



22 MAY 2024

Clutha District Council  
PO Box 25, Rosebank Terrace  
**BALCLUTHA 9240**

*Tēnā koutou, ko tēnei mihi atu ki a koutou, ngā mema o te komiti, ngā kaiwhakawa o ngā mea e pa ana tēnei kaupapa taumaha, me ki, o tātou nei rohe moana, he taoka o tātou nei whānau, hapū me te iwi. Ki a rātou kua whetu rangitia, te hunga wairua, haere, moe mai, oki oki mai, kati.*

Submission on a Limited Notified Resource Consent Application – RM3030 C & M Campbell.

**RM3030 Application**

**To undertake a two-lot subdivision with an identified residential building platform in the Coastal Resource Area at 239D Moturata Road, Taiari Beach.**

Te Rūnanga o Ōtākou **opposes** this application.

Te Rūnanga o Ōtākou is not a trade competitor for the purposes of section 308B of the Resource Management Act 1991.

Te Rūnanga o Ōtākou **may wish** to be heard in support of this submission at a hearing.

## **1. SCOPE OF THIS SUBMISSION**

- 1.1 This submission relates to the application by C & M Campbell (**'the Applicant'**) in its entirety.
- 1.2 This submission addresses matters under sections 6(e), 7(a), and 8 of the Resource Management Act 1991.
- 1.3 To acknowledge the association with the district and its resources, Māori words are used within this document and a glossary is provided at **Appendix 1**.

## 2. TOITŪ TE MANA, TOITŪ TE WHENUA: TE RŪNAKA

- 2.1 This submission is made on behalf of Te Rūnanga o Ōtākou, the kaitiaki rūnaka whose takiwā includes the site to which the application relates.
- 2.2 The takiwā of Te Rūnanga o Ōtākou centres on Muaūpoko/Otago Peninsula and extends from Purehurehu Point/north of Heyward Point to the Clutha River/Mata-au.

## 3. CONTENT OF APPLICATION

- 3.1 Te Rūnanga o Ōtākou understands that the Applicant has applied to Clutha District Council (**Council**) to undertake a 2-lot subdivision of the site at 239D Moturata Road, Taiari Beach.<sup>1</sup>
- 3.2 The subject site comprises 2.9770 hectares and was created by a previous 9-lot subdivision (**RM1411**), which identified a residential building platform (**RBP**) on the site. The Applicant has since obtained a building consent for a dwelling. On the present application, the consented dwelling will be held on proposed Lot 1, which comprises 2.00ha, with an existing pedestrian right-of-way to the beach along southern boundary of proposed Lot 1. Proposed Lot 2 comprises 0.972ha and a RBP is identified. The application states that wastewater will be disposed to land.
- 3.3 The processing planner, in their s92 Request for Further Information, recognised that the subject site affects Te Tai-o-Ārai te uru Statutory Acknowledgement Area (**Appendix 2**).<sup>2</sup>
- 3.4 Rule **COA.2** of the Clutha District Plan (**CDP**) requires that –

*Any person making an application for a Resource Consent and Council, in considering any Resource Consent application, shall consult with the Runanga that has kaitiaki in that particular area, and where relevant, the Department of Conservation and the Regional Council.*
- 3.5 Te Rūnanga o Ōtākou note that no prior consultation was undertaken with mana whenua and the applicant's agent, in lieu of consultation, requested that Council limited notify the application.<sup>3</sup>

## 4. DECISION SOUGHT

- 4.1 Te Rūnanga o Ōtākou seek that Council **decline** the application.

## 5. REASONS FOR DECISION SOUGHT

- 5.1 The present application represents an intensification of subdivision and development along the coast, in a landscape with significant cultural values. Te Rūnanga o Ōtākou has concerns with the increasing number of subdivisions within the coastal areas of their takiwā and their

---

<sup>1</sup> Taiari is the correct spelling for the "Taiari River."

<sup>2</sup> Refer *RM3030 – Clark & Megan Campbell – 239d Moturata Road – Response to Request for Further Information RM3030 ("RM3030 RFI Response")*, p.1. The s92 request was served to Applicant on 25/03/2024. Note that *Section 95 Notification Report (ID892789)* appears to have erroneously referenced "Kuramea/Catlins Lake" as the relevant Statutory Acknowledgement Area (refer p.21).

<sup>3</sup> *RM3030 RFI Response*, p.3.

encroachment and adverse effects on the cultural landscape – in particular Te Tai-o-Ārai te uru, Otuarae,<sup>4</sup> and the Taiari – of which the proposed subdivision forms a part.

- 5.2 It is the preference of Te Rūnanga o Ōtākou that such developments have access to a reticulated wastewater and stormwater network. The application proposes that wastewater will be disposed to land for the residential activities on each allotment; however, a feasibility assessment was not included in the application package.
- 5.3 Insufficient information has been provided for Rūnaka to assess the potential adverse impacts of wastewater disposal on cultural values and the receiving environment of Te Tai-o-Ārai te uru. Rūnaka are particularly concerned with the cumulative effects of discharges of wastewater and stormwater at the coast, as a consequence of subdivision and development outside of those settlement areas provided for by the CDP.
- 5.4 Kāi Tahu whānui view the environment holistically, understanding that the way in which land is developed and used affects the health of freshwater and the values of cultural landscapes. A priority for Kāi Tahu is the protection of significant cultural landscapes from inappropriate use and development. Kāi Tahu aspirations for the management of coastal landscapes and wāhi tūpuna are set out in the *Kāi Tahu ki Otago Natural Resource Management Plan 2005* with relevant provisions set out at **Appendix 3**.<sup>5</sup>

## 6. CONCLUSION

- 6.1 This submission confirms that Te Rūnanga o Ōtākou **oppose** the application as applied for. Te Rūnanga o Ōtākou wish to **restate** mana whenua interests in the landscape and **record** concerns about adverse and cumulative effects of residential subdivision upon the cultural landscape in which the Applicant's proposal is situated.

---

<sup>4</sup> Otuarae is the recognised Kāi Tahu placename for the headland that borders the development, as was documented by Council in their Report and Decision: Moturata Road Subdivision Road Naming (24 June 2021), Item 5, File Reference 522494. The Otago Regional Council has previously assessed Taiari Mouth Unit (CL.3) as having High Tangata Whenua Values, among which the following is recorded: "*Otuarae (a wahi tapu cave) adjoins Te Ao Ka Kume. Collectively, Te Ao Ka Kume, Otuarae and Moturata are an important cultural landscape for the Moturata Taiari Whanau.*" See ORC Memorandum, pp.11-12. <orc.govt.nz/media/2300/pxx-appendix-3-clutha-district-oustanding-natural-features-and-landscape-assessment-sheets.pdf>

<sup>5</sup> In particular, see Sections [5.6.3], [5.6.4], [5.8], and [9.5] included at Appendix 3.

## Appendix 1: Glossary of te reo Māori terms

Ara tawhito	Ancient trails
Hapū	Sub-tribe
Iwi	Tribe
Kaitiaki/Kaitiakitaka	Guardian / to exercise guardianship
Kāi Tahu	Descendants of Tahu, the tribe
Kaupapa	Topic, plan
Ki uta ki tai	Mountains to the Sea
Kōiwi tākata	Ancestral remains
Mahika kai	Places where food is produced or procured.
Mana Whenua	Customary authority or rakātirataka exercised by an iwi or hapū in an identified area
Manawhenua	Those who exercise customary authority or rakātirataka
Mātauraka	Knowledge, wisdom, understanding, skill
Mauka	Mountain
Mauri	Essential life force or principle, a metaphysical quality inherent in all things both animate and inanimate
Ngā Rūnanga/Kā Rūnaka	Local representative group of Otago
Nohoanga/Nohoaka	Occupation site(s)
Papatipu Rūnaka/Rūnanga	Traditional Kāi Tahu Rūnaka
Papatūānuku	Earth Mother
Rakātirataka	Chieftainship, decision-making rights
Rakinui	Sky Father
Rohe	Boundary
Roto	Lake
Takiwā	Area, region, district
Tākata whenua	Iwi or hapu that holds mana whenua (customary authority) in a particular area
Taoka	Treasure
Tikaka	The customary system of values and practices that have developed over time and are deeply embedded in the Māori social context.
Tino rakātirataka	Self-determination, autonomy, self-government
Urupā	Burial place
Wai māori	Fresh water
Whakapapa	Genealogy
Whānau	Family

## Appendix 2: Statutory Acknowledgement for Te Tai o Arai Te Uru (Otago Coastal Marine Area)

### Ngāi Tahu Claims Settlement Act 1998, sch 103.

#### Specific area

The statutory area to which this statutory acknowledgement applies is Te Tai o Arai Te Uru (the Otago Coastal Marine Area), the Coastal Marine Area of the Moeraki, Dunedin Coastal and Molyneaux constituencies of the Otago region, as shown on SO Plans 24250, 24249, and 24252, Otago Land District, and as shown on Allocation Plan NT 505 (SO 19901).

#### Preamble

Under section 313, the Crown acknowledges Te Rūnanga o Ngāi Tahu's statement of Ngāi Tahu's cultural, spiritual, historic, and traditional association to Te Tai o Arai Te Uru as set out below.

#### Ngāi Tahu association with Te Tai o Arai Te Uru

The formation of the coastline of Te Wai Pounamu relates to the tradition of Te Waka o Aoraki, which foundered on a submerged reef, leaving its occupants, Aoraki and his brothers, to turn to stone. They are manifested now in the highest peaks in the Kā Tiritiri o Te Moana (the Southern Alps). The bays, inlets, estuaries and fiords which stud the coast are all the creations of Tū Te Rakiwhānoa, who took on the job of making the island suitable for human habitation.

The naming of various features along the coastline reflects the succession of explorers and iwi (tribes) who travelled around the coastline at various times. The first of these was Māui, who fished up the North Island, and is said to have circumnavigated Te Wai Pounamu. In some accounts the island is called Te Waka a Māui in recognition of his discovery of the new lands, with Rakiura (Stewart Island) being Te Puka a Māui (Māui's anchor stone). A number of coastal place names are attributed to Māui, particularly on the southern coast.

The great explorer Rakaihautu travelled overland along the coast, identifying the key places and resources. He also left many place names on prominent coastal features. Another explorer, Tamatea, sailed along the Otago coast in the waka Takitimu. After the waka eventually broke its back off the coast of Murihiku, Tamatea and the survivors made their way overland back to the North Island, arriving at the coast by the place Tamatea named Ō-amaru (Ōamaru).

Place names along the coast record Ngāi Tahu history and point to the landscape features which were significant to people for a range of reasons. For example, some of the most significant rivers which enter the coastal waters of Otago include: Waitaki, Kakaunui, Waihemo (Shag), Waikouaiti, Kaikarae (Kaikorai), Tokomairiro, Mata-au (Clutha), and Pounaweia (Catlins). Estuaries include: Waitete (Waitati), Ōtākou (Otago), Makahoe (Papanui Inlet), Murikauhaka (Mata-au and Kōau estuaries), Tāhaukupu (Tahakopa Estuary), and Waipātiki (Wapatī Estuary). Islands in the coastal area include Ōkaihe (St Michael's Island), Moturata (Taieri Island), Paparoa, Matoketoke, Hakinikini, and Aonui (Cooks Head).

Particular stretches of the coastline also have their own traditions. The tradition of the waka (canoe) Arai Te Uru and its sinking at the mouth of the Waihemo (Shag River) has led to the coastal area of Otago being known as Te Tai o Araiteuru (the coast of Arai Te Uru). Accounts of the foundering, the wreckage, and the survivors of this waka are marked by numerous landmarks almost for the length of the Otago coast. The boulders on Moeraki coast (Kai Hīnaki) and the Moeraki pebbles are all associated with the cargo of gourds, kūmara and taro seed which were spilled when the Arai Te Uru foundered.

For Ngāi Tahu, traditions such as these represent the links between the cosmological world of the gods and present generations. These histories reinforce tribal identity and solidarity, and continuity between generations, and document the events which shaped the environment of Te Wai Pounamu and Ngāi Tahu as an iwi.

Because of its attractiveness as a place to establish permanent settlements, including pā (fortified settlements), the coastal area was visited and occupied by Waitaha, Ngāti Mamoe and Ngāi Tahu in succession, who, through conflict and alliance, have merged in the whakapapa (genealogy) of Ngāi Tahu Whānui. Battle sites, urupā and landscape features bearing the names of tūpuna (ancestors) record this history. Prominent headlands, in

particular, were favoured for their defensive qualities and became the headquarters for a succession of rangatira and their followers. Notable pā on the Otago coast include: Makotukutuku (Oamaru), Te Raka-a-hineatea (Moeraki), Te Pā Katata, Pā a Te Wera, (Huriawa Peninsula), Māpoutahi (Pūrākaunui), Pukekura (Taiaroa Head), and Moturata (Taieri Island). The estuaries from the Waitaki River to the Chaslands also supported various hapū.

Tūpuna such as Waitai, Tukiauau, Whaka-taka-newha, Rakiiamoā, Tarewai, Maru, Te Aparangi, Taoka, Moki II, Kapo, Te Wera, Tu Wiri Roa, Taikawa, and Te Hautapanuiotu are among the many illustrious ancestors of Ngāti Mamoe and Ngāi Tahu lineage whose feats and memories are enshrined in the landscape, bays, tides and whakapapa of Otago.

The results of the struggles, alliances and marriages arising out of these migrations were the eventual emergence of a stable, organised and united series of hapū located at permanent or semi-permanent settlements along the coast, with an intricate network of mahinga kai (food gathering) rights and networks that relied to a large extent on coastal resources. Chiefs such as Kōrako (several), Tahatu, Honekai, Ihutakuru, Karetai, Taiaroa, Pōtiki, Tuhawaiki, and Pokene being some among a number who had their own villages and fishing grounds. Otago Peninsula (Muaupoko) had many kāinga nohoanga with a multitude of hapū occupying them. At one time up to 12 kāinga existed in the lower Otago harbour, some larger and more important than others.

The whole of the coastal area offered a bounty of mahinga kai, including a range of kaimoana (sea food); sea fishing; eeling and harvest of other freshwater fish in lagoons and rivers; marine mammals providing whale meat and seal pups; waterfowl, sea bird egg gathering and forest birds; and a variety of plant resources including harakeke (flax), fern and tī root. In many areas the reliance on these resources increased after the land sales of the 1840s and 1850s, and the associated loss of access to much traditional land-based mahinga kai.

Many reefs along the coast are known by name and are customary fishing grounds, many sand banks, channels, currents and depths are also known for their kaimoana. One example is Poatiri (Mt Charles - Cape Saunders) the name of which refers to a fish hook. Poatiri juts out into the Pacific, close to the continental shelf, and is a very rich fishing ground. Another example is Blueskin Bay which was once a kōhanga (breeding ground) for the right whale, although it is well over 150 years since it has seen this activity.

Other resources were also important in the coastal area. Paru (black mud used for dyeing) was obtained from some areas. Some of the permanent coastal settlements, such as those at the mouth of the Mata-au (Clutha River), and at Ōtākou and Pūrākaunui, were important pounamu manufacturing sites. Trading between these villages to the south and north via sea routes was an important part of the economy.

The Otago coast was also a major highway and trade route, particularly in areas where travel by land was difficult. Pounamu and tītī were traded north with kūmara, taro, waka, stone resources and carvings coming south. Travel by sea between settlements and hapū was common, with a variety of different forms of waka, including the southern waka hunua (double-hulled canoe) and, post-contact, whale boats plying the waters continuously. Hence tauranga waka (landing places) occur up and down the coast in their hundreds and wherever a tauranga waka is located there is also likely to be a nohoanga (settlement), fishing ground, kaimoana resource, rimurapa (bull kelp - used to make the pōhā, in which tītī were and still are preserved) with the sea trail linked to a land trail or mahinga kai resource. The tūpuna had a huge knowledge of the coastal environment and weather patterns, passed from generation to generation. This knowledge continues to be held by whānau and hapū and is regarded as a taonga. The traditional mobile lifestyle of the people led to their dependence on the resources of the coast.

Numerous urupā are being exposed or eroded at various times along much of the coast. Water burial sites on the coast, known as waiwhakaheketūpāpaku, are also spiritually important and linked with important sites on the land. Places where kaitangata (the eating of those defeated in battle) occurred are also wāhi tapu. Urupā are the resting places of Ngāi Tahu tūpuna and, as such, are the focus for whānau traditions. These are places holding the memories, traditions, victories and defeats of Ngāi Tahu tūpuna, and are frequently protected in secret locations.

The mauri of the coastal area represents the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. All elements of the natural environment possess a life force, and all forms of life are related. Mauri is a critical element of the spiritual relationship of Ngāi Tahu Whānui with the coastal area.

### **Purposes of statutory acknowledgement**

Pursuant to section 215, and without limiting the rest of this schedule, the only purposes of this statutory

acknowledgement are—

- (a) to require that consent authorities forward summaries of resource consent applications to Te Rūnanga o Ngāi Tahu as required by regulations made pursuant to section 207 (clause 12.2.3 of the deed of settlement); and
- (b) to require that consent authorities, Heritage New Zealand Pouhere Taonga, or the Environment Court, as the case may be, have regard to this statutory acknowledgement in relation to Te Tai o Arai Te Uru, as provided in sections 208 to 210 (clause 12.2.4 of the deed of settlement); and
- (c) to enable Te Rūnanga o Ngāi Tahu and any member of Ngāi Tahu Whānui to cite this statutory acknowledgement as evidence of the association of Ngāi Tahu to Te Tai o Arai Te Uru as provided in section 208 (clause 12.2.5 of the deed of settlement).

#### **Limitations on effect of statutory acknowledgement**

Except as expressly provided in sections 208 to 211, 213, and 215,—

- (a) this statutory acknowledgement does not affect, and is not to be taken into account in, the exercise of any power, duty, or function by any person or entity under any statute, regulation, or bylaw; and
- (b) without limiting paragraph (a), no person or entity, in considering any matter or making any decision or recommendation under any statute, regulation, or bylaw, may give any greater or lesser weight to Ngāi Tahu's association to Te Tai o Arai Te Uru (as described in this statutory acknowledgement) than that person or entity would give under the relevant statute, regulation, or bylaw, if this statutory acknowledgement did not exist in respect of Te Tai o Arai Te Uru.

Except as expressly provided in this Act, this statutory acknowledgement does not affect the lawful rights or interests of any person who is not a party to the deed of settlement.

Except as expressly provided in this Act, this statutory acknowledgement does not, of itself, have the effect of granting, creating, or providing evidence of any estate or interest in, or any rights of any kind whatsoever relating to, Te Tai o Arai Te Uru.

### **Appendix 3: Provisions of the *Kāi Tahu ki Otago Natural Resources Management Plan 2005* relevant to the present submission**

The following Issues/Objectives/Policies of the *Kāi Tahu ki Otago Natural Resource Management Plan 2005* are seen as relevant to the above proposal. This relates to the holistic management of natural resources from the perspective of local iwi.

#### **Chp. 5: Otago Region | Te Rohe o Otago**

##### **[5.2] – Overall Objectives include:**

- i. The rakātirataka and kaitiakitaka of Kāi Tahu ki Otago is recognised and supported.
- ii. Ki Uta Ki Tai management of natural resources is adopted within the Otago region.
- iii. The mana of Kāi Tahu ki Otago is upheld through the management of natural, physical, and historic resources in the Otago Region.
- iv. Kāi Tahu ki Otago have effective participation in all resource management activities within the Otago Region.

##### **[5.3.3] Wai Māori General Objectives include:**

- i. The spiritual and cultural significance of water to Kāi Tahu ki Otago is recognised in all water management.
- ii. The waters of the Otago Catchment are healthy and support Kāi Tahu ki Otago customs.

##### **[5.4.3] Wāhi Tapu Objectives:**

- i. All wāhi tapu are protected from inappropriate activities.
- ii. Kāi Tahu ki Otago have access to wāhi tapu.
- iii. Wāhi tapu throughout the Otago region are protected in a culturally appropriate manner

##### **[5.4.4] Wāhi Tapu General Policies include:**

1. To require consultation with Kāi Tahu ki Otago for activities that have the potential to affect wāhi tapu.

##### ***Earth Disturbance***

4. To require that a Kāi Tahu ki Otago mandated archaeologist survey an area before any earth disturbance work commences.
5. To promote the use of Accidental Discovery Protocols for any earth disturbance work.
6. To require all Māori archaeological finds to remain the cultural property of Kāi Tahu ki Otago.

##### **[5.5.3] Mahika Kai and Biodiversity Objectives include:**

- i. Habitats and the wider needs of mahika kai, taoka species and other species of importance to Kāi Tahu ki Otago are protected.
- ii. Mahika kai resources are healthy and abundant within the Otago Region.
- v. Indigenous plant and animal communities and the ecological processes that ensure their survival are recognised and protected to restore and improve indigenous biodiversity within the Otago Region.
- vi. To restore and enhance biodiversity with particular attention to fruiting trees so as to facilitate and encourage sustainable native bird populations.



- ix. To create a network of linked ecosystems for the retention of and sustainable utilisation by native flora and fauna.

**[5.5.4] Mahika Kai and Biodiversity General Policies include:**

1. To promote catchment-based management programmes and models, such as Ki Uta Ki Tai.
7. To require that all assessments of effects on the environment include an assessment of the impacts of the proposed activity on mahika kai.

**[5.6.3] Cultural Landscapes Objectives**

- i. The relationship that Kāi Tahu ki Otago have with land is recognised in all resource management activities and decisions.
- ii. The protection of significant cultural landscapes from inappropriate use and development.
- iii. The cultural landscape that reflects the long association of Kāi Tahu ki Otago resource use within the Otago region is maintained and enhanced.

**[5.6.4] Cultural Landscapes General Policies**

1. To identify and protect the full range of landscape features of significance to Kāi Tahu ki Otago.

***Earth Disturbance***

19. To require all earthworks, excavation, filling or the disposal of excavated material to:
  - i. Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation;
  - ii. Avoid, remedy, or mitigate soil instability; and accelerated erosion;
  - iii. Mitigate all adverse effects.

**[5.8] Coastal Environment – *Te Taiao O Te Takutai***

**[5.8.14] Cultural Landscapes Issues**

- Marine aquaculture in culturally significant landscapes.
- The cumulative effect of incremental, unco-ordinated land use change and building within the coastal environment.
- Coastal erosion and the impact on coastal frontages.
- Protection of cultural landscapes and seascapes such as reef systems and other sites with associated mana.
- Coastal subdivisions and building consents.
- Failure to provide for changing coastal landscapes resulting from changing sea levels.
- Reclamation impacting on cultural landscapes.
- Integrity of cultural information and interpretation pertaining to the coastal environment.

**[5.8.15] Cultural Landscapes Objectives**

1. To recognise and protect the cultural integrity of coastal land and seascapes.

**[5.8.16] Cultural Landscapes Policies**

1. To encourage access and protection of coastal landscapes.
2. To encourage the identification and protection of significant sea and landscapes in the coastal environment.

## [9.5] Cultural Landscapes – *Kāika Kanohi Ahurea*

### [9.5.1] Cultural Landscapes in the Taieri Catchments

#### *Kāika Nohoaka*

There were many nohoaka sites on the Lower Taieri, particularly within the wetland complex used by food gathering parties, which would travel to the lakes and camp for two to three days to gather kai, to eel, hunt waterfowl and gather flax. There were also permanent or semi-permanent settlements located in a number of locations around the lakes, some on islands in the wetlands system. Maukaatua once sheltered kāika within close proximity of its base at Whakaraupuka.

#### *Ara Tawhito*

The attractiveness of the Taieri Catchments as a mahika kai was enhanced by accessibility:

- from Moeraki to Taieri Lake and the Upper Taieri via the Danseys Pass;
- from Puketeraki / Karitāne to Taieri Lake, the Upper Taieri and Strath Taieri via Shag River Valley and McRaes;
- from Ōtākou- with the direct link to the Taieri River, access via the Taieri to villages on the banks of the Taieri River, up-stream and down, and access by waka to the coast and northward to Ōtākou, kai and other resources gathered from the wetlands could be transported back to these home bases with relative ease.

### [9.5.2] Cultural Landscapes Issues in the Taieri Catchments

- Lack of recognition and implementation of the Cultural Redress components of the Ngāi Tahu Claims Settlement Act 1998 by local authorities, namely:
  - Statutory Acknowledgements
  - Place names
  - Nohoaka sites
- Rural residential development in sensitive landscapes throughout the Taieri Catchments particularly in the coastal environment and on mauka.
- Impeded access to traditional places of encampment.
- The loss of traditional trails to road networks.

### [9.5.3] Cultural Landscapes Policies in the Taieri Catchments

#### *Statutory Acknowledgement areas, Tōpuni areas, Nohoaka sites and Place names:*

1. To promote the adoption of Statutory Acknowledgements into regional and district plans and regional policy statements through the formulation of specific objectives, policies and rules, in conjunction with Kāi Tahu ki Otago for the statutory area:
  - ii. Te Tai o Arai Te Uru (Otago Coastal Marine Area)
2. To promote the recognition of place names amended under the NTCSA and their use in regional and district plans, policy statements and non-statutory planning documents.
  - i. Taieri Island/Moturata
3. To encourage the use of Kāi Tahu place names in addition to those amended under the NTCSA.