

## Online submission

This is a submission that was made online via the Council's website.

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<b>Wish to be heard</b>	No
<b>Joint presentation</b>	Yes
<b>Trade competition</b>	I could not gain an advantage in trade competition through this submission.
<b>Directly affected</b>	N/A
<b>Withhold contact details?</b>	No

## Submission points

Plan section	Provision	Support/oppose	Reasons	Decision sought
Sites and Areas of Significance to Māori	SASM	Oppose	<p>Process has been rushed and no consultation with affected properties prior to letter from Council informing us of the designation being placed on our freehold properties. Adds a huge extra layer to resource consent on land that has been used for residence and/or business in private ownership for decades.</p> <p>There is nothing in the document that says it will be a fair equally-weighted decision between two parties. It gives all the power to Iwi to allow or deny a fair request for consent. We need a fair and equitable process where we can come to a mutual and reasonable outcome. Questions need to be answered first.</p> <p>What will the extra cost be to apply for permission? What is the timeframe that Iwi must make a decision by?</p> <p>Blanket designation to all of Punakaiki, not just some significant sections seems extreme. Is there evidence that every single section in Puakakaiki is a SASM? 'Discretionary' permission may or may not be granted is very vague.</p> <p>On what grounds can Iwi withhold permission?</p> <p>Can it be used to gain a competitive advantage on business properties?</p> <p>Will we be able to expand septic tanks on our own land for additional private or business usage? Can they deny a town treatment solution? No development can take place in Punakaiki if this is the case. Do the same rules apply to their own Iwi owned land - ie can they expand their septic tanks whilst denying ours, on neighbouring land?</p> <p>Iwi is now in charge of allowing or denying development whilst themselves also being given a new business, building and free land at Dolomite Point, this is a conflict of interest and prejudicial. The same people who decided which land to allocate as SASM are the same who decided whether or not to grant themselves free land from the conservation estate (on commission panel) and are now the ones who decide what long-standing freehold land and busineses owners can or cannot do. Total conflict of interest.</p> <p>Some clauses in 'Appropriate Activites' e.g.SASM - P14, SASM - P15 say Activity be allowed where it can be demonstrated that 'measures are taken to maintain or enhance the ability of Poutini Ngai Tahu to access and use the site or area of significance...' What does this mean? Can Iwi access and use our freehold land anytime, at times agreed, for how long, anytime at their own discretion? - we need clarification, and it cannot be allowed that access to freehold land is freely given with no regard to landholders.</p>	Ensure Iwi cannot withhold reasonable consent applications on prejudicial grounds.
Sites and Areas of Significance to Māori	SASM - P14	Oppose	<p>SASM - P14 a. Category and relevant Permitted Activity rules are not stated for Punakaiki Area SASM-31 and SASM 32 in Scedule 3.</p> <p>b. Sufficient land is provided - how much is not specified and gives no regard to proposed landowner use. This is unreasonable for landowners.</p> <p>c. Size is not specified and gives no regard to proposed landowner use. This is unreasonable for landowners.</p> <p>d. What is reasonable access, can Iwi then access private land in entire Punakaiki area SASM31 and SASM 32 at their own discretion at any time they decide? This is unreasonable for landowners.</p>	More regard to the Land or business owners ability to improve the land is required. SASM - P14 is a section under Appropriate activites however the clauses that have to be regarded may make it very difficult to undergo a permitted activity. Likely huge time and expense for consultants for the required assessments, which Iwi can easily say no to by saying a general statment like ' insufficient land has been provided around the site'. How much is sufficient land - can permission unreasonably be denied with sweeping bans? What timeframe to Iwi get? This entire plan gives no regard to Freehold Landowners ability to develop their land to suit their own values and values of their heritage. Iwi values override everyone else's which is unreasonable on private land - it is not Crown/Doc, Council or Public land, this is private land where landowners must be given more consideration. How much access are Iwi expecting on this land, can landowners control this or can Iwi have access to private land at their discretion? More information and consideration required.
Sites and Areas of Significance to Māori	SASM - P15	Oppose	<p>Permitted activities in SASM - P15 give Iwi sweeping powers to deny a permitted activity.</p> <p>Schedule 3 SASM 31 and SASM 32 has no Category or Relevant Permitted Activity rules in those columns.</p> <p>a. Alternative methods, locations, designs. Who pays for investigating alternative methods, what is the timeframe for Iwi to decide. This is unreasonable to landowners.</p> <p>c. Assesments, who pays and what timeframe - this means it can be unreasonably drawn out with need for infinite consultants.</p> <p>f. Enhance the ability for access to Poutini Ngai Tahu - does this mean Iwi may access the land anytime they wish without landowner consent for each visit? This is unreasonable to landowners.</p>	More regard to the Land or business owners ability to improve the land is required. SASM - P15 is a section under permitted activites however the clauses that have to be regarded may make it very difficult to undergo a permitted activity. Huge time and expense for consultants for the required assessments, which Iwi can easily say no to by saying a general statment like ' values of significance have not been incorporated significantly'. This entire plan gives no regard to Freehold Landowners ability to develop their land to suit their own values and values of their heritage. Poutini Ngai Tahu values override other races's else's this is unreasonable on private land - it is not Crown / Doc land, this is private land where the landowners must be given some consideration.

Sites and Areas of Significance to Māori	SASM - P13	Oppose	Clarification sought on what is critical infrastructure, seems to be more to do with network power lines etc, does this include individual septic tanks and wastewater? In the absence of a town-scheme, we need to be able to replace, expand this if required.	SASM - P13 references Schedule 3 which for Punakaiki Area SASM 31 and SASM 32 have nothing in the Category or Relevant Permitted Activity fields.
Sites and Areas of Significance to Māori	SASM - O1	Oppose	Gives active involvement by Ngai Tahu in decision making affecting individual's property rights. Redress issues need to be addressed by the Country as a whole and not by a few individuals who purchased land prior to this sudden Classification and now find themselves under entirely new rules . SASM-01 should be removed. It is unreasonable to expect me to pay rates to a council for my land and then the Council to add tino rangatiratanga and kaitiakitanga rights on my land in a race-based manner. Note that TPP does not adequately define/translate these Te reo words in the glossary.	Private freehold land should not be used to redress tino rangatiratanga and kaitiakitanga. Redress issues need to be addressed at Central Government level and not by certain individual landowners who now find the land they bought in good faith has a sudden new restrictive classification. SASM-01 should be removed.
Sites and Areas of Significance to Māori	SASM - O2	Oppose	Ngai Tahu should not be given blanket access to all SASM land. This is totally unreasonable to landowners, the clause is not restrictive, gives no need for consultation to landowners as to when,why, how long they wish to have access. Can all Ngai Tahu freely access SASM land?	SASM-02 clause gives free range to NgainTahu to access, maintain and use any land within the SASM classification. Should be changed to periodic access after consultation with landowners for reasonable access to particularly important areas.
Sites and Areas of Significance to Māori	SASM - O3	Oppose	SASM-03 and following list of inappropriate activities gives insufficient clarification as to what is inappropriate subdivision, use and development; how long the consultation may take; how much is may cost and leaves it open for activities to be unreasonably denied. Can it be denied based on commercial reasons i.e competition. Ngai Tahu has significant farming, forestry, tourism businesses, and have significant advantages already as redress i.e given land, tax-free status, first rights on Crown disposal etc and this leaves it open for them to deny permission to prevent commercial competition. They could effectively allow subdivison, septic tank expansion on their own land, yet deny it on neighbouring freehold owner's properties? This gives no checks and balances to ensure commercial equity.	Clarification on what is Inappropriate subdivision, use and development is absolutely necessary
Sites and Areas of Significance to Māori	SASM - P5	Oppose	Clarification on level of tino rangatiratanga and kaitiatanga for private land owners decision-making. The use of tino rangatiratanga and kaitiatanga needs to be fully translated and explained. These terms are non commonly used in English and it is absolutely necessary for all parties with this classification to know what is actually means in this context.	Issues of tino rangatiratanga and kaitiatanga need to be addressed at central government level. Small freehold landowners should not be expected to provide redress. Full translation and explanation sought on exactly what tino rangatiratanga and kaitiatanga means in regard to SASM and particularly to private landowers in SASM 31 and SASM 32. Very difficult to support this clause when the full meaning is not defined.
Sites and Areas of Significance to Māori	SASM -R2	Oppose	Removal of the need to seek consent for minor works such as erecting a new fence. In the proposed plan, landowners are only allowed to maintain exisiting fences, along an existing alignment. This puts additional time and costs for a minor job. Many very minor works will now require consent, this is unreasonable to landowners	Consent not required for insignificant work such as a new fences etc
Sites and Areas of Significance to Māori	SASM -R3	Oppose	This clause is too restrictive, most alterations, even minor would require some earth disturbance or foot print alteration. Adds time/cost to work on private property.	Remove the restrictions associated with the rule that an activity is only permitted where land disturbance is not involved and change to size, structure or location.
Sites and Areas of Significance to Māori	SASM - R17	Oppose	This clause is too restrictive and could thwart any new builds in Punakaiki. This SASM encompasses the entire residential and commercial area of Punakaiki which has no town treatment plant and is reliant on individual septic tank systems. This clause seems to allow lwi to not allow replacement of current systems - if your septic tank fails can you replace with a new one, or expansion of current ones, which may be necessary due to new development, increased tourist numbers etc. It is not reasonable for lwi to prevent this on private land. They could potentially stop individuals whilst allowing it on their own newly-given former Crown reserve land. They could also not give permission should a town treatment plant solution be found. On what grounds can permission be withheld - details are not thought through - does lwi even have to give a reason or can they just say No and prevent town or individual treatment solutions? More detail required.	Remove the ability for lwi to stop reasonable development on grounds of not allowing any changes to or new wastewater disposal.

## Documents included with submission

None