

## Rachel V

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**From:** James Mason Russell <jamesmasonrussell2018@gmail.com>  
**Sent:** Friday, November 11, 2022 16:10  
**To:** TTPP Info  
**Subject:** Proposed 'One Plan'.

**Follow Up Flag:** Follow up  
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Tena koutou katoa,

### **Introduction.**

The following submission is presented by The Proprietors of Mawhera Incorporation (Mawhera Inc.).

Throughout this submission Mawhera Inc. uses the Kai Tahu dialect of the 'K' for 'Ng'.

The first issue that Te Tai o Poutini proposed plan committee needs to address is the following:-

The 1840 Treaty of Waitangi states as to Article 2 of the Maori version of the Treaty that maori retain their

**'tino Rakatirataka' (full exclusive authority and undisturbed possession of their lands and estates, forest, fisheries and other properties that they may collectively or individually possess long as it is their wish and desire to retain the same in their possession).**

By the Crowns 1860 Arahura Deed of Purchase between the Crown and Kai Tahu resident on Te Tai o Poutini at that time some 57 Maori Reserves and the Arahura riverbed were exempted from the purchase.

By the 1879 Young Commission individual Kai Tahu were allocated as owners of the reserves.

Therefore, the present day owners of the reserves retain their 'tino Rakatirataka, over the reserves that they own.

The proposed 'One Plan' needs to address the Treaty's 'tino Rakatirataka' of the owners of the reserves that have never been ceded to the Crown.

If the 'One Plan' committee views that the issue is beyond them then Mawhera Inc submits the following:-

Throughout the proposed "One Plan" document the document makes reference to Poutini Kai Tahu. Is the reference directed at Poutini Kai Tahu the iwi (people) or the Mana Whakahono a Rohe group composed of Te Runaka o Kati Waewae, Te Runaka o Mahaki and Te Runaka o Kai Tahu who have named their group Poutini Kai Tahu. The document does not distinguish which

Poutini Kai Tahu reference is directed to. No such reference is highly confusing.

### **The Proprietors of Mawhera Incorporation.**

In 1976 owners of Te Tai o Poutini Maori Reserves, listed below, decided to amalgamate their reserves and form Mawhera Inc. who's legislative basis is an Order in Council dated 17 May 1976 pursuant to Section 15A of the Maori Reserve Land Act 1955 that constituted, and authorised the incorporation to manage their Te Tai o Poutini Maori Reserve lands that were exempted from the Crown's 1860 Arahura Deed of Purchase. The reserves that were never sold to the Crown.

By the Order in Council, the Order mandates the incorporation to manage the ancestral land as a Takata Whenua manawhenua organisation in its own right as it possesses its own exclusive 'tino Rakatirataka' as to Article 2 of the Maori version of the 1840 Treaty of Waitangi.

By the Order in Council the following ancestral Maori Reserves that are owned and managed by Mawhera Incorporation are:

#### **Schedule A Lands:**

Hokitika Reserve No 24, Kaniere Reserve No 25, Taramakau (South Bank) Reserve No 26, Taramakau (North Bank) Reserves 27 & 27c, Waimea (South Bank, Upper Taramakau) No 28, Pakihi (North Bank, Upper Taramakau ) No 29, Arahura Reserve No 30, Mawhera Reserve No 31, Ka Moana e Rua Reserve No 32, Kaiata Reserve No 33, Kararoa Reserve No 35, Kotukuwhakaoho Reserve No 34, Kawatiri (South Bank) Reserve No 36, 37, 39, 40, 41, 45 & 46, Kawatiri (North Bank) Reserve No 38 & 42, Orowaiti Reserve No 44 & 48, Karamea Reserve No 47.

#### **Schedule B Lands:**

Jackson's Bay Reserve No 1, Mawhera Reserve (North Bank) No 2, Kawatiri Reserve No 3, Kawatiri Reserve (South Bank) No 4, Mawheranui Reserve No 1, Ahaura Reserve No 2, Mokihinui Reserve No 3, Karamea Reserve No 4, Waimaukaroa Reserve No 5, Karamea Reserve No 6, Whakapoia Reserve No 7.

Next to the Crown Mawhera Inc. is the second biggest land owner on Te Tai o Poutini.

### **Ancestral Land.**

All the land and all the lands constituent components, mountains, water, forests, flora and fauna within the boundaries of the 1860 Arahura Deed of Purchase is ancestral land to the present day iwi who are descendants of the individual iwi that were allocated as owners of the Native Reserves by the 1879 Young Commission.

All the ancestral land within the boundaries of the 1860 Arahura Deed of Purchase known by the Kai Tahu Tipuna and their present day descendants as Te Tai o Poutini is a present day interpretation as a Site of Significance to them.

The "One Plan" is proposing to sectionalize Te Tai o Poutini into Sites of Significance to Maori by only naming certain areas of Te Tai o Poutini as Sites of Significance to Maori.

Mawhera Incorporation opposes the proposed sectionalizing of Te Tai o Poutini into Sites of Significance to Maori and further by the connotation of the reference "Maori" that would allow any

Maori in Aotearoa to say that a Proposed One Plan Site of Significant is a Site of Significant to them also.

The proposed One Plan needs to state that the reference to “Maori” relating to Mawhera Inc. lands that it owns and manages means the present day descendants of the 1879 Young Commission.

### **1840 Treaty of Waitangi.**

The Treaty places certain duties upon the Crown. The Crown acknowledges the Treaty as the founding document of our nation and recognises the need to be responsive to the Treaty by ensuring Maori rights and interest are protected and given appropriate priority in all aspects by articulating its responsibilities.

Statement is needed in the proposed One Plan relating to the Crowns authority and Maori authority as to the Maori and English versions of Article 2 of the Treaty.

Mawhera Inc. submits the following statement for the proposed ‘One Plan’.

English version of Article 2 states ‘sovereignty’, Maori version states ‘kawanataka’ (governance) to which Maori agreed to. The Crown agreed as to the Maori version of Article 2 that Maori retain as to ‘tino Rakatirataka’ (**full exclusive authority and undisturbed possession of their lands and estates, forests, fisheries and other properties that they may collectively or individually possess so long as it is their wish and desire to retain the same in their possession**).

Maori sovereignty authority was not ceded to the Crown but that Maori gave the right to the Crown to govern but the Crown could only govern over the lands that it acquired from Maori.

The Maori Reserve that Mawhera Inc. own and manage were never ceded to the Crown. The proposed ‘One Plan’ does not address if local government law applies to Maori land that has never been ceded to the Crown.

Maori land that was not ceded or acquired by the Crown then as to Article 2 of the Maori version of ‘tino Rakatirataka’ applies.

### **1860 Arahura Deed of Purchase.**

By the Deed, 57 Native Reserves and the Arahura Riverbed were exempted from the Crowns 1860 Arahura Deed of Purchase. Te Tai o Poutini is unique within Aotearoa relating to governance, as to the deed, due to the exemptions and as to the Treaty’s ‘tino Rakatirataka’ ownership of the reserves to this day remains with the present day descendants of the 1879 Young Commission.

Therefore all reference to Te Tai o Poutini Maori Reserves and the Awa Arahura be deleted from the proposed ‘One Plan’ except a statement in the One Plan that the ‘tino Rakatirataka’ (full exclusive authority) as to the Treaty that the Maori Reserves and the Arahura River on Te Tai o Poutini will be managed by the present day owners and their future descendants using parliamentary law as a guide for management.

### **Introduction. First time references.**

Poutini Kai Tahu – means the members of the two Kai Tahu hapu from the West Coast/Tai o Poutini – Kati Waewae and Kati Mahaki.

The proposed 'One Plan' statement is incorrect. Poutini Kai Tahu are the iwi of Te Tai o Poutini.

'Te' of Te Tai o Poutini is not highlighted. Just 'Tai o Poutini' relates to ' the tides of Poutini. Te Tai o Poutini relates to everything within the 1860 Arahura Deed of purchase boundary of Poutini Kai Tahu and does not comprise just of the two Kai Tahu hapu, Kati Waewae and Kati Mahaki.

Other Kai Tahu hapu members who were titled to Te Tai o Poutini lands by the 1879 Young Commission have the right to be known as Poutini Kai Tahu also.

As the Maori name was the first name on the landscape then the Maori name precede the English name throughout any 'One Plan' future documents.

Manawhenua - means customary authority by an iwi or hapu in an identified area.

Manawhenua has diverse meanings and not just the meaning as stated in the proposed 'One Plan' document.

Individual Te Tai o Poutini Maori who are descendants of their tipuna from the 1879 Young Commission possess the customary authority. Te Tai o Poutini hapu do not unless all the individual hapu members agree that the hapu be given the customary authority. No such agreement exists on Te Tai o Poutini.

Mawhera Inc. when formed the iwi surrendered their customary authority to the incorporation to exercise their manawhenua right. Mawhera Inc. possess the exclusive manawhenua customary authority right over the properties that it manages.

Takata Whenua - means in relation to a particular area the iwi or hapu which hold manawhenua over the area.

Mawhera Inc. iwi that the incorporation represents possess exclusive Takata Whenua status over the properties that Mawhera Inc. manages for them.

No hapu hold manawhenua status over the area that Mawhera Inc. manages.

Te Waipounamu. Within 2<sup>nd</sup> paragraph of Buller District Te Waipounamu is spelt with an hyphenated 's'. There is no 's' in the Maori language. By adding a hyphenated 's' to Te Waipounamu bastides the maori language.

Aotea - Westland District 2<sup>nd</sup> Paragraph. ....***“taoka for Kati Mahaki ki Makawhio”***.... Aotea is also a taoka of the ancestral descendants of the tipuna that were

allocated land in Awarua (South Westland) by the 1879 Young Commission. One Plan to state such.

Mawhera river - 5<sup>th</sup> paragraph. Mawheranui is the full name of the river.

Statutory Context. Figure 2 RMA responsibilities etc. Paragraph 2. It states that **“Te Runaka o Kai Tahu is the iwi authority for the entire West Coast”**. The statement is misleading. By Mawhera Inc. legislative Order in Council Mawhera Inc. is legislated as an iwi authority to manage Maori Reserved Land on Te Tai o Poutini that has never been ceded to the Crown. Te Runaka o Kai Tahu has no authority over properties owned and managed by Mawhera Inc. Therefore Te Runaka o Kai Tahu does not have “authority for the entire west coast” as stated.

2<sup>nd</sup> paragraph also states that **“Poutini Kai Tahu are the takata whenua of Te Tai o Poutini”**. Refer to Poutini Kai Tahu Takata Whenua and manawhenua above.

2<sup>nd</sup> paragraph also states that **“Under Section 9 of the Kat Tahu Act 1996 the two Papatipu Runaka who represent the tangata whenua interest of Poutini Kai Tahu on the West Coast are Te Runaka o Kati Waewae and Te Runaka o Makawhio”**.

The two Papatipu Runaka do not represent the tangata whenua interest of The Mawhera Inc. iwi as their interest is represented by the incorporation.

### **Management of Cross Boundary Matters.**

As Mawhera Inc possess manawhenua status then Mawhera Inc. be included in the integrated management of cross boundary issues.

### **Sites and Areas of Significance to Maori. Overview. Part 2.** States that:-

**“Councils acknowledge Poutini Kai Tahu as manawhenua”**.

The proposed One Plan document now becomes confusing as in Part 1 a drop down states that Poutini Kai Tahu means **“the members of the two Kai Tahu hapu from the West Coast/Te Tai o Poutini – Kati Waewae and Kati Mahaki”**. Councils also have a Mana Whakahono a Rohe grouping of Te Runaka o Kai Tahu, Te Runaka o Kat Waewae and Te Runaka o Makawhio that Councils acknowledge who call themselves Poutini Kai Tahu. So who are Councils acknowledging, the two hapu members or the three Runaka grouping. For the group to be composed of with Te Runaka o Kai Tahu which is not a Te Tai o Poutini identity then Mawhera Inc. does not recognise the Mana Whakahono a Rohe that council’s acknowledge.

While Councils are acknowledging; their, which ever grouping; they ignore other groups that possess manawhenua status within Te Tai o Poutini rohe.

Overview further states that **“Te Runaka o Kati Waewae and Te Runaka o Mahaki are the only elected and mandated bodies with authority to represent and administer to all Poutini Kai Tahu interests”**.

The statement is highly misleading and highly incorrect. Mawhera Inc. who possess the manawhenua over the Maori Reserves that it manages have an elected committee of management that has legislative authority that represents and administer the interest of the incorporation.

Mawhera Inc. submits it has a legislative mandated authority to represent the iwi that are part of Mawhera Inc.

Further, the Overview states that ***“Councils acknowledge Te Runaka o Kai Tahu as the Iwi Authority with jurisdiction over the West Coast/Te Tai o Poutini. They have legal mandate to represent Kai Tahu interest and support the position of Poutini Kai Tahu”.***

Is councils acknowledgement reference for a jumped up Mana Whakahono a Rohe group that calls its self Poutini Kai Tahu. The proposed ‘One Plan’ document does not state from where or what information councils received to make such a statement.

Refer to Mawhera Inc. Takata Whenua information.

Overview further states, Paragraph 2, Bullet Point 5, 2<sup>nd</sup> sentence that ***“Under the Pounamu Vesting Act all Pounamu on Te Tai o Poutini is owned by Poutini Kai Tahu”.***

The Pounamu Vesting Act 1997 by F of the Preamble of the Act it states ***“to give effect to a recommendation of the Waitangi Tribunal, Te Runaka o Kai Tahu intends to execute a deed vesting in the Mawhera Incorporation all pounamu within the catchment area of the Arahura river”.***

A deed between Te Runaka o Kai Tahu and The Proprietors of Mawhera was so executed on the 23 September 1997 vesting all Pounamu within the catchment of the Arahura river in The Proprietors of Mawhera.

This Pounamu vesting by a deed by Te Runaka o Tahu to Mawhera Inc. substantiates the incorporations ‘Tino Rakatirataka, manawhenua and kaitiakitaka status over the land, estates and other properties that Mawhera Inc. possesses as to the Maori version of Article 2 of the Treaty.

Therefore all Pounamu on Te Tai o Poutini is not owned by Poutini Kai Tahu, the Iwi or Poutini Kai Tahu Mana Whakahono a Rohe group.

Overview. 3<sup>rd</sup> Paragraph. 1 & 2 makes reference to Poutini Kai Tahu. Who is the reference meant for, Poutini Kai Tahu the iwi or Poutini Kai Tahu the Mana Whakahono a Rohe group.

Activities listed from ‘Maori Objectives to Prohibited Activities.

Confusing reigns with the listed activities as it is not clear for who the activities will benefit (ie) Poutini Kaitahu the iwi or Poutini Kaitahu the Mana Whakahono a Rohe group and who of Poutini iwi will be consulted to implement the activities.

Sites of Significance to Maori: Delete 'to Maori ' as the statement allows any Maori anywhere, plant earth or space, to claim that an area or areas on Te Tai o Poutini are of significance to them.. Replace with 'Poutini Kai Tahu iwi'.

### **Takata Whenua – Te Takata Whenua.**

First paragraph states:-

**Kai Tahu comprises people who descend from the tribes five primary hapu .... as well as earlier Rapuwai, Hawea, Waitaha (insert Kati Wairaki) and Kati Mamoe ancestors.**

The second paragraph states:-

**“Te Runaka o Kai Tahu is the mandated iwi authority for Kai Tahu Whanui and was established by Te Runaka o Kai Tahu Act 1996”.**

The act was implemented as a means to manage compensation arising out of the Kai Tahu Waitangi Tribunal Claim (Wai 27). The **purpose of the act** lies within the first sentence of the Preamble to the act, which states:-

**“Whereas Kai Tahu wishes to establish an enduring tribal structure to manage its assets and its business ....”**

That is assets from the Kai Tahu Claim to the Waitangi Tribunal (Wai 27) and assets from the dissolved Kaitahu Maori Trust Board. The acts purpose gives Kai Tahu a mandate to manage Wai 27 and dissolved Kaitahu Maori Trust Board assets and to distribute such assets to Kai Tahu whanui.

The act does not give Te Runaka o Kai Tahu a mandate over Kai Tahu organisation(s) that were in existence who owned and managed ancestral land for Kai Tahu owners before the commencement of the act. Kai Tahu did not consult with those organisation to gauge if they would give up their Rakatirataka, manawhenua and Kaitiakitaka status over their ancestral land that they managed to Te Runaka o Kai Tahu.

As Te Runaka o Kai Tahu does not possess a mandate to act and represent all Kai Tahu then its affiliated members, the two Papatipu Runaka also do not possess any mandate to act and represent those organisations who owned and manage ancestral land that were in existence before the commencement of the 1996 Te Runaka o Kai Tahu Act. Papatipu Runaka have no mandated authority to have a say over land managed by organisations that were in existence before the commencement of 1996 Te Runaka o Kai Tahu Act.

The Act states at Clause 9 of who the 'members' of Te Runaka o Kai Tahu shall be (ie) each of the Papatipu Runaka o Kai Tahu and as to sub-section (2) sets out in the Declaration of Membership Order 2001 the takiwa of the two Te Tai o Poutini Runaka. Although the Te Tai o Poutini Runaka have defined takiwa it does not give the Runaka the right to have an authoritative say over organisation(s) takiwa that were in existence before the commencement of 1996 Te Runaka o Kai Tahu Act.

As to the act, Runaka are only 'members' of Te Runaka o Kai Tahu. The Act does not state that Te Runaka o Kai Tahu devolves its 'tino Rakatirataka' authority down to the Runaka.

Runaka are incorporated societies and only represent those members who are registered with the society. The act does not give Te Runaka o Kati Waewae status to represent the Kai Tahu Hapu of Kati Waewae.

The Act does not diminish or over-ride Mawhera Inc Order in Council that set up Mawhera Inc. Neither is there any statement in the Act of any amendment dissolving the existence of Mawhera Inc.

Paragraph three states:-

**“The hapu who hold manawhenua in Tai Poutini are Kati Mahaki o Makaawhio and Kati Waewae”.**

Kati Mahaki o Makaawhio and Kati Waewae hapu do not exclusively possess the manawhenua of Te Tai o Poutini. There were iwi of other Kai Tahu hapu that were given Maori Reserved Land on Te Tai o Poutini at the time of the 1879 Young Commission that gave them manawhenua status over their land which their descendants today inherit and uphold their manawhenua status except those who surrendered their manawhenua status to Mawhera Inc to represent them in the capacity of Mawhera Inc. exercising their manawhenua status

Further it states:-

Kati Mahaki o Makaawhio and Kati Waewae  
**“Together they are known as Poutini Kai Tahu”.**

The iwi of the Kati Waewae hapu has never been consulted if they want their hapu to join with the Kati Mahaki o Makawhio to be known as Poutini Kai Tahu (Mana Whakahono a Rohe) group.

Paragraph four states:-

**“Te Runaka o Kati Waewae is the mandated representative body of Kati Waewae, a hapu of Kai Tahu”.**

This statement is highly opposed by Mawhera Inc. as the incorporations legislative Order in Council mandates the incorporation to represent those Kati Waewae iwi who are shareholders in the incorporation. The Runaka has not consulted the incorporation to gauge if Kati Waewae iwi of the incorporation would give up their Rakatirataka, manawhenua and kaitiakitaka status to the Runaka so as to give the Runaka a mandate to represent them. As no consultation has taken place, therefore, Te Runaka o Kati Waewae does not have a mandate to represent the iwi of Kati Waewae who are personal of Mawhera Inc. or the hapu of Kati Waewae. Kati Waewae owners in Maori Reserves not included in the incorporation have also not been consulted to see if they want to give up their Rakatirataka, manawhenua and Kaitiakitaka status to the Runaka. Nor does the Runaka have a mandate to represent all Kaitahu arising from the 1996 Te Runaka o Kai Tahu Act as to the reference to the act above.

Further in paragraph four, reference is stated of Te Runaka o Kati Waewae Takiwa. However, the Takiwa of the Runaka does not give the Runaka the right to represent or speak for those organisations over their judicial territory that they possess the ownership and management



of as no consultation has been held with them. The same applies to Te Runaka o Makaawhio Takiwa as stated in paragraph five.

### **Mana Whakahono a Rohe.**

Te Runaka o Kati Waewae, Te Runaka o Mahaki and Te Runaka o Kai Tahu formed themselves into a group and called themselves Poutini Kai Tahu. Mawhera Inc. does not recognise the group as no consultation was held with the present day ancestral descendants of the 1879 Young Commission to gauge if they wanted to give up their Rakatirataka, Manawhenua and Kaitiaki status to the Poutini Kai Tahu group. The Poutini Kai Tau group after its formation used its status to form an agreement with Te Tai o Poutini councils with the audacity to state that they represent the iwi of Te Tai o Poutini.

### **Poutini Kai Tahu Values.**

### **Rakatirataka, Kaitiakitaka, Mauri, Mahika Kai Ki Uta Ki Tai, Waihi Tapu, Taoka, and Resources of Significance.**

As to the immediately listed values above, Mawhera Inc. posses the exclusive right of those values that exist relating to the properties that the incorporation owns and manages.

**Treaty Settlement Requirements:** Poutini Kai Tahu and the Poutini Mana Whakahono a Rohe group possess no right to exercise 'tino Rakatirataka or Kaitiakitaka over the properties that Mawhera own and manage.

**Hapu and Iwi Planning Documents:** Under Section 74(2A) of the Resource Management Act Mawhera Inc.be consulted as the incorporation has exclusive 'tino Rakatirataka' over its properties that it owns and manages. The proposed 'One Plan' document states that the two Te Tai o Poutini Runaka have prepared Pounamu Management Plans. Mawhera inc has not seen any such Pounamu Management Plans to ascertain if the plans infringe on Mawhera Inc. ownership of Pounamu in the Arahura Catchment

**Maori Purpose Zones;** That as Mawhera Inc possesses the 'tino Rakatirataka' over Maori classified property that it owns and manages Mawhera Inc. opposes any type of zoning categorized over Mawhera Inc. property. Mawhera Inc. opposes OSREZ – P6' CMUZ – P1, CMUZ -PREC 1, P1, P3, P5 c, GRUZ -18 e,GRUZ – R25 e, RLZ – R15 e, BCZ 4 e, MINZ -P6, MPZ, SVZ- P5 & P6 and R5 d.

Why isn't 'Whare Rakau' Urupa, the water supply tanks and the water supply extraction and pumping building at Arahura recorded in the Area Specific Matters, Westland District Council Designations.

**Appendix 3:** 2.1 Context. Oppose Paragraphs 1, 2, & 4.  
2.2 Guidelines: Oppose Paragraphs IW1, IW2, IW5, IW6, & IW7.

### **Appendix Four. Accidental Discovery Protocol.**

If Koiwi is accidentally discovered on Mawhera owned and managed lands then Mawhera Inc. will decide who the relevant authorities and parties are to be contacted. Mawhera Inc. protocol will be to immediately notify the New Zealand Police and then decide who they will give permission to, to enter on to Mawhera Inc. property.

**Appendix.**

Te Runaka o Kati Waewae does not exclusively possess the 'tino Rakatirataka over the whole of the Kai Tahu takiwa.

Mawhera Inc. wish to speak to our submission

Ma te Wa,

James Mason Russell,  
Tiamana [Chairman] Mawhera Inc.

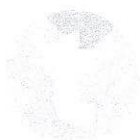


**Subject:** RE: Proposed 'One Plan'.  
**Date:** Friday, 11 November 2022 at 4:25:45 PM New Zealand Daylight Time  
**From:** TTPP Info <info@tppp.nz>  
**To:** James Mason Russell <jamesmasonrussell2018@gmail.com>  
**Attachments:** image001.png

Good Afternoon James  
 Thank you for your email.  
 Unfortunately, there is certain information that is required for us to accept your submission.  
 Can you please complete the table below and return it with your submission by 5pm today.  
 Kind Regards  
 Jo

<b>SUBMITTER DETAILS</b>	
First name	JAMES RUSSELL
Last name	RUSSELL
Are you submitting as an individual, or on behalf of an organisation?	<del>Individual</del> ORGANISATION
Organisation (if applicable)	<del>N/A</del>
Would you gain an advantage in trade competition through this submission?	No
Postal address	632 Blue Spur Rd., R.D. 2, Hokitika, 7882
Email	jamesmasonrussell2018@gmail.com
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<b>OUR SUBMISSION</b>	
The specific provisions of the proposal that my submission relates to are TAKATA WHERUA ISSUES. 'tino Rakatīāfaka' 'manawhenua' 'Kaitiakiāfaka' etc etc etc.	<ul style="list-style-type: none"> <li>✓ • Strategic Direction</li> <li>✓ • Energy Infrastructure and Transport</li> <li>• Hazards and Risks</li> <li>✓ • Natural Environment Values</li> <li>• Subdivision</li> <li>✓ • General District Wide Matters</li> <li>✓ • Zones</li> <li>• Schedules</li> <li>✓ • Appendices</li> <li>• General feedback</li> </ul>
Do you wish to speak your submission?	Yes
Would you consider presenting a joint case at a hearing?	<del>Yes</del> No.

Jo Armstrong  
 Project Manager, Te Tai o Poutini Plan



**Te Tai o Poutini**  
 PLAN

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