

**From:** Matthew Ross [mailto:Matthew.Ross@ngaitahu.iwi.nz]  
**Sent:** Thursday, 29 March 2018 4:16 PM  
**To:** Cindy Butt <Cindy.Butt@ecan.govt.nz>  
**Cc:** Ronnie Cooper <Ronnie.Cooper@ngaitahu.iwi.nz>; Kara Edwards <Kara.Edwards@ngaitahu.iwi.nz>  
**Subject:** RE: LTP submission

Kia ora Cindy

Please find attached the Te Runanga o Ngai Tahu submission on the Canterbury Regional Council draft Long Term Plan 2018-2028.

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I confirm that Te Runanga o Ngai Tahu would like to be heard.

Ka mihi  
Matthew

**Matthew Ross | Programme Leader – Mana | Kaiarahi – Mana**

Te Ao Turoa

Te Runanga o Ngai Tahu

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**Te Rūnanga o Ngāi Tahu**

**From:** Cindy Butt [mailto:Cindy.Butt@ecan.govt.nz]  
**Sent:** Monday, 26 March 2018 4:05 p.m.  
**To:** Ronnie Cooper  
**Subject:** RE: LTP submission

Kia ora Ronnie

I confirm approval for an extension to lodge an LTP submission to Thursday 29 March.

Do you wish to be heard?

Nga mihi  
Cindy

From: Ronnie Cooper [mailto:Ronnie.Cooper@ngaitahu.iwi.nz]  
Sent: Monday, 26 March 2018 3:43 PM  
To: Cindy Butt <Cindy.Butt@ecan.govt.nz>  
Subject: LTP submission

Kia ora Cindy

As discussed, Te Runanga would really appreciate having a few extra days to prepare for you our submission on the Environment Canterbury LTP.

Matthew Ross and myself will coordinate our submission and will email it to ECAN by the end of Thursday 29 March before the Easter holidays.

Many thanks,  
Nga mihi,  
Ronnie

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Te Rūnanga o NGĀI TAHU

To: Canterbury Regional Council  
P O Box 345  
Christchurch 8140

**TE RŪNANGA O NGĀI TAHU SUBMISSION ON THE CANTERBURY REGIONAL COUNCIL  
DRAFT LONG-TERM PLAN 2018-28.**

- 1.1 This is a submission on the draft Long-Term Plan 2018-28 (dLTP) proposed by Canterbury Regional Council (CRC).
- 1.2 Te Rūnanga o Ngāi Tahu (Te Rūnanga) wishes to be heard in support of its submission.
- 1.3 Te Rūnanga notes that the territorial responsibilities of CRC are wholly contained within the Ngāi Tahu Takiwā.
- 1.4 Te Rūnanga acknowledges and welcomes the proactive engagement CRC has had with Papatipu Rūnanga during the development of the dLTP in line with the Tuia relationship agreement.
- 1.5 Te Rūnanga strongly submits that the Tuia relationship with Papatipu Rūnanga should continue to be affirmed as a top priority for CRC. In this context, Te Rūnanga is in-principle generally supportive of the portfolios and work programmes included in the dLTP. This support is subject to:
  - 1.5.1 CRC facilitation of the effective and meaningful involvement of Papatipu Rūnanga in decision making processes and work programme implementation in line with the Tuia relationship agreement, and;
  - 1.5.2 The specific matters outlined in Appendix 1 being addressed by CRC with Papatipu Rūnanga.
  - 1.5.3 Any other matter raised by Papatipu Rūnanga being proactively addressed by CRC.

**Signed** for and on behalf of Te Rūnanga o Ngāi Tahu.

**Kara Edwards**

General Manager | Te Ao Tūroa  
Te Rūnanga o Ngāi Tahu  
Date: 29 March 2018

Address for service: Matthew Ross, Programme Leader – Mana | [matthew.ross@ngaitahu.iwi.nz](mailto:matthew.ross@ngaitahu.iwi.nz)

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## APPENDIX 1 – SPECIFIC MATTERS

### 1 GENERAL

- 1.1. Te Rūnanga o Ngāi Tahu (Te Rūnanga) is statutorily recognised as the representative tribal body of Ngāi Tahu whānui and was established as a body corporate on 24 April 1996 under section 6 of Te Rūnanga o Ngāi Tahu Act 1996 (the Act).
- 1.2. For the Canterbury Regional Council (CRC) the following are relevant provisions of the Act:
  - 1.3.1 Section 3 of the Act States: *This Act binds the Crown and every person (including any body politic or corporate) whose rights are affected by any provisions of this Act.*
  - 1.3.2 Section 15(1) states: *Te Rūnanga o Ngāi Tahu shall be recognised for all purposes as the representative of Ngāi Tahu Whānui.*
- 1.3. The Charter of Te Rūnanga o Ngāi Tahu established under the Act constitutes Te Rūnanga as the kaitiaki of the tribal interests.
- 1.4. Te Rūnanga respectfully requests that the CRC accord this response the status and weight due to the tribal collective, Ngāi Tahu whānui, currently comprising over 55,000 members, registered in accordance with section 8 of the Act.
- 1.5. Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui “for all purposes”, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses in relation to this matter.
- 1.6. It should be noted that in Section 15 (2) of the Act, the provision provides for; where any enactment requires consultation with any iwi or with any iwi authority, that consultation shall, with respect to matters affecting Ngāi Tahu Whānui, be held with Te Rūnanga o Ngāi Tahu. Section 15 (3) of the Act requires that in carrying out any consultation Te Rūnanga o Ngāi Tahu shall in turn consult with Papatipu Rūnanga. In practice, Te Rūnanga takes into account the views of Papatipu Rūnanga when determining its position. In the case of issues of local significance only, Te Rūnanga may defer a response completely to Papatipu Rūnanga.
- 1.7. Papatipu Rūnanga are defined in section 9 of the Act.
- 1.8. Te Rūnanga draws the attention of CRC to the specific matters outlined below as the basis for further discussion with Papatipu Rūnanga under the Tuia relationship agreement. Te Rūnanga reserves the right to comment at a hearing on all matters included in the dLTP where there are implications for Ngāi Tahu Whānui.

### 2 TŌ TĀTOU KAUPAPA MĀTUA: OUR PRIORITIES

- 2.1 Te Rūnanga notes that the Tuia relationship with Ngāi Tahu was a key priority for CRC in the Long-Term Plan 2015-25 which stated:

*“Above and beyond the statutory obligations (Local Government Act, Resource Management Act, and Ngāi Tahu Claims Settlement Act 1998), Environment Canterbury has committed with Ngāi Tahu leadership to engage together in a constructive and progressive relationship. This commitment is based on the recognition that the*

*relationship of Ngāi Tahu with their ancestral land within Canterbury is inextricably affected by the powers and functions of Environment Canterbury. Environment Canterbury's relationship with Ngāi Tahu is supported by a joint work programme called Tuia, which translates as 'working together shoulder to shoulder'. It has been affirmed as a top priority for Environment Canterbury."*

- 2.2 Te Rūnanga strongly submits that the relationship with Papatipu Rūnanga and Te Rūnanga should continue to be affirmed as a top priority for CRC. Whilst supportive of the further integration of the Tuia work programme across all dLTP portfolios and programmes, Te Rūnanga notes that the Treaty Partner relationship is now a subcomponent of a work programme under the Regional Leadership portfolio i.e. Ngāi Tahu and regional relationships. Te Rūnanga suggests that further discussion is had with Papatipu Rūnanga on how the Tuia relationship should be recognised in the dLTP.

### **3 FRESHWATER MANAGEMENT**

- 3.1 Notwithstanding the involvement of Papatipu Rūnanga in Canterbury Water Management Strategy (CWMS) processes, Te Rūnanga submits that CRC should proactively involve Papatipu Rūnanga in the development of programmes in the Freshwater Management portfolio under the Tuia relationship. This approach recognises CRC's obligations to the Treaty Partner and provides for a stronger platform for Te Mana o Te Wai to be addressed.

#### **3.2 CWMS Facilitation**

- 3.2.1 Te Rūnanga notes that the CWMS work programme continues to be a key component of CRC's approach to improving the management of freshwater in Canterbury. In this context, Te Rūnanga submits that service levels and resources for Tangata Whenua facilitation should be equivalent to those in the Long-Term Plan 2015-25.

#### **3.3 Environmental monitoring and progress reporting**

- 3.3.1 Te Rūnanga welcomes the inclusion of Mātauranga Māori in the environmental monitoring and progress reporting programme. This is a key matter for CRC to seek guidance from Papatipu Rūnanga.

#### **3.4 Zone and Regional Delivery**

- 3.4.1 Te Rūnanga supports the introduction of Cultural Land Management Advisors and welcomes the Tuia relationship commitment of CRC to develop a jointly agreed approach with Papatipu Rūnanga on the implementation of this new resource, as an example of the further integration of the Tuia relationship across CRC portfolios.

#### **3.5 Resource Management Act Water Framework**

- 3.5.1 Te Rūnanga notes that decisions made by CRC under the Resource Management Act can have significant impacts on the rights and interests of Ngāi Tahu Whānui. This is a work programme where CRC should continue to build and further develop proactive and meaningful engagement with Papatipu Rūnanga, including technical planning advice from their Regional Environmental Entities.
- 3.5.2 Te Rūnanga notes the proposed use of consent reviews (as an alternative to or to complement plan change proposals in local catchment areas) and suggests that the implementation of this approach is specifically discussed with Papatipu Rūnanga.

### **3.6 Regional Water Infrastructure Support**

- 3.6.1 Te Rūnanga submits that CRC should discuss the development of its programme of support for regional water infrastructure projects with Papatipu Rūnanga due to the potential intergenerational impacts of infrastructure projects on Ngāi Tahu Whānui.

### **3.7 Te Waihora Restoration**

- 3.7.1 Te Rūnanga welcomes the continued commitment of CRC to the restoration of Te Waihora, the co-governance agreement, and shared responsibility for the wider catchment, and notes that the future work programme includes the need to secure funding for Whakaora Te Waihora Phase 2 and/or direct funding of Phase 2 implementation.

## **4 BIODIVERSITY AND BIOSECURITY**

### **4.1 Biosecurity**

- 4.1.1 In relation to the implementation of the new Regional Pest Management Plan, Te Rūnanga submits that the Biosecurity programme should proactively protect the relationship of Ngāi Tahu Whānui with their ancestral lands, waters, sites, wāhi tapu and wāhi taonga, and that this approach is specifically discussed with Papatipu Rūnanga.

### **4.2 Braided Rivers**

- 4.2.1 Te Rūnanga welcomes the new programme on Braided Rivers and submits that CRC seek early input and guidance from Papatipu Rūnanga on implementation, in particular, the development of *ki uta ki tai* non-statutory management plans for braided rivers.

### **4.3 Wetlands**

- 4.3.1 Te Rūnanga welcomes the commitment to work in partnership with Ngāi Tahu in relation to the wetlands programme and suggests that early engagement is had with Papatipu Rūnanga.



## **5 HAZARDS, RISKS AND RESILIENCE**

### **5.1 Flood Protection and Control Works**

- 5.1.1 Te Rūnanga welcomes the commitment for Mana Whenua values to be recognised in annual flood protection and control work programmes and for engagement with Papatipu Rūnanga on flood protection and drainage infrastructure. Furthermore, Te Rūnanga submits that CRC should seek early input and guidance from Papatipu Rūnanga on the proposed review of river and drainage schemes.

### **5.2 Coastal Environment and Hazards**

- 5.2.1 In relation to the dLTP proposal to defer the review of the Regional Coastal Plan for the Canterbury Region (RCP) for at least 3 years, Te Rūnanga notes that:

- Papatipu Rūnanga raised concerns at the proposed deferral with CRC under the Tuia relationship agreement.
- The RCP became operative in 2005 and was due for statutory review in 2015 and may not take into account:
  - New Zealand Coastal Policy Statement 2010.
  - Canterbury Regional Policy Statement 2013.
  - Recently gazetted Mātaitai.
  - A *ki uta ki tai* approach to integrated resource management (e.g. Canterbury Water Management Strategy 2009, Whakaraupō/Lyttelton Harbour Catchment Management Plan 2018).

- 5.2.2 Te Rūnanga submits that a further delay in the review of the RCP may mean that CRC may not meet its obligations to the Treaty Partner and does not take into consideration Ngāi Tahu whānau relationships with their moana and surrounding environs.

- 5.2.3 Te Rūnanga asks that CRC gives greater urgency to the review of the RCP within the next 3 years. In the event that a full review is not possible, Te Rūnanga suggests that CRC promulgate a targeted plan change to better address the relationship of Ngāi Tahu Whānui with their moana. For example, working in partnership with Te Hapū o Ngāi Wheke and Tangata Tiaki under the Tuia relationship, CRC could implement an exemplar approach to aligning regional coastal planning with the two gazetted Mātaitai for Whakaraupō, and the Whakaraupō/Lyttelton Harbour Catchment Management Plan, and inform a full review of the RCP in due course.

- 5.2.4 Te Rūnanga notes that CRC recently signed the Whakaraupō/Lyttelton Harbour Catchment Management Plan 2018. Te Rūnanga submits that the dLTP should include clear explanation as to how CRC will implement the catchment plan.

### **5.3 Climate Change Integration**

- 5.3.1 Te Rūnanga welcomes the new programme on Climate Change integration and suggests that CRC has early engagement with Papatipu Rūnanga on this topic.

- 5.3.2 Te Rūnanga notes that the Ngāi Tahu Climate Change Strategy will be finalised in mid-2018 and looks forward to working with CRC and Papatipu Rūnanga on implementation of practical climate change measures.

## **6 REGIONAL LEADERSHIP**

### **6.1 Governance and Engagement**

- 6.1.1 Te Rūnanga welcomes the commitment to complete a representation review before the transition of CRC to full democracy and suggests that this is a topic for further discussion with Papatipu Rūnanga.

### **6.2 Ngāi Tahu and Regional Relationships**

- 6.2.1 Notwithstanding comments 2.1-2.3, Te Rūnanga is generally supportive of the Ngāi Tahu and Regional Relationships work programme.
- 6.2.2 Te Rūnanga submits that resources for the Tuia work programme should be retained at levels equivalent to service levels in the Long-Term Plan 2015-25. Whilst it is important that CRC continues to integrate its Tuia work programme across all of its portfolios, this cannot be achieved without continuing to build stronger relationships with Papatipu Rūnanga as a top priority.
- 6.2.3 To help ensure that the Tuia work programme is further integrated, Te Rūnanga suggests that consideration is given to the development of "Tuia Implementation Statements" whereby:
- CRC facilitates the development of Tuia Implementation Statements for each portfolio and work programme in the Long Term Plan.
  - Each Tuia Implementation Statement clearly identifies where CRC activities may relate to the rights and interests of Ngāi Tahu Whānui, and opportunities for Papatipu Rūnanga to exercise rangatiratanga and kaitiakitanga.
  - Tuia Implementation Statements are jointly agreed by CRC and Papatipu Rūnanga on an annual basis.