

Section 32 report: Māori values

for the Proposed Natural Resources Plan for the Wellington Region



greater WELLINGTON

REGIONAL COUNCIL

Te Pane Matua Taiao



Issues and Evaluation Report



Section 32 report: Māori values

for the Proposed Natural Resources Plan for the Wellington Region

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1. Preamble

This report is the section 32 analysis of the appropriateness of the objectives, policies and methods that provide for Māori values in the Natural Resources Plan (proposed Plan or PNRP). The proposed Plan takes a significant step forward in recognising the requirement of the Resource Management Act 1991 (RMA) under section 8 to take into account the principles of the Treaty of Waitangi in the management of natural and physical resources. The proposed Plan also recognises and provides for “the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga” as a matter of national importance under section 6(e) Part 2 of the RMA. Providing for this distinct and nationally important relationship within a regulatory framework is a significant challenge for a process structured to deliver sustainable management of resources rather than complex and continually evolving cultural relationships.

Plans do of course deal with relationships, primarily the relationship between the resource user and the resource. They seek to provide consistency and certainty to this relationship through a regulatory framework of objectives, policies, rules and methods. To date regulatory plans have not provided the same certainty or consistency to the relationship of Māori and te taiao (the environment). This is particularly relevant to the relationships of mana whenua who are Māori with ancestral claims to a particular area of land and resources. Kaitiakitanga is the role of mana whenua in sustaining mauri and upholding their customary responsibilities.

To achieve the purpose of the RMA the proposed Plan identifies Māori values as a fundamental element of resource management at both a regional and catchment scale. The Plan proposes that Māori concepts be integrated into how all water is managed and measured, mana whenua places of importance be given greater protection and that the role of Māori in decision-making is given more emphasis, particularly in deciding how their values are provided for within their own tribal areas for which they hold mana whenua.

The commitment to integrate Māori and mana whenua specific values in the proposed Plan comes directly from the longstanding relationship between iwi of the Wellington Region and Greater Wellington Regional Council (WRC). The most recent expression of this relationship is the Memorandum of Partnership signed in 2013 that established “a structural and operational relationship between the Council and Mana whenua in the context of the Treaty of Waitangi, Te Tiriti o Waitangi and the legislation which gives functions, duties and powers to the Council”.

Mana whenua of the Wellington Region note a decline in their traditional relationships with the environment. This loss of relationship is evidenced by a general decline in water quality particularly in relationship to larger bodies of water, loss of mahinga kai, and an inability to use sites of significance for cultural purposes due to effects of activities at these places or in the wider catchment. The RMA in section 8 requires that councils take into account the principles of the Treaty of Waitangi and Te Tiriti o Waitangi, in the management of natural resources. These principles, which are also emphasised

in the Memorandum of Partnership 2013, clearly state the respective responsibilities of Crown and iwi in recognising and providing for each other's interests in the relationship. The provisions in the proposed Plan give greater emphasis to the relationship of Māori with their environment and greater certainty for mana whenua that their rights and interests are an integral part of the regulatory framework of the region.

2. Whakapapa (background)

Iwi of the Wellington Region have invested significant time and expertise in development of the proposed Plan. Their commitment is evident in the wording and intent of the proposed objectives, policies, rules and methods that explicitly identify Māori values and their places of significance. Of equal importance is the understanding that in conjunction with WRC, mana whenua have reviewed all matters within the compass of the plan review. The result of this partnership approach is a proposed Plan that is a significant step forward in giving effect to the requirement for the recognition of Māori values and the role of iwi in decision-making in the RMA, National Policy Statement for Freshwater Management 2014 (NPS-FM) and iwi-specific Treaty settlement legislation.

The review of the regional plan has been conducted in partnership between WRC and the six mana whenua iwi of the Wellington Region who are:

- Rangitāne o Wairarapa – represented by Rangitāne o Wairarapa Inc.
- Kahungunu ki Wairarapa – represented by Ngāti Kahungunu ki Wairarapa Trust
- Taranaki Whānui ki te Upoko o Ika a Maui – represented by Port Nicholson Block Settlement Trust
- Ngāti Toa Rangatira – represented by Te Rūnanga o Toa Rangatira Inc.
- Te Ātiawa ki Whakarongotai – represented by Āti Awa ki Whakarongotai Charitable Trust
- Ngāti Raukawa ki te Tonga – represented by Ngā Hapū o Ōtaki

2.1 Mana whenua

Te Upoko Taiao – Natural Resource Management Committee (Te Upoko Taiao) of the WRC has used the term mana whenua to describe local Māori in the proposed Plan. Tangata whenua (people of the land) and mana whenua (those with authority over the land) are translated and applied differently in different places, documents and processes within New Zealand. Use of these terms is evolving and there is no standard usage.

Te Upoko Taiao have sought to use terms that they consider best give effect to their responsibilities under the RMA (section 6) to: “*recognise and provide for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga*”. They agree that the Act's emphasis on traditional relationship, together with the management of

resources requires clear identification of those Māori (groupings or individuals) who hold the requisite authority to represent a traditional relationship in their contribution to resource management decisions at a regional scale and whaitua (catchment) scale. To this end they have identified that “mana whenua” translated as “those with authority over the land” provides this distinction better than more generic terms such as Māori (indigenous person) or tangata whenua (people of the land). Their approach also recognises the Act’s direction in having particular regard to kaitiakitanga (section 7), taking into account the Principles of the Treaty of Waitangi (section 8) and the Memorandum of Partnership (2013) signed by WRC and iwi of region which emphasises that the individual relationship between iwi and the Crown is pre-eminent.

There are good arguments for suggesting that mana whenua (authority over land) and tangata whenua (people of the land) are interchangeable, particularly if you interpret the term whenua as the placenta that relates the person to that specific place where they were born. However Te Upoko Taiao wished to bring particular emphasis to the role of Māori in decision-making and so are using the term mana whenua to denote those with the authority to make decisions over customary matters. In a grammatical sense they are using the abstract noun (to have authority over land) as the noun (those who have authority over land).

2.2 Ara Tahi and Te Upoko Taiao

The establishment of Te Upoko Taiao – Natural Resource Management Committee, the committee responsible for overseeing the review of the regional plan, as a partnership body is an innovative process built from the longstanding relationship between WRC and iwi of the region. This relationship was initially formalised in 1993 with the establishment of Ara Tahi, a governance partnership formed to develop a relationship of mutual benefit based on Te Tiriti and The Treaty. The Ara Tahi Charter of Understanding (1993), replaced by a Memorandum of Partnership (2013), recognised that WRC and iwi share a common goal in supporting the environmental, social, cultural and economic well-being of the region. The Memorandum of Partnership also emphasises Treaty of Waitangi principles of shared decision-making, active protection and tribal self-regulation as fundamental to the relationship.

The stronger relationships resulting from the formation of Ara Tahi enabled the development of new and more operational expressions of partnership and a better understanding of how the partnership could best give effect to legislative requirements of the RMA, Local Government Act (LGA) and Treaty Settlements. The Regional Policy Statement for the Wellington Region 2013 (RPS), which sets the policy framework for regional resource management, identified the significant resource management issues shared by mana whenua as issues of regional significance:

1. **Kaitiaki decision-making:** Lack of tangata whenua involvement in resource management decision-making.
2. **Loss of mauri:** Loss of mauri, particularly in relation to fresh and coastal waters.

3. **Mahinga kai:** Continuing loss of quality, quantity, and access to mahinga kai and natural resources used for customary purposes.
4. **Wāhi tapu:** Degradation and destruction of places, sites and areas with spiritual, cultural or historic heritage value to tangata whenua.

These four key issues are similar to the matters of national importance that must be recognised and provided for under section 6(3) of the RMA.

At a regional scale, iwi point to a decline in water quality and mahinga kai species, an attendant loss of traditional Māori uses of water, and an inability to influence the decisions they believe are contributing to this decline.

Ara Tahi identified the mauri of water as an overarching concern, fundamental to the well-being of the region. They determined to develop a combined iwi management plan for fresh water that identified Māori values and provided direction to regulatory authorities, resource planners and users as to how these should be used to support improved water quality. Their principal intention was to have regulatory effect on activities affecting water by ensuring that Māori values and practices associated with fresh and coastal water were provided for in the regional and district plans. As the development process got underway Ara Tahi became aware of the limited legislation supporting iwi management plans which under section 66(2A) of the RMA only require that “the council must take into account any relevant planning document recognised by an iwi authority”.

In light of this understanding, Ara Tahi recognised that they would have greater regulatory effect through direct involvement in the review of the regional plans. This decision led to the formation of Te Upoko Taiao – Natural Resource Management Committee as a partnership committee for the review of the regional plan.

Te Upoko Taiao is made up of seven councillors, and seven appointed members nominated by iwi for their cultural, planning and environmental knowledge. The committee is co-chaired by a councillor and an appointed member. Te Upoko Taiao won an Institute of Public Administration New Zealand (IPANZ) award for Crown–Iwi partnership in 2012.

2.3 Māori values and mana whenua interests in the proposed Plan

The recognition of and provision for Māori values and mana whenua interests in water are integral to the proposed Plan. This is due to the deliberate approach of the plan review process, which integrated mana whenua perspective throughout. The principle method to achieving this has been the partnership with mana whenua as appointed members to the review process. All matters pertaining to the plan review have been considered by mandated mana whenua appointees in conjunction with councillors. Individual mana whenua groupings have been engaged as partners to ensure their views are formative in the process. Kaitiaki groups were also established to develop and test that proposed approaches are reflective of partnership.

The proposed Plan contains provisions in response to issues identified by mana whenua in the RPS. These issues, and the objectives, policies, rules and methods that respond to them, are interrelated and need to be understood together. They combine people and place with values, and support the role of mana whenua as decision-makers. They also support kaitiaki in providing for their values and supporting the mauri of the region in partnership with local government, resource users and the general community.

The operative regional plans, particularly the freshwater and coastal plans, had good intentions, and clearly identified mana whenua priorities. However they did not address the priorities they so clearly establish in sufficient detail to be effective in providing for the relationship of Māori with natural resources. The objectives and policies are not evident in rule structures and are only able to be given effect to through non regulatory methods. There is no evidence that non-regulatory methods have been implemented.

The proposed Plan takes a ‘shared objectives’ approach to managing for key values in water that aims to deliver on the regulatory partnership formed through Te Upoko Taiao. The shared objectives in the proposed Plan are ‘ecosystem health and mahinga kai’ and ‘contact recreation and Māori customary use’. These shared objectives recognise the role of mana whenua as kaitiaki, and specify Māori customary use and mahinga kai values as overarching values that all water will be managed for. Mana whenua of the region have supported the inclusion of mahinga kai and Māori customary use as objectives for the management of all water. These objectives provide for the intrinsic nature of their values throughout the water cycle as expressed through their concern for the mauri of the region’s fresh and coastal waters.

Managing regional water quality for these shared objectives recognises and values the complimentary nature of the Māori and science-based priorities identified by Te Upoko Taiao. The collaborative approach to objective setting elevates Māori values within the regulatory process to be considered as integral to the plan as a whole, and equivalent to aquatic ecosystem health and contact recreation as regional-scale priorities for the management of fresh and coastal waters. The emphasis on shared objectives does not assert that the values that make up the shared objectives are the same, but recognises the benefits that arise from managing for these jointly at a regional scale while acknowledging their differences through the measurement of their respective attributes. At the whaitua, catchment-specific scale, the shared objectives can be given further meaning in their geographic and specific context (see section 2.4 below).

Objectives, policies and methods have been developed that require mana whenua decision-making. The shared objective approach is fundamental to this in that it promotes the role of kaitiaki in resource management decision-making. It achieves this by promoting Māori interests within a regulatory framework; mana whenua can now see themselves and their values represented in the process.

The proposed Plan directs resource users to protect mana whenua relationships and values by considering how proposed activities may affect these relationships. It does this through objectives, policies, rules and other methods

that emphasise the importance of mana whenua values and relationships and which direct resource users to engage directly with mana whenua.

The proposed Plan provides greater protection for aquatic sites scheduled for significant mana whenua values and provides detailed information about their associated values. Mana whenua will have an increased role in limiting and managing adverse effects on scheduled places and their associated values including Ngā Taonga Nui a Kiwa (extensive and treasured water bodies).

Recognising the challenges in protecting or providing for values associated with a specific site that relies on good water quality has been formative in development of mana whenua provisions in this plan. Whilst sites and values can be protected from the direct effects of identified activities, such as livestock access, discharges or works in the bed, water quality at a site scheduled for specific values is largely determined by upstream land use.

In addressing this challenge, the concept of ki uta ki tai was promoted to manage a water quality outcome for the whole water body (see Section 32 report: Ki uta ki tai – mountains to the sea). Ki uta ki tai is a fundamental precept of a Māori perspective that sees te taiao (the environment) as an integrated system of constantly interacting relationships that should be viewed together in order to be understood.

WRC has involved iwi in the development of the proposed Plan at three levels:

1. Regional plan decision-making via Te Upoko Taiao – Natural Resource Management Committee
2. Workshops with individual iwi throughout the plan review
3. Ongoing engagement with iwi kaitiaki during development and review of the plan provisions.

Kaitiaki mandated by iwi to work with WRC staff have been involved in the development of the proposed Plan. They have identified mana whenua values and interests in water at both a regional and tribal level, and advised on the development of water management provisions. The kaitiaki group worked at an operational level, to refine and progress the higher level direction of Te Upoko Taiao and Ara Tahī. The kaitiaki have worked with their iwi and hapū to identify sites of significance and Ngā Taonga Nui a Kiwa for inclusion in the proposed Plan's schedules (Schedules B and C).

WRC has undertaken three rounds of iwi workshops with individual mana whenua groupings reporting back on the proposed Plan.

2.4 Ngā Whaitua

Whaitua is te reo Māori for “catchment area”. Whaitua committees are being established to develop catchment-scale water quality and quantity limits and the regulatory and non-regulatory methods to achieve them. At the time of preparing this report the Ruamāhanga and Te Awarua-o-Porirua whaitua committees have been established.

Whaitua committees will prepare a Whaitua Implementation Plan that sets the water quality and quantity limits and methods to achieve them through adoption as a chapter into the regional Plan. . Mana whenua values will also be considered within the larger framework that uses future variations and plan changes to incorporate catchment-specific water quality limits based on the recommendations from the five whaitua committees, as described in the NPS-FM Implementation Programme (GWRC 2015) and discussed in the report “Introduction to the Resource Management Act 1991 Section 32 reports”.

The eventual inclusion of whaitua chapters in the Natural Resources Plan (by RMA Schedule 1 variation or plan change) will provide further recognition of mana whenua values by specifying how individual waterways and whole catchments will be managed , as well as giving effect to the NPS-FM.

The whaitua chapters will address ngā kawa, tikanga and tohu a iwi (iwi specific constructs, processes and indicators), and specify how these will apply to and support local regulatory and non-regulatory processes to identify and achieve water quality and water quantity limits within the whaitua.

The appointed membership of the whaitua committees was undertaken in conjunction with mana whenua. Each whaitua committee includes a Te Upoko Taiao appointed member, local council representatives and at least one local iwi representative. The other members of the committees are community leaders rather than representatives of community or industry sectors. Māori community members can also be appointed to the whaitua committee as individuals through the general appointment process in addition to the iwi representative position.

The decision not to use a representative model was based on the need for a shared community outcome as opposed to a bilateral agreement between Treaty partners. This decision also recognised that the composition of Te Upoko Taiao itself provided a Treaty Partnership model for final review and decision-making in response to the recommendations of the whaitua committees. This process aligns with the NPS-FM guideline which identified that a two-tier decision-making process (as provided through whaitua and Te Upoko Taiao) is a best-practice model in natural resource management partnership decision-making. Local hapū and iwi interests must be recognised in whaitua recommendations, a commitment which requires committees to engage with all parts of their Māori community.

The establishment of the Ruamāhanga whaitua committee has required a number of initiatives to ensure whaitua committee decision-making is informed by mana whenua perspective. These include:

- The establishment of a Wairarapa kaitiaki group made up of iwi kaitiaki
- The employment of two iwi kaitiaki to support engagement with mana whenua and Māori community
- The input from specialist Māori advisors and local kaitiaki

- Marae-based hui to inform mana whenua of whitua process and to engage them as to how their values can inform decision-making

Te Awarua-o-Porirua whitua committee has been formed using the same terms of reference, make-up and structure as that used by the Ruamāhanga whitua committee.

3. Report purpose and method

This report contains an analysis of the appropriateness of the mana whenua objectives, policies and methods contained in the proposed Plan.

To fulfil the requirement of section 32(2) of the RMA, the report identifies and assesses the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions.

In accordance with section 32(2), the analysis identifies the opportunities for economic growth that are anticipated to be provided or reduced and the employment that are anticipated to be provided or reduced.

In addition, the analysis, where practicable, quantifies the benefits and costs and assesses the risk of acting or not acting if there is uncertain or insufficient information.

The structure of the report is shown below:

- *Issues statement*: an outline of the main issues relevant to the mana whenua values identified during development of the proposed Plan (section 4)
- *Regulatory context*: identification of relevant international, national and regional legislation and policy (section 5)
- *Evaluation of objectives*: an evaluation of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the RMA as required by section 32(1)(a) (sections 6 and 7)
- *Assessment of the policies and other methods*: an assessment of the efficiency and effectiveness of the provisions as to whether they are the most appropriate way to achieve the objectives (section 8)

This report should be read in conjunction with several other section 32 reports prepared for the proposed Plan. In particular the section 32 reports focusing on water quality, aquatic ecosystems and discharges to water of wastewater and stormwater are valuable to understand the context and approach of the development of the proposed Plan.

4. Resource management issues

WRC began a region-wide engagement with the community in 2010 to identify the views of the community regarding natural resource management and to help define the issues that the Natural Resources Plan would address. This process involved engagement with iwi partner organisations, the general

public, agencies and organisations with interests in resource management, resource users, school children, developers and policy-makers.

From region-wide engagement, two significant issues were identified (GWRC 2014) that the proposed Plan has addressed with provisions to manage for mana whenua values. The relevance and significance of these issues is discussed below.

Table A1 in the Appendix to this report contains a summary of these two issues.

4.1 Mana whenua relationships with land and water

The relationship of tangata whenua with land and water is adversely affected by the inappropriate use and/or degradation of natural and physical resources.

The traditional relationships of mana whenua with their land and water are matters of national importance under section 6(e) of the RMA. In order to meet the requirements of the RMA it is incumbent on the decision-maker to understand the specific nature of traditional relationships between mana whenua and their traditions, land, water and places of significance. Whilst Māori values are held in common by all iwi, mana whenua express these specifically through their own lens of whakapapa (genealogy), history, traditions, location, kawa (principles) and tikanga (practices).

Within the Wellington Region there are six mana whenua iwi who have a formal relationship with WRC. Each iwi represents groupings of either iwi and or hapū, each with their own distinct identity formed through a longstanding relationship with place. Mana whenua (authority over land) and rangatiratanga (right to exercise authority) are concepts that express the recognition and rights of these specific groups to speak and act as kaitiaki (guardian) over a defined area. Understanding this mixture of common values as applied through individual mana whenua experience and authority is critical to providing for relationships as directed by the RMA.

The relationships of mana whenua with their ancestral water and land are based in a Māori cosmology that describes a shared genealogy as the basis for what is a familial relationship between te ira tangata (mankind) and te taiao (the environment). The elements making up the environment are embodied in the form of ngā atua, ancestral deities whose individual attributes and dynamic relationships are readily observable and play out in the day-to-day interactions of land and water, wind and sky.

Māori relationship with the environment is governed by the direct identification of the physical world as being fundamental to and synonymous with human identity and well-being. This is reflected in the direct association of individual hapū and iwi with specific rivers, mountains and other natural features as entities that define and support their existence. The proposed Plan captures this relationship in Schedule B Ngā Taonga Nui a Kiwa that recognises the mana whenua relationship with the most important water bodies in the region.

Another pre-eminent principle is the concept of mauri being inherent in all elements, both physical and metaphysical. Mauri is regarded as a prerequisite for life to exist and is pervasive in that it is present everywhere. The importance of the mauri of fresh and coastal water is emphasised by iwi and is also the best example of how mauri is inherent in the environment. The mauri (life-giving property) of water supports all life including human well-being. This is shown in the following whakatauaiki;

Ka ora te wai	<i>If the water is healthy</i>
Ka ora te whenua	<i>The land will be nourished</i>
Ka ora te whenua	<i>If the land is nourished</i>
Ka ora te tangata	<i>The people will prosper</i>

Mauri is the life force that exists in all things in the natural world, including people. Mauri comprises both physical and spiritual qualities and can be harmed by pollutants and by development which diminishes the natural character, life-supporting capacity and ecosystem health. For example, the health and vitality of the sea, streams and rivers and the plants and animals they support can be threatened by activities such as discharges of pollutants, stormwater, sewage and runoff of contaminants from land; excessive water use; changing the course of water bodies or diverting water between catchments or rivers.

The relationship of mana whenua with their environment is governed by principles and practices (kawa and tikanga), which include such elements as tauututu (reciprocity), kaitiakitanga (duty of care) and karakia (spiritual invocation). Whilst kawa and tikanga stem from common precepts, they are interpreted differently by individual hapū and iwi in determining and directing what resources are used and by whom, when they are used and the manner in which they are used.

The role of kaitiaki is held by whānau, hapū and iwi over specific areas determined by whakapapa (genealogy). Kaitiakitanga is the responsibility of mana whenua to sustain the familial relationship with the environment. This is done by maintaining enhancing and restoring natural and physical resources including cultural rituals and practices for current and future generations,

4.2 Areas and sites of significance

There are areas and sites of significance to tangata whenua that are at risk of degradation or are threatened by human activities.

The RPS identifies the need to protect sites of significance to mana whenua.

Mana whenua inhabit a cultural landscape informed by several hundred years of habitation and celebrated in waiata (songs), karakia (invocations), pepeha (representations of identity) and pakiwaitara (stories). Waterways, landscapes, hills and wetlands are redolent with meaning, each referencing its significance from the experience of mana whenua. Places in and contiguous with water bodies were and continue to be of importance as sites of homes, harvesting and industry and all the attendant and supporting usages of human life; kauhoe (swimming), wāhi horoi (washing), ūrunga waka (canoe launching) to name a

few. Wetlands and estuaries are regarded as important places for gathering food and building materials and rivers and large stream systems provided access for transporting people and materials between coast and hinterland.

The confluences of waterways are places of special significance to mana whenua as this is where the individual mauri of each water body joins to form a new and distinct entity. All waterways had particular sites identified for special purposes based on historical context, i.e. consecrated for a particular religious function, or their natural characteristics; a source of a particular type of clay, species of mahinga kai (natural food source) or quality of water.

The cultural landscape of our region's water bodies also includes those places associated with ngā atua (deities), taniwha and kaitiaki (guardians and protectors of places), as well as places discovered, visited and or named by ancestors and explorers. The many coastal places in our region that reference the life and times of Kupe, one of the first visitors to Aotearoa are an important example as are the many landmarks including the majority of the region's rivers named by his grandson Haunui a Nanaia.

Places are also referenced, named and remembered for what happened there; battle grounds, agreements, love stories, visitations and accidents all form part of the cultural landscape experienced by mana whenua.

The loss of a Māori cultural landscape in our waterways occurs in many ways, mainly through changes of ownership and land use and the attendant impact on water quality. Mana whenua sites are often inaccessible or unusable to iwi for their traditional purpose. Place names and their meanings have been lost through the overlay of British names and mistranslations in the official records. Yet despite these changes the places themselves do not lose their importance to mana whenua who regard them as fundamental to their well-being and identity, past, present and future.

Mana whenua are Māori with ancestral claims to a particular area of land and resources. Kaitiakitanga is the role of mana whenua in sustaining mauri and upholding their customary responsibilities. The proposed Plan recognises this role and supports the management of natural resources through enhanced recognition of mana whenua concepts (mauri, ki uta ki tai, mahinga kai, Māori use), relationships with extensive areas (Schedule B) and restrictions on activities in sites of significance to mana whenua (Schedule C).

Mana whenua values in the proposed Plan provide for the relationship of the region's six iwi with land and water. These relationships are fundamental to the identity and well-being of mana whenua, who derive their status as mana whenua and their responsibilities for maintaining customary authority over their tribal area directly from their longstanding association with their environment.

Mana whenua have also identified sites of significance at a smaller scale, recorded in Schedule C in the proposed Plan. These sites fall within the jurisdiction of the proposed Plan, are deliberately more discrete than the extensive associations recognised in the Ngā Taonga Nui a Kiwa schedule, are

directly affected by resource use and that mana whenua consider will benefit from specified protection. Identification of sites of significance is a matter of great sensitivity to mana whenua who in the past have taken a very conservative approach to having sites recorded in public documents. This approach is in conflict with their assertion that these places remain vulnerable to continued degradation and has not supported prioritisation or resourcing of strategies to protect these places through regulation. The proposed Plan has taken a determined approach to achieving this and has developed the relationship with mana whenua who have made a marked shift in their stance demonstrated by the inclusion of some 165 sites of significance in schedule C.

The proposed Plan identifies some 165 sites (Schedule C) and 15 broader areas of significance to mana whenua (Schedule B). These places have been specified because of mana whenua concern that they require additional protection and or restoration from the impacts of land use, works in the beds of lakes and rivers and direct and non-point discharges. Both schedules are supported by detailed lists of values held by mana whenua relating to the sites with Schedule B explaining the significance of the individual relationships of iwi with larger entities (Ngā Taonga Nui a Kiwa).

This means that along with additional restrictions on activities within sites of significance resource users now have access to detailed information pertaining to what values need to be protected and where. Most importantly the information also tells them who they need to interact with in relation to the site and proposed activity in order to provide for the values.

The identification of so many sites supported by such a wealth of detailed information in the regional plan is a very significant change in the way that mana whenua have managed their relationship with these places in the past. Previously the majority of mana whenua iwi within the region were not willing to publish information pertaining to specific places in public documents fearing that this would lead to further degradation. The determination by iwi leadership to contribute a mana whenua perspective to development of regulatory provisions of resource management and educate general community in understanding mana whenua values has been instrumental in achieving this shift. As a body these schedules are a source of much knowledge that describes an integral part of the region's heritage and provides links between the past, present and future generations.

The schedules were developed by mana whenua kaitiaki of the region meeting together as a group to determine criteria and format for inclusion of their sites in the plan. It was agreed that their priority was to schedule only sites that met the following criteria:

- Are in the water body or coastal marine area (CMA) and within the jurisdiction of the regional plan
- Would benefit from specific regulatory protection
- Are not extensive or excessively complex in order for regulation to protect them

The kaitiaki developed a template that recorded the name and location of the site, the values present at the site and a comment on the general pressures on the values from resource use. They also wrote background reports providing context for values at the site referencing their traditional relationships with their tribal area. The sites were then mapped, submitted to the draft plan and affected landowners notified as part of the draft plan process.

It was recognised that many of the sites were affected by the effects of ubiquitous permitted activities such as weed clearance, works and structures in the bed and stock access. These permitted activities have been reviewed in relation to the sites and changes recommended to their permitted conditions. Kaitiaki have also been involved in engagement with stakeholders reviewing stock access policy and rule structure.

All other activities in a site scheduled for mana whenua values are not permitted and require resource consent unless their effect on the site is assessed as being less than minor. Application triggers requirement for a cultural impact assessment (CIA) by mana whenua (Policy P45).

The creation of Schedule C: sites of significance to mana whenua revealed that Māori values at a site that relied on water quality, e.g. mahinga kai could not necessarily be provided for at that site due to water quality being a result of the effects of upstream land use. This recognition of the plan's inability to provide for all Māori values at a site was formative to the plan as it resulted in the application of Māori values at a catchment and regional scale as values for which all water would be measured; aquatic ecosystem health and mahinga kai, contact recreation and Māori use.

It also identified the need to recognise the mana whenua relationship with those more extensive entities from which individual iwi derive their most important and integral associations. These places are large entities, e.g. Wellington Harbour (Port Nicholson) and Wairarapa Moana with complex and multiple resource use meaning it is difficult to establish regulatory protection at an entity scale without affecting the regulatory status of the many essential day-to-day activities that occur in these places. However it is appropriate to establish and provide for relationships of mana whenua with these more extensive areas and to this end kaitiaki developed Ngā Taonga Nui a Kiwa (Schedule B) (the treasured inheritance of Kiwa) as a schedule of these fundamental relationships. Again this schedule is supported by maps, values and contextual background reports.

5. Regulatory and policy context

The national and regional regulatory and policy context for the provisions in the proposed Plan are discussed in this section.

5.1 Resource Management Act

Section 6(e) in Part 2 of the RMA requires that “the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga” be recognised and provided for as a matter of national importance. Kaitiakitanga must be given particular regard to under section

7(a). Section 8 requires that the principles of Te Tiriti o Waitangi (the Treaty of Waitangi) be taken into account.

Legal definition of the requirement to “recognise and provide for” section 6(e), means that councils must make actual provision for the relationship with Māori as described in the RMA and anticipates a positive action by decision-makers. The requirement to “have particular regard to kaitiakitanga” in section 7 means that this matter must be given genuine attention and consideration and appropriate weight in consideration. These definitions taken from recent case law do not override the primary purpose of the RMA but clearly show the need for active commitment by decision-makers to meet the requirements of the RMA in relation to Māori.

The proposed Plan was developed in a principled manner by engaging directly with mana whenua to ensure that appropriate provisions are made. In relation to kaitiakitanga, WRC is required to give genuine attention and consideration to the role of Māori as kaitiaki. As discussed above in section 2, WRC through the formation of Te Upoko Taiao and development of mana whenua provisions in the proposed Plan has met the requirement of the RMA. In particular WRC’s proposal to include Māori customary use and mahinga kai (key determinants of kaitiakitanga) as core values for which all water will be managed is a demonstrated commitment to the recognition of mana whenua kaitiakitanga.

In section 8 of the RMA, WRC is required to take into account the Principles of the Treaty of Waitangi (Te Tiriti). These principles are very important and fundamental to the Memorandum of Partnership signed by WRC and iwi of the region in 2013. The Memorandum of Partnership adds emphasis to the requirements in the RMA as it confirms that the relationship between WRC and iwi will give effect to the intentions of the Treaty and in doing so, actively protect Māori interests. The proposed Plan achieves this firstly through the partnership approach adopted in the development of the plan. Secondly, provisions respond directly to the issues identified by Māori and these provisions have been developed in direct consultation with them.

It is important to restate that the partnership approach taken in the review of the regional plan has not been limited to matters traditionally regarded as “Māori interests” but recognises that the Treaty of Partnership extends to all matters pertaining to natural resource management. To this end Māori values and community values are being considered together in all the plan provisions. The proposed Plan makes a step forward in the increased definition and specification of mana whenua values to provide greater parity in consideration and balancing of interests in the plan.

It is important to recognise that iwi issues in relation to resource management are in many cases also those presented as Treaty breaches and are the subject of Waitangi Tribunal claims. It is incumbent on WRC to actively protect Māori interests and ensure that they do not perpetuate these issues and/or create further issues which may be regarded as breaches.

Treaty Principles:

- The Treaty set up a partnership, and the partners have a duty to act reasonably and in good faith
- The Crown has freedom to govern
- The Crown has a duty to actively protect Māori interests
- The Crown has a duty to remedy past breaches
- Māori retain rangatiratanga over their resources and taonga and have all the rights and privileges of citizenship
- The Crown has a duty to consult with Māori
- The needs of both Māori and the wider community must be met, which will require compromise
- The Crown cannot avoid its obligations under the Treaty by conferring authority on some other body
- The Treaty can be adapted to meet new circumstances
- Tino rangatiratanga includes management of resources and other taonga according to Māori culture
- Taonga include all valued resources and intangible cultural assets

5.2 Settlement legislation and statutory acknowledgements

There are two Treaty of Waitangi settlement acts that apply in the Wellington Region—the Ngāti Toa Rangatira Claims Settlement Act 2014, and the Port Nicholson Block (Taranaki Whānui ki te Upoko o Te Ika) Claims Settlement Act 2009. Both of these acts require that statutory acknowledgements be appended to the regional plan.

Statutory acknowledgements recognise legal status of places, resources, names and other matters of importance to mana whenua that have been identified in the new legislation. Councils are required to give effect to this legislation through management agreements, use of names and other responses as specified. Further settlement legislation for the remaining pre-settlement iwi of the Wellington Region is expected during the life of the new regional plan.

It is important that the proposed Plan gives effect to the requirements of treaty settlements. To this end it is anticipated that the mana whenua provisions in the proposed Plan, particularly the extensive expression of values in the schedules, are consistent with the general intention of Treaty Settlement in acknowledging historic relationships of people with place, and providing for them through both regulatory and non-regulatory methods.

Within the Wellington region this includes statutory recognition of the traditional relationships of Taranaki Whānui and Ngāti Toa Rangatira, both of

whom have settled historic Treaty claims with the Crown. It is likely that the four remaining mana whenua iwi of the region will also achieve Treaty settlement during the life of the proposed Plan.

5.3 National Policy Statement for Freshwater Management

The National Policy Statement for Freshwater Management 2014 (NPS-FM) “is about recognising the national significance of fresh water for all New Zealanders and Te Mana o te Wai.”¹ There is one objective and one policy specific to recognising mana whenua interests in freshwater management:

Objective D1

To provide for the involvement of iwi and hapū, and to ensure that tangata whenua values and interests are identified and reflected in the management of fresh water including associated ecosystems, and decision-making regarding freshwater planning, including on how all other objectives of this national policy statement are given effect to.

Policy D1

Local authorities shall take reasonable steps to:

- a) involve iwi and hapū in the management of fresh water and freshwater ecosystems in the region;*
- b) work with iwi and hapū to identify tangata whenua values and interests in fresh water and freshwater ecosystems in the region; and*
- c) reflect tangata whenua values and interests in the management of, and decision-making regarding, fresh water and freshwater ecosystems in the region.²*

The intent of the NPS-FM is similar to that of the proposed Plan in that it requires both recognition of values and the involvement of iwi in decision-making. See section 2 of this report for discussion of how WRC gives effect to NPS-FM iwi engagement requirements.

In developing the proposed Plan, WRC has addressed Policy D1 by:

- a) involving iwi at all levels of plan review and development from governance and decision-making (Te Upoko Taiao), to technical specification (the identification of sites of significance), to consultation on provisions (hui).
- b) establishing the kaitiaki advisory group for the plan review, and mana whenua positions on whitua committees

¹ p 6

² NPS-FM p18

- c) developing and including the specific plan provisions discussed in this report.

5.4 New Zealand Coastal Policy Statement 2010

Objective 3 of the New Zealand Coastal Policy Statement 2010 (NZCPS) requires that we “take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment” through the following:

- *recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources;*
- *promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the Act;*
- *incorporating mātauranga Māori into sustainable management practices; and*
- *recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.*³

Policy 2 provides councils with direction for the implementation of Objective 3:

Policy 2 The Treaty of Waitangi, tangata whenua and Māori heritage

In taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi), and kaitiakitanga, in relation to the coastal environment:(a) recognise that tangata whenua have traditional and continuing cultural relationships with areas of the coastal environment...

(b) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of... plans,

(c) ... incorporate mātauranga Māori in... plans,

(f) provide for opportunities for tangata whenua to exercise kaitiakitanga over waters, forests, lands, and fisheries in the coastal environment through such measures as:

(i) bringing cultural understanding to monitoring of natural resources;

(ii) providing appropriate methods for the management, maintenance and protection of the taonga of tangata whenua;...

(g)(ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori.

³ NZCPS p9.

The operative coastal plan for the Wellington Region clearly sets out issues of concern to iwi and has a number of objectives and policies relating to mana whenua matters. However the policies do not explicitly protect values significant to mana whenua through rules or methods. Policies in both the coastal and proposed plans identify the need to record the location of significant sites, but this has not been implemented.

The proposed Plan addresses the Treaty of Waitangi requirements of the NZCPS by identifying sites with significant mana whenua values in schedules and engaging mana whenua in decisions where these values are affected.

The proposed Plan also provides recognition of the connection between the hinterland and the coast through Policy P1 Ki uta ki tai and integrated catchment management. This recognition is very significant to mana whenua who view the world as a whole connected by relationships. This is particularly true of water which is regarded as one system. Mana whenua have been concerned to ensure that the Council recognises the connectivity of natural systems in reducing cumulative effects on the mauri of fresh and coastal water. Objective O3 Mauri is sustained and enhanced “Mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters” also provides recognition of the relationship between fresh and coastal water systems.

The coastal area is of particular significance to Māori due to their reliance on mahinga kai species and the number of traditional places in proximity to the coast. While there are few indigenous physical structures in the CMA, iwi have scheduled significant areas including river mouths, estuaries, mahinga kai areas and places associated with tūpuna (ancestors) in Schedule C. Ngā Taonga Nui a Kiwa (Schedule B) recognises large and extensive areas of coast that mana whenua have a particular relationship with. The proposed Plan requires the protection of Schedule C sites and the maintenance and enhancement of mana whenua relationships identified in Schedule B.

5.5 Regional policy statement

The Regional Policy Statement for the Wellington Region 2013 (RPS) sets the policy framework for regional resource management, identifying the significant resource management issues shared by mana whenua and issues of regional significance.

The Māori and mana whenua provisions in the proposed Plan must give effect to the policies and objectives of the RPS. These have been informed by issues affecting mana whenua relationship with place, traditions and cultural values as identified by mana whenua.

The following objectives in the RPS relate to mana whenua priorities for and involvement with resource management:

Objective 23

The region’s iwi authorities and local authorities work together under Treaty partner principles for the sustainable management of the region’s environment

for the benefit and well-being of the regional community, both now and in the future.

Objective 24

The principles of the Treaty of Waitangi are taken into account in a systematic way when resource management decisions are made.

Objective 25

The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region's natural and physical resources.

Objective 26

Mauri is sustained, particularly in relation to coastal and fresh waters.

Objective 27

Mahinga kai and natural resources used for customary purposes, are maintained and enhanced, and these resources are healthy and accessible to tangata whenua.

Objective 28

The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained.⁴

Objective 23 of the RPS seeks to ensure the development and maintenance of a collaborative relationship between mana whenua, the regional council and the territorial authorities of the region in the sustainable management of the region's natural and physical resources.

Objectives 24 to 28 of the RPS recognise the principle tenets and foundations of Māori culture, such as the concept of kaitiakitanga and mauri, as integral to a collaborative model of sustainable resource management, and a commitment to the maintenance of the cultural relationship Māori have with their ancestral lands, water, sites, wāhi tapu and other taonga.

In order to achieve the objectives of the RPS, there are a number of policies and methods.

Policies 23 and 24 require the identification and protection of ecosystems and habitats with significant indigenous biodiversity values. Criterion (e) of Policy 23 is:

Tangata whenua values: the ecosystem or habitat contains characteristics of special spiritual, historical or cultural significance to tangata whenua, identified in accordance with tikanga Māori.

⁴ p 75-6

The explanation to Policy 23 states:

“There are a number of indigenous ecosystems and habitats across the region that are significant to tangata whenua for their ecological characteristics. These ecosystems will be considered for significance under this policy if they still exhibit the ecosystem functions which are considered significant by tangata whenua. Access and use of any identified areas would be subject to landowner agreement. Wellington Regional Council and district and city councils will need to engage directly with tangata whenua and work collaboratively with them and other stakeholders, including landowners, to identify areas under this criterion.”

Policy 48 provides for particular regard to be given to the principles of the Treaty of Waitangi and any Waitangi Tribunal reports and settlement decisions relating to our region when considering a resource consent or plan change.

Policy 48: Principles of the Treaty of Waitangi – consideration

When considering an application for a resource consent, notice of requirement, or a change, variation or review of a district or regional plan, particular regard shall be given to:

- (a) the principles of the Treaty of Waitangi; and*
- (b) Waitangi Tribunal reports and settlement decisions relating to the Wellington region.*

Policy 49 is more specific and directs that matters of significance to mana whenua, such as the exercise of kaitiakitanga, be recognised and provided for.

Policy 49: Recognising and providing for matters of significance to tangata whenua – consideration

When preparing a change, variation or review of a district or regional plan, the following matters shall be recognised and provided for:

- (a) the exercise of kaitiakitanga;*
 - (a) mauri, particularly in relation to fresh and coastal waters;*
 - (b) mahinga kai and areas of natural resources used for customary purposes; and*
 - (c) places, sites and areas with significant spiritual or cultural historic heritage value to tangata whenua.⁵*

Non-regulatory Policy 66 underlines the importance of enhancing Māori involvement in resource management decision-making.

⁵ p125-8.

Policy 66: Enhancing involvement of tangata whenua in resource management decision-making – non-regulatory

*To enhance involvement of tangata whenua in resource management decision-making by improving opportunities for iwi authority representatives to participate in local authority decision-making.*⁶

Methods 13, 19, 32, 33 and 38 of the RPS emphasise the role of mana whenua in decision-making in various areas of resource management, are also given effect to in the development of this objective. In summary all these methods support councils to give greater consideration to Māori engagement in resource management decision-making.

The policies in the RPS have been recognised and given effect to in objectives policies, rules and schedules in the proposed Plan. The methods identified in the RPS have been instrumental in guiding the approach to the relationship with Māori in the proposed Plan. Method 38 – iwi prepare planning documents is recognised through Te Upoko Taiao and whitua plan processes. Methods promoting recognition of iwi interests in resource consents have also been taken into consideration through development of schedules of sites of significance and iwi involvement in decision-making in these places.

6. Operative regional plans and proposed Plan provisions

The operative Regional Freshwater Plan for the Wellington Region (RFP) and Regional Coastal Plan for the Wellington Region (RCP) have good intentions in regards to recognising and providing for Māori relationships.

The RFP and RCP contain objectives and policies that clearly identify mana whenua issues and priorities. However the rules and methods have not been effective in providing for the relationship of Māori with natural resources by addressing the priorities they so clearly establish. One obvious example of this is Objective 4.1.14 in the RCP that recognises and provides for mana whenua values but limits the response to when it is “practicable”. The objectives and policies are not evident in rule structures and are only given effect to through non-regulatory methods. There is no evidence that the non-regulatory methods have been implemented.

Policies in both the operative coastal and freshwater plans identify the need to record the location of significant sites, but this has not been implemented. This is evident in the failure of Method 8.1.1 which was not implemented. Identification of sites of significance is a matter of great sensitivity to mana whenua who in the past have taken a very conservative approach to having sites recorded in public documents. This approach is in conflict with their assertion that these places remain vulnerable to continued degradation and has not supported prioritisation or resourcing of strategies to protect these places through regulation. The proposed Plan has taken a determined approach to achieving this and has developed the relationship with mana whenua to a point

⁶ p 145

where they have made a marked shift in their stance in their willingness to share site-specific information and have scheduled 165 sites of significance.

The RFP contains a method for identifying sites and consideration for including them in the proposed Plan via a plan change, but it has also not been implemented. Clearly this method and the objectives in the coastal and freshwater plans providing for mana whenua values were not prioritised in the period covered by the operative plan and there is no evidence of implementation.

In summary it would seem that development of the relationship between WRC and iwi in ensuing years as described in section 2, particularly the formation of Te Upoko Taiao, has resulted in a stronger and more specific focus on mana whenua values. This has occurred through the identification of key issues many of which resulted from lack of implementation of methods identified in the operative plan.

Iwi expectation of a more operative relationship with local government in resource management has also grown through awareness of iwi from throughout Aotearoa who are increasingly involved in monitoring of mahinga kai and Māori customary use values. Post settlement iwi organisations are investing in partnerships with regional councils to monitor values as part of environment reporting requirements.

Efforts to improve kaitiaki decision-making in resource consent processes through development of stronger relationships and better understanding of how iwi values are affected have been sporadic, limited by iwi kaitiaki capacity and turnover of resource consents staff. WRC has an Iwi Capacity Fund which supports iwi responses to non-notified consents. Use of the funding for this purpose is no longer regarded as a priority for iwi who would prefer an increased focus on proactive engagement with resource consents staff and resource consents applicants.

6.1 Proposed Natural Resources Plan

The Proposed Natural Resources Plan (the proposed Plan or PNRP) was developed in partnership with mana whenua of the Wellington Region. This is a significant step forward as it directly addresses the issues identified by mana whenua.

Wellington Regional Council recognises that Māori have a unique perspective on resource management and these broad concepts have been integrated into the PNRP. While this is not a new understanding, the direct participation of mana whenua in writing the proposed Plan brings focus to the most significant issues affecting mana whenua, a more profound appreciation of Māori perspective, and the degree of commitment required to give effect to Council responsibilities under the RMA.

The proposed Plan identifies Māori values and objectives at a regional scale but the regulatory provisions for these are delivered through engagement with individual groupings who hold mana whenua (tribal authority) over the area subject to resource use. This approach is cognisant of the Memorandum of

Partnership (2013) that recognises the interaction of individual iwi with the WRC as the pre-eminent expression of the Treaty relationship.

Mauri, often described as the intrinsic and regenerative life force inherent in everything, is an example of a primary value shared by all Māori of the region. The mauri of fresh water, in particular, is regarded by mana whenua as the basis for all well-being. Concern for the mauri of the region's water was the primary motivation for iwi commitment to participation in the plan review process. At a regional scale, the proposed Plan identifies mauri as a principle and overarching objective by requiring that the mauri of all fresh and coastal water is maintained and improved.

Ki uta ki tai (from mountains to sea) and integrated catchment management is another overarching objective that derives in part from a Māori perspective and is formative in the proposed Plan. This objective recognises the catchment as the most significant spatial unit for management of land and water, and the importance of considering the all matters concerning the catchment together in decision-making.

Also at a regional scale, the proposed Plan requires that all water be managed for two sets of shared values – aquatic ecosystem health and mahinga kai, and contact recreation and Māori customary use. Recognition of the pervasive nature of Māori values throughout the region and throughout the water cycle required a response that ensured that Māori values were considered in all aspects on water resource management.

These two sets of shared values also recognise the partnership implicit in the development of the proposed Plan. The addition of Māori values brings added dimensions to the existing values of aquatic ecosystem health and contact recreation. Mahinga kai connects the health of a waterway to human health by requiring that species are fit for consumption and that places where wild foods are collected are protected. Māori customary use emphasises the spiritual, emotional and mental benefits of our connection with water beyond those provided through direct contact. These concepts are easily recognisable to the wider community including non-Māori who have their own cultural interactions with water. Finally, the recognition of how difficult it is to provide for values that rely on water quality (e.g. the need for water quality to be high enough for uses such as baptisms) at a specific site emphasise the necessity of ensuring that these values are considered in the management of water at a catchment and regional scale.

The proposed Plan defines the values of mahinga kai and Māori customary use as follows:

Mahinga kai – The customary gathering of food and natural materials, the food and resources themselves and the places where those resources are gathered.

Māori customary use – The interaction of Māori with fresh and coastal water for cultural purposes. This includes the cultural and

spiritual relationship with water expressed through Māori practices, recreation and the harvest of natural materials.

These values are regarded by Māori as important indicators of the health or mauri of the natural world and their relationship with it. The policy and rule structure in the proposed Plan requires all resource users to consider Māori values when their resource use may affect fresh or coastal water.

The proposed Plan also supports the involvement of mana whenua in resource management through direct engagement with resource users. For example, an application to extract gravel will require the user to consider the effect the proposed activity may have on Māori customary use and/or mahinga kai. These effects will differ depending on the predominant mahinga kai species in the waterway and/or the specific uses applied by mana whenua in that place.

The proposed Plan requires resource users to avoid activities in sites scheduled for significant mana whenua values. If the site cannot be avoided then the proposed Plan requires users to protect and restore the site. The schedules in the proposed Plan are educative for plan users in that they provide important information pertaining to specific mana whenua values at each site. If adverse effects on the site cannot be avoided and are deemed to be more than minor, the applicant will be required to source a cultural impact assessment from mana whenua (Policy P32). This process will identify specific values and provide a pathway for providing for them.

At a catchment scale mana whenua have identified Ngā Taonga Nui a Kiwa, entities of particular importance to them, in schedules for the proposed Plan. The proposed Plan encourages protection and enhancement of the relationship between mana whenua and Ngā Taonga Nui a Kiwa through their direct involvement in decision-making about these entities. Mana whenua are naturally the best source of information regarding their values and how to give effect to them. Some of this information is captured in schedules whilst requirement for cultural impact assessments and a method to communicate their values to the community will also support the increased recognition of these values.

Mana whenua kaitiaki of the region came together and met several times over a period of three years to develop a consistent approach to the recording of mana whenua sites of significance in the regional plan. Their approach recognises the need to protect values at identified sites from the direct effects of detrimental resource use whilst enabling use that is not detrimental to continue. The result is a schedule that provides detailed information to resource users on sites of significance to mana whenua, their whereabouts and the values that need to be protected. Requirements for their protection are managed through the individual resource user and the mana whenua of the site in question through a two-stage cultural impact assessment process.

Schedule C identifies both the site and the values that mana whenua wish to have protected in these places. Schedule C sites are supported by policies, rules and methods that will enable values to be protected or enhanced.

The proposed Plan requires resource users to avoid, remedy and mitigate the adverse effects of activities in sites scheduled for significant mana whenua values where adverse effects are deemed more than minor. The schedules in the proposed Plan are educative for plan users in that they provide important information pertaining to specific mana whenua values at each site. If adverse effects on the site cannot be avoided, the applicant will be required to source a cultural impact assessment from mana whenua (Policy P32). This process will identify specific values and provide a pathway for providing for them.

The rules place restrictions on certain activities to ensure protection of mana whenua values in their most significant places. For example, the discharge of contaminants into a site of significance to mana whenua is discouraged and requires consent as a non-complying activity.

Mana whenua are also integral to the development of the whaitua chapters in the proposed Plan as discussed in section 2.4. These chapters will specify water quality and quantity limits for the six largest catchments in our region and recommend rules and methods that will enable local communities to achieve them. Understanding what Māori values are, and showing how they are provided for when setting catchment-scale water quality and quantity limits is a legislative requirement (D1) in the NPS-FM. At a catchment scale this requires working across all local Māori community structures including individual kaitiaki, local marae committees, hapū, standing committees and pre- and post-settlement entities.

The proposed Plan also proposes a method where iwi are supported to engage with the community to share their knowledge and promote a broader understanding of their values. It is anticipated that this method will support mana whenua activities and presentations that include the community. This could include restoration projects of iwi sites of significance, development of resources that explain mana whenua values and events that celebrate kaitiakitanga.

7. Summary of the appropriateness of the objectives

Section 32(1)(a) section 32(1)(a) of the RMA requires that an evaluation report must “examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the Act”.

The appropriateness test applied consists of four standard criteria: relevance, usefulness, reasonableness and achievability. These criteria can be summarised as follows:

- **Relevance** – is the objective related to addressing a resource management issue? Will it achieve one or more aspects of the purpose and principles of the Resource Management Act?
- **Usefulness** – will the objective guide decision-making? Does it meet sound principles for writing objectives?
- **Reasonableness** – what is the extent of the regulatory impact imposed on individuals, businesses or the wider community?

- **Achievability** – can the objective be achieved with tools and resources available, or likely to be available, to the local authority?

The existing operative objectives have been analysed against the appropriateness criteria to provide guidance as to what degree the objectives required amendment (if any) to achieve the purpose of the Act, and give effect to the relevant statutory documents. In response to this assessment, some amendments have been proposed.

A brief description of each of the proposed objectives is provided below. These objectives have been developed in collaboration with mana whenua who are seeking to enhance, not just maintain, the mauri of the natural environment. In this respect, all the objectives are in alignment with proposed Objective O11 that kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making.

Tables A2 to A8 in the Appendix provide summary evaluations of the appropriateness of the proposed and operative objectives against the four criteria discussed above.

7.1 Objective O3: Mauri is sustained and enhanced

Mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters.

Māori consider all things in the natural world to have mauri (life force) and wairua (a spiritual dimension). Each of the rivers in the region has its own mauri. The deliberate mixing of water from two different sources such as two different rivers or water that contains human, animal, toxic or industrial waste is considered counterproductive to a river’s health and jeopardises that waterway’s mauri.

This objective also introduces a broader idea of responsibility to the proposed Plan that is consistent with what is known about the cumulative effects of all land uses on water quality, and the increased intensity of these effects during the passage of water through the catchment. All activities and all persons within a catchment affect the mauri of fresh water, and ultimately coastal water, and all have a degree of responsibility in balancing uses that degrade mauri with those that sustain and enhance it. In fact one way of understanding mauri is to consider it as an overarching construct, as is the approach with the consideration of “sustainability”. As with measuring the sustainable use of a water body, the measurement of mauri needs to consider not only the water body and all the elements that form it, but also everything that affects it, and everything that it in turn affects.

The purpose of this objective is to enhance the relationship of mana whenua with the natural environment and enhance and protect the mauri of natural resources. In this respect this objective is complimentary to proposed Objective O14 which relates to Māori relationships with air, land and water.

There is a strong relationship between mauri and water quality and the proposed Plan addresses this by linking objectives for the management and

measurement of all water; aquatic ecosystem health and mahinga kai and contact recreation and Māori customary use. In this way the proposed Plan sets out to manage the use of waterways for the shared nature of the objectives whilst at the same time providing for the individual integrity of both mātauranga Māori and cosmopolitan science constructs.

The objective is relevant in that it addresses the issue that both the physical and spiritual qualities of mauri can be harmed by pollutants and development that diminish the natural character, life-supporting capacity and ecosystem health activities of the regional environment, particularly the fresh and coastal waters which are the ultimate receiving environments for contaminants. By enhancing the relationship of mana whenua with the region's natural resources, the objective is also relevant to sections 6 and 7 of the RMA, specifically sections 6(e), 6(g) and 7(aa), and section 8.

The objective is useful as it will guide decision-making by ensuring that the mauri of the region's natural resources, particularly fresh and coastal water resources, should not be further degraded; and that consideration is given to the relationship that mana whenua have with the natural environment when activities that may have an adverse impact on the mauri of the natural environment. It is also useful in giving effect to WRC's implementation of the NPS-FM and RPS.

This objective is achievable in that WRC has the functions, powers and tools to achieve it, and mana whenua will be partners in its achievement. The objective will not be fully achieved within the life of the proposed Plan, but the Council and iwi partners are committed to its achievement over the long term.

This objective is reasonable because its achievement will benefit the entire regional environment, community and economy. The objective is a reasonable means of achieving the purpose of the RMA.

Table A2 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.2 Objective O14: Māori relationships

Māori relationships with air, land and water are recognised, maintained and improved.

This objective gives effect to requirements and expectations for mana whenua relationships with land and water specified in RMA (sections 6(e) and 6(g)), the NPS-FM (Objective D1 and Policy D1) and RPS (Objective 15 and Policies 21, 22 and 46).

Mana whenua relationships with air, land and water are established through whakapapa (genealogy) that connects the identity and well-being of people directly with that of their environment and with each other. Mana whenua of a given area enact their mana whenua (authority over the land) to ensure that the mauri (life force) of their environment is supported in accordance with their

kaupapa (principles) and tikanga (practices). Lack of recognition of tangata whenua perspective, values, roles and relationships in regulatory and environment management has driven implementation of new national policy and Treaty settlement legislation to provide redress.

The proposed objective requires regulatory authorities and applicants to inform themselves of, and better understand, mana whenua relationships with the environment and to provide for them in resource management processes, activities and decision-making.

The RPS makes it clear that the identification of places, sites and areas with significant spiritual or cultural historic values to mana whenua rests with iwi, hapū, whānau and marae in accordance with their kaitiakitanga responsibilities. For this reason, the ongoing successful implementation of policies, rules and methods required for the achievement of this objective is also intrinsically related to the implementation of policies and methods to achieve Objective O15 which relates to kaitiakitanga, addressed in sections 7.3 and 8.3.

Table A3 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.3 Objective O15: Kaitiakitanga

Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making.

Kaitiakitanga refers to the kaupapa (principles) and tikanga (practices) by which mana whenua give effect to their responsibilities as mana whenua in providing for the mauri of their environment and community. Kaitiaki roles and responsibilities include all fields of human activity from advocacy and spiritual guidance to the physical protection, monitoring and restoration of specific places, entities and concepts. Kaitiaki are recognised and valued by mana whenua as repositories and providers of knowledge, skills and physical strength who care for the environment and by extension the people.

Kaitiakitanga is a matter to which decision-makers shall have particular regard under section 7(a) the RMA, and the proposed objective gives effect to this matter. The objective requires mana whenua perspective, values and processes be brought into resource management decision-making. The objective also gives effect to Policy 66 of the RPS which seeks to ensure that the involvement of mana whenua in decision-making is enhanced. Proposed Objective O15 also gives effect to Objective D1 and Policy D1 of the NPS-FM in respect of the management of freshwater resources in the region.

Opportunities to engage kaitiaki directly in local government planning and decision-making are provided for under RMA section 36b entitled “Power to Make Joint Management Agreements”. There are many potential methods and processes that enable achievement of this objective all of which require local bodies, applicants and others exercising functions and powers to provide opportunities and resources. This includes supporting mana whenua priorities,

removing obstacles to participation and extending parameters of existing programmes in response to mana whenua perspective.

The participation of iwi-mandated representatives on Te Upoko Taiao, the Natural Resources Committee of Wellington Regional Council responsible for the regional plan review is the most important mechanism supporting iwi decision-making in the region. The partnership intends to ensure that all aspects of the regional plan are informed by the mana whenua perspective, an approach further augmented through the whaitua chapters in the proposed Plan, which are in turn informed by local hapū and iwi values. A more detailed explanation of the make-up, structure and functions of Te Upoko Taiao is provided earlier in this report in section 2 which focuses on whakapapa.

Table A4 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.4 Objective O26: Mahinga kai

The availability of mahinga kai species to support Māori customary harvest for hui is increased, both in quantity and quality

Threats to mahinga kai and natural resources include degradation of water quality in freshwater and marine environments through poor stormwater, sewage and runoff management; loss of water resources and associated ecosystems through water abstraction, drainage and flood management works; and exclusion from access to sites where cultural resources are found.

This objective describes an outcome whereby resources are managed so as to ensure that cultural resources found in our rivers and lakes, wetlands and coastal areas are of a quality and abundance good enough to support cultural as well as physical and social health and well-being.

The threats to the health, quality and quantity of mahinga kai in our fresh and coastal waters are affected by a broad range of activities. This means that the achievement of this objective is interconnected and indeed dependent on not just the achievement of the other objectives associated with mana whenua values, but also those describing outcomes for water quality and land-use management more generally.

The objective is relevant to both issues described in section 4 of this report, and to RMA sections 5 and 6(e) in recognising and providing for the relationship of Māori and their culture and traditions with the environment. Mahinga kai species and places are fundamental to this relationship and observation of their health is the primary way that Māori assess the health and well-being of their aquatic environment. It is also linked closely to the objective for mauri as indigenous species are integral to the health of fresh and coastal waters. The objective of kaitiaki decision-making is also particularly relevant as utilisation of Māori determinants by Māori is fundamental to decision-making.

The objective also seeks to give effect to Policy 49 of the RPS which states that mahinga kai and natural resources used for customary purposes are maintained and enhanced, and that these resources are healthy and accessible to mana whenua.

Table A5 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.5 **Objective O11: Māori customary use**

The opportunities for Māori customary use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are recognised, maintained and improved.

Māori customary use is defined as the interaction of Māori with fresh and coastal water for cultural purposes. This includes the cultural and spiritual relationship with water expressed through Māori practices, recreation and the harvest of natural materials.

The proposed Plan gives effect to the relationship of Māori with their culture and traditions as required by the RMA (section 6(e)) by specifying the nature of that relationship in the objectives of the proposed Plan. This objective for Māori use recognises those interactions which are unique to Māori culture and traditions, and the objective is therefore relevant and useful.

Māori express their relationship with water through cultural and spiritual practices, many of which are unique to them as a people. Two important examples are whakarite and whakawātea both of which involve the purposeful interaction of Māori with water for holistic well-being. Whakarite involves preparing oneself for future tasks or processes through ritual, while whakawātea is used in response to ill health, accident or trauma to free an individual or group from spiritual contamination, mental affliction or emotional stress. Both practices use water to enhance well-being and focus mental acuity. These practices are common to all iwi but interpreted differently according to kawa and tikanga of individual whānau, hapū and iwi. The use of water for such practices can be associated with place, specific water quality and/or other conditions prescribed by local tradition and circumstance. The specific application of water can range from ritual anointment of a few drops of water to, ingestion or full immersion at a specific location. It is closely associated with other traditions, particularly karakia (prayer/invocations).

Association with water that does not necessarily require direct contact is also a feature of Māori customary use. Ngā mahi pārekareka i/ki te wai recognises beneficial activities that are undertaken for well-being associated with water such as camping, walking or sitting near a water body. These activities recognise the particular healing and beneficial nature of association with water. Water quality that reflects a vibrant mauri is an important feature of this relationship. Whilst determination of mauri is not definitive it includes elements that can be clearly established; water clarity, smell, flow, quantity, riparian and mahinga kai values and others that are more subjective; how an

individual feels, number or species of birds seen at the site, or how the site compares to a previous experience or expectation passed down to the user.

Other more familiar Māori uses of water include baptism (tōhi), waka ama (outrigger canoe racing) and the collection of healing plants (rongoā), clays (uku) and weaving materials (mahi rāanga).

As with mahinga kai, the ability of Māori to use water for cultural purposes is a primary determinant both of water quality and of the ability for Māori to interact with their culture, traditions and environment in accordance with the Act. Māori cultural use of water is necessarily fundamental to kaitiaki decision-making in that interaction informs decision-making and gives effect to their kaitiaki responsibilities as mana whenua. It also informs their relationship with place, particularly those scheduled as sites of significance or Ngā Taonga Nui a Kiwa.

Table A6 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.6 Objective O16: Ngā Taonga Nui a Kiwa

The relationship of mana whenua with Ngā Taonga Nui a Kiwa is recognised and provided for.

The challenge of recognising the significance of the relationship between mana whenua and larger entities has been addressed in the proposed Plan through a schedule that identifies these extensive areas, an objective and a policy that aim to protect and restore the relationship of iwi with these areas. Sites for mana whenua values (Schedule C) are closely defined and mapped in order to provide both protection for those values and certainty for landowners and resource users. Whilst protection of these specific sites is fundamental to the recognition of mana whenua values in the region, of equal importance is the recognition and acknowledgment of the importance of the relationship of mana whenua with the entity as a whole.

This proposed Objective O16 emphasises the importance of mana whenua relationships with their most significant entities, and requires that these relationships are recognised and provided for in the management of these places. The objective recognises that iwi identity and well-being is inextricable from that of Ngā Taonga Nui a Kiwa and requires applicants and regulatory authorities to consider those relationships in the use and management of resources.

Ngā Taonga Nui a Kiwa are those most important places from which mana whenua derive cultural and spiritual identity, their status as mana whenua and associated responsibilities, including those of kaitiaki. These places are in most instances the larger entities; rivers, lakes, estuaries and harbours that have a long history of multiple and complex resource use associated with large populations. As a result they are some of the more degraded places in our

region evidenced by poorer water quality and greater pressure on resources. (see Section 32 report: Water quality)

Mana whenua relationships with Ngā Taonga Nui a Kiwa are increasingly recognised through Treaty settlements due to the significant displacement and loss that occurred through colonisation. Treaty settlements for Taranaki Whānui and Ngāti Toa Rangatira recognise their relationships with Te Whānganui a Tara (Wellington Harbour (Port Nicholson)) and Te Awarua-o-Porirua (Porirua Harbour), important lakes, rivers and coastlines through specific legislation. The Crown acknowledges that their actions led to iwi losing their traditional relationships and interactions with their taonga and legislation requires (with varying levels of specificity) that regulatory authorities recognise and provide for these. Impending settlements with Wairarapa and West Coast iwi are likely to create new legislation relating to the ownership and management of Wairarapa Moana and significant rivers and coastal areas associated with all iwi involved. These places are the same as those identified within the Ngā Taonga Nui a Kiwa schedule.

Mana whenua would like Ngā Taonga Nui a Kiwa to be pristine and protected in the same way that outstanding freshwater bodies are protected in the draft regional plan. There is recognition that due to multiple and complex use of these large water bodies, complete restoration to their natural state is neither likely nor achievable in the life of this regional proposed Plan. In this sense, the kaitiaki see the Ngā Taonga Nui a Kiwa schedule as a list of priorities for restoration, the most significant water bodies and the most significant relationships in the region. This is of particular importance for the development of the whaitua chapters in the proposed Plan. In this regard, identifying specific relationships with Ngā Taonga Nui a Kiwa will assist the whaitua in their discussions at the catchment scale and help them meet the NPS-FM requirements by reflecting iwi values in decision-making. Key in this is that these sites should be the focus of actions to restore their status by improving their condition over time.

An objective to protect and restore the relationship of mana whenua with Ngā Taonga Nui a Kiwa is relevant as it aligns with the policy direction set by the Memorandum of Partnership. It is also relevant as it gives effect to the RMA, NPS-FM, NZCPS, RPS and Treaty settlement legislation in that it seeks a relational rather than a regulatory outcome in the first instance. Mana whenua seek recognition of the importance of natural resources to them and shared decision-making for their most important relationships.

Table A7 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.7 Objective O33: Sites of significance to mana whenua

Sites with significant mana whenua values are protected and restored.

This objective is directly relevant to Issue 2 discussed in section 4.2 (areas and sites of significance), and gives effect to section 6(e) of the RMA, (the

relationship of Māori with their culture and traditions, water and wāhi tapu), and Policies 23, 24 and 49 of the RPS. It acknowledges that many places in the region are associated with Māori histories, traditions and tikanga.

These sites have heritage value as well as cultural importance because of the historical and traditional practices and events associated with them. These individual sites need to be considered within the context of a cultural landscape as discussed in relation to Issue 2.

Sites with significant mana whenua values in the coastal marine area or freshwater bodies are often associated with residential sites such as pā, marae and papakainga and tauranga waka (canoe landing places), bathing areas and places of ritual use. Protection of place is a key issue for mana whenua identified in both the RPS and proposed Plan. They wish to retain or restore their association with these places and have sought a regulatory means to achieve this.

Other sites are associated with a particular ecosystem or living resource that is valued for mahinga kai and or particular cultural use. Although mahinga kai is most often associated with food gathering, it also encompasses the gathering of plants or animals for medicine and spiritual practices, and weaving or other biological resource use. It can be difficult to separate identification of the plant/animal (resource) from the place where it is collected, and the cultural practice within which it is used. Places will often have spiritual, historic and community use values. Cultural traditions bind these aspects together and the values listed in Schedules B and C are summaries of these closely integrated relationships.

The significance of these places is not necessarily diminished by changes that have occurred over time. The place may commemorate an ancestor, a deity or an event. An example of this might be the use of flax from a wetland by an ancestor for a particularly important purpose famed in local traditions. Even if the wetland is no longer there, or if the flax is no longer productive, the place remains significant for mana whenua.

The RPS makes it clear that the identification of places, sites and areas with significant spiritual or cultural historic values to mana whenua rests with iwi, hapū, whānau and marae in accordance with their kaitiakitanga responsibilities. For this reason, the successful implementation of policies, rules and methods required for the achievement of this objective is also intrinsically related to the implementation of policies and methods to achieve Objective O15 in relation to kaitiakitanga.

Table A8 presents the appropriateness of this objective in terms of relevance, usefulness, reasonableness and achievability. This assessment shows that the objective is appropriate to achieve the purpose of the RMA and give effect to the statutory instruments.

7.8 Conclusion

As outlined in Tables A2 to A8 of the Appendix, the proposed objectives are relevant as they:

- Give effect to the RMA, the RPS, the NZCPS and the NPS-FM in respect of mana whenua values and their recognition and protection
- Use language and terminology that is consistent with the RMA, the NPS-FM, the NZCPS and the RPS; and
- Reflect current best cultural practice, information, research and data

The proposed alternative objectives are useful in achieving the purpose of the Act as they are:

- Consistent with the guidance and direction provided in the RPS and the NPS-FM; and
- Provide decision-makers with assessment tools that will enable consistent and comprehensive consideration the impacts of activities on values important to mana whenua in the region

8. Summary of the appropriateness of the policies, rules and methods

In accordance with section 32(1)(b) and section 32(2) of the RMA, an assessment of the efficiency and effectiveness of the proposed policies, rules and methods to achieve the objectives are discussed in this section of the report.

The provisions are discussed in two main groups – provisions that implement the objective that mauri is sustained and enhanced, and provisions that implement the objectives that recognise and provide for the relationships of mana whenua with their cultural landscape and environment.

The proposed Plan provides for the relationships of mana whenua through regulatory and non-regulatory methods.

Mana whenua relationships rely in the first instance on the regulatory approach taken in the proposed Plan as a whole. This is because Māori aspirations and outcomes for an improved and more sustainable environment, and the actions required to achieve them, are inextricable from those of the regional community as a whole.

The most significant issues to mana whenua are those pertaining to the mauri of water; a matter which is fundamental to all activity in the region. In the same way, mana whenua role as kaitiaki is relevant to all activities and communities across the region. In recognition of this connection between their aspirations and those of the general community, mana whenua determined that the most effective way to influence the regulation of land and water was to integrate their values into the key objectives, policies and rules that form the proposed Plan. In doing so they took a significant risk that their values may either be subsumed by the dominant cultural paradigm of regulatory process or be identified yet not be given effect to as has happened in the operative plans.

Recognition of the need for a shared approach to resource management inclusive of Māori values aims to ensure that Māori objectives are part of a programme that is effectively managed and funded. It is clear that the operative plans failed to understand and prioritise Māori-specific objectives and this remains a significant risk to Māori-specific objectives in the proposed Plan. Some of that risk is being addressed through the inclusion of Māori values in key objectives in the plan (aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use), and the inclusion of a considerable amount of specific information about Māori values in the schedules of mana whenua sites.

A further risk is that, in being integrated, Māori values remain a visible part of the process of resource management; identifiable and quantifiable. A regional environmental measurement framework inclusive of Māori measures overseen by mana whenua is critical to the integrity of the integrated approach.

Where mana whenua discrete interests are identified, e.g. in schedules of sites and areas, they are given emphasis and recognition through the review of rule structures that affect those places and an increased requirement for iwi-led responses to activities that affect them. It is anticipated that, as with recent Treaty settlements with Taranaki Whānui and Ngāti Toa Rangatira, iwi-specific regulation (Parangārahu Lakes and Whitireia Management Agreements) requiring co-governance and management will continue to occur.

New co-governance and management arrangements deriving from settlement legislation will require additional resources from iwi and WRC. There are significant benefits and economies of scale to be found in the formation of overarching agreements between councils and mana whenua that provide sustainable and affordable ways of managing multiple new arrangements. Managing regional resources in a manner that recognises mana whenua relationships also alleviates pressure on mana whenua to achieve implementation of their values outside of the regulatory process and enables them to more effectively target their resources.

The cost of implementing a partnership approach to the integration of values should be substantially less than that of delivering a stand-alone Māori framework. It is also more likely to be achieved due to being consistent with an “all in” approach that recognises collective responsibilities as the best response to management of inter-connected land and water issues. The commitment of mana whenua to the integrated process comes with an inherent risk that the relationship will suffer if the programmes of action required to give effect to their values are not resourced and/or followed through. This risk is very real given that the operative plans have not addressed identified mana whenua objectives.

The discussion of the policies, rules and methods to achieve the objectives has been organised according to the seven objectives discussed in the previous sections. These are the recognition of mana whenua relationships with air, land and water; the recognition of kaitiakitanga; the protection and restoration of the relationships of mana whenua with Ngā Taonga Nui a Kiwa; and the protection and restoration of sites with significant mana whenua values. Table A9 in the

Appendix of this report provide an assessment of the status quo and proposed options for achieving the objectives. The following sections contain a more detailed analysis of the appropriateness of the policies and methods, including rules, of the preferred option in each case.

8.1 Mauri is sustained and enhanced

Objective O3 is that mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters. This objective, more than any other, signals the importance of Māori values in the proposed Plan. Mana whenua consider that water quality is paramount in sustaining the well-being of people and the environment and therefore the mauri of fresh and coastal water is the most important resource management issue.

Mauri is an inclusive and all-embracing construct that necessarily requires that all matters that affect water quality and all parties who are involved in its use or management consider the effects on the whole. The objective will be achieved through all proposed policies, rules and methods pertaining to the management of land and water as Table 1 illustrates.

Table 1: Provisions relevant to Objective O3

Objective:	O3 Mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters.
Policies:	P19 – P152
Rules:	All rules for land and water
Methods:	All methods supporting management of land and water, particularly M2, M25 and M26.

Providing for the mauri or life-giving properties of water sets the direction of the proposed Plan in managing water positively and purposefully whilst recognising all factors that affect it. The measurement of mauri includes but is not limited to the assessment of mana whenua values but is also addressed in the measurement of shared objectives for aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use.

Method M2 in the proposed Plan is an inclusive approach to environmental monitoring that aims to develop an information and monitoring strategy inclusive of mātauranga Māori. Māori, particularly mana whenua, values and attributes are important to how mauri is measured. Some of these have already been identified at various scales in the proposed Plan including objectives for mahinga kai and Māori cultural use, and schedules of values and hūanga describing places (Schedules B and C).

Further development will be supported through proposed Methods M25 and M26 which promote the engagement of mana whenua in resource consent processes and support greater community understanding of mana whenua values.

The costs, benefits and risks of acting versus not acting are discussed below.

(a) Cost

The objective identifies an overarching and inclusive outcome that aims to benefit the regional environment and community. Ongoing costs will be related to Council staff time and resources needed to develop mauri measures and a process for reporting on this.

(b) Benefit

The costs are significantly outweighed by the direct benefits to environmental, cultural and social well-being identified through the inclusive nature of managing the region's water bodies for the enhancement of mauri, not just for mana whenua but for the whole of the region.

(c) Risk of acting vs not acting

Mauri is a fundamental construct of Māori world view and mataūranga Māori. As such it underpins the Treaty relationship and the responsibilities required to give effect to the Māori provisions in the Act. Providing for the mauri of fresh and coastal water as a key objective in the proposed Plan achieves this by placing value on the role and perspective of mana whenua in regional resource management and linking it to an objective shared by all in the region. The partnership approach undertaken in the proposed Plan development means that it would be difficult to achieve the individual objectives and policies identified in the RPS and proposed Plan without being able to reference the broader inclusive direction provided by the objective. Risks of not acting include damage to the relationship with mana whenua through lack of a common construct for regulatory management.

8.2 Māori relationships with air, land and water

Table 2 identifies the relevant policies, rules and methods proposed to achieve the objectives O14 (Māori relationships), O15 (kaitiakitanga), O11 (Māori customary use), O26 (mahinga kai), O16 (Ngā Taonga Nui a Kiwa) and O33 (sites of significance). The primary assessment of provisions to achieve these objectives are considered here together, as the identification of mahinga kai and Māori customary use are overarching values for which all water will be managed, and are fundamental to the achievement of O3 (mauri) as well as O15 (kaitiakitanga). Further assessments of the provisions for individual objectives follow in sections 8.3 to 8.7.

Table 2: Provisions relevant to Objective O14

Objectives:	O14: Māori relationships with land, air and water are recognised and adverse effects on these relationships are minimised. Also O3, O15, O11, O16, O26 and O33
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Policies:	P1: Ki uta ki tai P8: Beneficial activities P17: Mauri P19: Mana whenua values P20: Exercise of kaitiakitanga P21: Statutory acknowledgements P18: Ngā Taonga Nui a Kiwa P44: Protection and restoration of sites with significant mana whenua values P45: Managing adverse effects on sites with significant mana whenua values
Rules:	Many
Method:	Development of schedule for aquatic ecosystem health and mahinga kai M2: Kaitiaki information and monitoring strategy M10: Wairarapa Moana M20: Wetlands M22: Integrated management of the coast M25: Understanding and providing for mana whenua values and relationships M25: Understanding and providing for mana whenua values and relationships M26: Encouraging the involvement of kaitiaki

Recognition of iwi interests in water is provided through a number of mechanisms in the proposed Plan (see Section 32 report: Water quality).

The achievement of the objective is assisted by Policy P1: Ki uta ki tai and integrated management that identifies the catchment as the spatial unit for land and water management. This is known to mana whenua as ki uta ki tai, which roughly translates ‘from the mountains to the sea’, and to local government as integrated catchment management. It enables an inclusive and all-encompassing approach that is consistent with, and a prerequisite for, responding to the loss of mauri as applied to fresh and coastal waters.

Identification of overarching objectives (mahinga kai and Māori customary use) and policies and methods that include educative and monitoring strategies inclusive of mana whenua values and indicators also enable the proposed objective to be achieved efficiently and effectively. The primary response to this issue is the identification of mahinga kai and Māori customary use as overarching objectives for which all water will be managed. Method M2 implements the monitoring of mahinga kai as a measure for all water quality alongside Methods M25 and M26 that establish the role of mana whenua as kaitiaki in determining tohu (indicators) and tikanga (processes) to achieve this.

The identification of measures for mahinga kai and Māori customary use and their incorporation into regulatory management is a challenge facing Crown agencies, councils and iwi. It requires development of a baseline measurement framework that is meaningful to both kaitiaki and environmental science teams. Development will require significant commitment of time and resources

to build the necessary capability and capacity to establish this and incorporate it into existing regional processes.

Costs include work required for further specification of values and their attributes and their inclusion into regulatory monitoring. There is significant development of mahinga kai frameworks nationally and there is growing expertise within iwi throughout the country. This work will need to be brought together in the form of science and matauranga Māori monitoring plans.

Mahinga kai monitoring would need to include tests for whether harvested species are fit for human consumption. Increased engagement of mana whenua kaitiaki in developing, implementing and monitoring a regimen inclusive of their values will be another significant cost. In addition, Wellington Regional Council will need to build its own capacity and capability to engage with mana whenua values. Whilst there are significant costs, there are also significant benefits in establishment of a resource management regime that includes mana whenua values. The issues identified by mana whenua will be directly addressed in a substantive way that promotes their interests and directly involves them in the management of their values. This is the essence of what the Act requires of decision-makers in devolving the Crown's Treaty responsibilities and will directly support implementation of settlement legislation in the region.

A further benefit is that Māori values specified by mana whenua relationships with place bring a whole additional knowledge system to resource management that has been largely ignored until now. Māori perspective has much to contribute in that it is determinedly subjective, aligning people with place, and the past with present and future. The concept of kaitiakitanga is one based on the accountability of human kind to care of the environment. This is an important contribution as Māori leadership as kaitiaki in resource management encourages the wider community to contribute and engage. Ultimately, an improved and sustainable environment will only come about if the community engage in an ongoing discussion about their values. Mana whenua have clearly articulated their intention in being central to that discussion and their declared interest will bring much needed focus to the critical issues of declining water quality and its causes.

As stated in the opening paragraphs of this section, the proposed Plan aims to integrate Māori values into the core regulatory functions of the region; how it is regulated, monitored and measured. The review of the operative plans identified that Māori-specific objectives are at risk of not being prioritised or implemented and that a change of approach is important to ensure that this does not happen within the life of the proposed Plan. The preferred approach is one where the whole regional regulatory process is imbued with Māori values so that they are part and parcel of the whole and not an extraneous "add on" vulnerable to being minimised or ignored due lack of understanding or other pressures.

Mahinga kai and Māori customary use sites have been identified in the schedules of significance to mana whenua (Schedule C) and given additional

protection from the adverse effects of development through the proposed Plan in the activity rules.

It is worth noting that in forming these detailed schedules mana whenua have contributed a significant body of cultural knowledge which is now available to plan users and the regional community. Mana whenua kaitiaki undertook extensive research and consultation amongst their own people in identifying sites and their attendant values and gaining agreement that the information should be scheduled in a public document. In doing so they were addressing a longstanding concern that sites are being constantly degraded by resource management activities. Whilst that is not a new understanding, the decision to schedule these important places points to a significant act of faith in agreeing to partner WRC in their protection.

This commitment should be recognised by greater protections for places of significance to mana whenua and their values. It is appropriate that users and decision-makers accept that there are both higher thresholds and higher costs for activities that impact these places. These costs must recognise the efforts made by mana whenua to protect these values, their role in decision-making through cultural impact assessments and direction for enhanced protection and restoration of the values at the site.

Policy P45 – Managing adverse effects on sites with significant mana whenua values – states that activities in sites of significance to mana whenua identified in Schedule C should be avoided. This includes activities that are permitted elsewhere. Where activities cannot be avoided a cultural impact assessment is required in which mana whenua will determine the effects of the proposed activity on the values at the site.

Cultural impact assessments create additional costs for resource users and applicants in terms of time, money and commitment to relationship building. These costs need to be balanced against the benefits that accrue from an improved understanding of how highly significant sites can be managed to protect mana whenua values and direct benefits to the places themselves. Over time this approach will change and improve practice and community awareness through building relationships between plan users and mana whenua with an attendant transfer of knowledge regarding mana whenua values and how they are provided for. There are also direct benefits to mana whenua in researching and responding to resource consent applications that support their role as kaitiaki. These processes will add to and inform mana whenua knowledge, relationships and capability pertaining to how they manage their values through the regulatory process.

There are limitations to the effectiveness of site-based protections for mahinga kai and other values that are largely affected by whole catchment water quality, however this approach aims to stop the direct effects that contribute to the continued degradation of some of the more vulnerable sites identified by mana whenua. Recognition of the limitations of site protection for values associated with water quality led to strong demands from mana whenua for recognition of whole catchments as having significant values and attendant restrictions on activities across extensive areas. This approach would pose significant

problems and costs for existing regulatory process as recognising whole catchments for those values would trigger non-compliance for many ubiquitous activities including discharges and water takes.

The proposed Plan recognises this risk and that many of these region-wide activities benefit the whole community, including mana whenua, and seeks to provide for their place-based values in a balanced way. The proposed Plan does this through broad recognition of mana whenua relationships with whole entities (Ngā Taonga Nui a Kiwa) that encourages engagement of the mana whenua in their kaitiaki role but does not specify this in a rule structure. At the site scale places of significance to mana whenua and their values are identified and managed through a rule structure.

The proposal in the proposed Plan is that Māori values are recognised throughout the water cycle through shared objectives of mahinga kai and ecosystem health, contact recreation and Māori customary use and that site and catchment relationships are scheduled. This is clearly a more managed, collaborative and cost-effective approach than whole-catchment recognition which is more properly the role of Treaty settlements.

Mana whenua identify that they are losing access to mahinga kai species. They attribute this to a decline in habitat and water quality. These declines are caused by direct and diffuse discharges, damage to in-stream values and spawning sites on riparian margins from stream clearance and grazing and the introduction of predatory pest species. Some species have become entirely absent from their former locations, others are present but are unable to be harvested due to small populations, poor health of the species, being undersized or subject to toxicity.

The review of permitted activity rules and significant policies pertaining to water quality and quantity have taken into account the need to reduce the impact on mahinga kai species, their habitat and life cycle. These include review of conditions supporting permitted activities for weed removal and works in the beds of lakes and rivers. These activities which happen all the time are known to destroy mahinga kai species and their habitat including spawning areas. Stock access rules and new provisions for management of stormwater and wastewater have also been formed in recognition on mahinga kai values.

Ubiquitous permitted activities including weed removal and works in the beds of lakes and rivers have had their conditions reviewed in light of mahinga kai and Māori use values. One example of this is that a condition of weed removal is a new limitation on extent of reach cleared and that only one side is cleared at a time in order to maintain habitat. Stock access rules have also been reviewed to reduce access and effects of animals on freshwater values.

Objectives for water quality in the PNRP include narratives that measure the health and abundance of mahinga kai species from a mana whenua values framework (Objective O25). This identifies taonga species (species of particular significance to mana whenua) and recommends that they are available in suitable quality and quantity for cultural use. These proposed

measures are interim in their current form and it is intended they will be developed as baseline data for mahinga kai becomes available.

As discussed above, greater specificity and understanding of how to monitor mahinga kai is an area of national interest common to all iwi and regional authorities. The status quo is not sufficient in providing resource users with the certainty required to manage for mahinga kai values. It is important to move beyond narrative measures as this information is developed or becomes available. With new knowledge will come new costs, particularly those involving iwi in managing and monitoring their values. It is considered appropriate that Council should commit to a programme of action given that loss of these resources has been a significant issue over many generations. As discussed previously integrating mana whenua values and objectives is regarded as an appropriate and responsible way to manage the programmes of action and attendant costs. Provision for mahinga kai and Māori use is also a matter that is directly addressed through Treaty settlement.

The costs, benefits and risks of acting versus not acting are summarised in Table A9 in the Appendix and discussed below.

(a) Cost

The identification of measures for mahinga kai and Māori cultural use and their incorporation into regulatory management is a challenge facing Crown agencies, councils and iwi. It requires development of a baseline measurement framework that is meaningful to both kaitiaki and environmental science teams. Development will require significant commitment of time and resources to build the necessary capability and capacity to establish this and incorporate it into existing regional processes.

Costs include work required for further specification of values and their attributes and their inclusion into regulatory monitoring. There is significant development of mahinga kai frameworks nationally and there is growing expertise within iwi throughout the country. This work will need to be brought together in the form of science and mātauranga Māori monitoring plans.

Mahinga kai monitoring would need to include tests for whether harvested species are fit for human consumption. Increased engagement of mana whenua kaitiaki in developing, implementing and monitoring a regimen inclusive of their values will be another significant cost. In addition Wellington Regional Council will need to build its own capacity and capability to engage with mana whenua values.

(b) Benefit

Whilst there are significant costs, there are also significant benefits in the establishment of a resource management regimen that includes mana whenua values. The issues identified by mana whenua will be directly addressed in a substantive way that promotes their interests and directly involves them in the management of their values. This is the essence of what the Act requires of decision-makers in devolving the Crown's Treaty responsibilities and will directly support implementation of settlement legislation in the region.

A further benefit is that Māori values specified by mana whenua relationships with place bring a whole additional knowledge system to resource management that has been largely ignored until now. Māori perspective has much to contribute in that it is determinedly subjective, aligning people with place, and past with present and future. The concept of kaitiakitanga is one based on the accountability of human kind to care of the environment. This is an important contribution as Māori leadership as kaitiaki in resource management encourages the wider community to contribute and engage. Ultimately, an improved and sustainable environment will only come about if the community engage in an ongoing discussion about their values. Mana whenua have clearly articulated their intention in being central to that discussion and their declared interest will bring much needed focus to the critical issues of declining water quality and its causes.

(c) Risk of acting vs not acting

Recognition of mahinga kai values in the management of all water brings with it additional responsibilities and attendant expenses in providing for them. Whilst poor water quality has a significant impact, all activities in a catchment ultimately affect mahinga kai species. There is real value in having visible measures for water quality that are recognised and supported by communities. Mahinga kai species and the places from which they are harvested are the local measures by which the community measure their water quality and general health of their environment.. Failure to recognise and protect mahinga kai as a value risks the continued loss of these species and the loss of an important connection between people and regional resource management.

(d) Conclusion

The approach in the proposed Plan is that Māori values are recognised through shared objectives of mahinga kai and ecosystem health, contact recreation and Māori customary use and that site and catchment relationships are scheduled. This is clearly a more managed, collaborative and cost-effective approach than the recognition of iwi relationships with extensive areas of land which is more properly the role of Treaty settlements.

The proposed Plan includes policies, rules and methods that implement the objectives to maintain and sustain mana whenua relationships. Iwi have specified sites of significance where values must be protected through the control of activities and also supported the inclusion of their values in the management of all water to provide for the intrinsic nature of their values throughout the water cycle.

The whitua chapters in the proposed Plan will provide further recognition through increased specificity as to how both individual waterways and whole catchments will be managed for values inclusive of mana whenua and will continue to ensure that the objectives of the proposed Plan are achieved.

8.3 Kaitiakitanga

Proposed Objective O15 seeks that kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making.

Table 3: Kaitiakitanga

Objective:	O15: Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making.
Policies:	P1: Ki uta ki tai P60: Implementing the NPS-FM P17: Mauri P19: Māori values P20: Kaitiakitanga P21: Statutory acknowledgements P18: Maintain mana whenua relationships with Ngā Taonga Nui a Kiwa P45: Managing adverse effects on sites with significant mana whenua values P70: Managing point-source discharges for aquatic ecosystem health and mahinga kai P73: Minimising adverse effects from stormwater discharges P37: Significant values of wetlands P99: Livestock access to surface water bodies
Rules:	
Method:	M2: Kaitiaki information and monitoring strategy M9: Wairarapa Moana M20: Wetlands M22: Integrated management of the coast M25: Understanding and providing for mana whenua values and relationships

The policies designed to achieve this objective are very similar to those required to achieve Objective O14 relating to Māori relationships and flow through from increased recognition of values resulting from their integration in the proposed Plan. In this case it should follow that the expressed inclusion of Māori values as objectives for which all water will be managed will substantially increase the role of mana whenua kaitiaki in decision-making as users. This is because regulatory authorities will need to respond to schedules of sites of significance and the requirement to regulate and manage water for mahinga kai and Māori customary use. It is worth restating that the implementation of this objective relies on new investment in a management and measurement framework that is inclusive of mana whenua values and recognises the kaitiaki role in providing for these. The costs and benefits of this are discussed with regard to Objective 26 in relation to mahinga kai.

The requirement to undertake cultural impact assessments on activities when those activities cannot avoid sites of significance to mana whenua will also enable kaitiaki decision-making and support resource consent processing.

The whitua chapters in the proposed Plan will require significant input from mana whenua in terms of identifying and providing for values at a catchment scale in accordance with the NPS-FM. Iwi are represented on the committees

and also work as part of the project teams supporting the work of the whaitua committee. Kaitiaki are also called upon to represent mana whenua interests on a range of regional and local council work programmes, standing committees and project consultation groups. The status quo sees that a considerable burden of engagement is taken on by very few mana whenua representatives. This is unsustainable as it relies on their continued ability to engage and does not provide for succession. Pressure and focus on individuals is often at the expense of broader and more representative interagency organisational relationships. Taken together, these and other policies will require significant input from mana whenua kaitiaki, appropriate resourcing and development over time.

Costs include the building of iwi and council capacity, increased recognition of kaitiaki input through payment for contribution to decision-making and environmental monitoring and creation and operation of management plans resulting from settlements. These costs are best controlled through proactive agreements that plan engagement based on agreed priorities and give both parties the certainty required to invest in development of capability to deliver them.

Demand for kaitiaki decision-making from both Crown and iwi continues to grow but lacks strategic definition or response. The benefits of a determined and coordinated approach to giving effect to kaitiaki decision-making greatly outweigh a status quo that is characterised by limited iwi capacity, low investment and unmanaged expectations.

The best example of a strategic response to kaitiaki decision-making is Te Upoko Taiao itself. The committee alleviates some pressure on individual iwi by providing a strategic partnership response that acts as a backstop for issues and concerns experienced by individual iwi on a day-to-day basis. The same strategic approach is required at the operative level. The PNRP suggests this in requiring responses to mana whenua places and relationships.

Mana whenua ability to engage is the most significant risk to this objective not being achieved. Increased call on iwi resources through Treaty settlement processes and the uncoordinated demands of Crown agencies has left many iwi with very limited capacity to respond. The approach taken in Plan development identifies the advantages in resource management systems that incorporate iwi values for the benefit of the whole region. One particular benefit of doing so is to alleviate some of the demand placed upon iwi to respond on a day-to-day basis through their engagement in development of the policy approach, process and measuring tools.

An alternative would be to maintain the status quo which is a policy framework that does not direct how engagement should happen. The risk here is that the objectives will not be implemented and that mana whenua policies would remain unaddressed. The conjunction of the plan review process with increased expectations arising from Treaty settlements would create a context where failure to develop operative responses to the issues driving mana whenua engagement in the PNRP would be seen as non-compliance with the Act and a further or continued breach of the Treaty.

8.4 Mahinga kai

Objective O26 is: The customary gathering of food and natural materials, the food and resources themselves and the places where those resources are gathered.

Mahinga kai is a key issue for mana whenua and was identified as such in objectives in the RPS. The ability of Māori to harvest mahinga kai species, the health of those species and the places from which they are harvested are amongst the key determinants by which mana whenua assess the health of their environment and the mauri of fresh and coastal waters. The collection of species such as inanga (whitebait), tuna (eel), koura (crayfish) and paua form a significant part of domestic and customary usage and the provision of these foods at hui supports the relationship between iwi. The recognition of mahinga kai as a key objective in the proposed Plan for which all water will be managed gives Māori communities a recognisable role as kaitiaki in contributing to regional resource management. In this way mahinga kai should be seen as directly meeting the requirements of the Act in recognising and providing for the relationship of Māori and their culture and traditions.

Mahinga kai and Māori customary use sites have been identified in many of the schedules of significance to mana whenua (Schedule C) and given additional protection from the adverse effects of development through the proposed Plan in the activity rules. Policy P32 addresses managing adverse effects on sites with significant mana whenua values and states that activities in sites of significance to mana whenua identified in Schedule C should be avoided. This includes activities that are permitted elsewhere. Where activities cannot be avoided a cultural impact assessment is required in which mana whenua will determine the effects of the proposed activity on the values at the site.

There are limitations to the effectiveness of site-based protections for mahinga kai and other values that are largely affected by whole catchment water quality. However this approach aims to stop the direct effects that contribute to the continued degradation of some of the more vulnerable sites identified by mana whenua.

Table 4: Mahinga kai

Objective:	O26: Mahinga kai in rivers, lakes, natural wetlands and the coastal marine area is maintained and restored. This objective should be read in conjunction with the objective supporting aquatic ecosystem health.
Policies:	P45: Managing adverse effects on sites with significant mana whenua values P17: Mauri P32: Adverse effects on aquatic ecosystem health and mahinga kai P18: Ngā Taonga Nui a Kiwa P1: Ki uta ki tai and integrated catchment management P33: Protecting indigenous fish habitat All policies that address aquatic ecosystem health

Rules:	R47: Dye or salt tracer R51: Stormwater R164: Replacement of a structure
Methods:	M2: Kaitiaki information and monitoring strategy M25: Understanding and providing for mana whenua values M26: Encouraging the involvement of kaitiaki

8.5 Māori customary use

The inclusion of Māori customary use of water (Objective O11) as an objective in the proposed Plan provides clarity and emphasis to an aspect of resource use that has been largely ignored in previous plans. Māori customary use specifies the cultural relationship of Māori with fresh and coastal waters identified in the Act. The PNRP proposes that Māori customary use is coupled with contact recreation as an overarching value for which all water will be managed. It recognises that Māori value their relationship with fresh and coastal waters beyond the narrow range of attributes measured to ascertain water quality levels supporting contact recreation. Maintaining traditional relationships with the environment is a key responsibility of kaitiaki. It is concern over the loss of these relationships that has led to mana whenua identifying their values in PNRP at a scale and level of detail not previously provided.

Water quality and quantity that supports Māori customary uses is able to be measured through a range of mechanisms dependent upon the specific use in question. Customary practices associated with water fit along a continuum of engagement with water from ingestion, through to activities covered under contact recreation definitions to non-contact association. In this manner many of the existing measures for water quality will support management of water for this objective.

Māori values can be challenged by resource users and decision-makers as being “purely metaphysical” and unmeasurable. This view is not accurate. Māori are acute observers of their environment, their survival relying on detailed understanding underpinning resource management decisions. There is a wealth of information on the Māori environmental perspective supporting their resource use. The issue here is not the spiritual or metaphysical context of Māori customary use but that as with mahinga kai, there has been no investment in the identification of measures supporting Māori customary use and the inclusion of these in the resource management process.

Whilst Māori perspective is grounded in a belief system that includes spiritual and metaphysical elements, these elements are measured through observation and engagement with the environment. An example that shows the integration of physical and spiritual connection might be the importance of wai ora (healing water) from a particular puna (spring) for an aspect of customary healing. If users observed signs of poor water quality; algal growths, faecal contamination, or lack of mahinga kai, they would consider that the puna (spring) was mauui (unwell) and that the wai (water) had lost its healing

attributes. These hūanga (attributes) are all measurable and able to be addressed through plan provisions.

It is difficult to suggest an alternative to the integration of Māori customary use into the substance of the proposed Plan as an objective supported by policies, rules and methods. The status quo position of the operative freshwater plan does not provide for this use in any substantive manner. Simply not addressing Māori customary use would be to ignore the essential purpose of the Act.

The suggested path forward aims to recognise and provide for Māori customary use through regulations supported by information identifying the values, places and relationships that support this objective. Costs associated with achieving this objective cover the same elements discussed in relation to mahinga kai (section 8.4) and are best managed together.

A more detailed explanation of Māori customary use is provided in section 7.5.

Table 5: Māori customary use

Objective:	Objective O11  The opportunities for Māori customary use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are maintained and improved.
Policies:	Policies that link to Māori customary use include; P2, P7, P8, P17-23, P18, P45, P22-41, P10, P63, P64
Rules:	R51, R125, R153-157
Methods:	M25 and M26

8.6 Ngā Taonga Nui a Kiwa

Ngā Taonga Nui a Kiwa are those more extensive water bodies from which mana whenua derive cultural and spiritual identity, their status as mana whenua and the associated responsibilities that come with that including those of kaitiaki. These places are in most instances the larger entities; rivers and harbours that have a long history of multiple and complex resource use associated with large populations. As a result many of these places have poor water quality that does not currently meet mana whenua objectives in relation to some aspects of Māori customary use and/or some mahinga kai species and activities.

The Ngā Taonga Nui a Kiwa construct captures the important and direct relationships between mana whenua and a number of large bodies of water across the region. Ngā Taonga Nui a Kiwa emphasises the importance of mana whenua relationships with their most significant entities of water.

Ngā Taonga Nui a Kiwa is an indigenous construct and has its own cultural context. The concept is an extension of the existing shared values approach to the regional plan and it seeks to establish acknowledgement of important mana whenua relationships with these places. Existing practice around many of the

processes and relationship between iwi and WRC involve consideration of areas described here as Ngā Taonga Nui a Kiwa.

It is important to understand that Objective O16 focuses on providing for the relationship of mana whenua with place as opposed to providing for the place itself as per Schedule C (sites of significance to mana whenua). The reason for this distinction is that it was considered that the regulatory recognition of values over large, complex and intensively used water bodies is problematic in that such recognition would make many current activities non-complying. Whilst this is a viable option in discrete sites as identified in Schedule C, this was not deemed achievable (and possibly counterproductive) over wider areas.

In many cases the activities that most affected values would need to continue due to a lack of alternative ways of managing the activity, e.g. discharges and stormwater. The net result of scheduling extensive water bodies for mana whenua values would have left them unprotected from the activities that they sought to address.

The preferred approach and the option proposed here is the development of a schedule of relationships that provides greater recognition and protection to mana whenua relationships with these more extensive water bodies. This is an effective approach given that it is these larger entities and primary mana whenua associations where new settlement legislation will focus on bringing new regulatory relationships. The risk associated with this approach is that it is essentially non-regulatory and largely reliant on other policies in order for it to be given any regulatory effect at all. It is also supported by non-regulatory methods M20 and M20a that support relationships around mana whenua values and the engagement of kaitiaki. The implementation of these methods rely on them being both prioritised and funded.

It is difficult to consider what alternatives could make practical steps towards recognition of these most significant relationships. The danger of scheduling whole water bodies for mana whenua values is that if there is no real protection of the values, the values themselves and the relationships that support them are further undermined risking further breaches of the Treaty.

Delivery of the proposed Policy O18 requires that decision-makers inform iwi authorities of relevant resource consents relating to Ngā Taonga Nui a Kiwa. This will require a review of current regulatory function and the development of a system that ensures that this information is provided consistently and is delivered at the appropriate scale. It is important that this is done well in order to ensure iwi know about the matters that concern them the most but are not overwhelmed by information.

The policy also includes support for iwi-led restoration initiatives and support for iwi monitoring. These will require additional funding and need to be considered within the same suite of provisions as those traversed in discussion of implementation of kaitiakitanga, mahinga kai and Māori customary use provisions. These initiatives should be supported as they respond not only to the requirements of the Act in regard to Māori relationships but also to whole catchment initiatives to improve water quality.

Ngā Taonga Nui a Kiwa are also the places that will be addressed in the whaitua chapters in the proposed Plan. However, irrespective of any subsidiary process, the Council has an overarching responsibility to consider the relationship of mana whenua with their most significant water bodies. The NPS-FM directly addresses the significance of the catchment-scale relationship and requires councils to:

- a) involve iwi and hapū in the management of fresh water and freshwater ecosystems in the region;
- b) work with iwi and hapū to identify tangata whenua values and interests in fresh water and freshwater ecosystems in the region; and
- c) reflect tangata whenua values and interests in the management of, and decision-making regarding, fresh water and freshwater ecosystems in the region.

This is a clear directive for the Council to engage directly with mana whenua and address their interests in regard to their most important relationships.

Ngā Taonga Nui a Kiwa: Ka moe a Kiwa ki a Parawhenuamea rāua ko Hinemoana. Ko ngā tamariki o ēnei hononga ko ngā awa, roto, manga, repo, moana hoki. He taonga nui ētahi o ēnei wāhi ki a ngāi tāua te Māori, arā ko ngā wāhi rongonui, ko ngā wāhi whakaharahara ki ngā iwi o ngā whaitua nei.

This whakapapa identifies the lineage from which all forms of water flow and emphasises their importance to Māori. Water descends from the union of Kiwa with his wives Parawhenuamea and Hinemoana. The offspring of the union with Parawhenuamea includes rivers, lakes, streams, wetlands and freshwater areas. The union with Hinemoana gave rise to wai-tai, or saltwater entities, which were the oceans and harbours of our world. All of these areas are of the utmost significance to Māori who regard them both as ancestors and an inheritance for which they have responsibilities of care. Iwi of our region share this view due to the well-known and outstanding qualities of the water bodies found within the whaitua that make up our region.

In summary, recognition of the most important relationships that iwi have with the environment is fundamental to the integration of Māori and mana whenua values and partnership in the proposed Plan. It is also consistent with the Memorandum of Partnership (2013) which prioritises the relationship between WRC and individual iwi.

Table 6: Ngā Taonga Nui a Kiwa

Objective:	O16: The relationship of mana whenua with Ngā Taonga Nui a Kiwa is recognised and provided for. Objectives that should be considered in conjunction with O16 include O11 Māori customary use, O3 Mauri, O14 Māori relationships, O15 Kaitiakitanga, O26 Mahinga kai
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Policies:	<p>P18: The relationship of mana whenua with Ngā Taonga Nui a Kiwa is recognised and provided for.</p> <p>P1: Ki uta ki tai</p> <p>P66: NPS-FM implementation</p> <p>P17: Mauri</p> <p>P20: Kaitiakitanga</p> <p>P21: Statutory acknowledgements</p> <p>P31 and P32: Aquatic ecosystem health and mahinga kai</p>
Rules:	There are no rules in the proposed Plan that support this objective.
Method:	M25: WRC will work with mana whenua to assist communities in understanding and providing for mana whenua values and relationships with air, land and water in particular Ngā Taonga Nui a Kiwa.

Each iwi has submitted a schedule of Ngā Taonga Nui a Kiwa and asks that the proposed Plan clearly recognise these most important associations in order to enable them to give effect to their values and attendant responsibilities as kaitiaki. Many of the places identified as Ngā Taonga Nui a Kiwa also have accompanying statements of association in Schedule D. Some of the region's iwi have not yet negotiated settlement, but would like their most important relationships acknowledged in the proposed Plan .

Ngā Taonga Nui a Kiwa policies seek to protect the relationship through increased involvement in the management of the places identified and where these are in a degraded condition deliver an improvement over time. This is particularly relevant to Council responsibilities identified in the NPS-FM which requires direct engagement of mana whenua in maintaining and improving catchment water quality.

Iwi are becoming increasingly active in the governance and management of Ngā Taonga Nui a Kiwa through a range of processes including formation of restoration and management committees and new governance entities resulting from settlement legislation. Iwi have existing responsibilities and interactions as part of the resource consent process and a range of other WRC activities. The identification of Ngā Taonga Nui a Kiwa offers the opportunity for an extension of the existing relationships surrounding these places.

These agreements and obligations are relational rather than regulatory in that they dictate an expectation that mana whenua will be involved in decision-making. The Memorandum of Partnership between Tangata Whenua ki Te Upoko o Te Ika a Maui and Wellington Regional Council identifies the Treaty of Waitangi principles key to the relationship, including the partnership/mutually beneficial relationship, shared decision-making, active protection and tribal self-regulation.

There is an expectation among iwi that they will have a greater role in the management of their values relating to their most substantive relationships. This is reflected in the purpose of the Memorandum of Partnership between

Wellington Regional Council and tangata whenua, which is: “to describe a partnership of mutual benefit”.⁷

The identification of Ngā Taonga Nui a Kiwa in a schedule provides stakeholders and the wider community with certainty about which places are of special interest to iwi. By identifying Ngā Taonga Nui a Kiwa at the regional scale, they also serve to establish areas where the whaitua can focus attention. A large percentage of the population also values these places and would be supportive of efforts to improve their condition over time. Submissions from a broad range of community groups appear to support greater recognition of mana whenua relationships. A number of existing programmes delivered by central and local government and non-governmental organisations are already focused on improving these areas and are doing so in partnership with iwi. Through working in partnership, over time mana whenua will have more influence over how these taonga are managed and can also help educate other stakeholders about their values and the importance of their relationships with Ngā Taonga Nui a Kiwa. Method M20 specifically addresses this aspect of Ngā Taonga Nui a Kiwa by WRC working with iwi to assist communities to understand and provide for mana whenua values specifying Ngā Taonga Nui a Kiwa.

Schedule B identifies Ngā Taonga Nui a Kiwa and their associated attributes, or Ngā Huanga. It has been developed by mana whenua, and includes the intergenerational experiences, the social interaction and the historical significance of an entity. There is no precedence for such a powerful cultural perspective being brought into a regulatory framework in the region. Schedule B represents a highly significant contribution from mana whenua to regional resource management. Table 7 below further explains the meaning of Ngā Huanga.

Table 7: Ngā Huanga (Ngā Taonga Nui a Kiwa)

Ngā Huanga	
Te Hā o te Ora	The breath of life (te hā o te ora) exists within our water bodies. Taonga water bodies have an essence within them that provide for wairua and mauri. This hā supports these water bodies in their ability to provide kai, provide resources and, heal the body and spirit.
Ngā Mahi a Ngā Tūpuna	The interaction of tangata whenua with fresh and coastal waters for tangata whenua purposes. This includes the cultural and spiritual relationship with water expressed through tangata whenua practices, recreation and the harvest of natural materials for tangata whenua purposes. This also includes connections to the land via tūpuna and whakapapa.
Te Mahi Kai	Places where tangata whenua manage and collect food and resources and undertake activities to uphold tikanga Māori. This is not only about the bounty collected but the transmission of knowledge through the act of collection.

⁷ Clause 1.

Wāhi Whakarite	Sites and places where particular practices and activities take place. These are often places that have been used for centuries and require a certain environment. These practices differ from day-to-day activities outlined above in <i>Ngā Mahi a Ngā Tupuna</i> . These include very important and often restricted activities that are undertaken by Māori that have been used for centuries.
Te Mana o te Tangata	Many water bodies are recognised by neighbours as being of particular value not only to those that hold rangatiratanga of a water body but also to those who interact and rely on their neighbours for certain resources. In this case a requirement could be the support or endorsement by another iwi. This would provide an opportunity for whanaungatanga and mutual mana enhancement.
Te Manawaroa o te Wai	Some water bodies have sustained intense pollution over a long period of time. In many cases these water bodies are seen as having a level of resilience unseen in other water entities. In the minds of tangata whenua the restoration of many of these water bodies provides an excitement. The potential of particular taonga water bodies provides a special opportunity for iwi to be able to once again provide their guests with kai-rangatira, relearn practices of the past, and identify themselves with a water body that will be healthy.
Te Mana o te Wai	Some water bodies of our region are inherently connected to our identity and the mana of the area. Te Whanganui a Tara, Wairarapa Moana are two apt examples of this and could easily be included as a tohu of taonga entities.
Wāhi Mahara	Wāhi mahara are places of learning and where local knowledge and histories are etched in the landscape. These are essentially a place that was central to intergenerational knowledge transmission of our tūpuna, and could be used as such again in our future.

8.7 Sites with significant mana whenua values

The development of Schedule C sites of significance for mana whenua values is traversed in detail in section 4.2. In summary the proposed Plan takes a determined approach to protecting mana whenua values pertaining to sites of significance to mana whenua. The proposed Plan includes schedules of sites of significance to mana whenua, detailing the values of those sites. Policies P44 and P45 direct users to engage directly with mana whenua in regard to how their values may be affected. In relation to the specific sites themselves the approach requires that activities whose effects are more than minor are not permitted. This approach is reflected in the rule structure which manages the effects of activities on schedule sites.

Schedule C brings an unprecedented level of specificity to the identification of mana whenua values to the Wellington regional plans. There is a considerable amount of information available to plan users that identifies where and what the values are and who they should engage with. For users, regulators and mana whenua alike this should contribute to a “no surprise” culture which provides greater protection to sites and values of significance to mana whenua. The provision of detailed information to plan users is also intended to reduce

costs to applicants by reducing the requirement for, and complexity of, cultural impact assessments.

Wellington Regional Council does not keep a record of numbers of cultural impact assessments (CIAs) undertaken or the costs associated with these arrangements as these are agreed between the applicant and mana whenua. Information from kaitiaki suggests that the time taken and attendant cost is dependent on the scale and complexity of the application and that these can vary greatly. Very small and straightforward matters are dealt with within capacity funding contracts provided by WRC. Small applications requiring research and a written response can be completed within a day at a cost of less than \$1,000. Larger and more complex applications could take several weeks or more with attendant costs. It is difficult to assess current demand for CIAs and the degree to which these may increase as a result of an increased number of sites scheduled in the PNRP. Any increase in CIAs is not limited to the schedules and will be driven by an increased emphasis on mana whenua values in a range of policies and processes dealing with water quality. Kaitiaki also point out that the CIA process can be more effective, faster and cheaper for the applicant than a section 92 process where Council requires the applicant to seek further information.

Whilst there may be some additional costs associated with an increased number of CIAs for resource consent applications pertaining to these sites, these should be relatively contained as the intent of the schedules is to limit the activities at these places. Mana whenua took scale and complexity of resource use into consideration in selection of these sites, balancing their vulnerability and need for regulatory protection. Again the best approach to reducing the cost of CIAs to both applicants and the mana whenua who provide them is the provision of more information, education and awareness to the regional community. Taken together along with a robust kaitiaki engagement process, the provision should ensure that the impact of this approach on landowners is minimal, whilst values are protected.

Table 8: Sites with significant mana whenua values

Objective:	O33 Sites with significant mana whenua values are protected and restored.
Policies:	P44 and P45 specifically relevant. Numerous other policies also address the matter of sites of significance to mana whenua.
Rules:	R48-52 Stormwater, R67-68 Discharges, R98 Stock access, Culverts R114 and 115 (F), Dam R116 (i), New structures R117 (f), Small river crossings, dams and structures R125, Reclamation R 127, 130, Additions and alterations to a structure R157,158, Removal or demolition R153, New and replacement R154, Replacement of a structure R163, New structure R157, Replacement of structure R164, Seawalls R166-167, Temporary occupation R164, Disturbance and damage R194, 195, Vehicles R196-198, Dredging R200, 204, 205, Deposition and dumping R207-213, Reclamation and drainage R214
Method:	M2 Kaitiaki information and monitoring strategy, M22 integrated management of the coast, M26 Encouraging the involvement of kaitiaki

References

Greater Wellington Regional Council. 2014. Issues report for the draft Natural Resources Plan for the Wellington region. Preliminary draft for discussion. October 2014.

Parminter, T. 2011. Your view about our environment – public engagement (2010) for the Natural Resource Regional Plan Review for the Wellington Region. Wellington Regional Council, Wellington.

<http://www.gw.govt.nz/assets/Valuing-Our-Environment/Regional-Plan-Review-PublicEngagementReport.pdf>

Appendix

Table A1: Tangata whenua issues summary

Issue	Significance	Need to be in proposed Plan	Different from operative plan?	Information sources	Appropriate level of information?
The relationship of tangata whenua with land and water is adversely affected by the inappropriate use and/or degradation of natural and physical resources.	Clear direction from RMA, RPS and NPS-FM	Demonstrates Wellington Regional Council leadership on issue, provides clear foundation for objectives and policies, and reflects mana whenua requirements and aspirations.		Data obtained through collaborative engagement with mana whenua	Yes.
There are areas and sites of significance to tangata whenua that are at risk of degradation or are threatened by human activities	Direction from RMA and RPS and from collaborative engagement with mana whenua during PNRP development	Demonstrates Wellington Regional Council leadership and provides clear foundation for objectives and policies.		Data obtained through collaborative engagement with mana whenua; historical sources	Yes.

Table A2: Assessing the appropriateness of Objective O3 – Mauri

Objective O3	Mauri is sustained and enhanced, particularly the mauri of fresh and coastal waters
Relevance	
Directly related to resource management issue?	Directly related to Issue 1
Will achieve one or more aspects of the purpose and principles of the RMA?	Directly related to sections 6 and 7a of the RMA
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes.

Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Gives effect to NPS-FM (Objective and Policy D1) and RPS (Objective 15 and Policies 21, 22 and 46).
Usefulness	
Will effectively guide decision-making?	Yes, by ensuring that the mauri of the region's natural resources, particularly our fresh and coastal water resources, should not be further degraded; and that consideration is given to the relationship mana whenua have with the natural environment where there activities that may have an adverse impact on the mauri of the natural environment.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	States what is to be achieved and is directly related to the issue.
Consistent with other objectives?	Yes, the proposed objective is consistent with the other objectives of the proposed Plan.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measureable and how would its achievement be measured?	The mauri of fresh and coastal water lacks an agreed set of measures and appropriate structure however there is no shortage of material to establish this including regional scale values; aquatic ecosystem health and mahinga kai, contact recreation and Māori customary use. Other measures including those associated with mana whenua place and relationships scheduled in the proposed Plan, stream loss and whaitua scale attributes and indicators. It is anticipated that these will contribute to development of a model for evaluation of mauri of water at a regional scale as part of regional environment monitoring and reporting.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	Achievement of the objective will be ongoing.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes. The Council has reviewed the regional plan with the intention of sustaining the mauri of fresh and coastal waters and has developed appropriate policy tools to achieve this. It also has a productive and positive relationship with mana whenua in the region, and which is important to achieving the objective over the long term.

What other parties can the Council realistically expect to influence to contribute to this outcome?	Mana whenua in the region, district councils, applicants and resource users.
What risks have been identified in respect of outcomes?	The risk is that a lack of understanding of mauri and how activities can affect it will undermine the achievement of the objective. The combination of this objective and O14 and O15 will ensure that this risk is mitigated.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	The objective identifies an overarching and inclusive outcome that aims to benefit the regional environment and community. Ongoing costs will be related to Council staff time and resources needed to develop mauri measures and a process for reporting on this. The costs are significantly outweighed by the direct benefits to environmental, cultural and social well-being, not just for mana whenua but for the whole of the region.
Who is likely to be most affected by achieving the objective and what are the implications for them?	The recognition that the mauri of water needs to be provided for informs the regulatory approach to water use in the proposed Plan. Mana whenua in the region will be positively affected by the achievement of the objective as their engagement as kaitiaki is a prerequisite. Resource users and developers may also be affected where potential impacts on mauri and mana whenua relationships with natural resources may require avoidance or mitigation measures to be implemented.
Existing objectives	
Is the operative objective in the operative plans for the Wellington Region still relevant or useful?	No the new objective takes a further step in specifying policy that gives effect to the objective particularly in the requirement to recognise role of kaitiaki in sustaining mauri.

Table A3: Assessing the appropriateness of Objective O14 – Māori relationships

Objective O14	Māori relationships with air, land and water are recognised, maintained and improved.
Relevance	
Directly related to resource management issue?	Directly related to Issues pertaining to role of kaitiaki in decision-making
Will achieve one or more aspects of the purpose and principles of the RMA?	Directly related to section 6(e) of the RMA
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes.
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Gives effect to NPS-FM (Objective D1 and Policy D1) and RPS (Objective 15 and Policies 21, 22 and 46).
Usefulness	
Will effectively guide decision-making?	Yes. The objective emphasises the need for regulatory authorities, applicants and resource users to become informed about mana whenua relationships with land, air and water, and provide for these relationships in the consideration of activities and resource use in the region. The development and inclusion of Schedule C and B in the proposed Plan ensures that there is greater public awareness of sites important to mana whenua, and against which the effects of activities on the integrity of such sites can be assessed.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	States what is to be achieved and is directly related to the issue. The associated provisions provide a means by which assessments as to whether the objective is being achieved can be made.
Consistent with other objectives?	Yes, the proposed objective is consistent with the other objectives of the proposed Plan.

Achievability	
<p>Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?</p>	<p>Yes. The development and inclusion of schedules for setting limits for water quality in the proposed Plan inclusive of mahinga kai and Māori customary use ensures that natural and physical resources in the region that are also important to mana whenua relationships with water, land and air resources are recognised and identified. Consequently the effects of activities on the integrity of such sites can be assessed and measured. The achievement of the objective is ongoing, but the progress of its achievement can be plotted on a case-by-case basis.</p>
<p>Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?</p>	<p>Achievement of the objective will be ongoing. Council and stakeholders would anticipate greater awareness of mana whenua relationships with air, land and water with the publication of the proposed Plan, and an improvement of wider public understanding of the aims of the objective over time.</p>
<p>Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?</p>	<p>Yes. The Council has, in collaboration with key stakeholders, developed the schedule which, in combination with the relevant policies, will contribute to the achievement of the objective. The Council has the staff to assess and issue consents which may involve assessment against the objective. The Council also has a productive and positive relationship with mana whenua in the region, which will also be important to achieve the objective over the long term.</p>
<p>What other parties can the Council realistically expect to influence to contribute to this outcome?</p>	<p>Key stakeholders include mana whenua in the region, applicants and resource users.</p>
<p>What risks have been identified in respect of outcomes?</p>	<p>The risk is that the relationship mana whenua have with land, air and water are not appropriately understood by Council and the wider public. However, this risk is substantially mitigated by a strong policy approach, and the development and inclusion of the schedule. Costs include work required for further specification of values and their attributes and their inclusion into regulatory monitoring. There is significant development of mahinga kai frameworks nationally and there is growing expertise within iwi throughout the country. This work will need to be brought together in the form of science and mātauranga Māori monitoring plans.</p>

Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	The costs have been largely focused on the development of a schedule to support the achievement of the objective. Ongoing costs will be related to Council staff time and resources needed to assess consents and maintain good relationships with key stakeholders. The costs are significantly outweighed by the direct benefits to cultural and social well-being, not just for mana whenua but for the whole of the region.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Mana whenua in the region and beyond will be positively affected by the achievement of the objective. Resource users and developers may also be affected where potential impacts on mana whenua relationships with air, land and water may require avoidance or mitigation measures to be implemented.
Existing objectives	
Is the operative objective in the Regional Air Quality Management Plan for the Wellington Region still relevant or useful?	The operative objective fulfils the requirements of the RMA, however, is not specific enough to ensure the outcomes expected by the Council and key stakeholders.

Table A4: Assessing the appropriateness of Objective O15 – Kaitiakitanga

Objective O15	Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making.
Relevance	
Directly related to resource management issue?	Directly related to RPS Issue – participation of mana whenua kaitiaki in decision-making
Will achieve one or more aspects of the purpose and principles of the RMA?	Kaitiakitanga is regarded as a matter to which decision-makers should have particular regard under section 7(a) the RMA.
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes.

Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Policy 66 of the RPS enables implementation of Methods 13, 19, 32, 33 and 38 of the RPS. Also seeks to give effect to Objective D1 and Policy D1 of the NPS-FM in respect of the decision-making in the management of freshwater resources in the region.
Usefulness	
Will effectively guide decision-making?	Sends a clear directive that mana whenua are to be directly involved in decision-making, which is intended to directly impact on the way in which decision-making is conducted.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	Yes. It describes what is to be achieved, and that it is to be achieved in respect of decision-making. It relates to the issue, and can be assessed.
Consistent with other objectives?	Yes
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	The objective is ongoing in nature, and is intended to be applied in all relevant cases and matters. Its achievement will be able to be measured through assessments of decisions, and an analysis of how mana whenua were involved in that process.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	The objective is expected to be achieved immediately, and have ongoing implications throughout the life of the proposed Plan.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes. Te Upoko Taiao natural resource plan committee has the make up and delegated powers to achieve this function. Methods in the RPS describe how mana whenua can be most effectively involved in decision-making, and highlights those areas of resource management in which mana whenua involvement, advice and guidance is essential.
What other parties can the Council realistically expect to influence to contribute to this outcome?	A positive, productive and transparent relationship between mana whenua and the Council is essential in the achievement of this objective and the outcomes it seeks. Similarly productive relationships between Council, mana whenua and TAs is also important.
What risks have been identified in respect of outcomes?	

Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	The benefits associated with genuine and effective involvement of mana whenua in decision-making regarding the region's resources far outweigh the costs of implementing the objective, and far outweigh the costs to social and cultural well-being of not proposing and achieving the objective.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Mana whenua will be most affected by the objective, and also Council in the way it conducts decision-making.
Existing objectives	
Is the operative objective in the Regional Air Quality Management Plan for the Wellington Region still relevant or useful?	The operative objective does require that adverse effects are managed to avoid, remedy or mitigate effects on human health, however the operative plan did not specifically note the effects that hazardous substances may have on human health outcomes. This proposed objective is directive with a clear outcome that must be met through the life of the proposed Plan.

Table A5: Assessing the appropriateness of Objective O26 – Mahinga kai

Objective O26	The availability of mahinga kai species to support Māori customary harvest for hui is increased, both in quantity and quality.
Relevance	
Directly related to resource management issue?	Yes
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes

Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Yes
Usefulness	
Will effectively guide decision-making?	Yes
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	Yes the objective establishes mahinga kai as a value for which water will managed. Although there is no current measurement framework this is achievable if there is appropriate investment.
Consistent with other objectives?	Yes it works with overarching shared objectives for aquatic ecosystem health and mahinga kai.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	Achievement of the objective needs to be established through direct input from mana whenua kaitiaki. Measures and processes for evaluating mahinga kai stocks are required to achieve this.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	The objective can be achieved for identified mahinga kai resources within tribal areas within the life of the proposed Plan. There will be ongoing work required beyond this period to achieve the objective on a regional scale.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	Yes however these need to be focussed and applied through investment of resources to establish management and monitoring tools appropriate for achievement of the objective.
What other parties can the Council realistically expect to influence to contribute to this outcome?	Mana whenua input is critical to the achievement of the objective. Science institutions and exponents in mātauranga Māori from throughout Aotearoa will also be required to contribute. There are opportunities and benefits in partnering with TAs, DOC, MfE and other central and local government agencies in the achievement of this objective.
What risks have been identified in respect of outcomes?	Mana whenua ability to engage is the most significant risk to this objective not being achieved. Increased call on iwi resources through Treaty settlement processes and the uncoordinated

	demands of Crown agencies has left many iwi with very limited capacity to respond. The approach outlined in this report identifies the advantages in resource management systems that incorporate iwi values for the benefit of the whole region. One particular benefit of doing so is to alleviate some of the demand placed upon iwi to respond on a day-to-day basis through their engagement in development of the policy approach, process and measuring tools.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes, inclusion of species, places and activities that connect communities to the environment is critical to achieving sustainable resource management objectives and enhancing mauri.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Resource users will need to understand impacts of activities on species and habitats and provide for these. This is likely to increase costs. Resource users and communities will be educated through achievement of new objective.
Existing objectives	
Are the existing objectives (include a list of objectives or relevant objective to the one being compared) still relevant or useful?	No the new objective has superseded the existing objective/s.

Table A6: Assessing the appropriateness of Objective O11 – Māori customary use

Objective O11	The opportunities for Māori use of the coastal marine area, rivers and lakes and their margins and natural wetlands for cultural purposes are recognised, maintained and improved
Relevance	
Directly related to resource management issue?	Yes, kaitiaki decision-making
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes

Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, particularly section 6(e)
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Yes, particularly RPS Objective 28 and Policy 49, Policy 2 of the NZCPS and NPS-FM Objective D1 and Policy D1.
Usefulness	
Will effectively guide decision-making?	Yes, this objective will guide the processing of resource consents for activities being undertaken in scheduled areas. It will also guide whitua committee decision-making.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective is a clear and complete sentence related to an issue. This objective is not time-bound as it aims to deliver benefits over time.
Consistent with other objectives?	Yes, all the objectives have been assessed, and work together to achieve the sustainable management of natural resources in the Wellington Region.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	Yes, the achievement of this objective will become clear in the future through monitoring and reporting on the effectiveness and efficiency of the proposed Plan.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	This objective is long term in that it seeks to recognise a fundamental and unique aspect of mana whenua relationships with the environment that has been missing from resource management.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	This will be achieved in partnership with mana whenua iwi and through the policies, rules, and other methods in the proposed Plan.
What other parties can the Council realistically expect to influence to contribute to this outcome?	All resource users Territorial authorities Government departments Mana whenua iwi

What risks have been identified in respect of outcomes?	There are risks associated with not recognising Māori customary use. Increased expectation that their values will be recognised associated with settlement require response, including resources.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes – this objective will have greater social and Treaty relationship benefits than the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Mana whenua and resource users—they will need to work together over time to negotiate how best to achieve the objective.
Existing objectives	
Are the existing objectives (include a list of objectives or relevant objective to the one being compared) still relevant or useful?	No, the operative objectives are not specific enough to address this natural resource management issue.

Table A7: Assessing the appropriateness of Objective O16 – Ngā Taonga Nui a Kiwa

Objective O16	The relationship of mana whenua with Ngā Taonga Nui a Kiwa is recognised and provided for.
Relevance	
Directly related to resource management issue?	Yes, this objective addresses issues pertaining to protection of sites and areas of significance to mana whenua and the role of iwi in decision-making.
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes, particularly sections 6(e) and 6(g).
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes.

Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Gives effect to NPS-FM (Objective D1 and Policy D1) and RPS (Objective 15 and Policies 21, 22 and 46).
Usefulness	
Will effectively guide decision-making?	Yes, this objective is a clear directive to decision-makers and resource users. Together with the schedule, it will effectively guide decision-making.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	The objective clearly states what is to be achieved, and specifically identifies those resources to which it refers. It relates to RPS Issue kaitiaki decision making and can be assessed.
Consistent with other objectives?	Yes.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	The achievement of this objective will be ongoing, and will be able to be assessed both at the specific case-by-case level, and at a more strategic level over time.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	The objective will be achieved over the life of the proposed Plan and beyond.

<p>Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?</p>	<p>Ngā Taonga Nui a Kiwa are the places that will be addressed in the whaitua chapters in the proposed Plan. The NPS-FM directly addresses the significance of the catchment-scale relationship and requires councils to;</p> <ul style="list-style-type: none"> a) involve iwi and hapū in the management of fresh water and freshwater ecosystems in the region; b) work with iwi and hapū to identify tangata whenua values and interests in fresh water and freshwater ecosystems in the region; and c) reflect tangata whenua values and interests in the management of, and decision-making regarding, fresh water and freshwater ecosystems in the region. <p>This is a clear directive for Council to engage directly with mana whenua and address their interests in regard to their most important relationships.</p> <p>Yes. The Council has, in collaboration with key stakeholders, developed the schedule which, in combination with the relevant policies, will contribute to the achievement of the objective. The Council has the staff to assess and issue consents which may involve assessment against the objective. The Council also has a productive and positive relationship with mana whenua in the region, which will also be important to achieve the objective over the long term.</p>
<p>What other parties can the Council realistically expect to influence to contribute to this outcome?</p>	<p>Mana whenua will be involved in the achievement of this objective, and also resource users with interests or activities in Ngā Taonga Nui a Kiwa</p>
<p>What risks have been identified in respect of outcomes?</p>	<p>Ngā Taonga Nui a Kiwa often involve large, multi-use sites and locations which are under multiple pressures. The achievement of other objectives, such as those that will be important to the achievement of this objective.</p>
<p>Reasonableness</p>	
<p>Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?</p>	
<p>Who is likely to be most affected by achieving the objective and what are the implications for them?</p>	<p>Stakeholders and resource users in locations and sites recognised as Ngā Taonga Nui a Kiwa.</p>

Existing objectives	
Are the existing objectives (include a list of objectives or relevant objective to the one being compared) still relevant or useful?	The existing objective (4.1.2) is relevant in that the operative plan aims to manage the effects of discharges on people's amenity values and their health and safety. The proposed objective has similar intent however, the operative objective requires a reduction in the nuisance effects on people's amenity values rather than having them managed, which does not necessarily require a reduction. In this respect the proposed objective is the most appropriate.

Table A8: Assessing the appropriateness of Objective O33 – Sites with significant mana whenua values

Objective O33	Sites with significant mana whenua values are protected and restored
Relevance	
Directly related to resource management issue?	Yes, Issue 1.9
Will achieve one or more aspects of the purpose and principles of the RMA?	Yes
Relevant to Māori environmental issues? (sections 6(e),6(g),7(aa),8)	Yes, particularly section 6(e)
Relevant to statutory functions or to give effect to another plan or policy (i.e. NPS-FM, RPS)?	Yes, particularly RPS Objective 28 and Policy 49, Policy 2 of the NZCPS and NPS-FM Objective D1 and Policy D1.
Usefulness	
Will effectively guide decision-making?	Yes, this objective will guide the processing of resource consents for activities being undertaken in scheduled areas. It will also guide whitua committee decision-making.
Meets sound principles for writing objectives? (specific; state what is to be achieved where and when; relate to the issue; able to be assessed)	This objective is a clear and complete sentence related to an issue. This objective is not time-bound as it aims to deliver benefits over time.

Consistent with other objectives?	Yes, all the objectives have been assessed, and work together to achieve the sustainable management of natural resources in the Wellington Region.
Achievability	
Will it be clear when the objective has been achieved in the future? Is the objective measurable and how would its achievement be measured?	Yes, the achievement of this objective will become clear in the future through monitoring and reporting on the effectiveness and efficiency of the proposed Plan.
Is it expected that the objective will be achieved within the life of the proposed Plan or is it an aspirational objective that will be achieved some time in the future?	It is expected that the protection clause of this objective will be achieved in the life of the proposed Plan, but the restoration aspects will require a longer timeframe.
Does the Council have the functions, powers, and policy tools to ensure that they can be achieved? Can you describe them?	This will be achieved in partnership with mana whenua iwi and through the policies, rules, and other methods in the proposed Plan.
What other parties can the Council realistically expect to influence to contribute to this outcome?	All resource users Territorial authorities Government departments Mana whenua iwi
What risks have been identified in respect of outcomes?	The risk to sites of significance to mana whenua will be reduced through the achievement of this objective.
Reasonableness	
Does the objective seek an outcome that would have greater benefits environmentally, economically or socially compared with the costs necessary to achieve it?	Yes – this objective will have greater environmental benefits than the costs necessary to achieve it.
Who is likely to be most affected by achieving the objective and what are the implications for them?	Mana whenua and resource users—they will need to work together over time to negotiate how best to achieve the objective.

Existing objectives

Are the existing objectives (include a list of objectives or relevant objective to the one being compared) still relevant or useful?

No, the operative objectives are not specific enough to address this natural resource management issue.

Table A9: Assessing alternative options – mana whenua relationships with air, land and water

		Option 1 – Status quo (no change from operative plans)	Option 2 – Amend provisions to be more directive and reflect strategic outcomes sought by proposed Plan (Preferred option)
Costs (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council	Costs incurred on an ad hoc basis for information requirements and input into resource consent processes	Additional costs to service kaitiaki groups and to resource Council staff to maintain and partnership relationship with mana whenua. Costs associated with resource consents are recoverable. Commissioning of external advice may be required, the costs for which will be recoverable from the applicant.
	Resource user (consent applicant or permitted use)	Costs associated with ongoing engagement with mana whenua stakeholders to maintain relationship.	Costs (moderate) associated with undertaking and participating in collaborative work to identify sites of significance. Ongoing costs (low to moderate) associated with maintaining and improving collaborative and positive relationship with mana whenua. Costs associated with processing applications for activities that trigger a consent because of non-compliance with permitted conditions designed to protect scheduled sites.

		Option 1 – Status quo (no change from operative plans)	Option 2 – Amend provisions to be more directive and reflect strategic outcomes sought by proposed Plan (Preferred option)
	Community costs (environmental, social, economic, cultural)	<p>Maintaining status quo position may result in sites of significance to mana whenua, and which also have significance and value to the community as a whole, being lost or degraded.</p> <p>Cultural integrity and identity and social values have the potential to be lost, undermined or degraded.</p>	<p>Costs associated with some applications triggering need for resource consent on basis of not complying with permitted conditions designed to protect scheduled sites. Costs will be resource consent fees, possibly public notification fees and hearing fees; commissioning expert cultural and other necessary advice; engagement and relationship building with mana whenua stakeholders.</p> <p>Additional development costs may be attracted in designing, or amending designs, to avoid, remedy or mitigate impacts on sites of value to mana whenua.</p> <p>Costs to Council will be provided through the general rates and therefore is a cost to the community.</p> <p>Preferred policy approach does not guarantee the avoidance of adverse effects on sites of significance to mana whenua (Policy P32), so environmental, social and cultural costs cannot be wholly avoided.</p>
Benefits (of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions)	Council		Adverse effects on sites of significance are managed better resulting in stronger relationships with iwi partners.

		Option 1 – Status quo (no change from operative plans)	Option 2 – Amend provisions to be more directive and reflect strategic outcomes sought by proposed Plan (Preferred option)
	Resource user (consent applicant/licensed operator or permitted use)	Light touch is relatively low cost. Status quo does not preclude positive engagement and collaboration with mana whenua.	Preferred approach enables Council to improve and develop its relationship and partnership with mana whenua stakeholders, and take a leadership role in the protection and restoration of sites of significance to mana whenua over the long term. The protection and restoration of sites of significance also contributes to the protection of other values identified as important to the regional community in the proposed Plan.
	Community benefits (environmental, social, economic, cultural)	Light regulatory touch and low cost for resource users and applicants.	Resource users and applicants enabled to undertake development and contribute to protection and restoration of cultural assets that benefit the wider community.
Efficiency (costs vs benefits) and effectiveness (will the provisions achieve the objective)		High profile sites of significance likely to be able to be protected where applications for discretionary or non-complying applications are made.	Communities will benefit from improved protection of sites of significance to mana whenua . Importance and value of such sites recognised at the outset. Other values indirectly associated with mana whenua values also protected. Cultural, historical and social integrity better protected.

		Option 1 – Status quo (no change from operative plans)	Option 2 – Amend provisions to be more directive and reflect strategic outcomes sought by proposed Plan (Preferred option)
<p>Risks (of acting or not acting) (If there is uncertain or insufficient information)</p>		<p>The operative freshwater plan (RFP) acknowledges the relationship of mana whenua with fresh water, and seeks to enable the identification of sites of significance through the proposed Plan, particularly operative Method 8.1.1. However, the light touch adopted through the operative plan has failed to ensure that the Plan's objectives in this respect can be achieved. Undoubtedly, Method M8.1.1 has been important to developing the groundwork for the draft Plan, but overall the status quo has, and will continue to be, ineffective in achieving the objectives and inefficient and the costs to cultural, social and environmental values will outweigh the benefits of the overall approach.</p>	<p>The preferred approach is more costly, in economic terms, than the status quo. Costs have and will fall to Council in preparing and maintaining the schedule of significant sites; in assessing applications that are made as a result of the provisions; and in maintaining and developing a productive and positive relationship with mana whenua in the region. Costs will also fall to developers and applicants that will need to take into account the impacts of development on sites of significance and design or relocate development accordingly. However, the benefits of implementing the provisions will far outweigh the economic costs. Benefits will accrue in terms of ensuring that important sites to mana whenua, and which also have resonance and value for the regional community as a whole, will be protected and restored under the proposed Plan. This reaffirms the region's cultural, historical and social identity, which is of significant benefit to the region. The proposed provisions are the most effective means of achieving not just Objective O25, but also other objectives in the proposed Plan with relevance to mana whenua outcomes, and will do so efficiently over the life of the proposed Plan.</p>
<p>Appropriateness (If it is efficient and effective then it must be appropriate)</p>		<p>At the time of the notification of the operative plan, Council's understanding of the location and nature of sites of significance to mana whenua was incomplete. The operative plan provided a set of provisions that sought to protect sites of significance as efficiently and effectively as was reasonable given the information available. The development of the schedule provides Council with certain information upon which to determine an alternative set of provisions that will be effective and efficient.</p>	<p>The work undertaken to develop the schedule of significant sites has provided a firm basis upon which to develop provisions which are directive and have the ability to achieve the objectives. To not act in the light of this information presents far more of a risk to the Council, mana whenua and the wider community than acting.</p>

		Option 1 – Status quo (no change from operative plans)	Option 2 – Amend provisions to be more directive and reflect strategic outcomes sought by proposed Plan (Preferred option)
Conclusions	This option is not appropriate as it fails to achieve the objective or meet the purpose of the RMA.	The new provisions are appropriate given the high level of efficiency and effectiveness for achieving the proposed Plan's objectives and meeting the purpose of the Act.	
	Option 1 is not considered to be the most effective or efficient means of achieving the proposed objectives or meeting the purpose of the RMA.	Option 2 is considered to be the most effective and efficient means of achieving proposed Objective 25, related objectives, give effect to the RPS and meet the purpose of the RMA.	

The Greater Wellington Regional Council's purpose is to enrich life in the Wellington Region by building resilient, connected and prosperous communities, protecting and enhancing our natural assets, and inspiring pride in what makes us unique

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