

Before the Independent Hearings Panel at Gore District Council

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing Submissions and Further submissions on the Proposed
Gore District Plan.

**Right of Reply planning evidence of Tina Carlson-McColl on behalf of Gore District
Council for Hearing Stream 12 – Final Hearing (Wrap up)**

Date: 3 April 2025

Introduction:

1. My name is Tina Carlson-McColl. My Section 42A report sets out my qualifications and experience as an expert in planning.
2. I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's practice Note 2023, as applicable to this independent hearing panel.
3. I have prepared this supplementary evidence to provide a response to expert evidence and statements presented in relation to the section 42A report – Final Hearing as well as any outstanding matters not captured under the s42A report.
4. In responding to submitter evidence, I have relied on advice from Ms Victoria Woodbridge, Dr Ann McEwan, Ms Mishka Banhidi, Ms Joanne Skuse and Ms Courtney Bennett. Where I have relied on technical support in responding to evidence this is noted in the relevant section.
5. This includes the evidence of:

McNab Management (S103)

- Josh Leckie
- Liz Rolph

Alliance Group (s121 & FS27)

- Doyle Richardson

PA & JE Johnstone Family Trust (S131)

- Robin Alexander Keith Miller (Origin Consultants Ltd)

Southland Province of Federated Farmers of New Zealand (S131 & S17)

- Rachel Thomas
- Bernadette Hunt

Recommendations Overview

6. The Section 42A report for the wrap up hearing intended to address any outstanding matters and assist the Hearings Panel in making final decisions on the submissions and further submissions and plan integration matters. I do not propose to repeat any of those matters here but instead focus on responding to submitters evidence, and in particular matters which remain in contention or are outstanding.
7. Recommended changes to the PDP chapters are listed in **Appendix A**.
8. Outstanding responses from Minute 9 questions are provided in **Appendix B**.

9. An updated Outline Development Plan for McNab is provided in **Appendix C**.
10. Evidence from Dr Ann McEwan in reviewing submitter S131 expert evidence is provided in **Appendix D**.
11. Further recommended changes to the PDP chapters that relate specifically to Ngāi Tahu Cultural Values-related provisions are included as **Appendix E**.

Note: these amendments in Appendix E are intended to be minor and consequential only, focused on consistency.

Detailed Responses to Evidence seeking changes to s42A Recommendations

Alliance Group Evidence

12. Doyle Richardson on behalf of Alliance Group Limited has reviewed and accepts the recommendations of the s42A report on relevant provisions.
13. This support is acknowledged, and no changes are recommended.

McNab Management Limited

14. Ms Victoria Woodbridge has provided the following response to Mr Josh Leckie and Liz Rolph on behalf of McNab Management Ltd.
15. Legal Counsel for McNab Management Ltd provided a Memorandum on 21 March 2025 identifying an error with Appendix C of the Section 42A report. The intention of Appendix C was to illustrate the zoning supported by the reporting officer which differs from that sought by the submitter.
16. The Memorandum confirms the submitter does not wish to pursue the Rural Industry Precinct and this is accepted. This means the consequential amendments to the PDP recommended at paragraph 168 of the Hearing Stream 12 Section 42A report would not be required.
17. As confirmed in Ms Woodbridge's right of reply dated 7 March 2025 there is general support for a Development Area approach, however, the extent of Light Industrial Zone (LIZ) is not supported.
18. The Outline Development Plan (ODP) provided by the submitter is accepted in part. However, it does not reflect the extent of zoning recommended by Ms Woodbridge in her Hearing Stream 8 Section 42A report (McNab) and Right of Reply dated 7 March 2025.
19. Therefore, in order to assist the panel, an amended ODP for the McNab Development Area is provided at Appendix C. This ODP shows the extent of zoning recommended along with some consequential amendments to the landscape buffer. An amendment to the colour of the Māori Purpose Zone (MPZ) is also included to ensure alignment with the National Planning Standards.
20. It should be noted that the purpose of the landscape buffer to the northern boundary of the LIZ is to assist in mitigating adverse effects from industrial activities on the General Rural Zone (GRUZ)

and MPZ taking into account the recommendations of the Ngā Hua o Āpiti Hono Tātai Hono report.

PA & JE Johnstone Family Trust

21. Robin Alexander Keith Miller, Director of Origin Heritage for Origin Consultants Ltd has provided expert evidence for PA & JE Johnstone Family Trust in relation to the scheduling of HH-81 Former Gore Dairy Factory at 146 Broughton Street, Gore, which the submitter opposes (S131.001). The submission is opposed by Heritage New Zealand (FS11.034). The submission was originally considered as part of Hearing Stream 8 and Historic Heritage¹, and was recommended to be rejected based on expert advice².
22. Mr Miller's opinion is that the building does not have significant heritage value, is in poor condition and only a small part of the building is original. He considers that the modern parts have no heritage value, and that the remaining parts no longer have any particular or sufficient heritage significance because of the significant modifications. He also considers that there is no heritage value in the setting.
23. Dr McEwan has reviewed Mr Miller's evidence, and her additional statement of evidence is provided in **Appendix D**. She considers that Mr Miller is incorrect to infer that the former Gore dairy factory is not one of the oldest extant factories in New Zealand, and that modifications to such industrial buildings are commonplace and do not automatically invalidate heritage significance.
24. Dr McEwan believes that Mr Miller has overstated the impact of the 20th century modifications to the building and remains of the opinion that the building merits scheduling as a historic heritage item within the Proposed District Plan (PDP). I accept Dr McEwan's advice and therefore reject the submission to remove the item from the heritage schedule.
25. It should be noted that in conjunction with HH-81 there is a Historic Dairy Factory Precinct (PREC9) in the underlying Medium Density Residential Zone which aligns with the heritage setting to acknowledge the historic use of the buildings and enable adaptive re-use for commercial activities and light industrial activities.
26. Although this is not my recommendation, if the panel is of a mind to accept the submission and remove HH-81 from HH-SCHED2, then the precinct provisions from the zone, maps and the 'How the Plan Works' section of the plan should also be removed as a consequential change, including the following:
 - How The Plan Works
 - Relationship Between Spatial Layers - Precincts

¹ Paragraph 91, Section 42A Report: Historic Heritage

² Paragraph 98, as above

- Medium Density Residential Zone
 - Overview and Purpose
 - MRZ-PREC9-O1
 - MRZ- PREC9-P1
 - MRZ-PREC9-R1
 - MRZ-PREC9-R2
- Planning Maps
 - Historic Dairy Factory Precinct PREC9

27. Consecutive numbering changes to the other items in HH-SCHED2 and the other precincts in the plan would also be required as a consequential change for plan integration, including in the 'How the Plan Works' section of the plan and maps.

Southland Province of Federated Farmers of New Zealand

28. Ms Courtney Bennett has provided the following response to Rachel Thomas and Bernadette Hunt on behalf of the Southland Province for Federated Farmers.

29. The management of Ngāi Tahu cultural values within the PDP was discussed at Hearing Stream 3 and Hearing Stream 9A. In terms of Sites and Areas of Significance to Māori, Ms Thomas and Ms Hunt highlight that the preferred relief of Southland Federated Farmers is that all sites and areas of significance to Māori within the district should be mapped. However, if the submission is not accepted then Ms Thomas and Ms Hunt preferred option is that specific values should be attributed to specific plan provisions.

30. The chapters which are of high interest to farmers and contain considerations of Ngāi Tahu cultural values as a matter of discretion are Ecosystems and Indigenous Biodiversity (ECO), Earthworks (EW) and the General Rural Zone (GRUZ).

Ecosystems and Indigenous Biodiversity

31. In terms of the Ecosystems and Indigenous Biodiversity Ms Thomas and Ms Hunt note a preference for removing width requirements from ECO-R1, and that if the Panel does not accept this then matters of discretion should not reference Ngāi Tahu cultural values. Matters of discretion in ECO-R1(2) are triggered where clearance widths/controls for fences, firebreaks, and commercial forestry outside SNAs/SIVAs are not met. Commercial forestry has its own specific matters of discretion which do not reference cultural values. There are also no specific matters of discretion for Ngāi Tahu cultural values apart from general reference to ECO-P7 and ECO-P10.

32. ECO-P7 (including the plan integration amendments in **Appendix E** shown in red) seeks to protect, enhance and restore Significant Natural Areas/SIVA by (1) Minimising the loss, fragmentation and reduction of... (d) the mauri of indigenous ecosystems, and 5) Enabling mahinga kai opportunities for mana whenua to express the following Ngāi Tahu cultural values of kaitiakitanga and mahinga kai exercise their customary rights and responsibilities and mana whenua responsibilities as kaitiaki in restoring, protecting and enhancing areas of significant indigenous biodiversity including identified taonga...
33. ECO-P10 seeks to maintain indigenous biodiversity across the district by...(4) Minimising adverse effects on, and encouraging mana whenua access to, areas of indigenous biodiversity which are significant to mana whenua....
34. As noted in the ECO s42A report³, ECO-P7 gives effect to NPS-IB 3.19(5) relating to taonga within SNAs and NPS-IB 3.3 and 3.5 relating to tangata whenua values not specifically addressed in other clauses. ECO-P7 also gives effect to NPS-IB Policy 1 relating to the principles of the Treaty of Waitangi and NPS-IB Policy 2 and SRPS Policy BIO.2 relating to kaitiakitanga. ECO-P10 (4) also gives effect to these same provisions. Consequently, it is not appropriate to remove reference to the cultural values addressed in ECO-P7 and ECO-P10 from the matters of discretion in ECO-R1(2).

Earthworks

35. In terms of Earthworks Ms Thomas and Ms Hunt raise concerns regarding a matter of discretion regarding “Impacts on Ngāi Tahu cultural values, including those listed in MW-2.3” for rules relating to drain clearance (EW-R4) farm related earthworks activities (EW-R7 to EW-R9) renewable electricity generation activities (EW-R11) and general land disturbance and earthworks activities (EW-R14). EW-R4 is recommended to be deleted⁴, and I will therefore not comment further on this provision.
36. Ms Thomas and Ms Hunt consider that the main concern of mana whenua with earthworks related to specified activities is in relation to the potential discovery of a taonga or artefact, which is covered separately within the PDP. I agree with Ms Thomas and Ms Hunt that Accidental Discovery Protocol is covered separately by earthworks standard EW-S7 and that all earthworks and land disturbance activities are subject to this standard. This is reflected in the policy direction EW-P4.5 (including the plan integration amendments in **Appendix E** shown in red) “Require *earthworks* to be appropriately designed, located and undertaken so that: ... accidental discovery protocol as listed in xx-inclusive of Ngāi Tahu tikanga and values is followed in the event of discovery of sensitive material or unknown archaeological sites”. However, although the standard manages accidental discovery protocol, this is not the only concern in relation to Ngāi Tahu cultural values.

³ Paragraph 455

⁴ Paragraph 68, Right of Reply planning evidence of Tina Carlson-McColl and Mishka Banhidi on behalf of Gore District Council for Hearing Stream 7 – Minute 27 National Planning Standards, Earthworks, Energy & Infrastructure Chapters, Dated 14 January 2025

37. Ms Thomas and Ms Hunt note Ngāi Tahu have stated concerns in relation to potential wāhi tapu discovery and impacts on natural landforms and landscapes (and mana whenua connection to these), and protection of mauri of whenua or wai, protection of wāhi tapu and mahinga kai values. These matters are reflected in the direction of policy EW-P5 (including the plan integration amendments in **Appendix E** shown in red):

Manage *earthworks* that are of a nature, scale or in a location where there may be adverse *effects* to ensure that: ... (2) the natural character of *rivers* and their margins are preserved and *water* quality, stream health, the intrinsic values of ecosystems, ~~Ngāi Tahu cultural~~ mauri and mahinga kai, and public *access* are maintained or enhanced; and (3) the design, location and undertaking of earthworks recognises and limits any adverse effects on Ngāi Tahu cultural values as listed in xx associated with the area, including whakapapa and a consideration of cultural landscapes, protects archaeological sites and cultural sites of significance and any wāhi tapu, ~~and limits any adverse effects on the underlying relationship Ngāi Tahu hold with the natural environment;~~

38. As set out above, I note that the only requirement that applies in relation to effects on cultural values for permitted activities is in relation to accidental discovery protocol (EW-S7), and that it is only when an activity is in breach of permitted activity rules, including bulk and scale limitations, that the matter of discretion will apply. As noted in the response to Minute 27, these limitations are considered relatively generous. I would also like to highlight that the specific example raised by Ms Thomas and Ms Hunt that drilling bores would exceed the volumetric limit is incorrect as volume does not apply to land disturbance activities, and an exemption to cut depths is recommended for drilling of bores⁵. I consider that the specific direction the submitter is seeking is already provided for within the earthworks policy provisions, and that it is not appropriate to split these out and list matters within the matters of discretion, as the assessment would be on a case-by-case basis and different matters may, or may not, be relevant for the specific activity.

General Rural Zone

39. In terms of the General Rural Zone Ms Thomas and Ms Hunt request changes to GRUZ-R3⁶, GRUZ-R4⁷, GRUZ-S7⁸ and GRUZ-S8⁹.
40. SFF request the matter of discretion relating to cultural values is removed from GRUZ-R3 in relation to farm quarries. GRUZ-R3 provides a permitted pathway for farm quarries subject to

⁵ Appendix A - Earthworks Chapter Option A, as above

⁶ GRUZ-R3 Quarrying Activities

⁷ GRUZ-R4 Rural Industry Activities

⁸ GRUZ-S7 Setbacks from stream and river

⁹ GRUZ-S8 Building Height

compliance standards.¹⁰ Exceeding these standards will require consent as a restricted discretionary activity. It is considered the permitted pathway provides for farm quarries to operate largely without the need for consent. Earthworks and ground disturbance have the ability to affect the values of concern to mana whenua and so this matter of discretion is recommended to remain.

41. In relation to GRUZ-R4, SFF seek the reference to GRUZ-S7 and GRUZ-S8 is removed, as non-compliance with these standards requires assessment against cultural values. Both these standards would be applicable to buildings and structures associated with the rural industry activity. Regardless of the use of the building, GRUZ-S7 intends to manage proximity to waterways and GRUZ-R8, the height. As such, the same concerns to mana whenua apply. No changes are recommended to GRUZ-R4.
42. Given the above, no changes are proposed to GRUZ-S7.
43. The wording of the matter of discretion within GRUZ-S8 is proposed to be amended as shown within **Appendix E** as follows:

Impacts on views ~~of to and between features of importance to mana whenua-The Mataura Falls, Hokonui Hills, and/or Tukurau.~~

44. Regarding height, mana whenua seeks to protect their whakapapa connection with natural features and areas, such as the Hokonui Hills, by maintaining appropriate building heights in the rural zones, where large areas of open space and low built form is anticipated, enabling connections to the natural features to be maintained.
45. The amended wording is a better reflection of this concern and adds consistency across provisions. Due to time constraints however, it is important to note that these amendments have not been discussed with Hokonui Rūnanga.

Servicing standard

46. In terms of the additional matter of discretion relating to Ngāi Tahu cultural values for the servicing standard, Ms Thomas and Ms Hunt consider that cultural values have no place in connecting to council services. However, an activity connecting to Council reticulation would be permitted under the servicing standard. The servicing standard is proposed to manage the effect on the environment when a development is potentially not being appropriately serviced, and the matters of discretion would only apply if in breach of the standard. The matter of discretion relating to Ngāi Tahu cultural values is considered appropriate in this context, and no change is recommended.

¹⁰ The total area of extraction open at any one time does not exceed 1,500 m²; and the activity is set back 100m from a sensitive activity; and the area is progressively stabilised, filled or recontoured; and any building or structures associated with the activities comply with the GRUZ standards.

Final Outstanding Matters

Resource Management reform

47. The Section 42A report for the final hearing included some detail of the potential RMA reform for context. Since the writing of the report the government has made some further announcement relating to the resource management system reform. A summary of these is included below for the panel's information. The panel should however note that the outline of potential future changes has no legal standing and should therefore have no weighting in decision making until any new direction comes into force. The following reform 'blueprint' is proposed:
48. The Government's resource management reform will replace the Resource Management Act 1991 (RMA) with two new pieces of legislation:
- A Natural Environment Act – focused on managing the natural environment
 - A Planning Act – focused on planning to enable development and infrastructure.
49. The new system is intended to:
- Narrow the scope of the system, with the enjoyment of property rights as the guiding principle. This includes the approach to effects management based on the economic concept of externalities, and effects that are borne solely by the party undertaking the activity will not be controlled. It is proposed to potentially lift the effects threshold to 'minor' or 'more than minor' adverse effects, and reduce the number of consent categories, with non-complying statuses being removed.
 - Strengthen the role of environmental limits and provide a clearer legislative basis for setting them in order to provide more certainty around where development can and should be enabled, whilst protecting the environment.
 - Provide nationally set standards including standardised land use zones to be used to simplify the system.
 - Strengthen compliance monitoring and enforcement after the activity, involving consideration of an entity like the Environmental Protection Authority to perform compliance and enforcement functions instead of Councils.
 - Introduce combined regional plans including spatial plans, with plan chapters being developed by each local authority, collated and accessed as a national e-plan.
 - Establish a new planning tribunal for low-cost dispute resolution.
 - Uphold Treaty of Waitangi settlements and the crown's obligations. The intent is that there will be a descriptive clause instead a generic Treaty clause, that will recognise the Treaty of Waitangi and the uniqueness of the settlements entered into by Iwi with the Crown.

KiwiRail map layers

50. The Section 42A report for the final hearing noted two map amendments in relation to rail corridor, one being an alteration to Designation KRH-1¹¹, and the other a Rail Corridor Vibration Alert Layer to be included as an information only layer¹². KiwiRail has confirmed that they will provide these map layers for the final hearing.

Alterations to NZTA state highway designations

51. The Section 42A report for the final hearing noted that the requested alteration to the state highway designation boundaries was reject based on legal advice, and it was suggested to the submitter that a Notice of Requirement process could be initiated to catch up with the decisions¹³. However, no Notice of Requirement seeking the change has been lodged by the requiring authority to date, and the submitter has confirmed they will not pursue the alteration to the designations before the decisions.

Alterations to Ngāi Tahu cultural values related provisions

52. The Section 42A report for the final hearing highlighted that a number of minor and consequential changes to plan provisions were necessary to ensure matters relating to Ngāi Tahu cultural values are referenced and discussed in a consistent way throughout the Plan. These amendments are not intended to change the intent of any provisions – rather, they are to add consistency in terminology, phrasing, and specificity across all chapters.

53. Ms Bennett has included these changes as a table in **Appendix E**. The reasoning for each amendment is given within **Appendix E**, but most amendments are for one of the following reasons:

- Cross-referencing Ngāi Tahu cultural values-related provisions back to the exhaustive list of these values to provide certainty for plan-users
 - Note: As the final location of this list is yet to be decided by the Panel, these amendments use the placeholder ‘xx’.
- Rewording provisions to replace bespoke wording with defined terms to add clarity for plan-users
- Replacing te reo Māori terms that have been used in error with the appropriate term
- Standardising references to Ngāi Tahu cultural values to add clarity for plan-users

¹¹ Paragraph 188

¹² Paragraph 190

¹³ Paragraph 113

- Minor rewording or reformatting of provisions to add clarity, remove repetition, and/or improve conciseness
- Updating cross-referencing

54. Due to time constraints, it is important to note that these amendments have not been discussed with Hokonui Rūnanga. Where there is a concern that a recommended amendment may potentially deviate from wording already discussed in Hearing with Hokonui Rūnanga, this is highlighted in the **Appendix E** table, and comment is welcomed.

Activity Statuses

55. The clarification of plan relationships between rules, standards and activity statuses was addressed in Section 8.2 of the Section 42A report for the final hearing, and included a recommendation to amend the 'How the Plan Works' section to clarify these relationships for plan users, as follows:

The activity status is set by the rule, and may be subject to conditions, including compliance with standards. The standards only apply when there is a rule requirement for them to apply. The standards also have associated activity statuses for non-compliances. Where a standard has a different activity status than the rule, the more restrictive status applies.

56. The reason that the activity statuses for non-compliance is located within the standards as well as the rule, rather than only within the relevant rule, is that including the standard activity statuses within the rule would potentially make the rules longer and more difficult to read where these are more complex rules with multiple conditions, standards and activity statuses.

57. The Panel has queried a potential inconsistency between GIZ-R9 and NOISE-S3 as an example. We do not consider this to be an 'inconsistency', rather the rule framework has been applied intentionally for the reasons Ms Woodbridge as the chapter author has outlined below:

- a. GIZ-R9 is for residential activities within the General Industrial Zone. GIZ-P4 is clear that residential activities (which may result in reverse sensitivity effects) should be avoided. GIZ-R9 therefore, appropriately, has a non-complying activity status if the specified conditions are not met. There is only one activity status as there is a general presumption against residential activity if the listed conditions are not met. This includes GIZ-R9(5), which, if not met has the potential to increase reverse sensitivity effects because of potential internal noise levels.
- b. NOISE-S3 applies to a range of zones and is applicable to 'sensitive activities' which are defined in the PDP. It has a Restricted Discretionary Activity Status because the matters to be considered are generally known / understood and can, therefore, be confined to those listed.

58. Another example of where NOISE-S3 is triggered is MUZ-R10 which enables residential activities subject to limits. In this rule there is a general presumption that residential activities are enabled

and the limits are relatively benign. Unlike GIZ-R9 where there is a general presumption that residential activities should be avoided unless they are confined to those limited conditions. For this reason, MUZ-R10(6) does trip to Restricted Discretionary with the only matter of discretion being those listed for NOISE-S3. This is appropriate because noise levels within the MUZ are anticipated to be slightly higher than residential zones because of the range of activities permitted but not as high as the General Industrial Zone, where, as noted there is a general presumption against residential activities due to higher potential for reverse sensitivity effects.

59. In summary, the RDA status for NOISE-S3 is appropriate given it covers a range of activities within a range of zones and the matters to be considered are known and confined. However, there are bespoke zone provisions which may trigger a need to comply with NOISE-S3 where non-compliance has the potential for greater adverse effects (such as GIZ-R9). As such a higher activity status is proposed for that zone rule given that the more restrictive activity status will always be applied. It is not considered necessary to draft NOISE-S3 with a range of activity statuses as this would make the rule unnecessary complicated and lengthy. Instead, as noted above the more restrictive activity status of the rule applies and the 'How the Plan Works' Section of the PDP explains this.

Appendix A corrections

60. The following recommended changes to the District Plan Chapters were omitted from Appendix A in the s42A report- Final Hearing:

- Amend wellbeing to well-being listed in relevant chapter
- ASW, EW, NFL and ECO chapters listed changes include amendments to Notes
- Ngāi Tahu Cultural Values chapter included as a strategic direction chapter (with a note that it may be located under historical and cultural values section instead)
- Map layers listed in full, with changes noted

Omitted matters

61. The following outstanding matters were omitted from the S42A report for the final hearing.

Commercial Core Precincts standard

62. For Hearing Stream 2 and in a response to Minute 10 through supplementary evidence dated June 24, 2024, amendments to TCZ – S1 to allow for any new building development or alteration be designed so that the maximum ground floor area per tenancy is 250m² instead of 100m². It was noted in the evidence that an identical standard applies in the Local Centre Core Precinct, and that as a consequential change may be required for consistency between the chapters, as shown below:

LCZ-S1	Activities within the Core Precinct
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All activities within PREC4 Local Centre Core Precinct

Any new building development or alteration must be designed so that:

1. The maximum ground floor area per tenancy accessible to the public shall not exceed:
 - (a) ~~100-250~~ square metres; and
 - (b) 10 metres in frontage width.

Note: the above dimensions are retail activity dimensions, not the building dimensions.

Activity status where compliance is not achieved:

Restricted Discretionary

Matters of discretion:

1. Whether the activity contributes positively to the vibrancy of the town centre and/or the fine grain retail experience of the Core Precinct.
2. The ability to reuse and adapt an existing *building* for the activity.
3. Whether the *site* has multiple *road boundaries*, and if the *building* design or modulation can retain the integrity of the character of the town centre core precinct.
4. The nature, location and design of existing development and the compatibility with anticipated scale, proportion, and context of activities in the surrounding area.

Minute 9 questions

63. Following Hearing Stream 1 in relation to the Introduction and General Provisions of the PDP (excluding Mana Whenua) and the Urban Form and Development chapter hearing the Panel issued Minute 9 (dated 13 June 2024).
64. A number of points were raised by Commissioner Bartlett in Minute 9 and some were deferred to subsequent hearing streams in the response by Matt Heale (27 June 2024, Right of Reply Appendix 4). To ensure the response to the panel is complete, the section authors, including Matt Heale, Victoria Woodbridge, Mishka Banhidi and Tina Carlson-McColl have subsequently reviewed these questions and provided commentary in **Appendix B** of this evidence.

Definitions

65. Following Hearing Stream 10 in relation Ecosystems and indigenous Biodiversity, and Hearing Stream 9A for how matters relating to Ngāi Tahu cultural values are referenced in the plan the definition for ‘mana whenua cultural purpose’ is no longer used and should therefore be deleted from the definitions table in the Interpretation chapter, as shown below:

M		
	...	
	~~mana whenua cultural purpose~~	~~Means those matters covered in MW — 2.3~~