

To Kāpiti Coast District Council

Further Submission of (or Opposition to) Submissions on Proposed Plan Change to the Operative Kāpiti Coast District Plan 2021.

Plan Change Number: Proposed Plan Change 2

Plan Change Name: Intensification to the Operative Kāpiti Coast District Plan 2021

**Further Submitter Details**

Full name of person making further submission: Naomi Solomon

Organisation Name: Te Rūnanga o Toa Rangatira on behalf of Ngāti Toa Rangatira

Contact Person: Onur Oktem Lewis

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We would like our address for service to be our email.

We are submitting as persons who have interest in the proposal that is greater than the interest the general public has.

Submitter Name/ Submission Number	Submitter Address/ Email	Support or Oppose	The particular part of the submission we support or oppose are:	The reasons for our support or opposition are:	Allow or Disallow	We seek that the whole or part of the submission be allowed or disallowed:
Suzette and Reinier Opperman S042.01, S042.02	Suzette.opperman@outlook.com	Oppose	The submitter requests changes to the papakāinga provisions, by making amendments so that they are for the people of Kāpiti rather than tangata whenua and asks for papakāinga to be amended to community housing developments.	We oppose this submission because as the proposed papakāinga chapter states, papakāinga enable tangata whenua to develop and live on their ancestral whenua.  This chapter aims to address the issues tangata whenua face when developing their land and help mitigate these specific issues so that iwi and Māori can reconnect with their whenua. Since these issues are unique to tangata whenua and papakāinga are taonga, it is important that papakāinga provisions are only for tangata whenua.	Disallow	We seek that this submission requesting papakāinga developments to be extended to community housing developments for all the people of Kāpiti is disallowed.
Greater Wellington Regional Council S097.02	Mika.Zollner@gw.govt.nz	Support	The submitter seeks the inclusion of objectives to promote positive effects of urban development on the health and wellbeing of freshwater bodies and coastal marine environments. They also seek for Te Mana o Te Wai to be integrated throughout the plan.	We support this submission because urban development and the proposed intensification could have adverse effects on the health of wai if it is not managed appropriately. Integrating Te Mana o Te Wai into the plan would ensure that the health of wai is prioritised and the plan would align with our values and aspirations for wai.	Allow	We seek that this part of the submission seeking the inclusion of objectives to promote the health and wellbeing of water bodies and marine environments alongside Te Mana o Te Wai is allowed.
Greater Wellington Regional Council S097.03, S097.04	Mika.Zollner@gw.govt.nz	Support	The submitter seeks improved stormwater management in the plan to avoid adverse effects on water quality from development. This would include	We support this submission because improving stormwater management is an important aspect of looking after the health of wai. Improved stormwater management, by way of monitoring and considering the	Allow	We seek that this part of the submission seeking improved stormwater management in the district plan is allowed.

			considering the effects of development, requiring water sensitive urban design, managing land use, requiring financial contributions, sustainable stormwater design, and managing the effects of subdivision on cultural values.	effects of development on multiple different aspects of Taiao, will be significant for achieving sustainable management of our water resources. It is also important that these provisions are consistent with Te Mana o te Wai and recognise rangatiratanga.		
Greater Wellington Regional Council S097.05	Mika.Zollner@gw.govt.nz	Support	The submitter requests that the effects of climate change on water availability are assessed. The submitter seeks water use efficiency to be included in the plan.	We support this submission because adaptation to climate change and sustainable practices are essential for upholding Te Mana o Te Wai.	Allow	We seek that this part of the submission requesting for water use efficiency to be included in the plan is allowed.
Greater Wellington Regional Council S097.06	Mika.Zollner@gw.govt.nz	Support	The submitter requests direction on reducing greenhouse gas emissions to be included in the plan.	We support this submission because including this direction in the plan will better enable adaptation to and mitigation of climate change.	Allow	We seek that this part of the submission requesting for direction on reducing greenhouse gas emissions to be implemented in the plan is allowed.
Greater Wellington Regional Council S097.12	Mika.Zollner@gw.govt.nz	Support	The submitter requests for mana whenua values associated with indigenous biodiversity to be recognised in the plan and for policies to be implemented that incorporate mātauranga and tangata whenua in biodiversity monitoring.	We support suggested provisions to be incorporated into the plan because they will better enable mana whenua to be more involved in the process of biodiversity monitoring, which will result in clarifying our role. This will also support mana whenua in sustaining mātauranga and monitoring skills which aligns with our tikanga.	Allow	We seek that this part of the submission requesting mana whenua values associated with indigenous biodiversity as well as policies that incorporate mātauranga and tangata whenua in biodiversity in the plan to be allowed.
Greater Wellington Regional Council S097.13	Mika.Zollner@gw.govt.nz	Support	The submitter requests inserting direction requiring resource management decisions to be made using an integrated holistic approach guided by Te Ao Māori into the plan.	We support this submission because it supports the integration of Te Ao Māori into resource management decision making processes which will better align with our values and tino rangatiratanga.	Allow	We seek that this part of the submission requesting that guidance for resource management decisions to be made using an approach guided by Te Ao Māori in the plan is allowed.
Greater Wellington Regional Council S097.18	Mika.Zollner@gw.govt.nz	Support	The submitter requests modifying intensification levels through setbacks and reduced building heights for areas adjacent to wāhi tapu and sites and areas of significance to Māori to the extent necessary following site specific analysis.	We support this submission point because this will ensure that our sites and their values are preserved in the face of intensification.  As wāhi tapu are qualifying matters under section 6 of the RMA and the IPI states that accommodating for qualifying matters may include reduced building heights and lower density it would be appropriate to reduce intensification levels around them.	Allow	We seek that this part of the submission requesting intensification levels to be modified through setbacks and reduced building heights adjacent to wāhi tapu and sites and areas of significance to Māori is allowed.
Waikanae Land Company S104.01, S104.02	Morgan.slyfield@stoutstreet.co.nz	Oppose	The submitter requests for the proposed amendments to Schedule 9 and the District Plan maps to be deleted in relation to Kārewarewa urupā. Alternatively they request that the provisions are implemented in the District Plan enabling residential development on the land.	We oppose this submission it is inappropriate for development to occur on this land as it is a wāhi tapu and will need to be recognised in the Plan in Schedule 9 and the District Plan maps. These changes in the District Plan are a work in progress and the site will be included in the Schedule for Sites and Areas of Significance to Māori which will make the site a qualifying matter under the IPI legislation, this means that it is inappropriate such amendment to be considered.	Disallow	We seek that both submission points S104.01 and S104.02 seeking for Kārewarewa urupā to be deleted from proposed amendments to Schedule 9 and the District Plan maps are disallowed.

Laurence Petherick S116.01	ripetherick@xtra.co.nz	Oppose	The submitter requests that the General Residential Zone in the Kārewarewa Urupā area is retained, with the undeveloped area to remain as General Residential or Proposed School. [It is implied that the decision requested is to reject the proposed addition of Kārewarewa Urupā to Schedule 9 and the District Plan maps.]	Kārewarewa Urupā should be included in Schedule 9 and the District Plan maps as a wāhi tapu to protect the site and surrounding area from further effects. As mentioned above, this site is in the process of being placed in the SASM schedule of the Operative Plan.	Disallow	We seek that submission point S116.01 requesting for Kārewarewa urupā to not be added to Schedule 9 and the District Plan maps is disallowed.
Kāinga Ora S122.06	developmentplanning@kaingaora.govt.nz	Oppose	The submitter requests that the HRZ is expanded to apply to areas within walkable catchments of Metropolitan Centre Zones, rapid transit stops and Town Centre Zones.	We oppose this submission because as mentioned in our original submission following rapid transit stops to determine residential intensification may not be appropriate. Matters such as the impacts of climate change, lack of infrastructure or high character values need to be given more consideration.	Disallow	We seek that this part of the submission requesting that the HRZ is expanded to apply to areas within walkable catchments of MCZ, TCZ and rapid transit stops is disallowed.
Kāinga Ora S122.17, S112.18, S122.19, S122.20, S122.82, S122.84, S122.85, S122.86, S122.87, S122.88, S122.111, S122.112, S122.116, S122.121, S122.123, S122.124, S122.125, S122.126, S122.129, S122.130, S122.136, S122.137, S122.138, S122.142, S122.144, S122.145, S122.150, S122.151, S122.160, S122.161, S122.163	developmentplanning@kaingaora.govt.nz	Oppose	The submitter opposes the inclusion of Design Guides in the plan.	We oppose this submission because design guides developed by tangata whenua are key mechanisms to give effect to cultural values, visions and tikanga. There is a need for design guides specific to each iwi to be reflected throughout the Kāpiti district.	Disallow	We seek that this part of the submission opposing the inclusion of Design Guides in the plan is disallowed.
Kāinga Ora S122.48, S122.58, S122.106, S122.112, S122.114,	developmentplanning@kaingaora.govt.nz	Oppose	The submitter requests increased development capacity across multiple zones, height variation controls and greater intensification.	We oppose the submitters request to increase development capacity, it is inappropriate for further intensification to take place. Further intensification and increased height controls further intensify the impacts of development on the environment, wellbeing and	Disallow	We seek that these parts of the submission requesting development capacity, height development and intensification to be further increased are disallowed.

S122.115, S122.116, S121.121, S122.122, S122.126, S122.133, S122.145, S122.146, S122.147, S122.148, S122.150, S122.159				cultural values. Development needs to be in accordance with cultural values and have minimal impact on te taiao. It is also unclear how this level of intensified development would be managed in order to avoid adverse effects on the natural environment. The current capacity proposed in the plan change seems sufficient for the housing needs in Kāpiti and it is unclear how further intensification is necessary.		
Kāinga Ora S122.105	developmentplanning@kaingaora.govt.nz	Oppose	The submitter request that the rule framework for papakāinga development be amended so that land held under Te Ture Whenua Māori Act 1993 and land held in general title have the same protections as provided by the Act as a permitted activity.	We oppose this submission because the rule framework has been developed to ensure that papakāinga are developed by those who have whakapapa or ancestral connections to the specified land.	Disallow	We seek that this part of the submission requesting that the rule framework for papakāinga development to be amended for land held under Te Ture Whenua Māori Act 1993 and general title to have the same protections as permitted activities is disallowed.
Mandy Hager S132.01	Mandy.hager72@gmail.com	Oppose	The submitter supports the papakāinga chapter in part and seeks provisions for papakāinga to be extended to all property owners including non-Māori landowners.	We oppose this submission because papakāinga are unique to tangata whenua and these provisions have been developed for the specific needs of tangata whenua. Although the submission makes valid points about addressing the housing crisis and developing resilience for the community, this is not the appropriate platform and /or appropriate District Plan Chapter to address these issues.	Disallow	We seek that the part of the submission requesting for papakāinga to be extended to all property owners including non-Māori landowners is disallowed.
Andy Oakley S147.01, 147.02	ajoago@gmail.com	Oppose	The submitter opposes papakāinga provisions because they are exclusive to tangata whenua and asks for papakāinga to be amended to community housing developments.	As mentioned in the earlier parts of our submission, papakāinga are unique to tangata whenua. This chapter has been developed to help tangata whenua navigate the specific issues that they face when it comes to developing on their ancestral whenua.  We oppose submitter's request of "removing the words tangata whenua and replace them with the people of Kāpiti".	Disallow	We seek that this submission requesting papakāinga developments to be extended to all the people of Kāpiti is disallowed.
Ngāti Haumia ki Paekākāriki S180.01, S180.02, S180.03, S180.04	farrellwhanau@hotmail.co.nz	Support	The submitter requests that potential for developing papakāinga in the Open Space Zone is explored. The submitter states that intensification will not necessarily encourage tangata whenua back to their whenua, and that housing should be provided in the right places for the right people. The submitter suggests that the effects of intensification on marae and papakāinga should be taken into account.	We support these submission points as the current proposed papakāinga chapter allows for papakāinga in several other zones. However, allowing for papakāinga in other zones should be explored to ensure that tangata whenua have opportunities to develop papakāinga and support their aspirations in as many zones as possible. We would like ancestral land currently zoned as Open Space in Paekākāriki and / or Kāpiti to be enabled for tangata whenua to implement their full Tino Rangatiratanga so that they can	Allow	We seek that the part of the submission requesting for papakāinga development to be explored in the Open Space Zone and the part requesting taking into account the effects of intensification on marae and papakāinga are allowed.

				<p>reconnect with their whenua and District Plan zoning should not be a barrier for them to do this.</p> <p>The submission also brings up important points regarding considering the impacts of intensification on tangata whenua and matters of significance such as our sites, values and aspirations. We alongside intensification it is important to consider and avoid impacts on matters of significance to Māori they would effect cultural wellbeing.</p>		
Ngā Hapū o Ōtaki S203.04	Kirsten.hapeta@t-wor-otaki.ac.nz	Support	The submitter requests the papakāinga provisions to be amended to provide for papakāinga in the Metropolitan, Local Centres and Mixed Use Zones and not to restrict papakāinga on Kāpiti Island.	We support this submission because provisions for papakāinga in these zones increases the opportunities for whānau who may have land in these zones and produces more potential papakāinga locations throughout the rohe.	Allow	We seek that this part of the submission requesting papakāinga to be provided for in the Metropolitan, Local Centres and Mixed Use Zones as well as no restriction on Kāpiti Island is allowed.
Ngā Hapū o Ōtaki S203.57	Kirsten.hapeta@t-wor-otaki.ac.nz	Support	The submitter states that education facilities that teach Te Reo Māori and Mātauranga Māori should be included as sites and areas of significance to Māori.	We support this submission because including these facilities as sites and areas of significance to Māori will ensure that they are protected in alignment with tikanga and cultural values.	Allow	We seek for this part of the submission requesting education facilities that teach Te Reo Māori and Mātauranga Māori to be included as sites and areas of significance to be Māori to be allowed.

We wish to be heard in support of our further submission.

If others make a similar submission, we will not consider presenting a joint case with them at a hearing.

Date: 25 November 2022

**From:** [Onur Oktem Lewis](#)  
**To:** [Jason Holland](#)  
**Cc:** [^Kirsten Hapeta](#); [claire@tekonae.co.nz](mailto:claire@tekonae.co.nz); [Denise Hapeta](#); [Mailbox - District Planning](#); [Jaida Howard](#); [Abbey Morris](#); [Robert McClean](#); [Email Service](#)  
**Subject:** Further submission attached  
**Date:** Friday, 25 November 2022 3:19:42 pm  
**Attachments:** [image001.png](#)  
[Ngāti Toa Further Submission on KCDC Proposed Plan Change.docx](#)  
**Importance:** High

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Kia ora Jason,

Please find our further submission attached. This is with Naomi getting a sign off at the moment.

But I thought we get it through before Monday. Ka pai.

Any pātai, happy to answer.

Ngā mihi nui,

Onur



**TE RŪNANGA O  
TOA RANGATIRA**

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