

## Statement of Evidence of Edward Ellison on behalf of Te Rūnanga o Ōtākou - Summary

1. Te Rūnanga o Ōtākou has worked collaboratively with the Dunedin City Council on waste management solutions that would enable the closure of the Green Island landfill and address longstanding concerns about contamination of the Kaikarae stream and estuary.
2. The development of a Class 1 landfill at Smooth Hill is preferred by Te Rūnanga o Ōtākou over continuation of this activity on the Kaikarae Estuary. However, the connections between land, wetlands, surface waterbodies and groundwater must be carefully managed through the construction and operation of the landfill to avoid degrading Ōtokia Creek, reducing the extent of wetlands within the catchment, and to avoid adverse impacts on taoka species.
3. Te Rūnanga o Ōtākou through the cultural impact assessment and the submission on the application have sought a high degree of protection for wai māori within the Ōtokia Creek catchment including ongoing water quality monitoring and the adoption of sediment and erosion controls during construction of the landfill.
4. The conditions proposed by the applicant recognise and provide for the exercise of rakatirataka and kaitiakitaka by whānau through engagement in the development of the Landfill Management Plan and through engagement in the development of specific management plans for taoka species, habitat restoration and freshwater and wetland monitoring.
5. Restoration of downstream freshwater and wetland habitats is a practical way of balancing the impact on te taiao from the construction of a landfill at Smooth Hill.

### **Response to Proposed Conditions**

6. The proposed conditions provide an opportunity for Te Rūnanga o Ōtākou to undertake monitoring alongside specialists undertaking landfill monitoring activities.<sup>1</sup> This will enable whānau to draw upon mātauraka Kāi Tahu to enhance the mahika kai values in this takiwā.

### **Response to Submissions of Counsel**

7. Ms Irving has submitted that the discharge of persistent organic pollutants from the proposed landfill may adversely affect mahika species and Māori cultural values.
8. Te Rūnanga o Ōtākou are acutely aware of the risk posed by landfills to mahika kai. The Kaikorai (Kaikarae) Stream and estuary are significantly compromised due to industrial,

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<sup>1</sup> Landfill Management Plan, proposed Condition 113.

landfill, and reclamation activity, rendering the water polluted and the food resources found there not fit for human consumption. We carefully weighed the risk posed by a Class 1 landfill at Smooth Hill to mahika kai values in the Ōtokia Creek catchment and concluded that the risk was low.

### **Response to Evidence of Submitters**

9. Ms Mauger concludes that “the risk of leachate escape alone poses a threat to the seven centuries old practice of mahinga of kai in the Ōtokia” and that the development of the landfill will degrade the “mauri wai and the wāhi tūpuna, regardless of the actual levels of contaminant escape.”<sup>2</sup>
10. With due respect to the Ōtokia whānau, we have assessed the effects of developing a landfill at Smooth Hill in accordance with our tikanga and concluded that the risk to the mauri of wai in the Ōtokia Creek catchment and wāhi tūpuna values is low.
11. Ms Mauger has expressed concern that mana whenua from Te Rūnaka o Ōtākou were provided with incomplete information relating to the archaeological significance of the Ōtokia Creek. Archaeological reports were prepared for this area by Brian Allingham and Jill Hamel (see attached references), and an archaeological survey of the Taiari Mouth District was undertaken in 1994 by Rachel Palmer from the Moturata Taiari whānau.
12. These reports confirm that Smooth Hill forms part of a wider wāhi tūpuna (ancestral landscape) between the Taiari Plain and the coast.
13. I visited the Smooth Hill property around 1992 with the Dunedin City Council. The property was then a paddock that appeared to have a history of cultivation. There were no reports of midden or umu and if there were remnant archaeological sites they would have been smoothed over by cultivation.



**Edward Ellison ONZM**

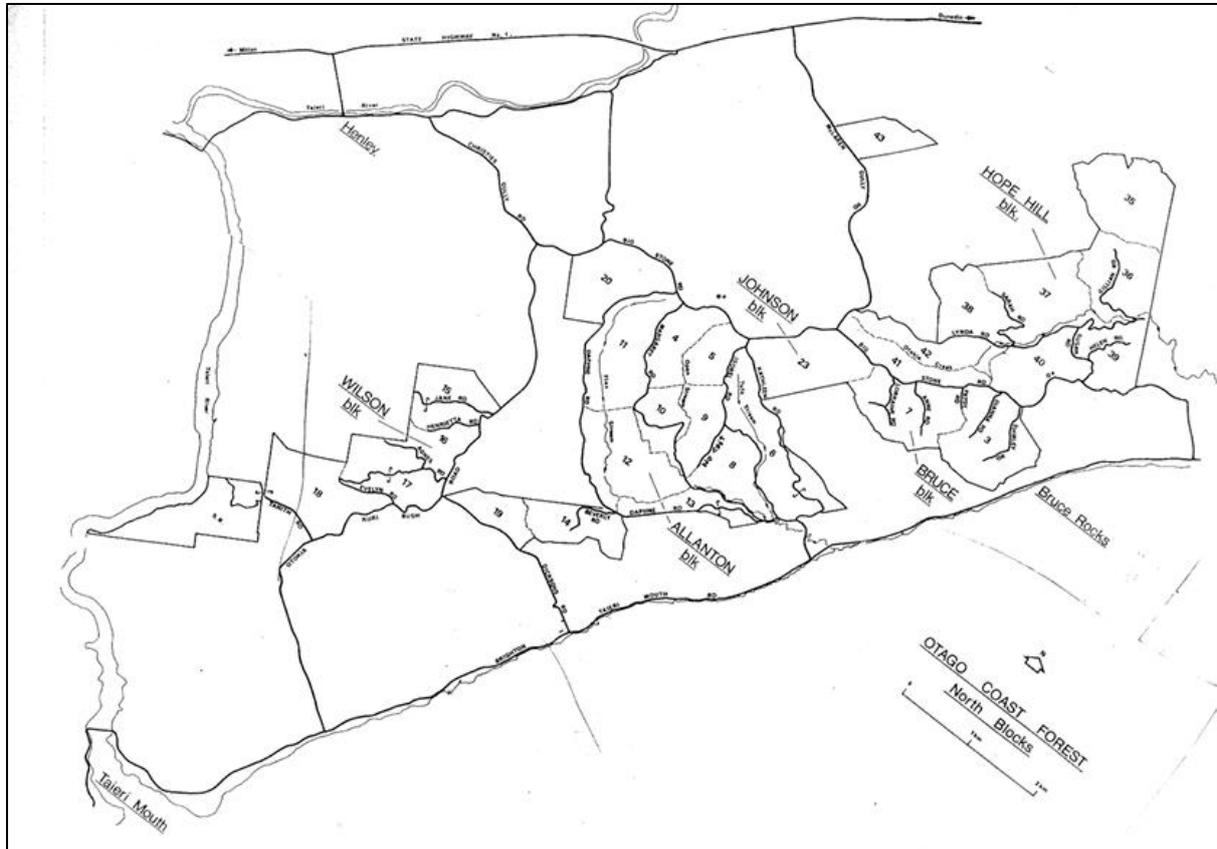
**23 May 2022**

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<sup>2</sup> Evidence of Anne-Claire Mauger, paragraph 25.

## Archaeological Reports – Taiari District and Ōtokia Creek

Allingham, Brian (1983/1984) *Otago Coast State Forest Archaeological Inspection. Part One of Three: The Allanton and Wilson Blocks.* Refer to the figure below.



Hamel, Jill (1983) *The Archaeology and European History of the Hope Hill Block.*

Hamel, Jill (1986) *The Archaeology and European History of The Cuttance Block, Otago Coast Forest*

Palmer, Rachel S. (1994) *Archaeology of the Taiari Mouth District.* BA (Hons) Dissertation

*“The evidence collected by the coastal survey in 1994, is consistent with Teal’s 1977 study that sites are most commonly found at the mouth of a creek, or in bays set on low platforms. In the area from the Mouth of the Kaikorai Stream to the Akatore Creek, Teal’s 1997 survey recorded 29 sites, including Moturata Island. Kaikorai Stream, Brighton (Ōtokia Stream), Taiari Mouth, Akatore Creek, and Tokomairiro Mouth were identified as logical areas to find sites, because of the potential for access inland.”*