

14 October 2022

Greater Wellington Regional Council  
100 Cuba St  
Te Aro, Wellington 6011  
Aotearoa New Zealand

Tēnā koe

## Proposed Change 1 to the Regional Policy Statement for the Wellington Region

Please find attached, the Māori Trustee's submission in response to the 'Proposed Change 1 to the Regional Policy Statement for the Wellington Region'.

Should you have any questions or queries, please feel free to contact our Resource and Environmental Advisor, Dougal Morrison.

Dougal can be contacted on 0274 700 658 or by email at [Dougal.Morrison@tetumupaeroa.co.nz](mailto:Dougal.Morrison@tetumupaeroa.co.nz).

Ngā manaakitanga,



**Dr Charlotte Severne**  
Māori Trustee



## **Proposed Change 1 to the Regional Policy Statement for the Wellington Region**

### **Submission by the Māori Trustee on the ‘Proposed Change 1 to the Regional Policy Statement for the Wellington Region’**

**14/10/2022**



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## Summary of Position

1. The Māori Trustee administers, as trustee or agent, nearly 90,000 hectares of Māori freehold land on behalf of approximately 100,000 individual Māori landowners. Te Tumu Paeroa is the organisation that supports the Māori Trustee to carry out her functions, roles and responsibilities. Detailed information regarding the Māori Trustee and Te Tumu Paeroa is set out in Appendix A. Additional information can be found on Te Tumu Paeroa's website, [www.tetumupaeroa.co.nz](http://www.tetumupaeroa.co.nz).
2. The views expressed in this submission on the 'Proposed Change 1 to the Regional Policy Statement for the Wellington Region' (Proposed Change) are those of the Māori Trustee as the single largest administrator of Māori land in Aotearoa. The Māori Trustee is the responsible trustee of 60 Māori land trusts located within the Greater Wellington region. Those trusts collectively hold 1,052 ha of land on behalf of approximately 6,000 Māori landowners. The average block size is 17.5 ha, and 52 (87%) contain low slope land – as defined by the Stock Exclusion 2021 map.
3. The views in this submission on the Proposed Change are those of the Māori Trustee. Given the sheer number of underlying owners of these lands, the views of the Māori Trustee may not necessarily be shared by some owners the land she administers impacted by Proposed Plan. Further, and to labour the point, the Māori Trustee does not speak for or otherwise represent iwi, hapū or other holders of Māori land, some of whom are likely to submit on this Proposed Change.
4. Our submission table is set out in pages 6-17 below. It contains the Māori Trustee's specific responses to draft provisions in the Proposed Change.
5. In summary, the Māori Trustee is generally comfortable with the proposed objectives, policies, rules and methods to manage land use activities and subdivision across Greater Wellington. However, the Māori Trustee considers amendments are required to recognise all Māori landowners, reduce ambiguity and to provide clear direction to those implementing plan change provisions.
6. Other key points made by the Māori Trustee in the submission include that:
  - a. The Māori Trustee is generally comfortable with Objective A, under the chapter "Proposed amendments to Chapter 3: Resource Management issues, objectives and summary of policies ...". However, the Māori Trustee considers the explanatory points should be changed to include a new point (a) Gives effect to Te Mana o te Wai; and to change point (b) to recognise *and provide* for ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment.
  - b. Māori Trustee considers that there is an express need for Te Mana o te Wai to be "given effect" to within Objective A. This will ensure that the whole plan change will give effect to Te Mana o te Wai.
  - c. The Māori Trustee also considers that ki uta ki tai should be recognised and provided for within Objective A. This will ensure that mana whenua/ tangata whenua values and mātauranga Māori is appropriately recognised and provided for in decision making.



- d. The Māori Trustee supports the inclusion of the 'Chapter 3.1A "Climate Change, as Māori land is disproportionately affected by climate change, particularly when it comes to resilience.
  - e. The Māori Trustee is generally comfortable with the objectives in the 'Freshwater' chapter. However, the Māori Trustee considers that the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa should be recognised and provided for, rather than just noted on page 35. This will ensure their expression of Te Mana o te Wai is considered appropriately when implementing the Regional Policy Statement.
7. The Māori Trustee notes that she has a direct interest in the impact of any provisions of the Proposed Change on blocks she administers.
  8. The relief sought in this submission may result in amendments needing to be made in chapters not directly submitted on. The Māori Trustee supports consequential amendments to be made, as a result of the relief sought in this submission, to provide consistency throughout the Proposed Change.
  9. The Māori Trustee would welcome the opportunity to discuss her submission with Council representatives.



## Specific Submissions

### Submission table

Proposed RPS provisions	Support or oppose	Māori Trustee submission	Relief sought
<b>Proposed amendments to Chapter 3</b> Resource Management issue, objectives and summary of policies and methods to achieve the objectives in the Regional Policy Statement			
<b>Objective A (pg 5)</b> Integrated management of the region's natural and built environments is guided by Te Ao Māori.	Partially support	The Māori Trustee is generally comfortable with Objective A.  However, there is an express need for Te Mana o te Wai to be given effect to in Objective A. This will ensure that the overarching resource management objective for the Wellington Region is appropriately addressing issues raised, particularly issue 1 and 3.  Furthermore, provision (c) could be more directive to guarantee ki uta ki tai is integrated into the decision making process at a high level, therefore, it should be recognised and provided for.	The Māori Trustee considers that there is an express need for 'Objective A' to give effect to Te Mana o te Wai.  The Māori Trustee considers the following amendment needs to be made to Objective A.  <b>Amendments</b> Integrated management of the region's natural and built environments is guided by Te Ao Māori and: (a) Gives effect to Te Mana o te Wai; (b) incorporates mātauranga Māori; and (c) recognise <i>and provides for</i> ki uta ki tai – the holistic nature and interconnectedness of all parts of the natural environment.
<b>Proposed insertion of Chapter 3.1A: Climate Change</b>			
<b>Chapter introductions (pg 8)</b>	Support	The Māori Trustee is generally comfortable with the 'Chapter Introductions' for climate change.	N/A
<b>Objectives</b>			
<b>CC.1 – CC.8 (pp 11-28)</b>	Support	The Māori Trustee is generally comfortable with the objectives in the 'Climate Change' chapter.	N/A

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Policies - Regulatory			
CC.1 – CC.8 (pg 100)	Support	The Māori Trustee is generally comfortable with the regulatory policies in the 'Climate Change' chapter.	N/A
Policies – Matters to be considered			
IM.1 (pg 133) IM.2 CC.9 – CC.14	Partially support	<p>The Māori Trustee is generally comfortable with policies CC.9 to CC.14 that need to be considered in the 'Climate Change' chapter.</p> <p>However, the Māori Trustee considers that the Policy IM.1 and IM.2 need to be changed to regulatory, to align with the changes sought in Objective A.</p>	The Māori Trustee considers that Policies IM.1 and IM.2 be changed to a regulatory policy.
Policies – Non-regulatory			
CC.16 (pg 163) Climate change adaptation strategies, plans and implementation programmes.	Partially support	<p>The Māori Trustee is generally comfortable with the non-regulatory policies in the 'Climate Change' chapter.</p> <p>However, Māori landowners should also be included in the decision-making process. This will allow for a collaborative approach, ensuring that Māori landowners have an equitable stake when it comes to outcomes of adaptation, managed retreat or re-location.</p>	<p>The Māori Trustee considers that the following amendment needs to be made to Policy CC.16.</p> <p><b>Amendment</b> Regional, city and district councils should, under the Local Government Act 2002, partner with mana whenua / tangata whenua, <i>landowners</i> and engage local communities in a decision-making process to develop and implement strategic climate change adaptation plans that map out management options over short, medium and long term timeframes, using a range of tools and methods.</p>
CC.17 (pg 164) Iwi climate change adaptation plans – non regulatory.	Partially support	The Māori Trustee proposes that this policy should be “considered”. It is noted within the policy that Climate change will disproportionately affect Māori, therefore this policy must be considered at implementation.	<p>The Māori Trustee considers that the following amendment needs to be made to Policy CC.17.</p> <p><b>Amendment</b> Iwi climate change adaptation plans – <i>nonregulatory considered</i>.</p>
Methods to implement			

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CC.1 – CC.10 (pg 173)	Support	The Māori Trustee is generally comfortable with the methods to implement for the 'Climate Change' chapter.	N/A
<b>Proposed amendment to Chapter 3.4: Freshwater (including public access)</b>		<b>Māori Trustee submission</b>	<b>Relief sought</b>
Chapter introduction (pg. 28)	Support	The Māori Trustee is generally comfortable with the 'Chapter Introductions' for Freshwater (including public access).	N/A
<b>Objectives</b>			
FW.12 (pg. 33)	Partially support	The Māori Trustee is generally comfortable with the objectives in the 'Freshwater' chapter.  However, the statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa should be recognised and provided for to ensure their expression of Te Mana o te Wai is considered appropriately when implementing the Proposed Policy Statement.	The Māori Trustee considers the following amendment needs to be made to objective FW.12.  <b>Amendment</b> The Statements of Kahungunu ki Wairarapa and Rangitāne o Wairarapa <i>are recognised and provided for.</i>
Statement of Rangitāne o Wairarapa Te Mana o te Wai expression	Support	The Māori Trustee is generally comfortable with Rangitāne o Wairarapa Te Mana o te Wai expression.	N/A
Statement of Kahungunu ki Wairarapa Te Mana o te Wai expression	Support	The Māori Trustee is generally comfortable with Kahungunu ki Wairarapa Te Mana o te Wai expression.	N/A
<b>Policies</b>			
12. (pg. 110) Management of water bodies – regional plans.	Support	The Māori Trustee is generally comfortable with policy 12 in the 'Freshwater' chapter.	The Māori Trustee considers that the following amendments need to be made to Policy 12.  <b>Amendment</b>



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		However, to ensure tino rangatiratanga is exercised appropriately, affected Māori landowners should be included in the partnership.	Regional plans shall give effect to Te Mana o te Wai and include objectives, policies, rules and/or methods that: (a) are prepared in partnership with mana whenua / tangata whenua and <i>affected Māori landowners</i> ;
<b>14. (pg. 112)</b> Urban development effects on freshwater and the coastal marine area	Partially support	The Māori Trustee considers there is an express need for iwi, hapū and affected landowners to identify and map rivers, and in particular wetlands with the regional and district councils. This will guarantee that Māori landowners have the opportunity to ensure water bodies of significance to them are appropriately identified.	The Māori Trustee considers that the following amendments need to be made Policy 14.  <b>Amendment</b> (l). Identify and map rivers and wetlands <i>in conjunction with iwi, hapū and affected landowners</i> .
<b>17. (pg. 114)</b> Take and use of water for the health needs of people	Partially support	The Māori Trustee supports Policy 17 and its implementation through regional plans, and the review of water allocation plans. However, the Māori Trustee considers that “papakāinga” should be added to point (d), to ensure water can be provided.	The Māori Trustee considers that the following amendments need to be made Policy 17.  <b>Amendments</b> (d) the taking of water for marae and <i>papakāinga</i> .
<b>FW.3 (pg. 116)</b> Urban development effects on freshwater and the coastal marine area – district plans	Partially support	The Māori Trustee partially supports Policy FW.3. However, to give effect to the relationship mana whenua / tangata whenua have, provision (c) needs to be more directive to preclude ambiguity within the policy.	The Māori Trustee considers the following amendments to Policy FW.3.  <b>Amendments</b> c) <i>Recognise</i> and provide for mana whenua / tangata whenua and their relationship with their culture, land, water, wāhi tapu and other taonga;
<b>Policies – Matters to be considered</b>			
<b>Policy 44. (pg. 144)</b> Managing water takes and use to give effect to Te Mana o te Wai. pg. 144	Partially support	The Māori Trustee considers that Policy 44 should be a regulatory policy, rather than a “Matter to be considered”.	The Māori Trustee considers that Policy 44 be changed to a regulatory policy.

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		This will ensure appropriate emphasis of the policy is applied and to give effect to the overarching Resource Management objective.	
<b>Policies – Non-regulatory</b>			
<b>FW.7 (pg. 166)</b> Water attenuation and retention.	Partially support	The Māori Trustee considers that Policy FW.7 should be a “Matter to be considered”, rather than non-regulatory. This will work towards strengthening a change of view and promoting and encouraging ecosystem health.	The Māori Trustee considers that Policy FW.7 be changed to a ‘considered’ policy.
<b>Methods to implement</b>			
<b>Method 32 (pg. 184)</b> Partnering with mana whenua / tangata whenua, and engaging with stakeholders, landowners and the community in the identification and protection of significant values.	Partially support	The Māori Trustee is generally comfortable with the methods to implement in the ‘Freshwater’ Chapter.  However, Method 32 should be a regulatory method to ensure the protection of significant values.	The Māori Trustee considers that Policy 32 be changed to a ‘regulatory’ method.
<b>Method 48 (pg190)</b> Water allocation policy review	Partially support	The Māori Trustee supports the review of the water allocation policy in the regional policy statement, particularly alternative solutions to a first in first served policy which has historically disadvantaged Māori landowners.  However, the Māori Trustee considers ‘rights and interests’ do not recognise the full extent of Māori rights, interests and responsibilities in freshwater, including the preservation of those rights and interests. Therefore, there is an express need to include ‘responsibilities’ to guarantee Māori rights, interests and responsibilities in freshwater are appropriately recognised and provided for.	The Māori Trustee considers that the following amendments need to be made method 48.  <b>Amendments</b> (e) provide for iwi, hapū <i>and Māori landowners</i> rights, <i>interests</i> and <del>interests</del> <i>responsibilities</i> ;

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Proposed amendment to Chapter 3.6: Indigenous ecosystems		Māori Trustee submission	Relief sought
<b>Chapter Introductions</b>	Support	The Māori Trustee is generally comfortable with the inclusion of the 'Chapter Introductions' for 'Indigenous ecosystems'.	N/A
<b>Objectives</b>			
<b>16 A-C (pp 63&amp;64)</b>	Support	The Māori Trustee is generally comfortable with the objectives in the 'Indigenous ecosystems' chapter.	N/A
<b>Policies</b>			
<b>Policy 24 (pg 120)</b>	Partially support	The Māori Trustee is generally comfortable with Policy 24. However, Policy 24 should be changed to include text to state that biodiversity offsetting should not be provided for "where it is not appropriate". This will provide greater clarity as there will likely be instances where offsetting is possible but not appropriate, particularly for whenua Māori.	The Māori Trustee considers that the following amendment need to be made Policy 24:  <b>Amendment</b> (a) not provide for biodiversity offsetting: (i) <i>where it is not appropriate</i> , there is no appropriate site, knowledge, proven methods, expertise or mechanism available to design and implement an adequate biodiversity offset.
<b>IE.1 (pg 121)</b> Giving effect to mana whenua / tangata whenua roles and values when managing indigenous biodiversity – district and regional plans.	Partially support	The Māori Trustee is generally comfortable with Policy IE.2. However, policy IE.1 should include a provision for giving local effect to Te Rito o te Harakeke, to be consistent with Policy IE.2.  Furthermore, Policy IE.1 should allow for Māori landowners to exercise kaitiakitanga on their whenua as not all Māori within the same iwi or hapū have the same tikanga when managing and monitoring indigenous biodiversity on their land.	The Māori Trustee considers that the following amendment need to be made Policy IE.1.  <b>Amendment</b> (a) apply mātauranga Māori frameworks, and support mana whenua / tangata whenua <i>and Māori landowners</i> to exercise their kaitiakitanga, in managing and monitoring indigenous biodiversity, including giving effect to <i>Te Rito o te Harakeke</i> .
<b>Policies – Matters to be considered</b>			

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<p><b>Policy 47 (pg 145)</b></p>	<p>Partially supports</p>	<p>The Māori Trustee is generally comfortable with the policies that need to be considered in the 'Indigenous ecosystems' chapter.</p> <p>However, under Policy 47, there is a need to expressly state that Māori values be included as part of any assessment of biodiversity values.</p>	<p>The Māori Trustee considers that the following amendments need to be made Policy 47, by adding a new point (j):</p> <p><b>Amendments</b>  <i>(j) 'identified historical, cultural and spiritual relationships and values tangata whenua have with indigenous biodiversity.'</i></p>
<p><b>Policies – Non-regulatory</b></p>			
<p><b>IE.3 (pg 166) &amp; IE.4 (pg 167)</b></p>	<p>Support</p>	<p>The Māori Trustee is generally comfortable with the non-regulatory policies in the 'Indigenous ecosystems' chapter.</p>	<p>N/A</p>
<p><b>Methods to implement</b></p>			
<p><b>54 (pg 192)</b>            Assist landowners to maintain, enhance and restore indigenous ecosystems.</p>	<p>Partially support</p>	<p>The Māori Trustee is generally comfortable with the methods to implement in the 'Indigenous ecosystems' chapter.</p> <p>The Māori Trustee supports the consideration for rates rebates, particularly as whenua Māori tends to have a greater amount of indigenous cover, limiting its land use capabilities.</p> <p>However, Māori landowners should be assisted in the cost to maintain, enhance and restore indigenous ecosystems by way of Ngā Whenua Rāhui as well as QEII covenants.</p>	<p>The Māori Trustee considers that the following amendment need to be made Method 48.</p> <p><b>Amendment</b>            (a) assisting with the costs of legally protecting indigenous ecosystems by way of open space covenants with Queen Elizabeth the Second National Trust (QEII) and <i>Ngā Whenua Rāhui</i>;</p>
<p><b>IE.1 (pg 180)</b>            Partnering with mana whenua / tangata whenua to give local effect to Te Rito o te Harakeke.</p>	<p>Partially Support</p>	<p>The Māori Trustee considers method IE.1 be changed to "regulatory" to guarantee partnership with mana whenua/tangata whenua is established to give effect to Te Rito o te Harakeke by the Regional Council.</p>	<p>The Māori Trustee considers that Method IE.1 be changed to a 'regulatory' method.</p>

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<b>IE.2 (pg189)</b> Inventory of biodiversity offsetting and biodiversity compensation opportunities	Support	The Māori Trustee supports method IE.2: Partner with mana whenua / tangata whenua, and engage with interested parties to develop a regional inventory of opportunities for offsetting or compensating for any residual adverse effects on ecosystems and habitats with significant indigenous biodiversity values.	N/A
<b>Proposed amendment to Chapter 3.8: Natural Hazards</b>		<b>Māori Trustee submission</b>	<b>Relief sought</b>
<b>Chapter Introductions</b>	Support	The Māori Trustee is generally comfortable with the inclusion of the 'Chapter Introductions' for Natural Hazards.	N/A
<b>Objectives</b>			
<b>19 - 21</b>	Support	The Māori Trustee is generally comfortable with the objectives in the 'Natural Hazards' chapter.	N/A
<b>Policies – Regulatory</b>			
<b>29 (pg 121)</b> Managing subdivision, use and development in areas at risk from natural hazards	Support	The Māori Trustee is generally comfortable with Policy 29 in the 'Natural Hazards' chapter.	N/A
<b>Policies – Matters to be considered</b>			
<b>52 (Pg 149)</b> Minimising adverse effects of hazard mitigation measures.	Partially support	The Māori Trustee considers that Policy 52 should be a "Regulatory" option, rather than a "Consideration" option, to give this greater weight.	The Māori Trustee considers that Policy 52 be changed to a 'regulatory' policy.
<b>Methods to implement</b>			
<b>1, 4,5,14 and 22 (pg. 181)</b>	Support	The Māori Trustee is generally comfortable with the methods to implement for the 'Natural Hazards' chapter.	N/A

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Regional form, design and function			
<b>Chapter Introductions</b>	Support	The Māori Trustee is generally comfortable with the inclusion of the 'Chapter Introductions' for the Regional form, design and function.	N/A
Objectives			
<b>22 A - B</b>	Support	The Māori Trustee is generally comfortable with the objectives in the 'Regional form, design and function' chapter.	N/A
Policies - Regulatory			
<b>UD.1 (pg. 83)</b> Providing for the occupation, use, development and ongoing relationship of mana whenua / tangata whenua with their ancestral land.	Partially support	<p>The Māori Trustee is generally comfortable with the regulatory policies in the 'Regional form, design and function' chapter.</p> <p>However, she believes there is a need to define 'ancestral land' in the Proposed Policy Statement to avoid ambiguity in regards to individual's interpretation of ancestral lands and their extent.</p> <p>The Māori Trustee believes there is a need for the Regional Council to clarify who will identify a Māori Purpose Zone, if it is appropriate within the districts. The Māori Trustee considers that it is appropriate that iwi, hapū and Māori landowners identify a Māori Purpose Zone in their respective rohe.</p> <p>Furthermore, provision UD.1(f) should provide for the development of land owned by Māori landowners, whether its whenua under General land or Māori Freehold land.</p>	<p>The Māori Trustee considers that 'ancestral lands' should be defined in the definitions chapter of this Proposed Regional Policy Statement.</p> <p>The Māori Trustee believes the Regional Council should clarify who will identify a Māori Purpose Zone if deemed appropriate.</p> <p>The Māori Trustee considers the following amendment needs to be made to UD.1.</p> <p><b>Amendments</b> (f) providing for the development of land owned by mana whenua / tangata whenua <i>and Māori landowners</i>.</p>
Policies – Matters to be considered			

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<b>UD. 2 (pg. 156)</b>	Support	The Māori Trustee is generally comfortable with the policies that need to be considered in the 'Regional form, design and function' chapter.	N/A
<b>Policies – Non-regulatory</b>			
<b>67 (pg. 167)</b>	Support	The Māori Trustee is generally comfortable with the non-regulatory policies in the 'Regional form, design and function' chapter.	N/A
<b>Methods to implement</b>			
<b>UD.1 (pg. 181)</b>	Support	The Māori Trustee is generally comfortable with the methods to implement for the 'Regional form, design and function' chapter.	N/A
<b>Coastal environment</b>		<b>Māori Trustee submission</b>	<b>Relief sought</b>
<b>Policies – Regulatory</b>			
<b>3 (pg 104)</b> Protecting high natural character in the coastal environment.	Support	The Māori Trustee is generally comfortable with Policy 3 for the Coastal Environment.	N/A
<b>Methods to implement</b>			
<b>1,2,4,30, 32 and 53 (pg 170)</b>	Support	The Māori Trustee is generally comfortable with the methods to implement for the 'Coastal Environment' chapter.	N/A
<b>Integrated Management</b>		<b>Māori Trustee submission</b>	<b>Relief sought</b>
<b>Policies – Matters to be considered</b>			
<b>IM.1 (pg. 133)</b> Integrated Management - Ki uta ki tai	Partially support	The Māori Trustee is generally comfortable with the content of IM.1 for 'Integrated Management'.  However, policy IM.1 should be changed to 'regulatory'. This will ensure that recognising and providing for Ki uta ki tai is paramount to resource management decisions.	The Māori Trustee considers that Policy IM.1 should be changed to a 'regulatory' policy.  The Māori Trustee considers the following amendment needs to be made to Policy IM.1.  <b>Amendment</b>

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		Furthermore, mana whenua/tangata whenua should be actively involved in resource management and decision-making to directly address issue 3 in the 'Proposed Amendment to Chapter 3'.	(a) partnering with mana whenua / tangata whenua to provide for mana whenua / tangata whenua <i>active</i> involvement in resource management and decision making.
<b>IM.2 (pg. 134)</b> Equity and inclusiveness	Partially support	<p>The Māori Trustee is generally comfortable with the content of IM.2 for 'Integrated Management'.</p> <p>However, policy IM.2 should be changed to 'regulatory'. This is pertinent given that Māori landowners have historically been disadvantaged within the resource management system and decision-making processes. Therefore, the policy should be regulatory to prevent further inequities.</p> <p>Additionally, the Māori Trustee reiterates her point in IM.1 that this change will directly address issue 3 in the 'Proposed Amendment to Chapter 3'.</p>	The Māori Trustee considers that Policy IM.2 should be changed to a 'regulatory' policy.
<b>Methods to implement</b>			
<b>IM.1 (pg. 182)</b> Integrated management - ki uta ki tai	Partially support	<p>The Māori Trustee is generally comfortable with the content of IM.1 for 'Integrated management'.</p> <p>However, the Māori Trustee considers that method IM.1 be changed to regulatory. This coincides with the change of Policy IM.1 to regulatory, further strengthening the implementation of ki uta ki tai.</p> <p>In addition, the methods of implementation of IM.1 should be alongside mana whenua/tangata whenua to guarantee that the fundamental concept of ki uta ki tai is integrated appropriately.</p>	<p>The Māori Trustee considers that method IM.1 be changed to a 'regulatory' method.</p> <p>The Māori Trustee considers the following amendments need to be made to Method IM.1.</p> <p><b>Amendments</b> <i>Implementation: Wellington Regional Council*, city and district councils, and mana whenua/tangata whenua.</i></p>



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<p><b>IM.2 (pg. 182)</b> Protection and interpretation of Mātauranga Māori and Māori data</p>	<p>Partially support</p>	<p>The Māori Trustee is generally comfortable with the content of IM.2 for 'Integrated Management'.</p> <p>However, Method IM.2 should be changed to regulatory, ensuring adequate protection is afforded to mātauranga Māori and Māori data sovereignty within the Proposed Policy Statement.</p> <p>The Māori Trustee reiterates her point above in Method IM.1 that the methods of implementation of IM.2 should be alongside mana whenua/tangata whenua. This will ensure that mātauranga Māori and Māori data sovereignty is protected and interpreted as intended.</p>	<p>The Māori Trustee considers that method IM.1 be changed to a 'regulatory' method.</p> <p>The Māori Trustee considers the following amendments need to be made to Method IM.2.</p> <p><b>Amendments</b> <i>Implementation: Wellington Regional Council <b>and mana whenua/tangata whenua.</b></i></p>
<p><b>Proposed amendment to Appendix 3: Definitions</b></p>		<p><b>Māori Trustee submission</b></p>	<p><b>Relief sought</b></p>
<p><b>Papakāinga (pg. 216)</b></p>		<p>The Māori Trustee notes that the definition of "Papakāinga" and the reason for its removal is entirely unclear. In the absence of a good reason, the definition should be reinstated.</p>	<p>The Māori Trustee believes the "Papakāinga" definition should be reinstated, in consultation with iwi, hapu and Māori landowners.</p> <p>In the very least the "Papakāinga" definition should include reference to residential accommodation, communal buildings and facilities for iwi, hapu and/or Māori landowners who whakapapa to the area.</p>



## Conclusion

10. The Māori Trustee looks forward to discussing this submission with Council representatives.
11. Should you have any questions or queries, please feel free to contact Dougal Morrison. Dougal can be contacted on 0274 700 658 or by email at [dougal.morrison@tetumupaeroa.co.nz](mailto:dougal.morrison@tetumupaeroa.co.nz).

A handwritten signature in black ink that reads "C Severne".

**Dr Charlotte Severne**

Māori Trustee



## Appendix A – The Māori Trustee and Te Tumu Paeroa

### Who We Are

12. The Māori Trustee is appointed by the Minister for Māori Development under the Māori Trustee Act 1953. The role of the Māori Trustee, is to provide accurate and timely administration and management of whenua and other client assets in compliance with the principles and obligations of trusteeship and agency, and in accordance with the Māori Trustee Act 1953, Trusts Act 2019, Te Ture Whenua Māori Act 1993 and other legislation. The current Māori Trustee, Dr Charlotte Severne, was appointed for a three-year term in September 2018 and was re-appointed for a five-year term in October 2021.
13. Te Tumu Paeroa is the organisation that supports the Māori Trustee to undertake her functions, duties and responsibilities.
14. The Māori Trustee administers around 88,000 hectares of Māori freehold land, as well as general land and other interests and investments, on behalf of approximately 100,000 Māori Land owners.
15. A primary objective of The Māori Trustee, is to protect, utilise and grow the assets of our Māori land owners. The organisation provides land administration and professional trustee and agency services to one third of all Māori land trusts (over 1,700 trusts), as well as targeted development and sector-specific expertise. The organisation is involved in the management of a number of Māori enterprises and development projects.
16. The Māori Trustee currently employs 124 staff across five offices throughout New Zealand, with the Māori Trustee located in Te Whanganui-a-Tara. Our organisation is made up of, but not limited to, trust and property management, law, client services, and other specialist teams. Our employees are focussed on protecting and enhancing the whenua Māori that we have the privilege to administer on behalf of its landowners and their tipuna.
17. Te Tumu Paeroa is unique, in that it is the only nation-wide organisation that manages significant tranches of Māori land and assets on behalf of Māori landowners.

### Our Vision and Priorities

18. Our vision is: *Ko Te Tumu Paeroa tēnei, te tauawhi nei, te taunaki nei, te tiaki nei ngā whenua Māori mō naiane, mō āpōpō hoki. Ensuring Māori land is protected and enhanced, now and for generations to come.*

Our vision requires a careful balance between protection of the whenua and taiao and enhancement of the whenua through a range of pathways, including commercial development.
19. Our purpose is to be a dedicated professional trustee service for Māori.
20. Our strategic priorities assist us to deliver on our vision and purpose:



- a. Ensuring consistent delivery of professional trustee services.
- b. Building trust and confidence across all of our engagements.
- c. Demonstrating leadership in meeting new challenges to governance and administration of whenua Māori.

21. Our responsibility as trustee in the context of the 'Managing our wetlands in the coastal marine area' discussion document, is to ensure that the voices of the whenua that we are responsible for, and those landowners who whakapapa to that whenua, are heard and understood.

## Our Portfolio

22. Our portfolio currently<sup>1</sup> consists of the following:

- a. Number of trusts and other entities under administration – 1,746.
- b. Number of hectares under management – 88,000.
- c. Number of owner accounts maintained – 102,502.
- d. Number of ownership interests – 258,469.
- e. Number of leases administered – 1,732.
- f. Client funds under management (market value) – \$ 130.1 million.
- g. Māori Trustee equity – \$ 170.7 million.

## Our Mahi

23. The Māori Trustee has the responsibility to ensure that the best interests and outcomes for Māori land owners are advanced by Te Tumu Paeroa's mahi.

24. Our core services are:

- a. Administering trusts as responsible trustee, custodian trustee, and agent
- b. Convening, running and recording proceedings of meetings of beneficial owners
- c. Responding to requests for information
- d. Consulting with advisory trustees and owners
- e. Leasing property on behalf of owners and administering leases
- f. Collecting rent and managing arrears and bad debts
- g. Managing contracts for service entered into by trusts
- h. Managing and investing cash assets in the Common Fund
- i. Reporting to beneficial owners
- j. Acquiring and paying for goods and services
- k. Preparing financial statements and annual tax returns
- l. Keeping records for trusts we administer
- m. Making trust distributions to owners
- n. Administering grants and scholarships
- o. Making applications to the Māori Land Court

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<sup>1</sup> The Māori Trustee Annual Report 2022



- p. Reviewing land use and considering, where appropriate, alternative land use options
- q. Developing and enhancing property and land management including Asset Management and Farm Environment Plans
- r. Managing and providing support services for the General Purposes Fund

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