitanga o Te Atiawa Trust are supportive of NPDC transferring powers in relation to decision making around the Mouna to enable one uniform plan to manage activities on Taranaki Mouna. Treaty settlement is currently progressing which will result in an entity that is the face and the voice of the values for the Mouna. This ‘iwi authority’ will be best placed to manage the impact of use and development on Ngā Mouna o Taranaki.</p>	

WATERBODIES			
Overview, Objectives, Policies and Rules	Support in Part	For Māori, water is the essence of all life. Te Ati Awa’s iwi environmental management plan <i>Tai Whenua, Tai Tangata, Tai Ao</i> acknowledges its importance: <i>‘All water originated from the separation of Papatūānuku and Ranginui. Water sustains the growth of plants, animals and our</i>	Amend overview, objectives, policies and rules to ensure there is a single category for all natural waterbodies to ensure they are all treated the same – including the main stem of the waterbodies and their tributaries.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p><i>people. It is fundamental to all aspects of life and is essential to our health and wellbeing. As kaitiaki, Te Ati Awa are responsible for protecting, maintaining and enhancing the mauri of Maru.</i></p> <p>All waterbodies between Te Rau o Te Huia to the Herekawa are of significance to Te Ati Awa. Te Ati Awa's relationship with freshwater is acknowledged by the Crown through the Statutory Acknowledgement Areas in the Te Atiawa Claims Settlement Act promulgated in 2016. The Statutory Acknowledgement areas are formed of most of the main waterbodies and their tributaries within the rohe and acknowledge the cultural, spiritual, historical, and traditional association Te Ati Awa has with those waterbodies.</p> <p>For these reasons, all waterbodies in our rohe that fall within the New Plymouth District are considered significant, and provisions must be designed to provide for Te Mana o Te Wai, recognising that all waterbodies have their own mauri.</p> <p>Subject to the following comments, we are supportive of the intent of this section:</p>	
WB-O4	Support in Part	The relationship of tangata whenua and their culture (to accord with section 6(e) of the RMA) and traditions, values, interests	Amend objective wording to address the submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		and associations (statutory acknowledgements) associated with waterbodies are recognised and provided for.	
WB-P3	Support in Part	Amend the policy to require expert cultural advice to be obtained to inform the consideration of a resource consent proposal, as opposed to consultation to inform decision making. This also necessary to ensure that tangata whenua have the ability to practice kaitiakitanga.	Amend policy wording to address the submission point.
WB-P4	Support in Part	As per the comments above, tangata whenua place more than just cultural and heritage associations with a waterbody	Amend policy wording to address the submission point.
WB-P5	Support in Part	TKOTAT support the incorporation of mātauranga Māori into the design, development and activities adjoining waterbodies.	Amend policy wording to remove reference to 'principles'.
WB-R1 – WB-R3	Oppose	TKOTAT are supportive of setbacks being required from waterbodies to further enhance the integrated management approach to freshwater. It is well known that within Te Ati Awa iwi rohe that in addition to rural waterbodies, some of our urban awa are some of the most degraded in the district e.g. Mangaone, Waitaha and Mangati. TKOTAT is concerned that setbacks are not provided from natural	Amend rules to apply to all zones. Clarification sought as to why the rules do not apply to all types of pump stations. Rules must be amended to ensure the rules apply to all pump stations.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>and significant waterbodies in the commercial and mixed use zones and all natural waterbodies in all zones except for in the rural zones.</p> <p>It is therefore considered reasonable to require setbacks from both significant and natural waterbodies in all zones to ensure their protection. This accords with the objectives and principles of Te Ati Awa's iwi environmental management plan <i>Tai Whenua, Tai Tangata, Tai Ao</i>.</p> <p>TKOTAT consider it necessary that the rules apply to all types of pump stations. No justification has been provided within the s32 report as to why the rule only applies to wastewater pump stations.</p> <p>When the location of wastewater infrastructure is close to waterbodies the potential for unauthorised discharges of untreated human effluent into freshwater is elevated. The recent Waitara sewer extension has resulted in numerous discharges of wastewater into waterbodies between Waitara and the treatment plant.</p> <p>There are hundreds if not thousands of stormwater outlets that discharge into waterbodies in the district. Collectively these have a significant adverse effect on the mauri of these waterbodies, as well as the</p>	

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		relationship tangata whenua are able to have with those waterbodies through kaitiakitanga, mahinga kai, kaukau and other activities. Whilst it is acknowledged that discharges are managed by the territorial authority integrated management, rule WB-R3 provides for by considering the location of infrastructure in relation to a waterbody and associated risks through the resource consent process.	
WB-R4	Oppose	<p>TKOTAT is supportive of the proposed rule; however, it is known that earthworks within urban catchments/ waterbodies can have impacts on tangata whenua's relationship with their culture and traditions with water. It is therefore considered appropriate to amend the rule to apply to all zones.</p> <p>TKOTAT are opposed to the exception that the rules do not apply where earthworks are permitted by a rule or a resource consent has been issued by the TRC; and for the matters set out in part 2 of the rule. It is considered that allowing for this exception would create confusion with developers and landowners. The provision of the rule, with the exceptions, will enhance the integrated approach to freshwater management.</p>	Amend rule to apply to all zones. Remove exception to the rules.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
WB-R5 – WB-R7	Support	TKOTAT support the activity statuses and matters over which control is reserved and over which discretion is restricted.	Retain as notified.
Planning Maps	Support in Part	It appears that some of the waterbodies do not appear to be shown completely e.g. Tangaroa Stream.	Amend planning maps to correctly show all waterbodies.

PUBLIC ACCESS			
Overview, Objectives, Policies and Rules	Support in Part	TKOTAT support the intent of this section of the Proposed District Plan, subject to the recommended amendments:	
PA-O1 – PA-O2	Support	Support the policies as notified.	Retain as notified.
PA-O3	Support in Part	TKOTAT support the intent of the proposed objective; however, suggest the following wording is added to enhance the linkage to the strategic objectives and proposed public access policies: <i>'Access to the coast and waterbodies does not result in adverse effects on natural character, indigenous biodiversity, historic heritage, cultural, or landscape values <u>and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga</u>.'</i>	Amend policy wording.
PA-P4	Support in Part	TKOTAT seek that tangata whenua expertise should be engaged to inform resource consent applications and decision making	Amend policy wording as follows:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		rather than being the lesser level of consulted. TKOTAT also seek that tangata whenua's relationship with their culture and traditions with ancestral lands... is strengthened. In many instances this relationship has been lost and therefore it should always be required to be strengthened rather than maintain the lack of relationship.	<p>.. 6. whether public access would compromise <u>cause adverse effects on</u> the natural character, indigenous biodiversity, historic heritage, cultural or landscape values of a waterbody or the coast, or the protection of sites and activities <u>areas</u> of significance to tangata whenua <u>Māori</u>; and</p> <p>.. 7. the outcomes of any consultation with and/or cultural advice provided by tangata whenua, including with respect to mitigation measures and opportunities for tangata whenua's relationship with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened <u>engaging the expertise of tangata whenua to inform proposals and opportunities for tangata whenua's relationship with their culture and traditions with ancestral lands, water, sites, wāhi tapu and other taonga to be strengthened.</u></p>
PA-P5	Support in Part	TKOTAT support the intent of the proposed policy including the incorporation of mātauranga Māori into the design, development and/ or operation of activities; however, as per policy PA-P4, tangata whenua expertise should be engaged to inform any development and the relationship being strengthened.	<p>Amend policy wording as follows:</p> <p><i>...3. The extent to which the activity may compromise tangata whenua's relationship with their <u>culture and traditions with</u> ancestral lands, water, sites, wāhi tapu, and other taonga and any opportunities for that relationship to be maintained or strengthened; the outcomes of any consultation with and/or cultural advice provided by tangata whenua <u>engaging the expertise of tangata whenua to inform proposals in particular with respect to mitigation measures and/or the incorporation of mātauranga Māori principles into the design, development and/or operation of activities that may affect cultural,</u></i></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<i>spiritual and/or historical values, interests or associations of importance to tangata whenua;</i>
New Policy	Support	In some instances the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga may require public access to be restricted or avoided altogether given the adverse effects it can have on this relationship. Only tangata whenua can advise on their relationship and potential and actual adverse effects. It is considered that a new policy could address this. This would accord with the NZCPS and policy TTOT11.2 of Te Ati Awa's IEMP <i>Tai Whenua, Tai Tangata, Tai Ao</i> .	Proposed policy PA-06 wording: <u>'Avoid public access where it would have adverse effects on the relationship of tangata whenua and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga, including historic heritage and scheduled features and cultural values'.</u> Addition of reference to PA-06 to the matters over which discretion is restricted in rules PA-R1 – PA-R7.
PA-R1 – PA-R7	Support	TKOTAT support the proposed rules, activity statuses, permitted standards, matters over which control is reserved and discretion is restricted as notified.	Retain as notified.

SUBDIVISION			
Overview, Objectives, Policies and Rules	Support in Part	TKOTAT support the intent of this section of the Proposed District Plan, subject to the following recommended amendments:	
SUB-O2	Support in Part	TKOTAT support the intent of this objective; however, consider the wording could be	Remove sub-clause 4 in its entirety and provide amend sub-clause 5 with the following amendments:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		strengthened with the following suggested changes: Sub-clause 4 as notified caveats waterbodies as being valuable for the eco-system service they provide regarding stormwater management. Waterbodies have their own mauri, and intrinsic values that must be provided for through subdivision design. Infrastructure, including water sensitive urban design in provided for through SUB-O3.	<i>..5. <u>Protect and enhance natural features and landforms, waterbodies, indigenous vegetation, historic heritage, sites of significance to tangata whenua Māori, and/or identified features;</u></i>
SUB-O3	Support in Part	Integrated and coherent infrastructure is considered necessary to manage the effects of network utilities over time. However, this must be subservient to protecting natural features and landforms, waterbodies, indigenous biodiversity, historic heritage, SASM and historic heritage required by SUB-O2. Examples of this are seen in the Oropūiri Structure Plan Development Area with roading networks in relation to Te Oropūiri Pā.	Amend the objective to read as follows: <i>Infrastructure is planned to service proposed subdivision and development;</i> <i>1. <u>that protects natural features and landforms, waterbodies, indigenous vegetation, historic heritage, sites of significance to tangata whenua, and/or identified features;</u> and</i> <i>2. to connect with the wider infrastructure network in an integrated, efficient, coordinated and future-proofed manner and is provided at the time of subdivision.</i>
SUB-P2	Support in Part	TKOTAT support the intent of the policy. To provide a linkage with the Objectives, amend the policy in accordance with the recommended wording to objectives SUB-O2 and SUB-O3.	Amend policy wording as recommended in the submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
SUB-P4	Support in Part	Additional wording is recommended acknowledging that infrastructure must be designed, constructed, maintained, repaired or upgraded in a way that protects the receiving environment.	Amend SUB-P4 to read as follows: <i>Require infrastructure to be provided in an integrated and comprehensive manner <u>that protects the receiving environment by...</u></i>
SUB-P5	Support in Part	This policy is designed to guide the treatment of stormwater at time of subdivision design, and the minimum outcomes stormwater infrastructure must achieve. There are a number of other outcomes that the design of a stormwater disposal system must consider. An amended policy is recommended.	Amend the policy to read as follows: <i>Require efficient and sustainable stormwater control and disposal systems to be designed and installed at the time of subdivision that achieve <u>all the following:</u></i> <i><u>1. Provide for tangata whenua values associated with waterbodies impacted at time of subdivision.</u></i> <i><u>2. Avoid any increase in sediment and contaminants entering water bodies because of storm water disposal.</u></i> <i><u>3. Ensure that any necessary storm water control and disposal systems and the upgrading of existing infrastructure are sufficient for the amount and rate of anticipated runoff.</u></i> <i><u>4. Encourage storm water treatment and disposal through low-impact or water-sensitive designs that imitate natural processes to manage and mitigate the adverse effects of storm water discharges.</u></i> <i><u>5. Ensure storm water is disposed of in storm water management areas to avoid inundation within the subdivision or on adjoining land.</u></i> <i><u>6. Where feasible, utilise storm water management areas for multiple uses and ensure they have a high-quality</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p><u>interface with residential activities or commercial activities.</u></p> <p><u>7. Incorporate and plant indigenous vegetation that is appropriate to the specific site.</u></p> <p><u>8. Ensure that treatment of any watercourse occurs in a manner that improves storm water drainage and enhances the mauri, ecological, mahinga kai and landscape values.</u></p> <p><u>9. Ensure there is sufficient capacity to meet the required level of service in the infrastructure design standard or if sufficient capacity is not available, ensure that the effects of development are mitigated on-site.</u></p>
SUB-P8	Support in Part	Amend the wording in sub-clause 7 to require any expert advice received from tangata whenua as opposed to simply the outcomes of consultation. This is to recognise the need for cultural expertise to inform the design of green field subdivision in the district.	<p>Amend the policy to read as follows:</p> <p><i>...considering whether a subdivision has the potential to compromise cultural, spiritual and/or historic values and interests or associations of importance to tangata whenua, and if so, also considering <u>expert advice received from tangata whenua, including with respect to:</u></i></p> <p><i>a) the incorporation of mātauranga Māori principles into the design and/or development of the subdivision;</i></p> <p><i>b) opportunities for tangata whenua's relationship with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened; and</i></p> <p><i>c) options to avoid, remedy or mitigate adverse effects..</i></p>
SUB-P13	Support in Part	Amend the wording in sub-clause 6 to require any expert advice received from tangata whenua as opposed to simply the	<p>Amend the policy to read as follows:</p> <p><i>...considering whether a subdivision has the potential to compromise cultural, spiritual and/or historic values and</i></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		outcomes of consultation. This is to recognise the need for cultural expertise to inform the design of green field subdivision in the district.	<p><i>interests or associations of importance to tangata whenua, and if so, also considering <u>expert advice received from tangata whenua, including with respect to:</u></i></p> <p><i>a) the incorporation of mātauranga Māori principles into the design and/or development of the subdivision;</i></p> <p><i>b) opportunities for tangata whenua’s relationship with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened; and</i></p> <p><i>c) options to avoid, remedy or mitigate adverse effects...</i></p>
SUB-R1 – SUB-R6	Support in Part	<p>TKOTAT support the proposed activity statuses; however, matters over which control is reserved and discretion is restricted in relation to the protection, maintenance and enhancement of natural features and landforms, historic heritage, sites and areas of significance to Māori, archaeological sites or other identified features, as well as the engagement of tangata whenua expertise should inform rather than simply consult.</p> <p>TKOTAT are supportive of the use of mātauranga Māori and Te Ao Māori being incorporated into proposed developments.</p>	<p>The following matters over which control is reserved and discretion is restricted should apply to rules R1 – R6:</p> <ol style="list-style-type: none"> <i>1. <u>Protection, maintenance and enhancement of natural features and landforms, historic heritage and scheduled features including sites of significance to Māori, waterbodies, indigenous vegetation, sites of significance to tangata whenua and archaeological sites, or identified features.</u></i> <i>2. <u>The measures to avoid, remedy, or mitigate any adverse effects on the particular cultural, spiritual and/or heritage values, interests or associations of importance to tangata whenua as kaitiaki and mana whenua that are associated with the land being subdivided and their relationship and their culture and traditions with their ancestral lands, waters, sites, wāhi tapu, and other taonga.</u></i> <i>3. <u>Tangata whenua are engaged to inform any applications and advise whether the subdivision has the potential to compromise could have</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p><i>adverse effects on the cultural, spiritual and/or historic values and interests or associations of importance to tangata whenua, and if so, the outcomes of any consultation with tangata whenua, including with respect to:</i></p> <ul style="list-style-type: none"> <i>a) opportunities to incorporate mātauranga Māori principles into the design and/or development of the subdivision;</i> <i>b) opportunities for tangata whenua's relationship and their culture and traditions with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened; and</i> <i>c) options to avoid, remedy or mitigate adverse effects.</i>
SUB-S1 (3)	Support in Part	TKOTAT support in part the effect standard for minimum lot size in relation to the General Residential Zone, except that where comprehensive developments are proposed smaller lots sizes should be enabled.	Amend to provide objectives, policies and rule framework that enables developments in the Residential Zone to create allotments less than 400m ² by way of a comprehensive residential development (multi-unit development combined subdivision and land-use) restricted discretionary rule.
SUB-R7 – SUB-R9, Effects Standards SUB-S1 – SUB-S8	Support	Support the proposed activity statuses, effects standards as notified.	Retain as notified.
SUB-R9	Support in Part	TKOTAT support the requirement for esplanade reserve or strips being taken at subdivision stage; however, it is our position that the requirement for esplanade strip or reserve should be taken on all natural waterbodies, not only significant	Amend effects standard as suggested.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>waterbodies to protect and recognise our relationship with our ancestral lands.</p> <p>The effect standard shall be amended to read:</p> <p><i>1. Where a subdivision of land creates any allotments (including any balance allotment) which are adjoining or which contain a significant <u>natural</u> waterbody, an esplanade reserve or esplanade strip shall be provided along the bank(s) of the significant waterbody of the following minimum width:</i></p> <p style="padding-left: 40px;"><i>a. In the Rural Zones: 20 metres</i> <i>b. In any other zone: 10 metres.</i></p> <p>Where subdivision of land creates an allotment of less than 4 hectares which adjoins or contains a waterbody, an esplanade reserve or esplanade strip of 5 metres or more in width shall be provided along the bank(s) of the waterbody.</p> <p>This accords with the intent of Te Ati Awa's IEMP <i>Tai Whenua, Tai Tangata, Tai Ao</i> in relation to waterbodies.</p>	
Subdivision Design Guide	Oppose	A number of policies and assessment criteria reference the subdivision design guide, and the consistency of a proposed subdivision with the outcomes articulated in that	Amend the subdivision design guide alongside tangata whenua to ensure cultural expertise regarding the outcomes the Guide advocates for, and make consequential changes to the rest of the plan.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		reference document. The subdivision design guide is largely silent on tangata whenua values, outcomes or principles. It is essential that Te Ao Māori, and mātauranga guide the quality of development in the environment.	

GENERAL DISTRICT-WIDE MATTERS			
ACTIVITIES ON THE SURFACE OF WATER			
Overview, Objectives, Policies, Rules	Support in Part	For Māori, water is the essence of all life. As kaitiaki, Te Ati Awa are responsible for protecting, maintaining and enhancing the mauri of the wai. TKOTA are supportive of the intent of this section subject to the following provisions:	
ASW-01	Support in Part	The proposed objective does not provide for Strategic Objectives HC-3 and TW-11.	Provide a new objective which provides for the submission point.
ASW-P1 – ASW-P3	Support in Part	TKOTAT support the intent of the proposed policies including providing for customary activities; however, ASW-P2 should be amended to require engagement of tangata whenua expertise, rather than the outcomes of consultation. TKOTA support the incorporation of mātauranga Māori (omit the kupu 'principles') into key aspects of the	Amend policy wordings to address submission point.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		development and/ or operation of activities responsibilities.	

COASTAL ENVIRONMENT			
Overview, Objectives, Policies and Rules	Support in Part	TKOTAT are supportive of the intent of this section subject to the following suggestions:	
CE-O3	Support	The intent and wording of the overview and objectives listed in this part of the District Plan is supported. CE-O3 must also provide for the ability of tangata whenua to actively practice kaitiakitanga as this is the key method for iwi and hapū to be able to protect this important part of our district's environment.	Amend the objective as follows: Tangata whenua values, Mātauranga, tikanga and their ability to actively practice kaitiakitanga are recognised and reflected...
New Objective for the Coastal Environment	Support	Integrated management of use and development that spans the mean high-water spring (jurisdictional boundaries) between Taranaki Regional Council and the New Plymouth District Council is required. Objective 1 of the Proposed Coastal Plan for Taranaki reads as follows: <i>Management of the coastal environment, including the effects of subdivision, use and development on land, air and fresh water, is carried out in an integrated manner.</i>	Include a new objective that is not inconsistent with Objective 1 of the Proposed Coastal Plan for Taranaki regarding integrated management of the coastal environment.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Policy direction regarding integrated management is required to give effect to the New Zealand Coastal Policy Statement 2010 (Policy 4).	
CE-P1	Support in Part	<p>TKOTAT support the inclusion of policy CE-P1 guiding the determination of the coastal environment in the District. However, there are a range of features within our rohe that appear to be excluded in the implementation of this policy in the determination of the Coastal Environment as shown on planning maps.</p> <p>Of particular concern is the inclusion of Ōakura Pā in its entirety within the Coastal Environment without recognising the underlying use of this area as departing from the elements of the coastal environment as set out in Policy 1 of the New Zealand Coastal Policy Statement 2010.</p> <p>There is no clear assessment in the section 32 as to where cultural advice has informed the location of the overlay.</p>	Engage the expert advice of tangata whenua to inform the location of the Coastal Environment area, and make consequential changes to the proposed plan on receipt of that advice.
CE-P3	Support	Recognising papakāinga, marae and associated development occur in proximity to the coast is consistent with the New Zealand Coastal Policy Statement 2010.	Retain the policy as notified.
CE-P6	Support in Part	TKOTAT support that the use of hard protection structures are only allowed in the	Amend the policy as follows:

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Coastal Environment where other options such as soft protection will not be successful and when any adverse effects are avoided when possible or mitigated and remedies where it is not, while noting that the primary option should be managed retreat away from the coast.	...any adverse effects on natural character, indigenous biodiversity, taonga species, cultural values and amenity values will be avoided...
CE-P7	Support in part	TKOTAT consider that recognising the expertise of tangata whenua in managing activities in the Coastal Environment, as opposed to simply consulting through resource management processes, will implement the strategic objectives of the Proposed Plan as notified.	Amend the policy as follows: ...the outcomes of any consultation <u>Any expert advice received from Tangata Whenua, including with respect to...</u>
CE-P9	Oppose	The New Zealand Coastal Policy Statement 2010 is clear that esplanade strips, and the public access that is facilitated is not always appropriate, in particular where it would disturb sites and areas of significance to Māori, and areas of indigenous biodiversity. This policy does not give effect to the New Zealand Coastal Policy Statement 2010 and is inconsistent with the Regional Coastal Plan for Taranaki.	Remove this policy in its entirety
Rules CE-R1 – CE-R38	Support	Support the proposed wording of these rules.	Retain the rules as notified.

EARTHWORKS

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
EW-P4	Oppose	This provision is considered unnecessary where earthworks are managed specifically in the sites and areas of significance to Māori, and the historic heritage chapters.	Remove the policy in its entirety.
EW-P5	Support in Part	Amend references in the effects standard from mana whenua to tangata whenua for consistency throughout the Proposed District Plan.	Amend references in the effects standard from mana whenua to tangata whenua.

LIGHT			
Overview, Objectives, Policies and Rules	Support in Part	The Overview states ' <i>Light spill and glare can also adversely affect views of the night sky and the cultural values associated with the night sky including the mouri of Ranginui</i> '; however, the objectives, policies and rules make reference to the adverse effects from light spill and glare on cultural values. Clarification is sought.	Clarification is sought.

NOISE			
NOISE-S3 and NOISE-S4	Oppose	There does not appear to be noise insulation standards for noise sensitive activities – zone and area specific for the Māori Purpose Zone. Sensitive activities include living activities which include pā/ marae and papakāinga housing. Clarification is sought that these provisions are not provided	Clarification is sought.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		because there are no instances that these rules could be triggered in the Māori Purpose Zone.	

SIGNS			
SIGN-P5	Support in Part	TKOTAT support that the cumulative effects of signs in any location is to be considered. We request that this policy is strengthened to ensure adverse effects of signage on historic heritage, sites and areas of significance to Māori, ecosystems and indigenous biodiversity, natural features and landscapes and waterbodies are avoided.	Amend policy wording to read as follows: <u>..8. historic heritage, sites and areas of significance to Māori, ecosystems and indigenous biodiversity, natural features and landscapes and waterbodies.</u>

TEMPORARY ACTIVITIES			
Overview, Objectives, Policies, Rules, Effects Standards, Matters over which Control is Reserved and Discretion is Restricted	Support	TKOTAT are supportive of the intent of this chapter.	Retain as notified.

PART 3: AREA SPECIFIC MATTERS
RESIDENTIAL ZONES
LOW DENSITY RESIDENTIAL ZONE

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies and Rules	Support in Part	<p>Lepperton is a smaller rural settlement located within the Te Ati Awa iwi rohe which is identified as being zoned Low Density Residential Zone.</p> <p>Whilst TKOTAT understand and support the intent of this chapter, there is no linkage between this chapter and the Strategic Objectives, particularly UFD-13 and UFD-19 in relation to developing a cohesive, compact and structured district which recognises the relationship of tangata whenua with their culture and traditions with ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance; neither does the chapter reflect the incorporation of mātauranga Māori by engaging tangata whenua expertise in design, construction and development of the low density residential zone.</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted.
LRZ-P1 and LRZ-R3	Support	Support the inclusion of Māori purpose activities that are compatible with this policy being provided for in the Low Density Residential Zone.	Retain as notified.
LRZ-P3	Support	Support the inclusion of activities that are incompatible with the zone.	Retain as notified.
LRZ-P5	Support	Support the intent and wording of this policy.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
LRZ-S1	Support in Part	<p>TKOTAT support the effects standard for the number of residential units on an allotment, except where the development is for Papakāinga Housing.</p> <p>The definition of Papakāinga Housing in the Proposed District Plan means <i>'a comprehensive residential development for tangata whenua residing in the New Plymouth District to provide residential accommodation for members of iwi or hapū groups on Māori land and/or within the Māori Purpose zone, and also includes communal buildings and facilities'</i>.</p> <p>As a papakāinga housing development would likely involve more than one residential unit, the requirement for resource consent will always be triggered. TKOTAT oppose this requirement and suggest that the effects of the number of residential units relating to papakāinga housing could be addressed through the bulk and location effects standards, particularly the 60% site coverage effects standards.</p>	<p>Amend the effects standard with the following wording:</p> <p><i>This standard does not apply to:</i></p> <ol style="list-style-type: none"> 1. <i>Accessory buildings; <u>and</u></i> 2. <i><u>Papakāinga housing.</u></i>
LRZ-S3	Support in Part	Support the increased maximum site coverage for papakāinga housing. A matter of discretion should be added regarding effects of exceeding site coverage on tangta whenua's relationship with their culture and	Add a matter of discretion if compliance not achieved.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		traditions with their ancestral lands, water, sites, wāhi tapu and other taonga and whether the scale, intensity and/ or character of the activity is appropriate in the context of the site and receiving environment.	

GENERAL RESIDENTIAL ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control and Discretion are Reserved	Support in Part	<p>New Plymouth, Waitara, Inglewood and Bell Block are located within the Te Ati Awa iwi rohe and have residential areas identified as being General Residential Zone within the Proposed District Plan, being established residential neighbourhoods with traditional suburban densities and housing forms.</p> <p>Whilst TKOTAT understand and support the intent of this chapter, there is no linkage between this chapter and Strategic Objectives UFD-13 and UFD-19 particularly in relation to developing a cohesive, compact and structured district which recognises the relationship of tangata whenua with their culture and traditions with ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance; neither does the chapter reflect the incorporation of mātauranga Māori principles by involving tangata whenua in</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		design, construction and development of the general residential zone.	
Planning Maps	Support	<p>TKOTAT support the zoning of the properties listed below as illustrated on the proposed planning maps:</p> <ul style="list-style-type: none"> • 14 Bayly Street; • 53 Record Street • 10, 12 and 16 Bell Street • 9 Cracroft Street • 307 Tukapa Street • 186A and 188 Tukapa Street <p>Support in part the Proposed District Plan planning maps as they relate to the proposed zoning of a portion of no. 34 Barrett Street (Former Barrett Street Hospital) that is predominantly zoned Medium Density Residential. This site is a Deferred Selected Property under the Te Ati Awa Deed of Settlement and Te Ati Awa are currently working through the process of acquiring this property with the Crown. If a transaction occurs between Te Ati Awa and the Crown, the site will be held in one title. TKOTAT consider that the General Residential zone over part of the site should be rezoned to Medium Density Residential as the General Residential zone is unduly</p>	Amend planning maps so that the General Residential Zone does not include part of no. 34 Barrett Street (Former Barrett Street Hospital). This site to be amended as being all Medium Density Residential Zone.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		restrictive given the predominant Medium Density Residential zoning of the site.	
GRZ-P1 and GRZ-R3	Support	Support the inclusion of Māori purpose activities that are compatible with this policy being provided for in the General Residential Zone.	Retain as notified.
GRZ-P3	Support	Support the inclusion of activities that are incompatible within the zone.	Retain as notified.
GRZ-P5	Support	Support the intent and wording of this policy.	Retain as notified.
GRZ-P10	Support	Support the provision of multi-unit developments within the zone.	Retain as notified.
GRZ-R10	Support in Part	Support the activity status. As per the Overview comments, provide matters over which discretion is restricted to provide a linkage to Strategic Objectives UFD-13 and UFD-19.	Provide matters over which discretion is restricted as recommended.
GRZ-R11 – GRZ-R13, GRZ-R27, GRZ-R29 – GRZ-R31	Support in Part	Support the activity statuses. As per the Overview comments, provide matters over which control is reserved and discretion is restricted to provide a linkage to Strategic Objectives UFD-13 and UFD-19.	Provide matters over which discretion is restricted as recommended.
GRZ-R20	Support	Support activity status as notified.	Retain as notified.
GRZ-S1	Support in Part	TKOTAT support the effects standard for the number of residential units on an allotment,	Add the following wording: <i>This standard does not apply to:</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>except where the development is for Papakāinga Housing.</p> <p>The definition of Papakāinga Housing in the Proposed District Plan means <i>'a comprehensive residential development for tangata whenua residing in the New Plymouth District to provide residential accommodation for members of iwi or hapū groups on Māori land and/or within the Māori Purpose zone, and also includes communal buildings and facilities'.</i></p> <p>As a papakāinga housing development would likely involve more than one residential unit, the requirement for resource consent will always be triggered. TKOTAT oppose this requirement and suggest that the effects of the number of residential units relating to papakāinga housing could be addressed through the bulk and location effects standards, particularly the 60% site coverage effects standards.</p>	<ol style="list-style-type: none"> 1. <i>Accessory buildings; and</i> 2. <i><u>Papakāinga housing.</u></i>
GRZ-S2	Oppose	TKOTAT oppose a maximum height of 8 metres as this does not enable the flexibility and opportunities to provide for a variety of housing choices/ types.	Amend maximum height to <u>10</u> metres.
GRZ-S3	Support in Part	TKOTAT support the increased maximum site coverage for papakāinga housing. A matter of discretion should be added	Add a matter of discretion if compliance not achieved.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		regarding effects of exceeding site coverage on tangata whenua's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga and whether the scale, intensity and/or character of the activity is appropriate in the context of the site and receiving environment.	
GRZ-S4 – GRZ-S12	Support	Support the wording of the proposed effects standards as notified in the Proposed District Plan.	Retain as notified.
GRZ-S13	Oppose	TKOTAT oppose the 1.4-metre maximum height limit for front boundary fencing as a safer height to ensure children cannot climb over is 1.5-metres. This height will still achieve a balance between privacy and street surveillance.	Amend GRZ-S13(1)(a) from 1.4m to 1.5m.

MEDIUM DENSITY RESIDENTIAL ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control and Discretion are Reserved	Support in Part	New Plymouth, Waitara and Inglewood and are located within the Te Ati Awa iwi rohe and have residential areas identified as being Medium Density Residential Zone within the Proposed District Plan, being areas with a mixture of detached, semi-detached and terraced housing and low-rise apartments.	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>Whilst TKOTAT understand and support the intent of this chapter, there is no linkage between this chapter and Strategic Objectives particularly UFD-13 and UFD-19 in relation to developing a cohesive, compact and structured district which recognises the relationship of TW with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance; neither does the chapter reflect the incorporation of mātauranga Māori principles by involving tangata whenua in design, construction and development of the medium density residential zone.</p>	
Planning Maps	Support	<p>Support the zoning of the properties listed below as illustrated on the proposed planning maps:</p> <ul style="list-style-type: none"> • 99 Liardet Street • 2 Standish Street • 34 Barrett Street (Former Barrett Street Hospital) <p>While TKOTAT support the rezoning of this site to Medium Density Residential, TKOTAT oppose the zoning of a portion of the site as General Residential Zone. This site is a Deferred Selected Property under the Te Ati Awa Deed of Settlement and Te Ati Awa are currently</p>	Amend planning maps so that the Medium Density Residential Zone covers the whole of the 34 Barrett Street (Former Barrett Street Hospital).

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		working through the process of acquiring this property with the Crown. If a transaction occurs between Te Ati Awa and the Crown, the site will be held in one title. TKOTAT consider that the General Residential zone over part of the site should be rezoned to Medium Density Residential as the General Residential zone is unduly restrictive and would create an onerous consenting pathway given the predominant Medium Density Residential zoning of the site.	
MRZ-P1	Support	Support Māori purpose activities as compatible activities.	Retain policy as notified.
MRZ-P2	Support in Part	Higher density living will result in higher populations which will result in greater demands on the Council's infrastructure. High quality, well planned infrastructure must be provided for. The policy must be strengthened to ensure this is provided for.	Amend policy wording: '5. There is adequate existing and/ or planned High quality, well planned infrastructure is available to service the activity'. A new objective should be provided to capture the proposed policy and linkages back to Strategic Objectives UFD-13 and UFD-19.
MRZ-R3	Support	Support the inclusion of Māori purpose activities that are compatible with this policy being provided for in the Medium Density Residential Zone.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
MRZ-P5	Support	Support the intent and wording of this policy.	Retain as notified.
MRZ-P3	Support	Support the inclusion of activities that are incompatible within the zone.	Retain as notified.
New policy	Support	The provision of a new policy in relation to multi-unit developments, similar to proposed policy GRZ-P10.	Provide proposed policy.
MRZ-R11	Support in Part	Support the activity status. As per the Overview comments, provide matters over which discretion is restricted to provide a linkage to Strategic Objectives UFD-13 and UFD-19.	Provide matters over which discretion is restricted as suggested.
MRZ-R12 – MRZ-R15, MRZ-R29, MRZ-R31 – MRZ-R33	Support in Part	Support the activity statuses. As per the Overview comments, provide matters over which control is reserved and discretion is restricted to provide a linkage to Strategic Objectives UFD-13 and UFD-19.	Provide matters over which control is reserved and discretion is restricted as suggested.
MRZ-R21	Support	Support activity status as notified.	Retain as notified.
MRZ-S1	Support in Part	TKOTAT support the effects standard for the number of residential units on an allotment, except where the development is for Papakāinga Housing. The definition of Papakāinga Housing in the Proposed District Plan means 'a comprehensive residential development for tangata whenua residing in the New Plymouth District to provide residential	Add the following wording: <i>This standard does not apply to:</i> <i>1. Accessory buildings; and</i> <i>2. <u>Papakāinga housing.</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p><i>accommodation for members of iwi or hapū groups on Māori land and/or within the Māori Purpose zone, and also includes communal buildings and facilities.</i></p> <p>As a papakāinga housing development would involve more than one residential unit, resource consent will always be triggered. We oppose this requirement and suggest that the effects of the number of residential units relating to papakāinga housing could be addressed through the bulk and location effects standards, particularly the 60% site coverage effects standards.</p>	
MRZ-S2	Oppose	TKOTAT oppose a maximum height of 9 metres as this does not enable the flexibility and opportunities to provide for a variety of housing choices/ types.	Amend maximum height to <u>12</u> metres.
MRZ-S3	Support in Part	TKOTAT support the increased maximum site coverage for papakāinga housing. A matter of discretion should be added regarding effects of exceeding site coverage on tangata whenua's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga and whether the scale, intensity and/or character of the activity is appropriate in the context of the site and receiving environment.	Add a matter of discretion if compliance not achieved.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
MRZ-S4 – MRZ-S12	Support	Support the wording of the proposed effects standards as notified in the Proposed District Plan.	Retain as notified.
MRZ-S13	Oppose	TKOTAT oppose the 1.4-metre maximum height limit for front boundary fencing as a safer height to ensure children cannot climb over is 1.5-metres. This height will still achieve a balance between privacy and street surveillance.	Amend MRZ-S13(1)(a) from 1.4m to 1.5m.

RESIDENTIAL DESIGN GUIDE			
Residential Design Guide	Oppose	A number of policies and assessment criteria reference the Residential Design Guide, and the consistency of a proposed development with the outcomes articulated in that reference document. The design guide is largely silent on tangata whenua values, outcomes or principles. It is essential that Te Ao Māori, and mātauranga guide the quality of development in the environment.	Amend the residential design guide alongside tangata whenua to ensure cultural expertise regarding the outcomes the Guide advocates for, and make consequential changes to the rest of the plan.

RURAL ZONE			
RURAL PRODUCTION ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters	Support in Part	The Rural Production Zone chapter acknowledges ' <i>Rural land is an important resource as it underpins the social and</i>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
over which Control and Discretion are Reserved		<p><i>economic well-being of the district.. The Rural Production Zone provides for primary production, such as pastoral farming, livestock, horticulture and forestry’.</i></p> <p>Many of Ngā Hapū o Te Ati Awa’s scheduled sites and areas of significance to Māori are located within the Rural Production Zone, reflecting Te Ati Awa’s relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga in these areas. This is acknowledged in the Overview.</p> <p>Whilst TKOTAT support the intent of the chapter, we note there is no linkage between the chapter as proposed between Strategic Objectives HC-3, TW-9, TW-10,TW-11 and UFD-24, particularly in the objectives and policies of the Rural Production Zone chapter including recognising and providing for the relationship of tangata whenua with their culture and traditions as per section 6(e) of the RMA.</p>	
RPROZ-P1 and RPROZ-R5	Support	Support allowing Māori purpose activities within the Rural Production Zone.	Retain as notified.
RPROZ-P3	Support	Support the inclusion of incompatible activities within the Rural Production Zone.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
RPROZ-P6	Support in Part	<p>TKOTAT has concerns regarding the policy being restricted to 'large-scale' primary production and rural industry. The 'large scale' qualifier must be removed.</p> <p>Require tangata whenua to be engaged to inform proposals rather than simply be consulted (4).</p> <p>To ensure the scope of the policy is kept broad, identified features should be listed as historic heritage, notable trees, SASM, ecosystems and indigenous biodiversity, natural features and landscapes, waterbodies and public access (6).</p>	<p>Amend policy wording to read as follows:</p> <p><i>Ensure large-scale primary production and rural industry..</i></p> <p><i>.. 4. <u>Engage tangata whenua expertise to advise with respect to whether the activity may compromise cultural, spiritual and/or historic values and interests or associations of importance to tangata whenua, and if so, the outcomes of any consultation with tangata whenua as kaitiaki and mana whenua, including with respect to mitigation options;</u></i></p> <p><i>.. 6. methods for avoiding adverse effects on identified features, including archaeological sites <u>historic heritage</u>, sites and areas of significance to Māori, ecosystems and indigenous biodiversity, natural features and landscapes and waterbodies; and</i></p> <p>The amendments to this policy should be reflected in the matters over which control is reserved and discretion is restricted in the rule framework.</p>
Definition: multi-unit development	Support in Part	Refers to the development on any site in any 'residential zone'.	Amend to ensure the definition is consistent across all zones.
RPROZ-S5	Support	Support the effects standard not applying to Papakāinga Housing.	Retain as notified.
RPROZ-S6	Support in Part	It is unclear from the s32 report how a restricted maximum gross floor area for papakāinga housing of 450m2 was arrived at. Based on the average size of a single dwelling in New Zealand, 450m2 may	<p>Clarification sought.</p> <p>In the event it is unknown how 450m2 came about, TKOTA seeks the engagement of tangata whenua expertise to inform a suitable maximum gross floor area.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		provide for three small dwellings with garages. Clarification is sought.	
RPROZ-S7	Support in Part	TKOTAT support the matter of discretion point 3 if compliance is not achieved; however, would suggest the word 'amenity' is removed and only the location and adverse effects on sensitive activities, historic heritage and scheduled sites including Sites and Areas of Significance to Māori and archaeological sites are considered.	Amend matters of discretion 3: <i>'Location and adverse amenity effects on sensitive activities, <u>historic heritage and scheduled sites including significant natural areas, sites and areas of significance to Māori and archaeological sites</u>.'</i>
Planning Maps	Oppose	TKOTAT oppose the Proposed District Plan planning maps as they relate to the zoning of the property with legal description Sec 2 SO 14672, Junction Street, New Plymouth. The site is a Deferred Selection Property under the Te Ati Awa Deed of Settlement and Te Ati Awa are currently working through the process of acquiring this property with the Crown. The property is currently zoned Rural Production Zone; however, TKOTAT consider that an urban zoning would be more appropriate in this instance.	Amend planning maps so that an appropriate urban zoning applies to Sec 2 SO 14672, Junction Street, New Plymouth.

RURAL LIFESTYLE ZONE

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies, Rules, Effects Standards, Matters over which Control is Reserved and Discretion is Restricted	Support in Part	<p>The Rural Lifestyle Zone is described as being <i>'generally located on the fringe of urban settlements and is peri-urban in nature. Some parts of the zone reflect historical subdivision patterns, while other parts have been identified as suitable to transition to rural lifestyle living'</i>.</p> <p>Many of ngā hapū o Te Ati Awa's scheduled sites and areas of significance to Māori are located within the Rural Lifestyle Zone, reflecting Te Ati Awa's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga in these areas. This is acknowledged in the Overview.</p> <p>Whilst TKOTAT support the intent of the chapter, we note there is no linkage between the chapter as proposed between Strategic Objectives HC-3, TW-9, TW-10, TW-11 and UFD-24, particularly in the objectives and policies of the Rural Lifestyle Zone chapter recognising and providing for the relationship of tangata whenua with their culture and traditions as required by section 6(e) of the RMA.</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.
RLZ-P1 and RLZ-R7	Support	Support allowing Māori purpose activities within the Rural Lifestyle Zone as a compatible activity.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
RLZ-P3	Support	Support the inclusion of incompatible activities within the Rural Lifestyle Zone.	Retain as notified.
RLZ-P5	Support in Part	TKOTAT support the intent of the proposed Policy; however, it is recommended that an additional standard requiring the expertise of tangata whenua be engaged to advise on adverse visual effects and adverse effects in general. This submission point accords with Strategic Objectives TW-9 and TW-11.	Amend the policy wording to read: <i>..9. engaging tangata whenua expertise to inform any proposals.</i>
RLZ-P7	Support in Part	TKOTAT support the intent of the policy; however, suggested wording for consistency through the Proposed District Plan.	Amend the policy wording to read: <i><u>Encourage Provide</u> opportunities for tangata whenua to exercise their customary responsibilities as mana whenua and kaitiaki <u>and their relationship with their culture and traditions</u> in respect of activities and/or development in the Rural Lifestyle Zone that may affect cultural, spiritual and/or heritage values of importance to tangata whenua.</i>
RLZ-S5	Support	Support the effects standard not applying to Papakāinga Housing.	Retain as notified.
RLZ-S6	Support in Part	As per TKOTAT's comments regarding effects standard RPROZ-S6, TKOTAT support the use of a maximum gross floor area as a method to control the scale of papakāinga housing on a site; however, it is unclear from the s32 report how a restricted maximum gross floor area for papakāinga housing of 450m ² was arrived at. Clarification is sought.	Clarification sought. In the event it is unknown how 450m ² came about, TKOTA seeks the engagement of tangata whenua is expertise to inform a suitable maximum gross floor area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
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COMMERCIAL AND MIXED USE ZONES			
LOCAL CENTRE ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control is Reserved and Discretion Restricted	Support in Part	<p>This zone applies to a mix of local centres ranging from rural service centres (e.g. Urenui and Okato), village centres (e.g. Ōakura) and suburban shopping centres (e.g. Bell Block, Fitzroy, Moturoa and Westtown) through to neighbourhood shops (e.g. Mill Road shops). Many of these centres are located within the Te Ati Awa iwi rohe.</p> <p>Whilst TKOTAT support the intent of the zone which includes allowing for Māori Purpose Activities within the zone, there is no linkage between the chapter as proposed between Strategic Objectives HC-3, TW-9, TW-10, TW-11 and UFD-24, particularly in the objectives and policies of the Local Centre Zone chapter and recognising and providing for the relationship of tangata whenua with their culture and traditions as per section 6(e) of the RMA.</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.
LCZ-P1 and LC-R11	Support	Support allowing Māori purpose activities within the Local Centre Zone.	Retain as notified.

LARGE FORMAT RETAIL ZONE

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control is Reserved and Discretion Restricted	Support	This zone applies to the area commonly known as the Waiwhakaiho Valley which is located within the Te Ati Awa iwi rohe. We support the intent of the chapter and the planning maps restricting the Large Format Retail to its current location only in the Proposed District Plan.	Retain as notified.

MIXED USE ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control and Discretion are Reserved	Support in Part	This zone is primarily located in New Plymouth and applies mostly to land adjacent to the one-way network that wraps around the City Centre Zone. The zone provides for a compatible mixture of commercial services, recreational and/ or community activities. Whilst TKOTAT support the intent of the zone, there is no strategic linkage between the chapter as proposed and the Strategic Objectives HC-3, TW-9, TW-10, TW-11 and UFD-24, particularly in the objectives and policies of the Mixed Use Zone chapter and recognising and providing for the relationship of tangata whenua with their culture and traditions as per section 6(e) of the RMA.	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		Support the intent of this section of the Proposed District Plan, subject to the following provisions:	
Planning Maps	Oppose	In so far that this zone relates to a site at 41-47 Eliot Street, New Plymouth. TKOTAT considers that the site is more in keeping with the role and function of the City Centre Zone than the Mixed Use Zone due to the height of the existing building and the site's redevelopment opportunities. The site is situated on a prominent corner site and lends itself to be developed for a range of activities enabled through the City Centre Zone. The Mixed Use Zone restricts the flexibility and opportunities for the site.	Amend planning maps so that 41-47 Eliot Street, New Plymouth is rezoned to City Centre Zone.
MUZ-R1 – MUZ-R4	Support in Part	TKOTAT support in part subject to consideration of the Planning Maps submission point. The site at 41-47 Eliot Street is a prominent corner site that lends itself to a variety of land-use opportunities that would benefit the New Plymouth Central Business District. The mixed-use zone should enable the ability to a greater range of activities within an area or building without the need for seeking resource consent, particularly in regard to living activities. Mixed-use by its very nature is land-use that integrates land-use types (typically commercial and living) in order to	Subject to consideration of the Planning Maps submission point, amend to include Living Activities and Visitor Accommodation as permitted land-use activities subject to specific effect standards.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		increase vibrancy and street activity. TKOTAT consider that living activities should be included as permitted activities.	
MUZ-S1	Support in part	Support in part subject to consideration of the submission to MUZ-R1 – MUZ-R4. The site at 41-47 Eliot Street is a prominent corner site that lends itself to a variety of land-use opportunities that would benefit the New Plymouth Central Business District. The 10m height limited is unduly restrictive and reduces the ability to redevelop the site.	Subject to consideration of the submission point to MUZ-R1 – MUZ-R4.
MUZ-S2 – MUZ-S7	Support	Support effects standards as proposed.	Retain as notified.

TOWN CENTRE ZONE			
Overview, Objectives, Policies, Rules, Effects Standards, Matters over which Control and Discretion Reserved	Support in Part	<p>This zone applies to the towns of Waitara and Inglewood, within Te Ati Awa iwi rohe, which both function as service towns providing a range of commercial, community, recreational and residential activities for their respective residential and rural communities.</p> <p>Whilst TKOTAT support the intent of the proposed section, there is no strategic linkage between the chapter as proposed and the Strategic Objectives HC-3, TW-9, TW-10, TW-11 and UFD-24, particularly in</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>the objectives and policies of the Town Centre Zone chapter. Neither does the chapter recognise and provide for the relationship of tangata whenua with their culture and traditions as per section 6(e) of the RMA.</p> <p>Support the intent of this section of the Proposed District Plan, subject to the following provisions:</p>	
TCZ-P1 and TCZ-R7	Support	Support allowing Māori purpose activities within the Town Centre Zone.	Retain as notified.
TCZ-P7	Support in Part	TKOTAT support the list of ways compatibility of structures and/ or additions and alterations with the character and amenity of the relevant town centre can be achieved. Support the incorporation of mātauranga māori (omit the kupu 'principles') into the design and construction of a structure; however, the policy should require the engagement of tangata whenua and their expertise to inform this policy.	<p>Amend policy wording to read as follows:</p> <p><i>..5. <u>Engage tangata whenua expertise to advise on incorporating mātauranga Māori principles into the design and construction of the structure and, where appropriate, art works or unique and recognisable features that reflect cultural, spiritual and/or heritage values of importance to tangata whenua; and..</u></i></p>
TCZ-P9	Support in Part	TKOTAT support the consideration of adverse effects in relation to any particular cultural, spiritual and/ or historical values (sub-clause 3). It should note that tangata whenua can only identify impacts on their relationship with their culture and traditions with their ancestral lands, waterbodies, sites, areas and landscapes and other	<p>Amend policy wording to read as follows:</p> <p><i>.. 3. <u>Engage tangata whenua expertise to advise on any particular cultural, spiritual and/or historical values that may be affected by the over-height structure; and</u></i></p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		taonga of significance and their associated values (to accord with Strategic Objectives TW-9).	

CITY CENTRE ZONE			
Overview, Objectives, Policies, Rules, Effects Standards and Matters over which Control is Reserved and Discretion Restricted	Support in Part	<p>The Overview acknowledges that the New Plymouth city centre is the principal centre that serves the district and the Taranaki region. It recognises that early settlement of the area by Te Ati Awa focused on the coast and the natural basin landform around the Huatoki Stream.</p> <p>Whilst we understand what the intent of this chapter is trying to achieve, there appears to be a lack of strategic linkage between the chapter as proposed and the Strategic Objectives HC-3, TW-9, TW-10, TW-11 and UFD-24, particularly in the objectives and policies of the City Centre Zone chapter. Neither does the chapter recognise and provide for the relationship of tangata whenua with their culture and traditions as per section 6(e) of the RMA.</p> <p>Support in principle, subject to the following provisions:</p>	Amend objective, policy, rule, effects standards, permitted activity standards and matters over which discretion is restricted to address submission.
Mixed Use Zone – Planning Maps	Support in Part	A site at 41-47 Eliot Street is proposed to be zoned as Mixed Use Zone but is more in character with the role and function of the	Amend Planning Maps so that 41-47 Eliot Street is rezoned to City Centre Zone.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		City Centre Zone due to the height of the existing building and the site's redevelopment opportunities. The site is situated on a prominent corner site and lends itself to be developed for a range of activities enabled through the City Centre Zone. The Mixed Use Zone restricts the flexibility and opportunities for the site.	
CCZ-P1 and CCZ-R6	Support	Support allowing Māori purpose activities within the City Centre Zone.	Retain as notified.
CCZ-R14	Support	Support activity status as proposed.	Retain as notified.
CCZ-S1 and CCZ-S3	Support	Support the effects standards as proposed.	Retain as notified.

CITY AND TOWN CENTRE DESIGN GUIDE			
City and Town Centre Design Guide	Oppose	Whilst the design guide makes references to TW history of NP in the central city in particular, no reference to Te Ao Māori, mātauranga Māori to guide the quality of development. No correlation with the Strategic Objectives, once the objectives and policies of the Commercial and Mixed Use zones are strengthened, these should inform the residential design guide.	Engage tangata whenua to provide cultural expertise to ensure the Guide aligns with the policy directive in relation to Commercial and Mixed Use zones.

GENERAL INDUSTRIAL ZONE

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies, Rules, Effects Standards, Matters over which Control is Reserved and Discretion is Restricted	Support in Part	TKOTAT support the intent of this section of the Proposed District Plan, subject to the following provisions:	
General Industrial Zone – Planning Maps	Support	<p>Support the zoning of the properties listed below as illustrated on the proposed planning maps:</p> <ul style="list-style-type: none"> • 228 De Havilland Drive • De Havilland Drive / Hudson Drive (various parcels noted above). <p>Based on the assessments undertaken by Council in order to meet their NPS-UDC reporting requirements there appears to be sufficient industrial land zoned in the New Plymouth District to meet anticipated growth requirements in the short to medium term and no further rezoning of land to General Industrial Zone is required.</p>	Retain as notified.
Definition – Industrial Activity	Support	Support the alignment of the definition with the National Planning Standards.	Retain as notified.
GIZ-R1	Support in Part	Support in part the inclusion of office activity, retail activity and/or training space that is ancillary to industrial activities as permitted activities, but the compliance condition for the ancillary activity being no more than 15% of gross floor area or	Clarification sought.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		180m ² whichever is lesser constrains flexibility and opportunities for industrial businesses in this zone. This limit does not represent a large amount of space and some industrial businesses would likely require a larger area, particularly if this gross floor area condition is a combined area for all ancillary activities. Clarification is sought as to whether the maximum gross floor area condition for ancillary activities would be applied as a combined area for all ancillary activities, for example 180m ² for ancillary retail activity, office, and/or training space.	
GIZ-R2	Support in Part	Support in part the permitted activity status of food and beverage retails stores in the General Industrial Zone but condition GIZ-R2(2) is unduly restrictive and may result in inefficient use of industrial land. Providing the ability for food and beverage retail stores to cluster in an area would result in more efficient use of industrial land with a maximum number of stores able to cluster in an area specified to manage the scale and establishment of food and beverage retails stores.	Amend as follows: Activity status: PER <i>Where:</i> <ol style="list-style-type: none"> 1. <i>the gross floor area of the store is no more than 100m² ;</i> 2. <i><u>no more than four stores adjoin or are adjacent to each other;</u></i> 3. <i><u>the cluster of stores is are not located within 200m of another food and beverage retail store/cluster of stores; and</u></i> 4. <i>all General Industrial Zone Effects Standards are complied with.</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
GIZ-R5	Oppose	TKOTAT oppose the discretionary activity status of commercial service activities as these activities are potentially compatible with the General Industrial Zone and may benefit the role and function of the zone through agglomeration effects. The discretionary activity status would result in an onerous consenting pathway and place additional costs on a proposal seeking to establish compatible and complementary land-uses.	Amend activity status to RDIS with specific concerns detailed in the matters of discretion, such as those matters detailed in GIZ-P2.

OPEN SPACE AND RECREATION ZONES			
NATURAL OPEN SPACE ZONE			
Overview, Objectives, Policies, Rules and Planning Maps	Support in Part	<p>TKOTAT support the intent and wording of the chapter for this part of the Proposed District Plan.</p> <p>TKOTAT consider that the objectives should be strengthened by articulating the need to balance any development of Open Spaces and their use by residents with the protection of sensitive areas. It is considered that this can be achieved through the alternative wording suggested.</p> <p>The Te Atiawa Claims Settlement Act 2016 contains Deeds of Recognition which oblige the Crown to consult with Te Ati Awa and have regard to their views about the special</p>	<p>Alternative wording for objective NOSZ-04: <i><u>The design and development of Natural Open Spaces reflect Tangata Whenua values including through:</u></i></p> <ol style="list-style-type: none"> <i><u>1. Restoring and enhancing ecosystems and indigenous biodiversity, particularly taonga species;</u></i> <i><u>2. Providing natural resources for customary use and;</u></i> <i><u>3. Ensuring Natural Open spaces incorporate and reflect Mātauranga Māori and provide opportunities for tangata whenua to use natural open spaces for customary and Māori cultural activities and opportunities for residents and</u></i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>association Te Ati Awa has with a site. These sites include:</p> <ul style="list-style-type: none"> • Awa te Take Pa Historic Reserve • Awa te Take Scenic Reserve • Everett Park Scenic Reserve • Katere Scenic Reserve • Mahoetahi Historic Reserve • Makara Scenic Reserve • Ngangana Pa (being Manukorihi Recreation Reserve) • Onaero River and its tributaries • Papamoa (being Meeting of the Waters Scenic Reserve) • Puketakauere Pa Historic Reserve • Robe Street Conservation Area • Sentry Hill Conservation Area • Sentry Hill Redoubt Historic Reserve • Waitara River No 1 Marginal Strip • Waiwhakaiho River mouth (Crown Land Conservation Area) <p>Given the nature of these sites, TKOTAT consider that these sites may benefit from an Open Space zoning.</p>	<p><u>visitors to experience and appreciate Māori historic heritage while protecting sites and areas of significance to Māori</u></p> <p>Alongside tangata whenua, amend planning maps to ensure that an appropriate open space zoning applies to those areas identified in the Te Atiawa Deeds of Recognition.</p>
NOSZ-P1	Support	TKOTAT support the specific protection for customary activities that is included in this policy.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
NOSZ-P2	Support	TKOTAT support the potentially compatible activities in the policy.	Retain as notified.
NOSZ-P3	Support	Support that this policy specifically requires the avoidance of activities that cause adverse effects to cultural, spiritual and/ or historical interests or associations of importance to tangata whenua.	Retain as notified.
NOSZ-P6	Support in Part	Support this policy as TKOTAT recognise that it aims to protecting values that are important to tangata whenua. Ask for a minor change to the wording to achieve consistency throughout the Proposed District Plan.	Amend policy wording as follows: <i>Ensure historic heritage <u>and sites and areas of significance to Māori in open space areas are is maintained and/ or enhanced, having regard to:..</u></i>
NOSZ-R1 – NOSZ-R3	Support	TKOTAT support the provisions including permitted activity standards and matters over which discretion is restricted.	Retain as notified.
NOSZ-R4 – NOSZ-R6	Oppose	TKOTAT are concerned that activities under the Māori Purpose Activities definition have been separated out. Māori Purpose Activities are identified as potentially compatible with the zoning. For consistency throughout the Proposed District Plan, these activities should be listed under one rule as a permitted activity status.	Replace rules NOSZ-R4 – NOSZ-R6 with a single rule <i><u>NOSZ-R4 Māori Purpose Activities</u></i> <i><u>Activity status: PER</u></i> <i><u>Where:</u></i> <i><u>1. all Natural Open Space Effects Standards are complied with.</u></i>
NOSZ-S1	Support	TKOTAT support the specific inclusion of pou haki in the exceptions to height rules.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
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OPEN SPACE ZONE			
Overview, Objectives, Policies and Rules	Support in Part	TKOTAT support the intent and wording of this chapter of the Proposed District Plan. However, it is considered that the Objectives should be strengthened by articulating the need to balance any development of Open Spaces and their use by residents with the protection of sensitive areas. Alternative wording for objective OSZ-04 is recommended.	Alternative wording for Objective OSZ-04 as follows: <u><i>The design and development of Open Spaces reflect tangata whenua values including through:</i></u> <ol style="list-style-type: none"> <u><i>1. Restoring and enhancing ecosystems and indigenous biodiversity, particularly taonga species;</i></u> <u><i>2. Providing natural resources for customary use and;</i></u> <u><i>3. Ensuring open spaces incorporate and reflect Mātauranga Māori and provide opportunities for tangata whenua to use natural open spaces for customary and Māori cultural activities and opportunities for residents and visitors to experience and appreciate Māori historic heritage while protecting sites and areas of significance to Māori.</i></u>
OSZ-P1	Support	Support the specific protection for customary activities and Māori Purpose Activities.	Retain as notified.
OSZ-P3	Support	Support the specific avoidance of activities that cause adverse effects to cultural, spiritual and/ or historic interests or associations of importance to tangata whenua.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
OSZ-P6	Support in Part	Whilst TKOTAT support the intent of this policy, as per previous submission points, minor wording changes will ensure consistency throughout the Proposed District Plan.	<p>Amend policy wording to read:</p> <p><i>Ensure adverse effects on historic heritage <u>and sites and areas of significance to Māori</u> in open space areas are appropriately avoided, remedied or mitigated, having regard to:</i></p> <ol style="list-style-type: none"> <i>1. the outcomes of any consultation with and/or cultural advice provided by <u>engaging tangata whenua and/or Heritage New Zealand expertise</u>;</i> <i>2. opportunities for tangata whenua's relationship with <u>their culture and traditions</u> with ancestral lands, water, sites, Wāhi tapu and other taonga to be maintained or strengthened;</i> <i>3. the incorporation of mātauranga Māori principles into the design, development and/or operation of activities in open space areas;</i> <i>4. tangata whenua's customary responsibilities as mana whenua and kaitiaki; and</i> <i>5. options to recognise <u>and provide for</u> sites and areas of significance to Māori, including through the use of signs, planting or other methods.</i>
OSZ-R1 – OSZ-R6	Support	Support that discretion is specifically restricted where this activity may compromise those activities outlined in section 2(b) for the protection they will offer values and sites and areas of significance to Māori.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
OSZ-R6	Support	Support the inclusion of Māori Purpose Activities in the zone.	Retain as notified.
OSZ-S1	Support	TKOTAT support the specific inclusion of pou haki in the exceptions to height rules.	Retain as notified.

SPORT AND ACTIVE RECREATION ZONE			
Overview, Objectives, Policies, Rules	Support in Part	<p>TKOTAT support the intent and wording of the overview and objectives for this chapter of the Proposed District Plan.</p> <p>It is considered that the objectives should be strengthened by articulating the need to balance any development of Open Spaces and their use by residents with the protection of sensitive areas.</p> <p>Alternative wording for objective SARZ-04 is recommended.</p>	<p>Alternative wording for Objective SARZ-04 as follows:</p> <p><u><i>The design and development of the Sport and Active Recreation Zone reflect Tangata Whenua values including through:</i></u></p> <ol style="list-style-type: none"> <u><i>1. Restoring and enhancing ecosystems and indigenous biodiversity, particularly taonga species;</i></u> <u><i>2. Providing natural resources for customary use and;</i></u> <u><i>3. Ensuring open spaces incorporate and reflect Mātauranga Māori and provide opportunities for tangata whenua to use natural open spaces for customary and Māori cultural activities and opportunities for residents and visitors to experience and appreciate Māori historic heritage while protecting sites and areas of significance to Māori</i></u>
SARZ-P1	Support	TKOTAT support the specific protection for customary activities that is included in this policy.	Retain as notified.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
SARZ-P2	Support in Part	TKOTAT support the intent of this policy; however, are concerned that only Pā/ marae and papakāinga are listed as potentially compatible activities. This policy should cover all Māori Purpose Activities.	Amend the policy wording to read as follows: .. <i>Potentially compatible activities include:</i> 4. Pā/ marae 5. Papakāinga 4. Māori Purpose Activities...
SARZ-P3	Support	Support that this policy requires the avoidance of activities that cause adverse effects to cultural, spiritual and or historical interests or associations of importance to tangata whenua.	Retain as notified.
SARZ-P6	Support in Part	Support this policy as TKOTAT recognise that it seeks to protect values important to tangata whenua. To ensure consistency throughout the Proposed District Plan, require the recommended wording.	Amend the policy wording to read as follows: <i>Ensure adverse effects on historic heritage <u>and sites and areas of significance to Māori in open space areas are appropriately avoided, remedied or mitigated, having regard to:</u></i> <i>1. the outcomes of any consultation with and/or cultural advice provided by <u>engaging tangata whenua and/or Heritage New Zealand expertise</u>;</i> <i>2. opportunities for tangata whenua's relationship with <u>their culture and traditions</u> with ancestral lands, water, sites, Wāhi tapu and other taonga to be maintained or strengthened;</i> <i>3. the incorporation of mātauranga Māori principles into the design, development and/or operation of activities in open space areas;</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<p>4. <i>tangata whenua's customary responsibilities as mana whenua and kaitiaki; and</i></p> <p>5. <i>options to recognise <u>and provide for</u> sites and areas of significance to Māori, including through the use of signs, planting or other methods.</i></p>

SPECIAL PURPOSE ZONES			
AIRPORT ZONE			
Airport Zone	Oppose	<p>The Special Purpose Airport Zone has been developed without the benefit of specific engagement with mana whenua on the proposed provisions.</p> <p>The section 32 report and chapter acknowledges that the Airport Zone is of significance to Puketapu Hapū. The objectives of the Zone are currently silent on tangata whenua related matters.</p> <p>Whilst policy provision is made for ensuring adverse effects on cultural, spiritual and/ or historic values and sites and areas of significance to Puketapu (mana whenua)(policy AIRPZ-P4); recognising sites and areas of significance to Māori by using best practice industry requirements and technology to ensure efficient use of land and to reduce effects (policy AIRPZ-P8); encourage the incorporation of mātauranga</p>	Amend the PREC1 – Figure 85 – New Plymouth Airport Precinct Map and make consequential changes to the provisions of the Airport Zone alongside mana whenua through a cultural impact process.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>Māori into development and airport operations as well as opportunities for Puketapu to exercise customary responsibilities (policy AIRZ-P9) and TKOTAT acknowledges the engagement of Puketapu Hapū around the Airport redevelopment, the Airport Zone does not recognise or provide for section 6(e) of the RMA. This lack of recognition and providing for the relationship of tangata whenua is further undervalued by Māori purpose activities being considered an incompatible use within the Airport Zone (with a non-complying activity rule status).</p> <p>In addition TKOTAT are opposed to the statement around best practice industry being utilised to ensure efficient use of land and to reduce effects (policy AIRPZ-P8), as per Strategic Objective TW-9, only tangata whenua can identify impacts on their relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga of significance to Māori.</p>	

FUTURE URBAN ZONE

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Overview, Objectives, Policies and Rules	Support in Part	Support the proposed Future Urban Zone overlay in principle, subject to the following provisions:	
FUZ-O2	Support in Part	The intent of this objective is to ensure urban growth is well planned prior to allowing development to occur. The objective must be updated to recognise the critical input from tangata whenua into the structure planning process to inform development capacity, as well as area specific provisions required to provide for the relationship tangata whenua may hold with the area.	Amend the objective to read as follows: <i>Until rezoning for urban growth purposes occurs and the area to be rezoned is comprehensively planned by a structure plan <u>that is developed through a process that engages the expertise of tangata whenua:</u></i> <i>1. urban growth is avoided within the Future Urban Zone areas; and</i> <i>2. the Zone is predominantly used for agricultural, pastoral and horticultural activities and low density rural living activities.</i>
New Policy	Support	Provision of a policy directly relating to Long Term Plan funding to implement Strategic Objective UFD-13 particularly in relation to the provision of infrastructure for new development.	Provide proposed policy.
FUZ-P7 (10)	Support in Part	FUZ-P7 is the key provision implementing FUZ-O2. The policy as drafted acknowledges tangata whenua, however the reference to simply the outcomes of consultation undervalues the requirement to engage cultural expertise to inform the development of any structure plan provision.	Amend policy wording as follows: <i>...The potential impact of development on any cultural, spiritual and/or historic values and interests or associations of importance to tangata whenua, and <u>any expert cultural advice received, including with respect to:</u></i> <i>a) opportunities to incorporate mātauranga Māori principles into the design and/or development of the structure plan area;</i>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
			<i>b) opportunities for tangata whenua's relationship with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened; and c) options to avoid, remedy or mitigate adverse effects;...</i>
FUZ-P7 (11)	Support in Part	In some instances the protection of identified features, waterbodies and/or indigenous vegetation will be required through the structure plan process/provisions.	Amend policy wording as follows: <i>The protection, maintenance or enhancement of identified features, natural waterbodies and/or indigenous vegetation; and...</i>
FUZ-R21	Support	Support activity status as proposed.	Retain as notified.

HOSPITAL ZONE			
Hospital Zone	Oppose	<p>The Special Purpose Hospital Zone has been developed without the benefit of specific engagement with mana whenua on the proposed provisions.</p> <p>The objectives of the Zone are currently silent on tangata whenua related matters. Whilst policy provision is made for consideration of adverse effects on identified features (these features should be outlined in the policy) (HOSPZ-P3); whether any development would compromise cultural, spiritual and/or historic values and interests or associations of importance to tangata whenua (HOSPZ-P6); encourage the</p>	Amend the PREC2 – Figure 89 – Taranaki Base Hospital Campus Precinct Map and PREC3 – Figure 90 - Southern Cross Hospital New Plymouth Precinct Map and make consequential changes to the provisions of the Hospital Zone alongside mana whenua through a cultural impact process.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>incorporation of mātauranga Māori into development and hospital operations as well as opportunities for tangata whenua to exercise customary responsibilities (policy HOSPZ-P9), the Hospital Zone does not recognise or provide for section 6(e), have particular regard to 7(a) or take into account section 8 of the RMA.</p> <p>This lack of recognition and providing for the relationship of tangata whenua (section 6(e)) is further undervalued by Māori purpose activities being considered an incompatible use within the Hospital Zone (with a non-complying activity rule status for both precincts).</p>	

MAJOR FACILITY ZONE			
Major Facility Zone	Oppose	<p>The Special Purpose Major Facility Zone has been developed without the benefit of specific engagement with mana whenua on the proposed provisions.</p> <p>The objectives of the Zone are currently silent on tangata whenua related matters. Whilst policy provision is made for the management of activities in relation to identified features (these features should be outlined in the policy), as well as the</p>	<p>Amend the PREC4 - Figure 91 - Methanex Motunui Precinct, PREC5 - Figure 92 - Methanex Waitara Valley Precinct, PREC6 - Figure 93 - McKee Mangahewa Production Station Precinct, PREC7 - Figure 94 - Pohokura Production Station Precinct, PREC8 - Figure 95 - Omata Tank Farm Precinct and PREC9 - Figure 96 - Paritutu Tank Farm Precinct and make consequential changes to the provisions of the Major Facility Zone alongside mana whenua through a cultural impact process.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>recognition of Kaupapa Māori (concerned about the reference of this framework within the policy scope given it was used to inform the development of the Proposed District Plan and is not application specific) (MFZ-P6); and the recognition of identified features (these features should be outlined in the policy) including SASM (MFZ-P7), the Major Facility Zone does not recognise or provide for section 6(e), have particular regard to 7(a) or take into account section 8 of the RMA and the Strategic Objectives.</p> <p>This lack of recognition and providing for the relationship of tangata whenua (section 6(e)) is further undervalued by Māori purpose activities not provided for in the policy section and the activity has a non-complying activity status under the rules.</p>	

MĀORI PURPOSE ZONE			
Māori Purpose Zone	Support in Part	<p>The Special Māori Purpose zone enables tangata whenua to exercise their customary responsibilities as kaitiaki and mana whenua and to undertake activities that reflect Māori customs and values.</p> <p>TKOTAT support the intent of the zone and its provisions. TKOTAT is concerned that in some instances the Māori Purpose Zone</p>	<p>Alongside mana whenua, marae and whānau make consequential changes to Māori Purpose Zone boundaries and amend Planning Maps to ensure they correctly reflect the actual property/ activity boundaries.</p> <p>Alongside mana whenua, marae and whānau identify properties whereby the property and its current and/ or future development and/ or activities would be more appropriately zoned as Māori Purpose Zone.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>boundaries do not reflect the actual property/ activity boundaries as correct , for example, but not limited to:</p> <ul style="list-style-type: none"> • Proposed Ngāmotu Marae site • Kairau Marae • Muru Raupatu Marae • Manukorihi Pā/ Owae Marae • Tarereare/ Katere-ki-te-Moana Marae • Te Kohanga Moa Marae • Te Rewa Rewa Reserve (as per the s32 report) <p>In addition, TKOTA considers that there are additional properties where it would be more appropriately zoned as Māori Purpose Zone, for example, but not limited to:</p> <ul style="list-style-type: none"> • Ngāti Rahiri proposed marae site • Whakawhitiwhiti Pā Historic Reserve • Aōtere Pā • Pukerangiora Pā • Pukeweka • Urupā 	
Iwi or hapū development plan	Support in Part	Support the intent of the iwi and/ or hapū development plans. Clarification is sought in relation to whether or not a plan change would be required if iwi or hapū decided to submit an iwi/ hapū development plan following the plan being operative?	Clarification sought.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Rules	Support	Support the wording of the Māori Purpose Zone rules within the Proposed District Plan.	Retain as notified.
Effects standards, matters over which control is reserved, matters over which discretion is restricted	Support	Support the wording of the Māori Purpose Zone effects standards, matters over which control is reserved and matters over which discretion is restricted.	Retain as notified.

PORT ZONE			
Port Zone	Oppose	<p>The Special Purpose Port Zone has been developed without the benefit of specific engagement with mana whenua on the proposed provisions.</p> <p>Whilst policy provision is made for ensuring adverse effects on cultural, spiritual and/ or historic values and sites and areas of significance to Ngāti Te Whiti (mana whenua)(policies PORTZ-P4 and PORTZ-P5); minimise adverse effects on identified features including SASM (these should be detailed in the policy) (policy PORTZ-P7); encourage the incorporation of mātauranga Māori into development and airport operations as well as opportunities for Ngāti Te Whiti to exercise customary responsibilities (policy PORTZ-P11), the Port Zone does not recognise or provide for section 6(e) of the RMA.</p>	Amend the PREC10 – Figure 101 - Port Precinct Map - Port Areas and Height Limits and make consequential changes to the provisions of the Port Zone alongside mana whenua through a cultural impact process.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		This lack of recognition and providing for the relationship of tangata whenua is further undervalued by Māori purpose activities being considered an incompatible use within the Port Zone (with a non-complying activity rule status).	

URBAN GROWTH AREAS (RE-ZONED RURAL (OPERATIVE) TO URBAN (PROPOSED))			
Urban growth areas (areas re-zoned from Rural (under the Operative District Plan) to urban zonings (under the Proposed District Plan))	Oppose	<p>General comment: Green field urban growth and development has the potential to dramatically alter the cultural landscape more so than many other activities managed by the District Plan.</p> <p>The proposed district plan as notified includes a number of Development Areas (with an associated structure plan), and a number of other areas proposed to be re-zoned without an overall structure plan. We note that the process to date to develop a structure plan, or to re-zone these areas has not benefited from the advice of mana whenua for those specific areas; and as such it is difficult to see how the current development plan provisions, or the land re-zoned from rural to an urban zone without a structure plan are implementing the proposed strategic objectives of the Proposed District Plan, including those referenced earlier in our submission. The</p>	Retain these areas in Rural Production Zone until such time as a structure plan process is completed where mana whenua are engaged and provide expert cultural advice on the provisions of any structure plan.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>inconsistencies between these approaches is ineffective.</p> <p>Submissions on specific areas that are proposed to be re-zoned, or development areas are made below.</p>	

RE-ZONING WAITARA			
<p>Rural Environment Area to General Residential Zoning – Armstrong Avenue and Aratapu Street</p>	<p>Oppose</p>	<p>The proposed plan re-zones Armstrong Avenue from rural to general residential. Several indicative roads are proposed. This extends the growth area known as Waitara Area A that was re-zoned through PLC09/00017. The development of Waitara Area A (now Dreaver Drive and Masters Lane) has resulted in significant adverse effects on the environment that were unable to be managed through the subdivision process alone. This recent history has demonstrated that specific provisions are required to manage development of this area given the level of significance to mana whenua, as well as the pressures on the natural environment that have been exacerbated through recent residential development.</p> <p>The proposed plan as notified relies on the general subdivision and residential provisions (rules and design guides), as well</p>	<p>Retain a rural zone until such time as the area is structure planned. Prohibit further residential subdivision of Armstrong Avenue area until such time as the aforementioned structure plan process is complete.</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		as some overlay provision (i.e. waterbodies) to avoid remedy or mitigate the adverse effects of development. These are not adequate. As one example, the full length of Tangaroa, including its origin is not included on the planning maps. In the absence of a structure plan, that is developed alongside mana whenua the proposed re-zoning cannot be supported.	

DEVELOPMENT AREAS			
DEV1 – Bell Block Area Q Structure Plan Development Area – Objectives DEV1-01, DEV1-02, DEV1-03; Policies DEV1-P1 to DEV1-P6; Rules DEV1-R1 to DEV1-R27	Oppose	<p>The Bell Block Area Q Structure Plan Development Area has been developed without the benefit of specific engagement with mana whenua on the proposed provisions. As such, the development of stages 2 and 3E of the structure plan area should be delayed for reasons other than the provision of roading infrastructure alone. An additional requirement before releasing those areas must be the detailed structure planning of those zones alongside mana whenua.</p> <p>The objectives of the development area are currently silent on tangata whenua related matters, and subsequently this permeates throughout the rest of the provisions of the development area.</p>	Amend the structure plan provisions regarding the release of stages 2 and 3E of the development area to be contingent on the review and finalisation of structure plans for those areas being developed alongside mana whenua, and make consequential amendments to the provisions of Dev1 – Bell Block Area Q Structure Plan Development Area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>As one example of the implications of this process, the Bell Block Area Q Structure Plan Development Area specifies that the Waitaha and tributaries are to be retained open for storm water management purposes. This is out of step with <i>Tai Whenua, Tai Tangata, Tai Ao</i>, as well as the national direction regarding the management of freshwater where Te Mana o te Wai and integrated management are two key directions.</p> <p>Te Mana o te Wai recognises that the first right of water is to water – that is the mauri of the Waitaha and tributaries is paramount. Subservient to this is the ability for people to safely swim, eat and have contact with the Waitaha; and subservient to that outcome again are ecosystem services – like stormwater management. Amending the rationale behind the retention of the Waitaha and tributaries is required to recognise Te Mana o te Wai. To give effect to this national direction the adequacy of infrastructure that is designed, constructed and maintained must be such that is provides for the remediation of the Waitaha and tributaries. Similarly, we note that water sensitive urban design is one method of managing stormwater impacts on freshwater. We note that WSUD is reliant on</p>	

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		<p>integrated management of land use and subsequent discharges, and that this starts on a site by site basis, including engineering solutions in any roads or other hard standing areas. The structure plan is silent on these issues.</p> <p>This is compounded in the proposed rule provisions (Dev1-R7) where the activity status for all subdivision within the structure plan area is controlled, and the matters of control are not sufficiently broad to consider any advice received by tangata whenua in relation to a proposal.</p>	
DEV2 – Carrington Structure Plan Development Area – Objectives DEV2-01, DEV2-02, DEV2-03; Policies DEV2-P1 to DEV2-P4; Rules DEV2-R1 to DEV2-R4	Oppose	<p>This development area has been designed without the benefit of advice from mana whenua. As a consequence, the objectives are silent on tangata whenua. This permeates throughout the policies and rules designed to implement those objectives where there are limited reference to tangata whenua, and no scope to consider the impact of the development of the structure plan area on cultural matters through the consent process.</p> <p>Policy Dev2-P4(6) considers whether an activity is located appropriately having regard to mātauranga Māori, among other things. In terms of subdivision within the development area, the rule provision (Dev2-</p>	Amend the structure plan alongside mana whenua through a cultural impact process, and make consequential changes to the provisions of Dev2 – Carrington Structure Plan Development Area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<p>R3) is a controlled activity where the matters of control are not sufficiently broad to consider tangata whenua matters, including mātauranga; it is not clear how this rule (or any of the rules) will implement Dev2-P4(6).</p> <p>The structure plan identifies an existing wetland as an appropriate area to construct a detention pond to manage stormwater generated through the development of the area for residential purposes.</p> <p>As noted for Dev1, this is out of step with the national direction regarding Te Mana o Te Wai. Water Sensitive Urban Design (WSUD) is encouraged, however, we note that this requires the treatment of stormwater to commence at site, including proposed roads</p>	
DEV3 – Junction Structure Plan Development Area – Objectives DEV3-O1, DEV3-O2, DEV3-O3; Policies DEV3-P1-DEV3-P4; Rules DEV3-R1-DEV3-R4	Oppose	This development area has been designed without the benefit of advice from mana whenua. As a consequence, the objectives are silent on tangata whenua. This permeates throughout the policies and rules designed to implement those objectives where there are limited reference to tangata whenua, and no scope to consider the impact of the development of the structure plan area on cultural matters through the consent process. Potential areas of consideration include, but are not limited to:	Amend the structure plan alongside mana whenua through a cultural impact process, and make consequential changes to the provisions of Dev3 – Junction Structure Plan Development Area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		<ul style="list-style-type: none"> • the treatment, remediation and protection of manga flowing in the development area into the Te Hēnui. • The tocation, width and ongoing management of the esplanade reserve. • The location of wastewater and stormwater infrastructure, its operation and impact on freshwater. 	
DEV4 – Oropuriri Structure Plan Development Area	Oppose	<p>This development area has been designed without the benefit of advice from mana whenua. As a consequence, the objectives are silent on tangata whenua. This permeates throughout the policies and rules designed to implement those objectives where there are limited reference to tangata whenua, and no scope to consider the impact of the development of the structure plan area on cultural matters through the consent process. Potential areas of consideration include, but are not limited to:</p> <ul style="list-style-type: none"> • the stressors resulting from development on the mauri of the Mangaone as a significant waterbody. • The degree of earthworks and land modification required to provide for industrial land uses. • The requirement for exotic plantings along the southern boundary of the 	Amend the structure plan alongside mana whenua through a cultural impact process, and make consequential changes to the provisions of Dev4 – Oropūriri Structure Plan Development Area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		development area adjoining the Mangaone.	
DEV5 – Patterson Structure Plan Development Area	Oppose	<p>This development area has been designed without the benefit of advice from mana whenua. As a consequence, the objectives are silent on tangata whenua. This permeates throughout the policies and rules designed to implement those objectives where there are limited reference to tangata whenua, and no scope to consider the impact of the development of the structure plan area on cultural matters through the consent process. Potential areas of consideration include, but are not limited to:</p> <ul style="list-style-type: none"> • The proposed detention pond. • How the development area provisions recognise and provide for the tributary of the huatoki, and associated statutory acknowledgement. • The location of wastewater infrastructure (the alignment that crosses the tributary up to seven times, and the location of the pumping station). • The retention of the SNA, and on-going management of indigenous biodiversity through the development of the area. 	Amend the structure plan alongside mana whenua through a cultural impact process, and make consequential changes to the provisions of Dev5 – Patterson Structure Plan Development Area.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
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INAPPROPRIATE ZONING			
<p>Planning Maps and applicable zone not appropriate as rural production provisions are not appropriate in this area – residential or MPZ may be more</p>	<p>Support in Part</p>	<p>It appears that in some instances inappropriate zoning has been applied to properties under the Proposed District Plan.</p> <p>For example, the northern most land adjoining the coast on the true right bank of the Waitara River (identified as Rohutu Pā) has a proposed Rural Production Zone yet it is known to contain papakāinga housing. A General Residential Zoning or Māori Purpose Zone may be more appropriate.</p> <p>As detailed under the Māori Purpose Zone above, some areas of Māori Land, including iwi and hapū land, and Sites of Significance to Māori may be better suited to a Māori Purpose Zoning. This would further recognise and provide for tangata whenua's relationship with their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p>	<p>Amend inappropriate zonings and reflect on planning maps. Engage mana whenua to inform appropriate zoning for Māori Land</p>

OTHER MATTERS - THROUGHOUT THE PLAN			
<p>Use of Te Reo</p>	<p>Support in Part</p>	<p>TKOTAT are supportive of the use of Te Reo throughout the Proposed District Plan. The correct kupu, spelling including the use of tohutō is imperative.</p>	<p>Amend where incorrect and/ or inaccuracies e.g. whanau and wananga</p>

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
Section 33 of the RMA	Support	Support the use of section 33 of the RMA to transfer powers to an 'iwi authority' in regard to specific matters.	Particularly transfer of powers around heritage items, SASM, natural features and landscapes and waterbodies.
Council resourcing tangata whenua engagement in RMA processes	Support	<p>The Proposed District Plan as notified will result in a significant increase in tangata whenua involvement in resource management processes.</p> <p>Only tangata whenua are qualified to identify the effects of the protection, use and development of resources and the relationship of their cultural and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga.</p> <p>This reiterates the importance of engaging cultural expertise and therefore NPDC will be required to assist tangata whenua in providing this expertise.</p>	
Mātauranga Māori	Support	Support the incorporation of mātauranga Māori in proposals and reference to it throughout the Plan; however, seek removal of reference to 'principles'.	Amend throughout the Proposed District Plan.
Engaging tangata whenua expertise	Oppose	<p>Only tangata whenua are qualified to identify the impacts of the protection, use and development of resources and the relationship they hold with the environment.</p> <p>TKOTAT reiterates the importance of engaging cultural expertise at the beginning of the development process rather than</p>	Amend throughout the Proposed District Plan.

Section/Sub-section/Provision	Support/Support in Part/Oppose	Submission <i>(Explain the reasons why you support/support in part/oppose the specific provisions or wish to have them amended.)</i>	Relief sought <i>(Give precise details of the decision you want the Council to make. To mark up changes to a provision strike through text you want to remove and underline text you want to add)</i>
		simply relying on consultation as the Proposed District Plan currently suggests.	
Identified features	Oppose	As per the submission points throughout this submission, identified features must be extrapolated to specifically refer to those features, including areas of significant natural features and landforms, waterbodies, indigenous biodiversity, historic heritage and sites and areas of significance to Māori.	Amend throughout the Proposed District Plan.