

# Wellington City Proposed District Plan Hearing Stream 3

Historic Heritage, Notable Trees, Sites of Significance to Māori

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## **Statement of evidence**

**Prepared by Morris Te Whiti Love, Māori, cultural sites in  
Te Whanganui a Tara**

**Report dated: 6 March 2023**

**Date of hearing: 9 May 2023**

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## 1. INTRODUCTION:

1.1.1. My full name is Morris Te Whiti Love

1.1.2. I have prepared this statement of evidence in respect of site affirmation of sites and areas of significance to Māori matters arising from the submissions and further submissions on the Wellington City Proposed District Plan (PDP).

1.1.3. Specifically, this statement of evidence relates to matters in the:

- Site affirmation and associated cultural narrative in Ngā Wāhi Tapu ki te Māori, Sites and Areas of Significance to Māori and Schedule 7.

## 2. QUALIFICATIONS AND EXPERIENCE

2.1.1. I am a Māori resource management consultant. I hold the following qualifications:

- Bachelor of Engineering (Agricultural)

2.1.2. I also a Māori cultural historian with expertise on Te Upoko o Te Ika and Taranaki Whānui ki Te Upoko o Te Ika.

2.1.3. Experience relevant to this hearing includes:

- I have been involved in drafting sections of the Wellington City District Planning dating back to the Wellington District Plan 1994
- I have been involved in reviewing the Council's sites and areas of significance inventories and preparing schedules for the draft district plan.
- I have been involved in the preparation of numerous Cultural Impact Assessments/Reports and Cultural Values Reports for major and minor projects in Wellington, Hutt and Upper Hutt City usually as principal of Raukura Consultants and well as similar work for projects from Tamaki Makaurau – Auckland City throughout Aotearoa including in Te Waipounamu.
- I have been a Senior analyst and Manager in Ministry for the Environment (Maruwhenua), Manatu Māori and Te Puni Kokiri.
- I have also been the Director of the Waitangi Tribunal

## 3. CODE OF CONDUCT

3.1.1. I have read the Code of Conduct for Expert Witnesses set out in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while

giving oral evidence. Except where I state that I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not knowingly omitted to consider material facts that might alter or detract from my expressed opinions.

#### 4. INVOLVEMENT WITH THE PDP

- 4.1.1. In the advice provided to the preparation of material on Māori sites of significance in the Wellington District I had been involved in a review of the sites in the Port Nicholson Block which culminated in the report provided by Raukura Consultants to Council with a revised copy dated 1 April 2021. That report tracked the history of sites from the previous District Plan
- 4.1.2. I was involved with the preparation of the Wellington City draft district plan as an advisor including providing advice on SCHED7 – Sites and Areas of Significance to Māori namely the location of sites and their cultural narratives.
- 4.1.3. Although I was not directly involved in the preparation of *Nga Waahi Taonga o Te Whanganui a Tara, Maori sites inventory*, that list was based on the list of sites provided by me, Miria Pomare and Ray Ahipene Mercer for the Wellington District Plan of 1994. That list has been updated with information gained over many years in site visits where I often accompanied Archaeologists involved in various projects around Wellington City.
- 4.1.4. I have reviewed the submission of Wellington International Airport Limited on Sites and Areas of Significance to Māori on the Miramar peninsula and the expert evidence of Mr John Kyle. To support this conversation I have provided a 'Context report' identifying the narratives of Taranaki Whānui sites.