BEFORE THE HEARINGS PANEL

UNDER the Resource Management Act

1991 (**RMA**)

IN THE MATTER OF the Proposed Far North District

Plan (**PDP**) – Hearing 4: Natural Environments – Ecosystems and

Indigenous Biodiversity

STATEMENT OF EVIDENCE OF MAKARENA DALTON ON BEHALF OF TE AUPŌURI
PLANNING

22 July 2024

1. SUMMARY OF EVIDENCE

- 1.1 This evidence has been prepared on behalf of Te Aupōuri Commercial Development Ltd ("**Te Aupōuri**") as it relates to its submission and further submission on the PDP Hearing Stream 4, Natural Environment Values & Coastal Environment. My evidence focuses on responses to the recommendations in the Ecosystems and Indigenous Biodiversity Section 42A Hearing Report ("**s42A**").
- 1.2 In summary, I consider that the Reporting Officer for Far North District Council (**Council**) on this topic have made a number of constructive recommendations that agree in part with Te Aupōuri's submission. Despite this, a number of areas remain where I disagree with the recommendations of the Reporting Officers, and consider that further amendments or analysis are required. These specifically relate to:
 - (a) Giving effect to the tangata 'partnership approach' directions of the National Policy Statement for Indigenous Biodiversity, acknowledging that this cannot be achieved in full as part of this PDP.
 - (b) Issues with the use of the term "minimum necessary" in IB-R1 and removing ambiguity from rule interpretation.
 - (c) Vegetation clearance thresholds in IB-R4 as it relates to the Treaty Settlement Land Overlay and Māori Purpose Zone to give effect to Clause 3.18 of the NPS-IB.

2. INTRODUCTION

- 2.1 My full name is Makarena Evelyn Te Paea Dalton. I am a Consultant Planner (Senior Associate) at Barker and Associates ("B&A"), a planning and urban design consultancy with offices across Aotearoa New Zealand. I am based in the Kerikeri office, but undertake planning work throughout the country, although primarily in Te Taitokerau Northland.
- 2.2 I affiliate to Ngāpuhi-nui-Tonu, from hapū in the Far North, including Te Hikutū, Ngāti Ueoneone, Ngāti Rangi, Ngātirangimatamamoe and Ngātirangimatakakaa in Hokianga, Kaikohe and Otangaroa.

Qualifications and experience

- 2.3 I have a Bachelor of Arts with double majors in Māori Studies and Political Studies and a Master of Planning Practice from the University of Auckland. I am an Intermediate Member of the New Zealand Planning Institute.
- 2.4 I have 10 years' experience in planning. During this time, I have been employed in various resource management positions in local government and private companies within New Zealand including experience in:
 - (a) Resource consent planning in the Northland and Auckland regions, including in the Far North, Whangārei and Kaipara district's. Of particular note, I worked at the Far North District Council ("Council") as a consent planner for 3 years, working with the operative Far North District Plan.
 - (b) Formulation of policy and policy advice for Kaipara and Far North District council's and private clients throughout Northland and Auckland (Plan Change 78 – Intensification).
 - (c) Providing planning advice, and engaging in consultation with and on behalf of iwi organisations and hapū.
- 2.5 I attach a copy of my CV in **Attachment 1** which provides further detail on my experience and expertise.
- 2.6 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I have complied with the Code of Conduct in preparing this statement of evidence. Unless I state otherwise, this evidence is within my sphere of

- expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
- 2.7 B&A staff have previously provided assistance to FNDC on the Proposed Far North District Plan ("PDP"). This related to assistance with the formulation of section 32 evaluations for a number of topics prior to the notification of the PDP. That engagement did not carry forward post notification of the PDP. I confirm the following:
 - (a) B&A is an independent planning consultancy providing planning and resource management advice and services. B&A act on behalf of a number of private and public clients throughout the country;
 - (b) Prior to my employment at B&A I was employed by FNDC as a Policy Planner for 4 years and contributed to the preparation of the Draft Far North District Plan; and
 - (c) I contributed to the section 32 evaluation of the Special Zones (Airport, Horticulture Processing Facilities, Kororāreka Russell Township, and Orongo Bay), Noise, Signs, Light, Earthworks and reviewed the section 32 evaluation for the Heritage topics, and confirm that these are not relevant to Te Aupōuri's submission.
- 2.8 I was not involved in the preparation of provisions, the section 32 evaluation or any advice following notification for the Natural Environment Values and Coastal Environment Topics that are part of Hearing stream 4.
- 2.9 Noting the above, I have no conflict of interest to declare with respect of the hearing of Te Aupōuri's submission within the PDP review.

Involvement with the PDP on behalf of Te Aupōuri

- 2.10 I have been engaged by Te Aupōuri since September 2022 to provide independent planning evidence on the PDP, including:
 - (a) assisting with preparing Te Aupōuri's original submission on the PDP;
 - (b) assisting with preparing Te Aupōuri's further submission on the PDP; and
 - ongoing planning advice associated with those submissions and the hearings relating to those submissions. Including for the Tangata Whenua and Part 1
 General and Miscellaneous Topic for Hearing 1. Mr Tipene Kapa-Kingi on

behalf of Te Aupōuri presented at Hearing 1 stream, this was supported by a presentation which provides useful context for Te Aupōuri's submissions on the PDP¹.

2.11 I confirm that I have reviewed the Ecosystems and Indigenous Biodiversity s42A reports and recommended amendments to the Ecosystems and Indigenous Biodiversity Chapter ("IB Chapter")

Scope of evidence

- 2.12 My evidence is presented on behalf of Te Aupōuri and relates to the relevant planning matters associated with PDP Hearing Topic: Ecosystems and Indigenous Biodiversity.
- 2.13 This addresses the submission (#339) and further submission (#FS409) by Te Aupōuri on the PDP.
- 2.14 My evidence is structured as follows:
 - (a) Te Aupōuri Context
 - (b) Statutory Context
 - (c) Ecosystems and Indigenous Biodiversity
 - (i) Objectives and Policies
 - (ii) Defined Terms
 - (iii) IB-R1 "the minimum necessary"
 - (iv) IB-R2 Papakāinga
 - (v) IB-R3-4- Thresholds
 - (d) Conclusion (Section 12).

A copy of Mr Kapa-Kingi's evidence statement can be viewed on Council's website for Hearing 1

https://www.fndc.govt.nz/__data/assets/pdf_file/0029/28379/7a6af4595a0eb37ca70a6343b8ab d9240cfabe3d.pdf

TE AUPŌURI CONTEXT

- 2.15 As set out in Mr Kapa-Kingi's presentations at Hearing 1, Te Aupōuri are an iwi in the Far North, who have been through the Treaty Settlements process with their historical claims and accounts recorded in their Deed of Settlement and the Te Aupōuri Claims Settlement Act 2015. Te Aupōuri are an iwi with approximately 12,000 members centred around Pōtahi marae. Te Rūnanga Nui o Te Aupōuri Trust ("Te Aupōuri Rūnanga") is a Post Settlement Group Entity ("PSGE") and is the parent entity of Te Aupōuri Commercial Developments Ltd, Te Aupōuri Fisheries Management Ltd, Te Aupōuri Iwi Development Trust and Te Aupōuri Property Ltd, and collectively these entities represent the interests and aspirations of approximately 12,000 people who identify as Te Aupōuri.
- 2.16 Te Aupōuri together with Te Aupōuri Fisheries Management Ltd are wholly owned subsidiaries of Te Aupōuri Rūnanga, and are responsible for growing the iwi's economic base and asset portfolio to support the social, cultural and environmental initiatives delivered by Te Aupōuri Rūnanga.
- 2.17 Mr Kapa-Kingi highlighted Te Aupōuri Claims Settlement Act 2015 settles historic claims which involved cultural redress of 1,370ha and commercial redress of 4,800ha as set out in **Figure 1**, and as I understand it, corresponds with the PDP's notified Treaty Settlement Overlay as shown in **Figure 2**.

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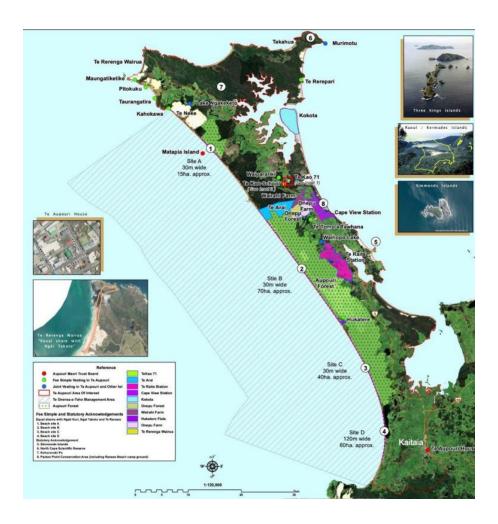


Figure 1: Te Aupōuri Cultural and Commercial Redress²

 $^{^{\}rm 2}$ Slide 6 and 7 of Mr Kapa-Kingi's Hearing 1 presentations.

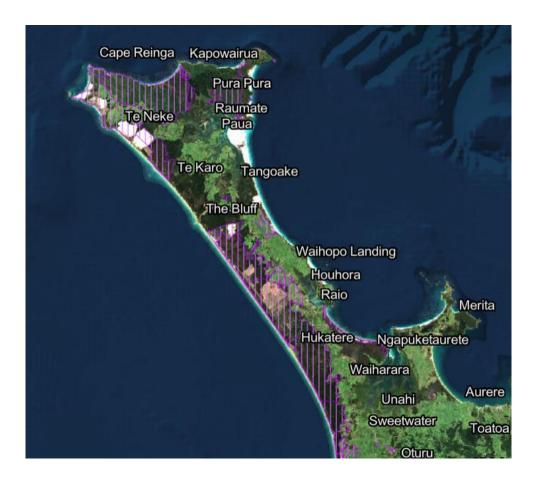


Figure 2: PDP Treaty Settlement Overlay

2.18 Slide 6 of Mr Kapa-Kingi's presentation highlights that:

"The Treaty settlement process and the return of land has been fundamental in reconciling and enabling the relationship of Te Aupōuri to their ancestral lands, rivers and oceans, wāhi tapu and other taonga.

Ensuring that Treaty Settlement land is ancestral land in the FNDP is critical. The treaty settlement process has, by legislation, recognised Te Aupōuri's relationship to this land as outlined in our deed of settlement."³

2.19 I agree with Mr Kapa-Kingi, and in my opinion the Te Aupōuri Deed and Claims Settlement Act 2015 provides a robust evidentiary base that has been tested through a legislative process, and demonstrates their relationship (as an iwi and people) to their rohe (boundaries) and ancestral lands. In my view, this is important context, as it

https://www.fndc.govt.nz/__data/assets/pdf_file/0029/28379/7a6af4595a0eb37ca70a6343b8abd9240cfabe3d.pdf

Refer to Mr Kapa-Kingi's Hearing's 1 presentation:

forms the basis for Te Aupōuri's interest in the relevant provisions and the desire to ensure that they adequately provided for within the PDP, specifically the proposed Ecosystems and Indigenous Biodiversity Chapter.

3. STATUTORY CONTEXT

Resource Management Act 1991

- 3.1 Part 2 of the Resource Management Act 1991 ("Act") sets out the sustainable management purpose and principles. Section 6 sets out matters of nation importance, and in achieving the purpose of the Act, all persons exercising functions and powers shall recognise and provide for those matters. Of particular relevance, are section's 6 (c) and (e) as set out below:
 - "(c) the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna:"

• • •

- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:"
- 3.2 Section 7, states:

"In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

- (a) kaitiakitanga:"
- 3.3 I highlight this, as it acknowledges that the Act recognises and provides for the protection of areas of significant indigenous vegetation, habitats and fauna; and the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga as matters of national importance. In my opinion, this provides the backdrop and statutory context that recognises the relationship of Māori, their culture and traditions with their ancestral land, and provides for their role as kaitiaki.

National Policy Statement for Indigenous Biodiversity

- 3.4 The National Policy Statement for Indigenous Biodiversity ("NPS-IB") came into force in August 2023 and applies to indigenous biodiversity in the terrestrial environment throughout Aotearoa New Zealand.
- 3.5 Part 1: Preliminary provisions provide introductory guidance for interpretation and informs how Part 2: Objectives and policies should be read. Of particular relevance, is

clause 1.5 Decision-making principles and relates to the interpretation and application of NPS-IB Policies 1 and 2. Sub-clause 1.5(3) states:

"Consistent with this, the decision-making principles that must inform the implementation of this National Policy Statement are as follows:

- (a) prioritise the mauri, intrinsic value and wellbeing of indigenous biodiversity:
- (b) take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi):
- (c) recognise the bond between tangata whenua and indigenous biodiversity based on whakapapa relationships:
- (d) recognise the obligation and responsibility of care that tangata whenua have as kaitiaki of indigenous biodiversity:
- (e) recognise the role of people and communities (including landowners) as stewards of indigenous biodiversity:
- (f) enable the application of te ao Māori and mātauranga Māori:
- (g) form strong and effective partnerships with tangata whenua."
- 3.6 Part 2 of the NPS-IB contained the objectives and policies. Objective 1(a) seeks to maintain indigenous biodiversity so that there is at least no <u>overall</u> loss, and in achieving this, Objective 1(b) seeks to recognises the mana of tangata whenua as kaitiaki; the role of other communities and landowners as stewards; the protection and restoration as necessary to achieve the overall maintenance; while providing for the social, economic, and cultural wellbeing of people and communities.
- 3.7 Policy 1 directs that indigenous biodiversity is managed in a way that gives effect to the decision-making principles (Part 1, sub-clause 1.5 of the NPS-IB).
- 3.8 Policy 2 specifically provides for the tangata whenua to exercise kaitiakitanga for indigenous biodiversity within their rohe, including on their land and the identification and protection of indigenous species that are taonga, and that they actively participate in other decision-making about biodiversity.
- 3.9 In addition to the specific policies that relate to tangata whenua matters, the NPS-IB specifically provides for and defines "specified Māori land", copied below is the relevant clause that relates to Te Aupōuri:

"specified Māori land means land that is any of the following:

"

- (g) Treaty settlement land, being land held by a post-settlement governance entity (as defined in the Urban Development Act 2020) where the land was transferred or vested and held (including land held in the name of a person such as a tipuna of the claimant group, rather than the entity itself):
 - (i) as part of redress for the settlement of Treaty of Waitangi claims; or

(ii) by the exercise of rights under a Treaty settlement Act or Treaty settlement deed."

- 3.10 In Appendix 3 of the s42A, the Reporting Officer provides an analysis of the PDP objectives and policies and provides the rationale and basis for a number of amendments to the notified PDP provisions recommended by the Reporting Officer. It also notes whether or not, the PDP IB Chapter gives effect in full, in part or whether the NPS-IB be given effect to in the future. While I found this analysis useful, it highlights the problematic approach with the notified IB Chapter, particularly the lack of involvement by tangata whenua in the preparation of the notified plan change, and as such the absence of a partnership approach required to manage indigenous biodiversity as set out in Policy 1, 2 and clauses 3.2, 3.3 and 3.18 of the NPS-IB.
- 3.11 In my opinion, this is critical and the absence of a partnership approach has meant the notified provisions are lacking and has flavoured the tone of the notified PDP. While I consider the Reporting Officers recommended amendments to be a marked improvement to the notified plan change, in my opinion, the amendments have still been made in the absence of a partnership approach and continue to lack an adequate tangata whenua and Māori cultural lens.

4. ECOSYSTEMS AND INDIGENOUS BIODIVERSITY

Objectives and Policies

- 4.1 Te Aupōuri's submission sought amendments to the notified IB-P1's identification policy, to provide greater recognition of Te Ao Māori values by the identification of taonga species in accordance with mātauranga Māori, and that this be done with engagement with mana whenua at the time of identifying Significant Natural Areas ("SNAs").
- 4.2 The Report Officer has recommended quite a substantial step change to the PDP IB Chapter by the deletion of references to SNAs, amendments to objectives and policies, and a general shift in the rule framework that, in my opinion, improves clarity and interpretation of the chapter as a whole. In particular, I am supportive of the Reporting Officer's recommendation to delete references to "Significant Natural Areas" within the Ecosystems and Indigenous Biodiversity Chapter, given these have not been mapped as part of the PDP.

4.3 In terms of proposed policy IB-P1, the s42A Report addresses this in "Key Issue 7"⁴ and recommends that IB-P1 as notified be deleted and replaced with the following wording:

"Ensure that the protection, maintenance and restoration of indigenous biodiversity is done in a way that:

a. recognises and values the mana of tangata whenua as kaitiaki; and

b. provides specific opportunities for tangata whenua to exercise kaitiakitanga in accordance with tikanga Māori." ⁵

The s42A Reporting Officer recommends the amendments for the same reasons detailed in Key Issue 2, and that it serves no useful purpose and would lead to implementation issues and costs. I support the Reporting Officers recognition of tangata whenua as kaitiaki and the practice of kaitiakitanga in accordance with tikanga Māori. To my understanding, "tikanga" is a broader framework of customs, practice protocols, and values that are developed over time and embedded within a social context, and would include the application of "mātauranga Māori" or Māori knowledge systems. They key here is that appropriate mechanisms are in place to ensure appropriate recognition and involvement of tangata whenua in the management of biodiversity.

Defined Terms

4.5 The PDP proposed definition for "Papakāinga" as follows:

"means an activity undertaken to support traditional Māori cultural living for tangata whenua residing in the Far North District on:

- (a) Māori land;
- (b) Treaty Settlement Land;
- (c) Land which is the subject of proceedings before the Māori land court to convert the land to Māori land; or
- (d) General land owned by Māori where it can be demonstrated that there is an ancestral link identified.

Papakāinga may include (but is not limited to) **residential**, social, cultural, economic, conservation and recreation activities, **marae**, wāhi tapu and urupā."

Refer to s42A Section 6.2.7 Key Issue 7, paragraphs 138 and 139.

⁵ Appendix 1.1 of the s42A.

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4.6 I note that Te Aupōuri sought amendments to the PDP definition to remove undefined terms to reduce uncertainty on how this should be applied.⁶ While I acknowledge that submissions on definitions will not be heard until Hearing 18 Interpretation & Mapping scheduled in August 2025, I consider that this is relevant in the context of the consideration of these rules, and other provisions that will be heard in other topics (such as the Treaty Settlement Land Overlay Chapter).

4.7 In addition, the notified PDP proposes to list the term "marae" in the Glossary and is described as:

"Complex of buildings which provide the focal point for social, cultural, and economic activity for Māori and the wider community."

4.8 The Ministry for the Environment ("**MFE**") published Guidance for 1.1 Definitions Standards⁷ which provides guidance on "Definitions vs glossary" and I highlight the following (my **emphasis** added):

"A glossary is where terms from a specific subject matter, text or dialect are listed with explanations. It explains more specialist terms or ones not easily understood. However, a term must be included in the Definitions List where it is in a provision (such as an objective, policy and/or rule) and its interpretation is important in determining the activity status of a rule."

- 4.9 Given "marae" are specifically mentioned in a number of PDP provisions (policies and rules), it is my opinion that this would more appropriately sit in the Definitions Chapter.
- 4.10 In my opinion, this highlights the inefficiencies in the approach that Council has elected to take to the PDP hearings timetable being slip across a multitude of topics and such an extended timeframe. In my view, this makes it challenging to achieve integration across the PDP.

IB-R1 Specified Activities – "the minimum necessary"

4.11 The Reporting Officer has recommended amendments to rule PER-1 to include:

"PER-1 It is the minimum necessary for any of the following:"

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⁶ S339.003.

⁷ Refer to https://environment.govt.nz/assets/Publications/Files/guidance-definitions-standard.pdf

I do not support the addition of "the minimum necessary" at the start of PER-1. This 4.12 appears to be acknowledged by the Reporting Officer:

> "While this is somewhat subjective and will need to be determined on case-by-case basis, it will help to reduce the risk of IB-R1 being used to undertake excessive indigenous vegetation clearance and also sends a clear message to landowners on the intent of the rule to minimise the amount of clearance undertaken."8

- In my opinion, this introduces a tone of ambiguity within the wording and plan 4.13 interpretation for how a plan user would be able to reasonably determine, without an element of discretion or judgement, that an activity complies with this clause. In my opinion, permitted activity rules must be written in a way that removes any judgement, and must be clear and measurable, i.e., you comply or you don't. Any material nuance or eligibility criteria to the rule should specified by criteria or by a general performance / development standard. In terms of this rule, I consider that this achieved through subclauses 1 - 14.
- 4.14 On this basis, I recommend that "the minimum necessary" be deleted from the IB-R1 PER-1 clause.

5. IB-R2 - Papakāinga

- 5.1 IB-R2 applies to the Māori Purpose Zone ("MPZ"), Rural Production Zone ("RPZ") and land subject to the Treaty Settlement Land Overlay ("TSL Overlay"). Te Aupōuri's relief⁹ sought indigenous vegetation clearance and any associated land disturbance thresholds be amended, and that the notified thresholds did not adequately enable or provide for papakāinga development, particularly where there is more than one residential unit, as it typically the case on Māori Free Land or in Te Aupōuri case, as the PSGE, where they are seeking to provide for the social and economic wellbeing of its members through the provision of papakāinga housing.
- 5.2 S42A Reporting Officer recommends the following amendments to the IB-R2¹⁰:

"PER-1 It does not exceed:

1. 1,500m² for a marae complex, including associated infrastructure and access; and

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Paragraph 275 of the s42A.

⁹ S339.028.

Appendix 1.1 of the s42A.

- 2. <u>1,000m² for the first residential unit and</u> 500m² <u>for each additional unit per</u> residential unit."
- 5.3 In my opinion, the amendments more appropriately recognise and provide for the relationship of Māori, their culture and traditions to their ancestral lands in accordance with section 6(e), while still giving effect to section 6(c) of the Act, and more appropriately align with "specified Māori land" directions in Clause 3.18 of the NPS-IB.
- I consider the amendments, in particular, the approach to provide for indigenous vegetation clearance for one or more residential unit as part of a papakāinga development to be appropriate. I agree that this should be done in a tiered manner with a higher threshold for the first residential unit and a lower threshold for each additional residential unit. I support the Reporting Officer's approach to removing reference to "within a Significant Natural Area" from the rule title for the reasons outlined above.
- 5.5 Finally, in terms of IB-R2 PER-1(1), I recommend an additional amendment to delete the term 'complex' from the rule as "marae" already refers to a "complex of buildings" as I have highlighted in section 4.7 above, and as such I consider this is unnecessary.

6. IB-R3 and IB-R4 – Permitted Activity Rule Thresholds

- 6.1 Te Aupōuri submissions¹¹ sought amendments to the thresholds generally. The Reporting Officer addresses IB-R3 in Key Issue 15 and recommends to deletion of the notified rule. I agree with the Reporting Officer for the reasons set out in the s42A Report.¹²
- 6.2 The s42A Reporting Officer addresses IB-R4 in Key Issue 16 and recommends the deletion of the notified clauses IB-R1-PER-1(1) and (2). I agree with the Reporting Officer's recommendations to delete IB-R4-PER-1(1) and (2) as notified given the PDP does not include SNA mapping. In my opinion, the notified approach to require all landowners to effectively obtain an expert ecological assessment to determine whether a rule applies or not is ineffective, inefficient and simply inappropriate for a permitted activity rule.

¹¹ S339.029 – S339.032

Paragraph 297 of the s42A Report.

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6.3 While I acknowledge the Reporting Officers analysis on other district plan thresholds¹³,

I disagree with the recommendations to reduce indigenous vegetation clearance within

PER-R1-(2) in the RPZ, MPZ and TSL Overlay given the absence of SNA mapping

and expert ecological evidence to support these thresholds. The Operative Far North

District Plan provides for up to 2ha of indigenous vegetation clearance within the Rural

Production Zone. While I agree that this area of clearance is likely out of step with more

recent district plan, I consider the 5,000m² threshold to be more appropriate in the MPZ

and TSL Overlay, particularly in the absence of SNA Mapping. In my view, this is

particularly relevant in the MPZ and TSL Overlay, as it will better give effect to the

directions of clause 3.18 of the NPS-IB.

7. CONCLUSION

7.1 In conclusion, I consider that there are still minor issues outstanding from Te Aupōuri's

submission that need to be addressed by the Hearings Panel. These primarily relate

to appropriate indigenous vegetation clearance thresholds in rules IB-R2 and IB-R4

and ensuring these appropriately give effect to the NPS-IB directions to manage

indigenous biodiversity, taking a partnership approach with tangata whenua.

Makarena Dalton

Date: 22 July 2024

¹³ Appendix 4 of the s42A Report.

Attachment 1 - Makarena Dalton CV



Expertise

- Plan reviews and policy development
- Tangata whenua, stakeholder and community engagement
- Te Ao Māori values policy, development planning and engagement
- Resource consent strategy and preparation

Affiliations

 Intermediate Member of the New Zealand Planning Institute

Makarena Dalton

Senior Associate

Bachelor of Arts; Master of Planning Practice; Intermediate Member of NZPI

Ko Ngāpuhi-nui-Tonu te iwi, no ngā hapū o Te Hikutū, Ngāti Ueoneone, Ngāti Rangi, me Ngātirangimatamamoe.

Makarena has over 9 years of experience as a planner in the resource management field. Over this time, she has worked both within councils and as a consultant in policy and plan development, private plan changes and resource consent preparation and processing, and has worked extensively with tangata whenua in different parts of Aotearoa.

Her experience also includes preparing non-statutory documents, facilitating iwi and hapū engagement on behalf of council and private clients, preparing relationship agreements, and working with iwi and hapū on their developments.

Projects / Key Experience

Northland Tsunami Siren Replacement Project: Lead consultant for the roll out of 94 new tsunami sirens and supporting infrastructure across Te Tai Tokerau. The project involved working with all three territorial authorities and the regional council to obtain resource consents and deliver the \$6.7m project to improve Te Taitokerau's resilience against tsunami hazards. This involved preparation of consenting strategy, establishing site selection criteria, tangata whenua engagement, elected member presentations and coordinating the project team.

Plan Changes and Policy: Preparation of s32 Reports and plan change provisions for the Far North, Kaipara, and Nelson Whakatū Plan Reviews. Most recently, I have prepared submissions, attended expert conferencing and prepared expert evidence for Auckland Council's Plan Change 78 – Intensification plan changes.

Auckland Light Rail: Supporting ALR's 'urban' workstream to engage and integrate mana whenua views, values and their outcomes sought by this project. This involved direct engagement with the Mana Whenua Kaitiaki Forum, reviewing and analysing mana whenua feedback, drafting issue and opportunity report, and contributing to the mana whenua engagement strategy for the across the urban workstream.

Queenstown Future Development Strategy: Led engagement with mana whenua on behalf of Queenstown Lakes and Otago Regional Councils on the FDS. Including workshop facilitation to develop their values and development aspirations, undertake analysis on feedback, and develop the multi-criteria analysis framework, including to appropriately incorporate mana whenua values and their outcomes sought. This work is ongoing.

