



TE RŪNANGA O
TOA RANGATIRA

Ā UPANE KA UPANE WHITI TE RA

3 May 2023

Jenna Raeburn
GM Corporate Affairs

Wellington International Airport Limited (WIAL)

Tēnā koe Jenna,

Subject: WIAL Submission on Wellington City Council District Plan Review

E mihi ana ki a koe Jenna for your e-mail dated 28 April 2023 and for the attached information in that e-mail which is a) statement of evidence and b) WIAL submission in full to Wellington City Council Proposed District Plan.

Having looked at the statement of evidence, Rūnanga understands there is some confusion around:

1. The Sites and Areas of Significance to Māori (SASM) Chapter provisions applied in the Tūāhanga (Infrastructure-INF) Chapter,
2. SASM schedule and map overlay applying to Airport Zone (WIAL designation) and WIAL Chapter, and
3. Whether the WIAL or INF chapter applies to Airport Zone provisions and whether WIAL should be exempt from the INF provisions which SASMs are protected under as an activity,

To provide context, the Rūnanga and Ngāti Toa Rangatira kaumātua were heavily involved, in fact, co-crafted the SASM provisions in the Proposed Plan with the Council officers in partnership. The Rūnanga kaimahi held a number of extensive wānanga with our kaumātua to identify and map these sites in Pōneke.

Our kaumātua proposed the policy framework and spent their precious time to go through various resource management and consenting scenarios to identify appropriate regulatory framework so that the sites can be protected, maintained, and managed from inappropriate use and development.

The Rūnanga also worked with the Council officers to ensure the contents of the Chapters proposed, spoke to each other in terms of Te Ao Māori and are consistent with each other as far as the SASM provisions are involved.

This meant that INF related SASM provisions would be placed in that particular chapter and the SASM policy framework would apply to infrastructure activities. The Rūnanga noted that as long as these provisions are placed in the Plan, it did not matter which Chapter that they were fitted in, as this is immaterial.

However Rūnanga was not aware of the statement in INF chapter that said:

"...this infrastructure Chapter does not apply to activities that fall under the definition of airport purposes or airport related activities (which are dealt with in Airport Zone chapter)..."

This then was not helped with the language of the condition 4 in WIAL Designation and Zone Chapter that suggests the Airport will have exclusive rights on a number of a long list of 'infrastructure' activities such as things like:

"...All demolition (if required) construction and earthworks activities, including associated structures..."

or

"Signage, artwork or sculptures, billboards and flags"

Our Rūnanga planner informs me that the District Plan Team was made aware of these inconsistencies, when the submissions were made and with the statement of evidence you have provided – WCC officers were not aware of these inconsistencies in the plan, either. Therefore, we appreciate the misunderstanding and confusion that was explained in the statement of evidence and we also will request these to be amended.

We are happy to work with Council officers to make sure these provisions are consistent by way of either:

- Deleting the confusing wording in the INF chapter and incorporating appropriate wording and explanation ensuring the provisions related to SASMs outlined in the SASM chapter are given effect in the WIAL chapter or;
- Amend the WIAL Chapter to clarify the SASM overlay and its tests will not be diminished under the Conditions 4 section of the WIAL and that the provisions regarding SASMs will be given effect in the Airport Designation.

This means that the Rūnanga reiterates their position in this letter:

- a) All SASMs, including the Moa Point and Maupuia Pā, are significant to Mana Whenua and must be protected as SASM policies and Rules instructed in the Proposed Plan.
- b) Infrastructure activities that WIAL undertakes are not exempt from these rules and the fact that INF Chapter says so, was not the intention of the Proposed Plan and this oversight will be noted and reiterated by planning officer in their right of reply.
- c) No infrastructure proposal or project, including the WIAL's, are given lesser resource management and consenting tests in which what is outlined in the Proposed Plan in the SASM chapter.
- d) This means that INF-OL-P62 (Adverse effects of Infrastructure) and INF-OL-R66 will apply and activities on SASMs should not be subject to a lesser resource consenting test.
- e) This matter should be referred to Hearing Stream 9 where the infrastructure chapter will be deliberated and the concerns about the provisions will be heard.
- f) Note that just because these two sites do not have a 'features integral' it does not make them less important for Mana Whenua. In fact these sites are highly significant and the fact that we have provisions to maintain and protect them means that we are able to recover their wairua and connect with them again.
- g) The column 'features integral' was not put there so that someone can challenge or diminish the significance of the sites; its purpose was rather to ensure that what management and recovery regime would be implemented to match Mana Whenua aspirations for these sites.
- h) The fact that these sites are built on heavily modified areas, gives us all the more reason to be involved in further resource consenting and what happens to our precious whenua and how our site is represented (its visibility) and how our sites are treated (protection).

With that, I conclude my letter and hope that the Rūnanga position is clear and please e-mail our Principal Planner Dr Onur Lewis onur.oktem@ngatitoa.iwi.nz if there are any questions. We look forward to working with you on this sensitive matter.

Ngā mihi nui

A handwritten signature in black ink, appearing to read 'Paula Collins', with a long horizontal flourish extending to the right.

Paula Collins
Pou Toa Matarau
Te Rūnanga o Toa Rangatira