

# **Manawatū District Plan Proposed Plan Change I: Minor Amendments**

Summary of Decisions Requested in  
Submissions

and

Original Submissions Report

November 2024

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## 1. Purpose

The summary in section 3 of this report has been prepared to assist the Council in meeting notification requirements under Clause 7 of Schedule 1 of the Resource Management Act 1991.

It has been prepared to assist those who may wish to prepare a further submission, or those preparing evidence or hearing evidence in respect of Proposed Plan Change I: Minor Amendments (PCI). Please note that a copy of the original submissions has been enclosed as part of this document.

**This summary does not replace the original submissions.**

Submissions typically have two parts:

**The submission:** Usually stating whether the submitter supports or opposes the plan change either in whole or in part, and the reasons for that support or opposition.

**Decision requested:** The action which the submitter requests the Council to take.

## 2. Making a Further Submission

The following parties may make a Further Submission either supporting or opposing submissions made on this plan change:

- any person representing a relevant aspect of the public interest;
- any person who has an interest in the proposed plan change that is greater than that of the general public; and
- the council itself.

A further submission must be made by making a written further submission in general accordance with Form 6 of the Resource Management Act (Forms) Regulations 1991, or similar. A further submission can be made either supporting (in whole or in part) or opposing (in whole or in part) an original submission. A further submission cannot traverse an issue that is not covered by the original submission but can give reasons for the support or opposition to the original submission.

Anyone making a further submission is required to serve a copy of their further submission on the original submitter within 5 working days after the day of the further submission being made to the Council. A list of the submitter's addresses is included in the Summary of Submissions Table in section 3 of this document.

### 3. Summary of Submissions Table

The following table outlines the key points from both submissions made on Plan Change I.

SUMMARY OF DECISIONS REQUESTED IN ORIGINAL SUBMISSIONS: PLAN CHANGE I MINOR AMENDMENTS						
Submission ID number	Submitter name	Submitter address	Plan Provision	Support/oppose	Reason	Decision requested
S01/01	Te Ao Tūroa Environmental Centre (TATEC) – Rangitāne o Manawatū	140-148 Maxwells Line Awapuni Palmerston North 4412	Deletion of text in TW-Tangata Whenua Chapter	Oppose	<p>Has concerns with the plan change because:</p> <ul style="list-style-type: none"> <li>The plan change removes vital contextual information from the tangata whenua chapter of the District Plan. The Tangata Whenua chapter has not been the subject of review since it was made operative in 2002, nonetheless it provides vital context and understanding to plan users on marae and papakāinga.</li> <li>The Environmental Management Plan [EMP] has not been appropriately taken into account. The EMP must be taken into account by the Council where the content has a bearing on the resource management issues covered by the plan change.</li> </ul>	<p>Recognises their concern around the EMP and consultation is a broader process issue that cannot be resolved through this plan change, seek the specific relief below, or any alternative relief that would have the same or similar effect; and any other consequential amendments required to the provisions to achieve clarity or consistency with the relief they have sought:</p> <p>Rangitāne oppose removal of any text in the Tangata Whenua chapter and submit any changes to the chapter should occur as part of a review and update of the chapter and subsequent plan change.</p> <p>That the Council retain all existing text in the tangata whenua chapter of the District Plan.</p>
S01/02	""	""	Plan Change I and future	N/A	MDC have not adequately achieved their consultation requirements under the RMA. Rangitāne o Manawatū wish to participate	To discuss their concerns around the EMP and consultation they would welcome a hui with Council and

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			plan changes		<p>meaningfully and early in plan changes in their rohe, and these plan changes should be responsive to their priorities.</p> <p>Disagrees with the statement (Section 32) that the plan change is not considered to have a material impact on matters raised in iwi management plans. If the EMP was taken into account they would have actively participated in the plan change’s preparation.</p> <p>Does not think the email notification of the content of the Plan Change adequately meets Schedule 1 Clause 3B of the RMA (1991).</p>	acceptance of our proposals for involvement in plan changes.
S02/01	Mark Wasley	PO Box 24 Feilding 4740	All of Plan Change I	Support	Trusts the Council's opinion and comprehensive reasoning given. The changes will make the District Plan easier to read and less ambiguous, which is important. Knows the owners/occupants of Notable Tree 4 and support its removal from the Notable Trees Schedule.	That the Manawatū District Plan is amended as notified, including removal of Notable Tree 4 from the Notable Trees Schedule.

## 4. Original Submissions

### 4.1 Te Ao Tūroa Environmental Centre (TATEC) – Rangitāne o Manawatū



## PROPOSED PLAN CHANGE I: Minor Amendments

FORM 5 UNDER THE RESOURCE MANAGEMENT ACT 1991

### SUBMISSION TO

MANAWATŪ DISTRICT COUNCIL  
PRIVATE BAG 10001  
FEILDING 4743

### SUBMITTER INFORMATION

**Ingoa** TE AO TUROA ENVIRONMENTAL CENTRE  
**Iwi** RANGITĀNE O MANAWATŪ  
**Wāhi noho** 140–148 MAXWELLS LINE  
AWAPUNI  
PALMERSTON NORTH  
**Īmēra** ALANA@RANGITAANE.IWI.NZ  
**Waea pūkoro** 021 592 334  
**Kaiwhakahaere** ALANA NUKU, MANAGER

**OUR SUBMISSION:**

This is a submission by Te Ao Turoa Environmental Centre on behalf of Rangitāne o Manawatū on the Minor Amendments plan change proposal.

Te Ao Turoa Environmental Centre **wishes to be heard** in support of this submission.

If others make a similar submission, we **will consider** presenting a joint case with them at any hearing.

We are **not** a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

We are **directly affected** by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and
- (b) does not relate to trade competition or the effects of trade competition.

This submission has been sent to Manawatū District Council by email to [districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

**ALANA NUKU**



**MANAGER, TE AO TUROA ENVIRONMENTAL CENTRE**

#### **TE AO TUROA ENVIRONMENTAL CENTRE**

Te Ao Turoa Environmental Centre ('TATEC') contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū iwi ('Rangitāne'). We promote the health and well-being of our people, the environment, wāhi tapu and taonga by forming positive relationships and partnerships with local councils, government agencies, private developers, and the wider community.

The Environmental Centre undertakes ecological and cultural monitoring projects, restoration of waterways through planting, weed and pest control, and initiatives to reduce plastics in waterways. We engage in planning processes, including plan changes and resource consents. We provide cultural impact assessments, on behalf of Rangitāne, on resource management proposals. These assessments outline our cultural values, potential effects on them and ways in which they can be managed by the proposal.

We are part of Best Care (Whakapai Hauora) Charitable Trust, which includes a collective of health services run by our iwi. We deliver a Māori model of environmental management which we use to identify and measure resource management outcomes sought by Rangitāne o Manawatū. This model is Te Ara Whānau Ora (the Whānau Ora Pathways Framework). Whānau Ora was originally developed by our esteemed kaumātua Sir Mason Dury, who applied it to our health-focused services.

#### **RANGITĀNE O MANAWATŪ, AND OUR CULTURAL AND CUSTOMARY CONNECTIONS AND ASSOCIATIONS WITH THE MANAWATŪ DISTRICT AREA**

Rangitāne o Manawatū ancestors arrived in Aotearoa aboard the Kurahaupō waka over 30 generations ago. At the turn of the 19th Century, Rangitāne and Rangitāne whānaunga had held mana over nearly the entire drainage basin of the Manawatū Awa for many hundreds of years.

Every part of the environment is understood to have a common genealogy, descending from a common ancestor. The principal ancestors being Io Matua te Kore (the nothingness), Ranginui and Papatūānuku (Sky Father and Earth Mother). This genealogy places Rangitāne iwi as descendants of the environment they have inhabited for many centuries. It reinforces cultural identity and a deep connection to the land. This mātauranga links Rangitāne o Manawatū to the world creating an inseparable bond and a responsibility to protect the environment physically and metaphysically in its widest sense from misuse and further degradation.



The Rangitāne o Manawātū Statutory Area of Interest is outlined in **Figure 1** below.<sup>1</sup> This cultural and customary connection encompasses 440,000 hectares of the plains divided by the Manawātū River and its tributaries and includes the Manawātū District in its entirety.



Figure 1 Rangitane o Manawatu statutory area for the purposes of the Resource Management Act 1991.

<sup>1</sup> The statutory area of interest comprises the area bordered by: a) to the north-west, a line from the southern bank of the mouth of the Rangitikei River inland to the Orangipango Trig near Ohingaiti, b) to the north, a straight line from the Orangipango Trig near Ohingaiti to Te Hekenga, c) to the south-east, a line following the ridge/summit along the Ruahine and Taranaki ranges across to the Taramea Trig, d) to the south-west, a line from Taramea Trig westward to the mouth of the Manawātū River, e) to the west, a line around the coast from the mouth of the Manawātū River northward to the mouth of the Rangitikei River.

Within the Manawatū District there are many features that are of historical, cultural, spiritual and traditional significance to Rangitāne o Manawatū including the Oroua River, Pukepuke Lagoon, Omarupapako, Tawhirihoe Scenic Reserve, Manawatu River and its tributaries, Rangitikei River, Pohangina and the coastal area. We also have a number of other sites of significance, our marae and whanau present in the district; a reflection of our ongoing connection to the district.

## **MANAWATŪ DISTRICT COUNCIL'S OBLIGATIONS UNDER THE RESOURCE MANAGEMENT ACT 1991**

The Manawatū District Council has a number of statutory duties under the Resource Management Act 1991 ('the Act') with respect to how it provides for Rangitāne interests, obligations and connections with te taiao, in the preparation of changes to the District Plan. These are set out below.

### **SECTION 74 – PREPARING AND CHANGING A DISTRICT PLAN**

Section 74 requires Council to take into account any iwi planning document when preparing or changing its District Plan. We (TATEC) have prepared a "relevant planning document" – Rangitāne o Manawatū Environmental Management Plan ('EMP') – which has been recognised by the iwi authority and lodged with the Manawatū District Council. The EMP must be taken into account by the Council where the content of the EMP "has a bearing" on the resource management issues covered by the change.

We understand that Council considers the plan change is limited in scope and the change does not address a resource management issue per se, but the EMP states key outcomes and methods for achieving whānau ora including:

- that Councils resource Rangitāne o Manawatū as its Treaty Partner to **participate meaningfully and early in Plan Change processes.**
- Councils **resource Rangitāne o Manawatū adequately to give effect to the outcomes in this Plan.**
- Plan Changes by design are **responsive to Rangitāne o Manawatū priorities.**
- Rangitāne **tikanga is understood and incorporated into Council practice and plan changes.**

We are concerned these aspects of the Rangitāne EMP have not been considered in the development of the plan change.

## **SCHEDULE 1 – PREPARATION, CHANGE AND REVIEW OF POLICY STATEMENTS AND PLANS**

During the preparation of a proposed plan change, the Council must consult the tangata whenua of the area who may be affected, through iwi authorities. Rangitāne are tangata whenua of the area – being the Manawatū District, and Tānenularangi Manawatū Charitable Trust via Te Ao Tūroa Environmental Centre are the mandated iwi authority through which consultation should take place. The changes involve removal of text from the tangata whenua chapter of the District Plan, so Rangitāne are affected by the change.

Schedule 1 Clause 3B of the RMA (1991) provides more detail on the nature of this consultation requirement. Consultation is considered to have taken place if the Council:

- (a) *considers ways in which it may foster the development of their capacity to respond to an invitation to consult; and*
- (b) *establishes and maintains processes to provide opportunities for those iwi authorities to consult it; and*
- (c) *consults with those iwi authorities; and*
- (d) *enables those iwi authorities to identify resource management issues of concern to them; and*
- (e) *indicates how those issues have been or are to be addressed.*

We think MDC have not adequately achieved their consultation requirements.

## GENERAL POSITION:

Te Ao Turoa Environmental Centre, on behalf of Rangitāne o Manawatū ('Rangitāne') has concerns with the plan change as proposed because:

- The plan change removes vital contextual information from the tangata whenua chapter of the District Plan.
- The EMP has not been appropriately taken into account, and Rangitāne o Manawatū not appropriately consulted in the plan change's development.

The tangata whenua chapter has not been the subject of review, as far as Rangitāne are aware, since it was made operative in 2002. Meaning that the plan is limited in up-to-date detail about tangata whenua in the district. Rangitāne recognise that the text has no legal weight, and the chapter is lacking in the content we would expect to see. Nonetheless, it provides vital context and understanding to plan users on marae and papakāinga.

On the other concerns we hold, the EMP clearly states our aspirations to participate meaningfully and early in plan change processes, and that these plan changes should be responsive to our priorities. The EMP does not differentiate between plan changes that are narrow in scope. The section 32 states the 'plan change is not considered to have a material impact on matters raised in the listed iwi management plans.'<sup>2</sup> Rangitāne o Manawatū disagree with this – we submit that if the EMP were taken into account we would have actively participated in the plan change's preparation.

For consultation, according to the section 32 report the following consultation was undertaken and responses received:

*"a public notice in the local paper, emails to District Plan stakeholders and Clause 3 parties, a letter to the owners of Notable Tree 4, and updates to Council's consultation webpage Make Your Mark on Manawatū. Feedback on PCI was received from three (3) parties."<sup>3</sup>*

*"Draft PCI was sent to all iwi authorities, marae and hapū throughout the District. At the time of preparing this report no feedback had been received."<sup>4</sup>*

<sup>2</sup> Section 9 of the Section 32 Report

<sup>3</sup> Section 12.1 of the Section 32 Report

<sup>4</sup> Section 12.2 of the Section 32 Report

We recognise that Council considers the plan change to be limited in scope, however Rangitāne o Manawatū wish to be involved and participate meaningfully in all plan changes in our rohe. To date we have not met with Council officers as requested to discuss and agree how our capacity to respond could be fostered. Nor have we been able to establish and maintain processes for Council to consult with us meaningfully. We have not been able to define our resource management issues as a result through this plan change.

Thus, we do not think the email notifying us of the content of the Plan Change adequately meets Schedule 1 Clause 3B of the RMA (1991).

To discuss our concerns around the EMP and consultation we would welcome a hui with Council and acceptance of our proposals for involvement in plan changes. TATEC have kaupapa taiao specialists and planners available to input into future plan changes and we want to work collaboratively with Council.

**RELIEF SOUGHT**

Recognising that our point of concern around the EMP and consultation is a broader process issue that cannot be resolved through this plan change, we seek the specific relief set out below, or any alternative relief that would have the same or similar effect; and any other consequential amendments required to the provisions to achieve clarity or consistency with the relief we have sought.

**THE PROVISIONS OF THE PROPOSAL THAT OUR SUBMISSION RELATES TO ARE:**


**REMOVAL OF ANY TEXT IN THE TW - TANGATA WHENUA CHAPTER**

Rangitāne **oppose** removal of any text in the tangata whenua chapter. Rangitāne o Manawatū submit any changes to the chapter should occur as part of a review and updated of the chapter and subsequent plan change.


**RELIEF SOUGHT**

That the Council retain all existing text in the tangata whenua chapter of the District Plan.

4.2 Mark Wasley



# DISTRICT PLAN REVIEW



Form 5  
**Manawatu District Plan - Proposed Plan Change I  
Minor Amendments**

### Submitter Details

Full name of submitter	Mark Wasley		
Address for service* <i>(postal address)</i>	PO Box 24		
	Feilding	Postcode	4740
Email	mark@markwasley.net.nz		
Phone/mobile	.....		

\* Please note that the Submitter name and Address for Service (postal address and/or email) will be made publicly available to enable the further submission process as required under Schedule 1 of the Resource Management Act 1991.

### Submission Details

This submission specifically relates to ..... *[please give details]*

Updates to the Manawatu District Plan in Proposed Plan Change I.

My submission is ... *[Summarise the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons]*

I support all proposed changes in Proposed Plan Change I to the Manawatu District Plan because I trust the Council's opinion and comprehensive reasoning given. The changes will make the District Plan easier to read and less ambiguous, which is important. I also know the owners/occupants of Notable Tree 4 and support its removal from the Notable Trees Schedule.

Submission Form – Proposed Plan Change I: Minor Amendments October 2024

.....  
.....  
.....

I/we have included ..... additional pages

I/we seek the following decision from the Manawatū District Council *[give precise details, use additional pages if required]*

That the Manawatu District Plan is amended as notified, including removal of Notable Tree 4 from the Notable Trees Schedule.

Send or deliver your submission to:  
Manawatū District Council  
Private Bag 10 001, Feilding 4743  
135 Manchester Street, Feilding 4702

Email to:  
[districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

For enquiries:  
Phone: 06 323 0000  
Email: [districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

<b>Signature</b>		<i>(Of submitter(s) or person authorised to sign on behalf of submitter(s))</i>	
Signed	<input type="text"/>	Signed	<input type="text"/>
Date	November 21 2024	Date	<input type="text"/>

### Important information

- Please indicate if you wish to speak in support of your submission at the Hearing stage:  
 I/we wish to speak in support of my/our submission  
 I/we do not wish to speak in support of my/our submission
- You can view Proposed Plan Change I: Minor Amendments at the Council Offices at 135 Manchester Street, Te Āhuru Mōwai Manawatū Community Hub Libraries at 64 Stafford Street, or online through Council's MakeYourMark website.

For Office Use Only	<input type="radio"/> post	<input type="radio"/> hand delivered
Received at the Manawatu District Council on	.....	at ..... am/pm