

BEFORE THE

Gore District Council

IN THE MATTER OF

Resource Management
Act 1991

AND

IN THE MATTER OF

Hearing Stream 9A:
Reconvened Sites and
Areas of Significance to
Māori and Ngāi Tahu
Cultural Values

Response to Supplementary Statement of Evidence of Amy Elizabeth Beran for
Hokonui Rūnanga Incorporated (dated 12 February 2025)

**STATEMENT ON BEHALF OF THE SOUTHLAND PROVINCE OF FEDERATED
FARMERS OF
NEW ZEALAND**

**Submitter number 126
Further submitter number 17**

Dated 28 March 2025

INTRODUCTION

1. This response has been prepared by Rachel Thomas and Bernadette Hunt on behalf of the Southland Province Executive for Federated Farmers (**SFF**). Our qualifications and experience is provided in the evidence submitted for Hearing Stream 1.
2. SFF presented at Hearing Stream 9A of the Gore Proposed District Plan (**PDP**).
3. For the purposes of this memorandum, we have for the most part utilised the s42A Author(s') proposed amended versions of the chapters in question. These are located within the relevant hearing chapter pages on the PDP website.¹
4. We offer our thanks for the Panel for facilitating our request to further address Ms Beran's Supplementary Statement. We appreciate the opportunity to provide feedback and request to be involved in any future drafting or amendments to the PDP which may be of concern to the rural community of the Gore District.
5. The Panel will be aware of the recent announcement to replace the Resource Management Act 1991 (RMA) with a Planning Act and a Natural Environment Act. This is of high relevance to the PDP given the underlying principle of the enjoyment of private property rights and identification of regulatory takings within the new Acts. The intention of regulatory takings is to ensure that councils do not use a rough paintbrush to blanket areas with overlays that impose restrictions on private property, such as sites and areas of significance to Maori (SASMs). Where this does occur, there may be mechanisms to require councils to pay for this privilege. As such, the Panel should be cautious about its approach to SASMs.
6. The notified PDP effectively mapped the entire district as a SASM which, under the new Acts, could result in an incredibly expensive exercise for the Council if regulatory takings are imposed. While there are no SASMs, by removing the clause which implied the entire district was a SASM, the approach is unchanged. The pDP still implies that the entire district is of significance due to the ability to assess several activities against cultural values. This could mean that the Council is subject to regulatory takings under

¹Available at: [Hearing topics and schedules | Let's Talk Gore District](#)

this approach and enforces our argument that SASMs must be carefully considered and mapped.

RELIEF SOUGHT

7. SFF has maintained its preferred relief throughout the PDP process that mapped SASMs are included within the plan. In our statement of evidence² we provided a pathway for SASM mapping recommending the identification of *known sites* be carried out in addition to the inclusion of a method within the SASM chapter for a future work policy. This policy would commit the Gore District Council (**GDC**) to the mapping of all other sites and areas of significance with a traffic light system for consenting.³
8. SFF maintains its preferred relief that all sites and areas of significance to Māori within the district should be mapped. Site mapping is a bottom line for our members to provide certainty over their land use, future development and cost/processing of resource consents. Our arguments, and legal submissions, on this have been well canvassed throughout the PDP process and we will not repeat these here. This response addresses only the specific matters which the Panel has requested feedback on.
9. Please note that nothing in this response statement signifies our acceptance with a district plan that does not contain site mapping.
10. However, the Panel has provided SFF a further opportunity to comment on a scenario where mapping would not form part of the final plan. This scenario may include a set of recommendations put forward by Ms Amy Beran for Ngāi Tahu⁴ which seeks to address the concerns within the SFF evidence⁵ alongside additional concerns raised by Hokonui Rūnanga relative to the inclusion of cultural matters in the entire PDP. This proposal (**the Ngāi Tahu Proposal**), being the deletion of the SASMs chapter in favour of a new Ngai Tahu Cultural Values Chapter (NTCV) and substantial amendments to the Mana Whenua Chapter, is the subject of consideration within this memorandum.

² dated 28 January 2025

³ SFF Evidence for HS9A, at paragraph 25

⁴ dated 12 February 2025

⁵ dated 28 January 2025

CULTURAL VALUES

11. The treatment of cultural values within the PDP has been subject to much debate regarding where the values can and should be located within the plan (Mana Whenua, NTCV or SASM chapter), how they apply and what they contain.
12. SFF has not attempted to provide comment on what the values are because we accept it is Mana Whenua's role to determine the values they hold within the Gore District, in the same way that it is the role of the farming community to determine matters of importance to them. We acknowledge that the economic interests of the farming sector and prioritisation of private property rights can be in opposition to the cultural interests of Māori. However, it is our opinion that site mapping would support both aspects of economic and cultural well-being through clear identification of significant areas that farmers can easily locate and understand, and therefore manage effects of activities on their land accordingly.
13. In the absence of site mapping, we are particularly concerned in how the values are applied in the plan context and within specific provisions. The Ngāi Tahu Proposal provides (for the first time in the PDP process) an assessment of which specific values apply to specific plan provisions. This is something that we requested through our evidence, and we have found this analysis incredibly useful in understanding the concerns of Mana Whenua relative to farming activities, such as earthworks.
14. When applying for a consent, a farmer should not need to pay for consultant advice in every single circumstance. If it is a simple consent, farmers should be able to read the plan and understand what they need to include in their application. Unfortunately, the complex nature of resource management planning means this is rarely the case, and farmers are increasingly utilising costly consultants for even the most straight-forward of consent applications to ensure they do not get tripped up by planning provisions which lack clarity and could end up costing them more money if they misunderstand anything. Furthermore, applying for consents is a lengthy process which often incurs significant delays.
15. Most farmers will not have a good understanding of cultural effects and how they can be managed. Therefore, it is beneficial to provide information within the District Plan regarding the types of cultural effects to be managed in terms of each type of activity.

A farmer should be able to pick up the plan and understand why a certain activity, for example earthworks needed for a silage pit, may be of concern to Mana Whenua. This is important for plan provisions that specifically require consideration of cultural values as a matter of discretion.

16. Clear incorporation of cultural values and how they apply within the plan will benefit landowners, the Council and Rūnanga in the processing of applications by ensuring limited resources are focussed where the risk to cultural values is the greatest. Within the notified PDP, the values sat within the Mana Whenua Chapter without clarity on which specific values applied to which activity. There have been attempts to address this by Ms Beran in proposing a specific list of activities within MW-P1 and then refined through NTCV-P1, however we have concerns with how these policies have been drafted as detailed in our evidence.
17. The exercise carried out within the Ngāi Tahu Proposal to assess values against specific activities (Appendix G) has shown that some of the notified values were not required (utu and te reo Māori) which emphasises why it is crucial to gain an understanding of which values apply to which activities.
18. While we maintain our preferred relief that all sites of significance are mapped, if the Panel is not minded to accept this recommendation, then the following options apply to the application of cultural values within the plan:
 - (a) Status quo – values remain within an overarching chapter (Mana Whenua or NTCV)
 - (b) Values are specified relative to each plan provision where Ngai Tahu cultural values assessment is a matter of discretion. Chapter specific values are also provided in the chapter overview to provide guidance for discretionary or controlled activities (SFF preferred option in the instance where the preferred relief is not accepted).
 - (c) Values are specified per chapter. Chapter specific values are provided in the chapter overview to provide guidance for restricted discretionary (where Ngai Tahu cultural values assessment is a matter of discretion), discretionary or controlled activities.

19. Our preferred option for how the values are presented in the plan is (b) as it provides the most clarity and certainty for plan users, Council and Rūnanga. For plan users, they will be able to understand the specific cultural effects that GDC are seeking to manage, for Council processing staff they will be better equipped to provide advice to applicants on which values may be considered and whether Hokonui Rūnanga need to be involved in the assessment of the application, and for Hokonui Rūnanga the process will be more streamlined and consistent if their consideration is sought. Valuable resources can be focussed to where the risk to cultural values is the greatest. Option (b) also ensures consistency when there are changes in staff at both Council and Rūnanga.
20. We believe there are significant risks in maintaining the approach as notified where no values are attributed to specific plan provisions (Option (a)). Risks include lengthy and expensive consent applications, additional resource required to decipher which values apply for Council processing officers and Hokonui Rūnanga staff, and inconsistent application of provisions which could lead to legal challenge.

CHAPTERS AND PROVISIONS OF GREATEST CONCERN TO FARMERS

21. We have conducted an assessment which allocates specific cultural values per chapter (Appendix 1). This has been carried out by looking at the values detailed in the 'outcome of revision' column within the table in Appendix G. We have then considered the likely level of interest for farmers.
22. From this analysis, there are three chapters of high interest to farmers where values apply, two chapters of medium interest, and 21 chapters of lower interest. We have categorised these in further detail in Appendix 1.
23. The chapters which are of high interest to farmers and contain assessment against cultural values as a matter of discretion are Ecosystems and Indigenous Biodiversity (ECO-IB), Earthworks (EW) and the General Rural Zone (GRUZ).
24. It is important to note limitations of this assessment:
 - (a) That it is high-level and some farmers may have an increased level of interest in some chapters over others.

- (b) That we have not considered discretionary activities where, under the current wording in the PDP, any or all the cultural values may be considered. The nature of these activity classes means that any matter can be considered within assessment therefore it would not be beneficial for our analysis to include these.

Table 1 - Chapters which contain a requirement to assess cultural values as a specific matter of discretion against the estimated interest level of farmers

	Low	Medium	High
Values apply	Energy Infrastructure Transport Historic Heritage Signs Temporary Activities Large Lot Residential Zone General Residential Zone Settlement Zone Neighbourhood Centre Zone Local Centre Zone Mixed Use Zone Town Centre Zone Light Industrial Zone General Industrial Zone Natural Open Space Zone Sport and Active Recreation Zone Airport Zone Māori Purpose Zone Camp Columba Zone Field Days Zone	Subdivision Rural Lifestyle Zone	Ecosystems and Indigenous Biodiversity Earthworks General Rural Zone
Values do not apply directly	Urban Form and Development Hazardous Substances Contaminated Land Notable trees Activities on the Surface Water Light Noise Medium Density Residential Zone	Natural Hazards Public Access	Sites and Areas of Significance to Māori ⁶ Natural Features and Landscapes ⁷

⁶ Values do not apply to specific activities as chapter is high level with no site mapping.

⁷ The Ngai Tahu Proposal states that *the inclusion of a specific matter of discretion (for RD rules) is not needed as where an identified natural feature or landscape holds cultural values these will be listed in NFL-APP appendix 5.*

Ecosystems and Indigenous Biodiversity (ECO-IB)⁸

Plan Provision	SFF recommendation
ECO-R1	As per evidence presented at Hearing Stream 10, remove all width restrictions, OR remove cultural values assessment as a matter of discretion

25. ECO-R1 covers indigenous vegetation clearance and land disturbance including many activities which are crucial for farmers such as fencing and farm tracks. Consideration of cultural values is triggered where permitted activity conditions cannot be met.
26. SFF has continually argued that the width clearances proposed within ECO-R1 for farming activities such as fencing and vehicle tracks are too restrictive. As such, if the permitted activity conditions cannot be met the activity becomes restricted discretionary and consent is required which could include assessment against cultural values. We note that ECO-R1 is not drafted in the same way that other plan provisions are, in requiring ‘assessment against cultural values listed in...’ the Mana Whenua or NTCV chapter.
27. If our recommendation to remove the width requirements in ECO-R1(1) are not accepted by the Panel, then it becomes even more important to ensure that the matters of discretion are not overly onerous and are clearly stated within the rule. Such is the purpose of a restricted discretionary activity as per s87A of the Resource Management Act 1991 which states that the power to grant or decline a consent for a restricted discretionary activity is *restricted to the matters over which discretion is restricted*.
28. It is our preference that the permitted activity conditions do not unnecessarily restrict farmers and that any direct or indirect requirement to consider cultural values is removed from ECO-R1.

⁸ The s42A version of the ECO-IB chapter has been utilised for this analysis. It is titled *Appendix A – Recommended PDP Text Changes* and was accessed via [Hearing Stream 10 - Biodiversity | Let's Talk Gore District](#)

Earthworks (EW)⁹

Plan Provision	SFF recommendation
EW-R4	Remove EW-R4. Alternatively, remove cultural values assessment as a matter of discretion
EW-R7, R8, R9	Remove cultural values assessment as a matter of discretion. Alternatively, specify that the cultural value to be considered is wahi tapu
EW-R11	Remove cultural values assessment as a matter of discretion. Alternatively, specify that the cultural value to be considered is wahi tapu
EW-R14	Remove cultural values assessment as a matter of discretion. Alternatively, reassess the cultural values applicable to EW-R14 and specify these within the rule

29. The recommendation from the s42A Report is to remove EW-R4 but we note that it is included in Appendix G. A matter of discretion for EW-R2¹⁰, R3¹¹, R4¹², R5¹³ and R6¹⁴ is impacts on Ngāi Tahu cultural values. Appendix G recommends removal of EW-R2, R3, R5 and R6. The only remaining rule therefore is EW-R4 and if the Panel accepts the recommendation to remove EW-R4 then there are no remaining concerns relative to this group of rules.
30. EW-R7¹⁵, R8¹⁶ and R9¹⁷ provide permitted activity status and where compliance is not achieved defaults to restricted discretionary. A matter of discretion is impacts on Ngāi Tahu cultural values. These rules are all crucial for on-farm operations, relating to earthworks for silage pits, dead holes and rubbish pits, and farm tracks and infrastructure.
31. We understand the main concern with earthworks related to these activities to be in relation to the potential discovery of a taonga or artefact. However, there are already

⁹ The following assessment utilises the amended EW chapter titled *Appendix A – Earthworks chapter* accessed from [Hearing Stream 7 - Activities on the Surface of Water, Earthworks, Infrastructure, and Energy | Let's Talk Gore District](#)

¹⁰ EW-R2 refers to *Test pits or boreholes necessary as part of a geotechnical assessment*

¹¹ EW-R3 refers to *Installing septic tanks and associated drainage fields*

¹² EW-R4 refers to *Disposal of spoil from drain clearance work within the site the drain is located*

¹³ EW-R5 refers to *Replacement, removal and installation of underground storage tanks*

¹⁴ EW-R6 refers to *Service connections*

¹⁵ *Digging of dead holes and farm rubbish pits*

¹⁶ *Earthworks for silage pits*

¹⁷ *to Earthworks for the construction, maintenance and repair or upgrade of a farm track or farm infrastructure*

provisions within the PDP, such as the Accidental Discovery Protocol (ADP) relative to the Heritage New Zealand Pouhere Taonga Act 2014 and Ngāi Tahu ki Murihiku Accidental Discovery Protocol (**ADP**), which satisfy this requirement.

32. The Ngāi Tahu Proposal notes that specific concerns regarding these rules are in relation to potential wāhi tapu discovery and impacts on natural landforms and landscapes (and mana whenua connection to these). Appendix G states, relative to EW-R7, R8, R9, R10 and R11:

Given that earthworks activities could involve large areas of earthworks being undertaken at any one time and works could involve excavation to significant depths below ground level, mana whenua hold concerns regarding potential wāhi tapu discovery and impacts on natural landforms and landscapes (and mana whenua connection to these).

33. As we have argued that specific values should be attributed to specific plan provisions, when considering the values specified in Appendix D of the Ngāi Tahu Proposal (the revised Mana Whenua Chapter), it would seem that the intention is for the value of wāhi tapu to be considered in any cultural assessment that may be required. As earlier mentioned, the ADP set out in the PDP provides sufficient protection therefore we see no need to require farmers to obtain an assessment against the value of wāhi tapu, which could increase their consent costs significantly.
34. EW-R10¹⁸ applies to earthworks for walking and cycling tracks and therefore is not of immediate concern to farmers. EW-R11¹⁹ applies to earthworks and land disturbance for network utilities or renewable electricity generation activities (emphasis added to reflect the s42A recommendation). A matter of discretion where permitted activity conditions are not met and the activity becomes restricted discretionary, its impacts on Ngāi Tahu cultural values.
35. Nationally, many farmers are looking to renewable electricity generation, such as solar power installation, as cost-effective methods to transition away from fossil fuels. These

¹⁸ Earthworks for the construction, upgrade or maintenance and repair of the transport network and recreational walking and cycling tracks

¹⁹ Earthworks and land disturbance for network utilities or renewable electricity generation activities, including associated vehicle access tracks

activities should not be unnecessarily restricted as there are positive environmental benefits from renewable energy.

36. EW-R14 provides exceptions for earthworks and land disturbance activities not otherwise provided for within the EW chapter. A matter of discretion where permitted activity conditions are not met and the activity becomes restricted discretionary, is impacts on Ngāi Tahu cultural values. Through Hearing Stream 11, we expressed concerns with the specified volume of earthworks permitted. It is likely farmers may need consent for activities that exceed the volumetric limit, such as drilling bores.
37. Appendix G specifies the values of concern relative to EW-R14 to be *protection of mauri of whenua or wai, protection of wāhi tapu and mahinga kai values*. If considering the values in Appendix G to the values in the PDP, it seems the intention is that the following apply: mauri, whenua, wai, wāhi tapu and mahinga kai. As EW-R14 is proposed to now include specified exceptions, the list of values should be revisited.
38. The SASM hearing occurred prior to the EW (further information) hearing where EW-R14 was discussed. It was stated within Appendix G that:

Given the uncertainty with the types of works that might trigger this rule, mana whenua supports the ability to consider future applications on a case-by-case basis.
39. The values applicable to EW-R14 should therefore be reassessed in light of the s42A recommendation to specify the exemptions within the rule.

General Rural Zone (GRUZ)²⁰

Plan Provision	SFF recommendation
GRUZ-R3	Remove cultural values assessment as a matter of discretion
GRUZ-R4	Remove reference to GRUZ-S7 and S8
GRUZ-S7	Specify the specific values of concern
GRUZ-S8	Remove Matter of Discretion (3) (Impacts on views of The Mataura Falls, Hokonui Hills, and/or Tuturau)

²⁰ [Hearing Stream 3 - Mana Whenua and the Rural Zones | Let's Talk Gore District](#)

40. GRUZ-R3²¹ relates to quarrying activities, providing permitted activity status including in relation to farm quarries. Where compliance with activity standards is not achieved, it becomes a restricted discretionary activity with a matter of discretion as impacts on Ngāi Tahu cultural values. We submitted that farm quarries should be excluded, however our submission was not accepted by the s42A author.
41. GRUZ-R4²² relates to rural industry and contains restrictive conditions within the permitted activity rule. It is noted that assessment against cultural values is not listed as a matter of direction where permitted activity conditions cannot be met. However, compliance with GRUZ-S7²³ and GRUZ-S8²⁴ triggers assessment against cultural values. GRUZ-S8 relates to setbacks from stream and river.
42. We understand the cultural associations Mana Whenua hold with waterways, but plan provisions must be practical for farmers without needing consent and cultural approval for every activity. In this instance, the rule under consideration (GRUZ-R4) is relative to the establishment of rural industry within the GRUZ. We question what cultural effects regarding waterways are intended to be managed with the location of rural industry. The location of rural industry brings economic benefits including job creation and should not be unnecessarily constrained.
43. GRUZ-S8 relates to height and a matter of discretion is listed as *Impacts on views of The Mataura Falls, Hokonui Hills, and/or Tutarau*. Again, there is no rationale as to why height should be controlled relative to cultural effects.

NEW MATTERS OF DISCRETION PROPOSED

44. Ms Beran proposes amendments to the following zone standards relating to servicing of developments, to include assessment against cultural values as a matter of discretion for:
- (a) LLRZ-S2
- (b) GRZ-S2

²¹ *Quarrying Activities*

²² *Rural Industry*

²³ *Setbacks from stream and river*

²⁴ *Height*

(c) SETZ-S3

45. Cultural values have no place in connecting to council services. In practice this would mean the servicing of every single new development would require assessment of cultural values as the standards relate to drinking water and wastewater. We presume iwi interests may lie onsite wastewater management, rather than any connections to the reticulated network.
46. Ms Beran proposes amending GRZ-S2 to include additional wording: *‘potential impacts on Ngāi Tahu cultural values as outlined in this chapter’*. ‘Ngāi Tahu cultural values’ are mentioned five times within the chapter and ‘Mana Whenua’ is mentioned once. In no place within the chapter did we find any outline of the specific values Ms Beran is seeking to address as alluded to by her proposed wording.
47. The addition of assessment against cultural values for these plan provisions, where it was not requested through submissions but proposed to be changed by the S42A report writer as part of addressing wider cultural value concerns, is not appropriate as if required it could significantly increase the cost of a resource consent (potentially by up to \$3,000).
48. This change is significant, and we consider there is no scope to introduce it as matter of discretion at this time given that submitters, except SFF and Transpower, have not been given any opportunity to comment on these. The scope argument has been well canvassed through legal submissions during the PDP process therefore we will not repeat these here, other than to note others may have submitted on these plan provisions if cultural assessment was included as a matter of direction when the PDP was notified. SFF strongly opposes the addition of assessment against cultural values for LLRZ, GRZ-S2 and SETZ-S3.

CONCLUSION

49. The primary concern for our members is that they can continue with farming their properties without lengthy and expensive consenting processes, while avoiding, remedying or mitigating adverse effects on Ngāi Tahu cultural values. Most farmers should just be able to get on with farming, without needing any external input or

approval, particularly when the activity or area it occurs in has a low risk of impacting Ngāi Tahu cultural values. For areas where extra care is needed, those affected should know what they need to be careful of. The process around that should be easy to navigate, and there should be transparency around the significance and location of these areas. If a farmer is expected to alter their land use or protect something on their land that is of value to Ngāi Tahu, that should not have to be at the landowners' cost.

50. It is for these reasons that we continue to support site mapping, which will enable farmers to be good stewards of their land while awarding appropriate recognition of significant sites to Māori.
51. If the Panel is not of a mind to support the approach of mapping all sites and areas of significance to Māori, then within this statement we suggest an alternative way to incorporate values within the plan that improves clarity for landowners, Council and Runanga about which values apply to specific activities.
52. SFF thanks the Hearing Panel for the opportunity to submit this response statement.



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Appendix 1 – Values by Chapter

Chapter	Values identified by Appendix G	Level of interest for farmers
Urban Form and Development	None	Low
Energy	Whenua, wai, effects on mauri, wāhi tapu, mahinga kai, mātauranga associated with landscape and Kaitiakitanga.	Low
Infrastructure	Whenua, wai, effects on mauri, wāhi tapu, mahinga kai, mātauranga associated with landscape and Kaitiakitanga.	Low
Transport	Mauri of whenua, access to mahinga kai, disturbance of wāhi tapu or other taonga.	Low
Hazardous Substances	None	Low
Contaminated Land	None	Low
Natural Hazards	None	Medium
Historic Heritage	Ongoing mahinga kai access along Maitara River and tributaries. Additional concerns include impact on mauri and any wāhi tapu.	Low
Notable Trees	None	Low
Sites and Areas of Significance to Māori	None	High
Ecosystems and Indigenous Biodiversity	Support ability to consider mana whenua relationship with indigenous vegetation as a taonga. Mauri of whenua, wait and environment, mahinga kai, exercise of Kaitiakitanga.	High
Natural Features and Landscapes	None	High

Chapter	Values identified by Appendix G	Level of interest for farmers
Public Access	None	Medium
Subdivision	Mana whenua support the ability to consider new subdivision proposals including in new development areas, as well as historic heritage. Concerns or values retaining natural contours of the land and drainage patterns, maintaining and enhancing wetlands, indigenous vegetation, other taonga, mahinga kai and protection of wāhi tapu.	Medium
Activities on the Surface Water	None	Low
Earthworks	Mana whenua are particularly concerned about potential impacts on mauri of wai and whenua, mahinga kai, access to wai in relation to this activity (disposal of spoil from drain clearance). Given that earthworks activities could involve large areas of earthworks being undertaken at any one time and works could involve excavation to significant depths below ground level, mana whenua hold concerns regarding potential wāhi tapu discovery and impacts on natural landforms and landscapes (and mana whenua connection to these). Protection of mauri of whenua or wai, protection of wāhi tapu and mahinga kai values.	High
Light	None	Low
Noise	None	Low

Chapter	Values identified by Appendix G	Level of interest for farmers
Signs	No values but not Appendix G proposes matters of discretion as: <i>‘Whether Hokonui rūnanga has been consulted, the outcome of the consultation and whether the activity responds to or incorporates the outcome of that consultation.’</i> <i>‘Whether the activity provides an opportunity to recognise Ngāi Tahu culture, history and identity associated with specific places.’</i>	Low
Temporary Activities	Mana whenua wish to retain consideration of their values, given the potential longer-term nature of these activities (includes buildings and structures) and the uncertainty of the potential impacts on whenua, wai, wāhi tapu and mahinga kai.	Low
Large Lot Residential Zone	Mana whenua are particularly concerned about potential alternative onsite servicing (e.g., wastewater and stormwater treatment and disposal) and the impacts these could have on their values, specifically on mauri of whenua and wai, mahinga kai including riparian margins/ habitat. Mana whenua consistently supports the ability to consider structure or buildings that intrude prescribed waterway setbacks throughout the district. This is confirmed through a number of submission points made by Hokonui Rūnanga. Concerns identified include-	Low

Chapter	Values identified by Appendix G	Level of interest for farmers
	access to mahinga kai, effects on mauri of waterways, ki uta ki tai.	
General Residential Zone	Mana whenua are concerned about potential servicing of development within the zone, rather than particular activities.	Low
Medium Density Residential Zone	None	Low
General Rural Zone	Mana whenua support the ability to consider consent applications that may impact on the mauri of whenua, wai and ecosystems, wāhi tapu. Mana whenua consistently supports the ability to consider structure or buildings that intrude prescribed waterway setbacks throughout the district. The height (greater than 12m in the general rural zone and 8m in the lifestyle rural zone) and breaches of waterway setbacks are the matters of concern for mana whenua. 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.	High
Rural Lifestyle Zone	Height breach and waterway setback breach – as for GRUZ.	Medium

Chapter	Values identified by Appendix G	Level of interest for farmers
Settlement Zone	Height breach and waterway setback breach – as for GRUZ. Note – Appendix G proposes to add in additional matter of discretion for SETZ-S3. Not in notified plan.	Low
Neighbourhood Centre Zone	Waterway setback breach – as for GRUZ.	Low
Local Centre Zone	Mana whenua seeks to incorporate their history and association with the district in building layout, design and greenspace.	Low
Mixed Use Zone	Waterway setback breach – as for GRUZ.	Low
Town Centre Zone	Waterway setback breach – as for GRUZ.	Low
Light Industrial Zone	Waterway setback breach – as for GRUZ.	Low
General Industrial Zone	Waterway setback breach – as for GRUZ.	Low
Natural Open Space Zone	Mana whenua concerns primarily relate to appropriately servicing sites for these activities (e.g. wastewater, stormwater management) and how this could impact on mauri of whenua, wai, mahinga kai, taonga (e.g. indigenous vegetation), noting it is unclear if these matters would always be captured by NOSZ-R11 (buildings and structures). Mana whenua are supportive of the opportunity to consider integrating mana whenua identity into building designs in the zone.	Low

Chapter	Values identified by Appendix G	Level of interest for farmers
	Ability to consider height exceedances given the minimal built form anticipated in the zone and their desire to maintain connection with key features in the district such as the Hokonui Hills. Mana whenua consistently supports having the ability to consider buildings or structures that intrude prescribed waterway setbacks throughout the district	
Sport and Active Recreation Zone	Height breach and waterway setback breach – as for GRUZ.	Low
Airport Zone	Height breach and waterway setback breach – as for GRUZ.	Low
Māori Purpose Zone	None	Low
Camp Columba Zone	None	Low
Field Days Zone	As per earlier comments relative to height in rural setting, waterway setback and servicing.	Low