



Te Rūnanga o NGĀI TAHU

Further Submission on the West Coast Proposed Regional Coastal Plan 2016

To: West Coast Regional Council
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Further Submitter contact details

Name:

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Nga Rūnanga and Te Rūnanga have an interest in the Proposed Regional Coastal Plan that is greater than the interest the general public has, in consequence of the rights and interests described in our primary submission (Submission 21).

We could not gain an advantage in trade competition through this submission.

We do wish to be heard in support of this further submission.

Signed

Date

22 July 2016

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Further Submission on the West Coast Proposed Regional Coastal Plan 2016 - Te Rūnanga o Mākaawhio and Te Rūnanga o Ngāti Waewae and Te Rūnanga o Ngāi Tahu

Submission reference (from Summary of Decisions Requested)	Person, or organisation, making original submission	Support or oppose the relief sought	Reasons
GS 6, 3.42, 4.10	Federated Farmers of New Zealand	Oppose	Unrestricted access of vehicles and stock to areas with important cultural or natural values could have significant adverse effects on those values. We consider that permitted activity provision for vehicle and stock access to the coastal marine area would be inappropriate in Culturally Significant Areas and other areas such as wetlands and significant indigenous habitats that are sensitive to disturbance.
GS 7	Grey District Council	Support in part	We support an integrated approach to management of the coastal environment, whether this is achieved through a single plan or across two plans. This is consistent with the Ngai Tahu concept of ki uta ki tai ("from the mountains to the sea"). If consideration is to be given to extending the Regional Coastal Plan to incorporate the broader coastal environment, Nga Rūnanga wish to be involved in determining how holistic management can best be achieved.
GS 11	Royal Forest and Bird Protection Society	Support in part	We support identification of sites that are important for indigenous flora and fauna, including marine mammal haul-out areas and bird nesting sites, and their protection from inappropriate development. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and wish to be involved in determining how the Regional Coastal Plan can ensure they are sustained for future generations.
GS 13, S2.3, NS.2	Royal Forest and Bird Protection Society	Support in part	We support specific identification of wetlands that cross the coastal marine area boundary, and reference to these in policies and rules. This would assist integrated management of mahinga kai and other wetland values.
1.7	Westland District Council	Support in part	We support an integrated approach to management of the coastal environment, whether this is achieved through a single plan or across two plans. This is consistent with the Ngai Tahu concept of ki uta ki tai ("from the mountains to the sea"). If consideration is to be given to extending the Regional Coastal Plan to incorporate the broader coastal environment, Nga Rūnanga wish to be involved in determining how holistic management can best be achieved.

Submission reference (from Summary of Decisions Requested)	Person, or organisation, making original submission	Support or oppose the relief sought	Reasons
2.1	Community and Public Health West Coast	Support in part	We support the intent of the submission but oppose wording that suggests that identification of Poutini Ngāi Tahu issues and values is, in itself, sufficient to give effect to the requirements of Section 6(e), 7(a) and 8 of the RMA.
2.9	Community and Public Health West Coast	Support in part	We support the intent of the submission but oppose wording that suggests that identification of Poutini Ngāi Tahu issues and values is, in itself, sufficient to give effect to the requirements of Section 6(e) of the RMA.
3.6	Royal Forest and Bird Protection Society	Support in part	We support amendment of rules to avoid adverse effects on wetlands, marine mammal haul-out areas and bird nesting sites. This would assist integrated management of natural and cultural values associated with these areas. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and wish to be involved in determining how the Regional Coastal Plan can ensure they are sustained for future generations.
3.65	Department of Conservation	Support	We support amendment of Policy 3.3.7 to require avoidance of significant adverse effects of activities in the coastal marine area on natural and cultural values. This will assist to sustain these values for future generations.
4.8	Royal Forest and Bird Protection Society	Support	Occupation of space in the coastal marine area can have effects that are broader than effects on public access. We support inclusion of an objective relating to management of the effects of occupation of space on natural and human use values protected in Chapter 3, including effects on Poutini Ngāi Tahu values.
4.12	Royal Forest and Bird Protection Society	Support in part	The submitter requests that Objective 4.2.2 be broadened to cover management of effects of any access, not just vehicle access from consented activities. We agree that this could assist in protecting sensitive sites from adverse effects, but we would be concerned if it was to result in inappropriate limitations on access of mana whenua to mahinga kai resources. The wording in the submission does not make it clear how the objective would be implemented or what effects would be considered. Nga Rūnanga wish to be involved in determination of the approach to managing any adverse effects

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4.19	Royal Forest and Bird Protection Society	Support in part	related to public access to sensitive areas. In Policy 4.3.1, we support replacement of reference to restriction of public access in “exceptional circumstances” with clearer direction about the circumstances in which public access may need to be restricted to protect values in sensitive areas. These may include areas that are sensitive because of cultural values as well as natural values. Protection of sensitive areas will assist to sustain their values for future generations.
6.19	Buller Conservation Group, Frida Inta	Support	Policy 6.3.4, relating to the effects of gravel extraction, does not require consideration of the effects of this activity on water quality or the important natural values of estuaries described by the submitters. We consider amendment of the policy to address this would be appropriate to ensure the health and natural values of estuarine systems are sustained for future generations.
6.22	Royal Forest and Bird Protection Society	Support in part?	Policy 6.3.4, relating to the effects of gravel extraction, does not require consideration of the effects of this activity on bird nesting sites and other habitats of indigenous fauna. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and we consider amendment of the policy would be appropriate to ensure they are sustained for future generations.
8.6, 8.24, 8.32, 12.190	Department of Conservation	Support	We support inclusion of a policy, method and rule to better manage vessel cleaning, in order to reduce the risks of introduction of exotic aquatic organisms. As stated by the submitter, such organisms may be harmful to marine ecosystems.
8.31	Westland District Council	Support in part	Direct discharges of human sewage to water are culturally offensive to Ngāi Tahu. We support inclusion of stronger direction on management of sewage effluent from coastal subdivision and development, including clear direction as to the circumstances in which a centralised sewage effluent treatment and disposal system will be required.
10.11	Department of Conservation	Support in part	We support amendment of Policy 10.3.1 to include consideration of adverse effects of noise on marine mammals. This would recognise effects that are acknowledged

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12.4	Michael Rogers	Oppose	<p>elsewhere in the Proposed Plan by reference to the Department of Conservation's "Code of Conduct for Minimising Disturbance to Marine Mammals from Seismic Survey Operations".</p> <p>We understand the intent of the submission. However provision for disturbance of beach gravels, even for localised use in coastal protection works, could have significant adverse effects on natural and cultural values in some locations. Providing for this activity would be inappropriate in Culturally Significant Areas and other areas such as significant indigenous habitats that are sensitive to disturbance.</p> <p>As Identified in our original submission, we have a particular concern about any provision for gravel extraction from the Mākaawhio River (including the beach around the river mouth) and removal of waitai (white stones) from Māori Beach, Bruce Bay. We oppose any provisions that would allow for the removal of taonga in these locations for the reasons set out in Section 3 of our original submission.</p>
12.14	New Zealand Defence Force	Oppose	<p>Occupation of the seabed for the periods of time suggested by the submitter (up to 5 consecutive days) could have adverse effects on some marine environments, including fishing grounds. We consider that permitting temporary occupation of space in sensitive marine environments would be inappropriate.</p>
12.15	Royal Forest and Bird Protection Society	Support	<p>Occupation of space in the coastal marine area can have effects that are broader than effects on public access. We support inclusion of conditions to manage the effects of occupation of space on natural and human use values protected in Chapter 3, including effects on habitats of indigenous fauna.</p>
12.27	Department of Conservation	Support	<p>Unimpeded passage between fresh water bodies and coastal waters is crucial to sustain populations of migratory indigenous fish including tuna and inanga. We support amendment of Rule 7 to ensure that installation of a culvert does not impede passage of indigenous fish species.</p>

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12.37	Royal Forest and Bird Protection Society	Support	We support amendment of Rule 10 (maintenance of structures) to avoid adverse effects on bird nesting sites and habitats of other indigenous species. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and we consider amendment of the rule would be appropriate to ensure they are sustained for future generations.
12.54	Royal Forest and Bird Protection Society	Support in part	Rule 15, permitting small-scale removal of natural material from beaches, does not require consideration of the effects of this activity on bird nesting sites and other habitats of indigenous fauna. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and wish to ensure they are sustained for future generations. We consider amendment of the rule to restrict activities in bird nesting sites and mammal haul-out areas would be appropriate to assist this.
12.62	Royal Forest and Bird Protection Society	Support in part	Rule 17, permitting small-scale beach mining, does not require consideration of the effects of this activity on bird nesting sites and other habitats of indigenous fauna. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and wish to ensure they are sustained for future generations. We consider amendment of the rule to restrict activities in bird nesting sites and mammal haul-out areas would be appropriate to assist this.
12.141	Department of Conservation	Support	Direct discharges of human sewage to water are culturally offensive to Ngāi Tahu, and we consider there should be a clear requirement for treatment of sewage effluent before any discharge to the environment. Direct discharge of raw animal effluent is also offensive. We support stronger controls in the rules to ensure such discharges do not occur, including in stormwater or land drainage discharges.
12.144, 12.191	Department of Conservation	Support	Direct discharges of human sewage to water are culturally offensive to Ngāi Tahu, and we consider there should be a clear requirement for treatment of sewage effluent before any discharge to the environment. Direct discharge of raw animal effluent is also offensive. We support stronger controls in the rules to ensure such discharges do not occur, and agree that discharges of untreated human and animal effluent to coastal

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12.183	Department of Conservation	Support	waters should be prohibited. We support inclusion of a rule that provides a means of considering and managing environmental effects associated with sunken, grounded or abandoned ships.
12.185	New Zealand Defence Force	Oppose	The submitter requests a rule to permit minor disturbance of foreshore and seabed subject to conditions to avoid adverse effects on various values. However the values identified do not include Poutini Ngāi Tahu values. We oppose the requested rule unless a condition protecting Poutini Ngāi Tahu values is included.
12.194	New Zealand Defence Force	Oppose	The submitter requests a new rule permitting take and use of any coastal water. If large quantities are taken from estuaries, lagoons or river mouths, this could result in closing the mouth, interfering with natural flow and impeding fish passage. We consider that permitting water takes without conditions to avoid adverse effects on natural processes and ecosystems would be inappropriate.
S1.2	Community and Public Health West Coast	Support	We support recognition of Poutini Ngāi Tahu mana whenua status by giving prominence to traditional place names wherever possible.
S3B.2	Grey District Council	Oppose	The identification of a potential port at Rapahoe as a Coastal Development Area in Schedule 3B. The Coastal Development Areas in Schedule 3B are intended to relate to existing and planned facilities and the submitter acknowledges that there are no current proposals for establishment of a port in this location. The Proposed Plan recognises significant Poutini Ngāi Tahu values at Rapahoe (CSA 12). Identification of a Coastal Development Area at this location would conflict with protection of the existing Poutini Ngāi Tahu values.
NS.1	Department of Conservation	Support	We support identification of sites that are important for indigenous flora and fauna, including habitats where species need unimpeded access across foreshore, bird nesting sites and significant ecological areas, and their protection from inappropriate

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			development. Nga Rūnanga have kaitiaki responsibilities in relation to these taonga and wish to be involved in determining how the Regional Coastal Plan can ensure they are sustained for future generations.