



Patron:
His Excellency The Hon
Anand Satyanand, PCNZM
Governor General of New Zealand

HP 33002-014

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Greater Wellington Regional Council
P.O Box 11646
Wellington 6142

**Submission of the New Zealand Historic Places Trust Pouhere Taronga to
the Proposed Regional Policy Statement for the Wellington Region.**

Tena Koe

Thank you for giving the New Zealand Historic Places Trust (NZHPT) the opportunity to submit on the Proposed Regional Policy Statement (RPS).

The NZHPT is supportive of the RPS as proposed, which is consistent with the Sustainable Management of Historic Heritage Guidance Series 2007 - Guide No.1. Regional Policy Statements (available online at www.historic.org.nz).

Some amendments to the RPS are requested, as outlined in the following submissions. The NZHPT considers that these amendments will enhance the integrated management of historic heritage resources at a regional level.

Historic Heritage in the Wellington Region

The Wellington Region has a wide range and number of unique and special heritage places, areas, and landscapes. These include archaeological sites, places and areas of significance to iwi/hapu, historic buildings, memorials, and historic areas, townscapes and rural landscapes.

A large number of heritage places and areas are registered under the Historic Places Act 1993 as Historic Places, Historic Areas, Wahi Tapu and Wahi Tapu Areas. Over 1200

archaeological sites have been recorded by the New Zealand Archaeological Association and some of these are registered under the Historic Places Act. Many heritage sites and places have been listed in District Plans and the district councils have prepared heritage inventories. Wellington also has a small number of historic reserves managed by the Department of Conservation. The NZHPT, DOC and local authorities own and manage important public heritage buildings such as Old Saint Paul's, Truby King Historic Area, Government Buildings, Wellington Town Hall, Wallaceville Blockhouse, and Gear Homestead. Wellington City Council has taken a leading role in the development and circulation of a City heritage inventory and public heritage information and brochures.

Landscape encapsulates both the natural environment and the anthropological relationship with the land and sea. Landscape is always historic. Every place has a history and the urban and rural form expressed today is a result of historic processes – they are an expression of progress and development. The Wellington Region has a unique and special historic urban townscape and rural landscape and a mix of both.

The NZHPT submits:

CHAPTER THREE – ISSUES, OBJECTIVES AND SUMMARY OF POLICIES AND METHODS

1. Submission

The provisions to which the submission relates are:

Objectives 3, 4, 5, 8, 15, 17, 21, 22, 23, 24, 25, and 26.

The reason for the NZHPT's submission is:

The NZHPT supports the integrated framework of objectives that provide for the sustainable management of the region's historic heritage, giving effect to section 6(f) and (e) as matters of national importance under the RMA.

The NZHPT seeks the following relief:

The NZHPT requests that Objectives 3, 4, 5, 8, 15, 17, 21, 22, 23, 24, 25, and 26 are retained in the RPS.

2. Submission

The provision to which the submission relates is:

Objective 15

The reason for the NZHPT's submission is:

The NZHPT strongly supports the identification and protection of the region's historic heritage.

All heritage places are valued by individuals, groups or communities for specific reasons. Identification is a process to recognise these places and values. This is the first step in achieving the sustainable management of historic heritage. Following identification, protection may involve a range of actions in response to risks and threats which result in adverse effects. The range of protective actions may include conservation, management and adaptive reuse.

The NZHPT requests that Objective 15 is retained in the RPS.

CHAPTER 4 – POLICIES AND METHODS

3. Submission

The provisions to which the submission relates are:

Policies 4, 16, 22, 24, 25, 29, 30, 47, 52, 53, 54, 66 and 67.

The reason for the NZHPT's submission is:

The policies define the means by which the historic heritage related objectives of the RPS are to be achieved, which are consistent with the NZHPT SMHH Guidelines. Many of the policies relate to the historic environment, including the urban environment, landscapes, and the Maori environment. The policies are also give effect to and provide for sections 6(f) & (e) of the RMA.

The NZHPT seeks the following relief:

The NZHPT requests that Policies 4, 16, 22, 24, 25, 29, 30, 47, 52, 53, 54, 66 and 67 are retained in the RPS

4. Submission

The provision to which the submission relates is:

Policy 20

The NZHPT supports the policy to ensure a regionally consistent approach is achieved with regard to identifying historic heritage. However, the NZHPT considers that an additional criteria addressing statutory recognition is needed.

The reason for the NZHPT's submission is:

All regional and district plans should list historic heritage for protection using schedules. Policy 20 provides a basic standard for the identification of historic heritage in the Wellington region.

The criteria in Policy 20 provide guidance for identification and protection. It should not be treated as a rigid list as heritage values are always dynamic. For example, recreational values are becoming an important aspect of historic heritage.

Further guidance criteria should ensure places with statutory recognition are identified and protected. These places may have recognition in New Zealand legislation or international law including: World Heritage Listing under the World Heritage Convention 1972; registration under the Historic Places Act 1993; an archaeological site as defined by the Historic Places Act 1993; statutory acknowledgement under claim settlement legislation; or recognised by special legislation.

The NZHPT seeks the following relief:

The NZHPT requests that Council amend Policy 20 by adding the following criterion:

(h) Statutory recognition: Whether the place or area has recognition in New Zealand legislation or international law including:

- (i)** World Heritage Listing under the World Heritage Convention 1972;
- (ii)** Registration under the Historic Places Act 1993;
- (iii)** An archaeological site as defined by the Historic Places Act 1993;
- (iv)** Statutory acknowledgement under claim settlement legislation;
- (v)** Recognition under special legislation.

5. Submission

The submission relates to:

Policy 21.

The reason for the NZHPT's submission is:

The destruction of unrecorded archaeological sites is a significant concern for the NZHPT with regard to the integrated management of natural and physical resources in the Wellington Region. An example of this issue is the Kapiti Coast coastal dune belt. This is an area where the majority of archaeological sites show very little surface indication of their presence, but due to intensifying coastal residential development, many sites are being encountered during earthworks and being damaged or destroyed

The NZHPT supports Policy 21 which requires District and Regional Plans to include provisions to protect identified historic heritage, as well as to avoid the destruction of unidentified archaeological sites and waahi tapu. This is a significant improvement over the current situation, and will require Council's to focus on this important issue.

The NZHPT seeks the following relief:

The NZHPT requests that Policy 21 is retained in the RPS.

6. Submission

The submission relates to:

Policies 24 and 26

The reason for the NZHPT's submission is:

The NZHPT supports the historical association's criteria under Policies 24 and 26 for identifying outstanding natural features and landscapes, and significant amenity landscape values.

Including 'historical associations' as a criteria for identifying outstanding natural features and landscapes, and significant amenity landscape values, in district and regional plans provides for the identification of heritage landscapes, including rural heritage landscapes which are important in terms of human settlement history.

The NZHPT seeks the following relief:

The NZHPT requests that Policies 24 and 26 are retained in the RPS.

7. **Submission**

The provision to which the submission relates is:

Policy 45

The reason for the NZHPT's submission is:

The NZHPT strongly supports policy 45 for the management of effects on historic heritage, but opposes the cessation of Policy 45 upon implementation of Policies 20 and 21 in Regional and District Plans.

Policy 45 provides criteria to determine if an activity may affect historic heritage in determining whether an activity is inappropriate. This guidance is welcomed by the NZHPT.

The NZHPT's *Sustainable Management of Historic Heritage Guidance Series (2007) – Information Sheet 1*, contains principles for assessing appropriate subdivision, use and development on historic heritage values. These principles are generally encapsulated within the criteria under Policy 45 however the following principles are not captured:

- ***Diversity and Community Resources***

Recognising the diverse cultures of New Zealand and the diverse social and physical environments and communities. There is a need to work with communities and take into account the needs, abilities and resources of particular communities, including owners of historic heritage and other stakeholders.

- ***Maori heritage***

Recognising and providing for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, wahi tapu and other taonga following the spirit and intent of the Treaty of Waitangi (Te Tiriti o Waitangi).

- ***Research and documentation***

Ensuring interventions are informed by sufficient research, documentation and recording, where culturally appropriate. All changes should be fully documented in drawings and photographs.

The NZHPT considers that the above policies should be reflected in the criteria under Policy 45.

The NZHPT considers that Policy 45 should not cease to be in effect once policies 20 and 21 are in place in an operative district or regional plan. The definition of historic heritage under the RMA, with regard to section 6(f), does not limit the protection of sites to just those listed in district, regional or regional coastal plans, and there is no guarantee that all sites of historic heritage value will have been identified. In particular, unrecorded archaeological sites will not be included in plan heritage schedules, and neither will any future registrations by the NZHPT under the Historic Places Act 1993 unless they are incorporated via later plan changes.

The NZHPT seeks the following relief:

- Council amend Policy 45 by including criteria which address principles 2, 4 and 5 of the NZHPT's *Sustainable Management of Historic Heritage Guidance Series* (2007) – Information Sheet 1.
- Council amend Policy 45 so that the policy does not expire when Policies 20 and 21 are in place in an operative district plan or regional plan.

8. Submission

The provision to which the submission relates is:

Policy 52

The NZHPT supports policy 52 in enhancing public access to coastal sites, and sites of historical significance. However, it is considered that this policy should also recognise and support the role of crown agencies such as NZHPT, to facilitate and manage public access to historic places located within the coastal environment.

The reason for the NZHPT's submission is:

The NZHPT considers that this policy should also recognise the role of crown agencies in enhancing public access to historic heritage sites located within the coastal environment. In the case of Pencarrow Lighthouse, the NZHPT manages a landlocked crown asset. The NZHPT would like to see this policy recognise and support our responsibilities under the Historic Places Act 1993 and the Policy for Government Departments' Management of Historic Heritage 2004 to improve the facilitation of public access to Pencarrow Lighthouse.

Access to historic heritage places located in the coastal environment, such as Pencarrow lighthouse, contributes to the sustainable management of historic heritage resources. It gives the public the opportunity to learn about places such as Pencarrow Lighthouse, which increase the public's awareness about the importance of identifying, protecting

and preserving historic places, across the Wellington region. By protecting historic heritage the stories associated with those places can be re-told for the enjoyment and appreciation of future generations.

The NZHPT seeks the following relief:

The NZHPT requests that Policy 52 is retained in the RPS but is amended to recognise and support the role of crown agencies such as the NZHPT, in facilitating and managing public access to historic places located within the coastal environment.

METHODS

9. General Submission

The provisions to which the submission relates are:

Methods 1, 2, 4, 13, 20 31 and 36

The NZHPT supports these identified methods to implementing the policies that support the sustainable management of the region's historic heritage.

The reason for the NZHPT's submission is:

The methods support the policies that provide for sections 6(f) & s. 6(e) of the RMA.

The NZHPT seeks the following relief:

The NZHPT requests that Methods 1, 2, 4, 13, 20, 31 and 36 are retained in the RPS

10. Submission

The provision which this submission relates to:

Method 20

The NZHPT supports the preparation of information to assist with the identification of historic heritage and recommends that it be based on the NZHPT's *Sustainable Management of Historic Guidance Series, Discussion Paper No.2, Assessing Effects on Historic Heritage, 2007*.

The reason for the NZHPT's submission is:

The NZHPT supports the development of information to guide identifying and assessing the effects on historic heritage. The NZHPT wishes to assist Council in developing this guide. In particular, the NZHPT has released a detailed discussion paper on assessing effects on historic heritage as part of the *Sustainable Management of Historic Heritage Guidance Series*.

The NZHPT seeks the following relief:

The NZHPT requests that Council takes into account the NZHPT's *Sustainable Management of Historic Heritage Guidance Series, Discussion Paper No.2, Assessing Effects on Historic Heritage, 2007*, as basis for developing the proposed information.

OTHER

11. Submission

The provision to which the submission relates is:

Appendix 1: Sites of regional significance in the coastal environment, under the draft RPS, which has not been carried over to the proposed RPS.

The NZHPT supports the identification of regionally significant heritage areas, and would like to see a future variation to the proposed RPS identifying such sites after further research and consultation is undertaken.

The reason for the NZHPT's submission is:

Landscape values relate to both the natural environment (i.e. ecology and geology) historic heritage and aesthetic values. Landscape identification processes aim to recognise these values. Following values identification, an additional step is to determine significance at either a local, regional or national level. Significance determination requires detailed research and evaluation. For example, to state a wetland is unique or special in the Wellington Region requires detailed knowledge about all the wetlands in the region and their values.

In particular, the NZHPT is concerned about the importance of identifying the regionally significant heritage values of Wellington's coastline, much of which is coming under increasing pressure. Archaeological sites within the Greater Wellington Region typically consist of pa sites, terraces, pits, middens and gardening evidence such as stone walls

and soils. These archaeological sites are located mostly along the coastline in areas desirable for development. Examples of important coastal areas include:

- The registered historic area of Waikekeno on the east Wairarapa contains a number of archaeological features including Pukehuiake Pa, an urupa, and an extensive stone wall and mounds gardening complex,
- The historical and archaeological significance of the early settlements of Wellington Harbour, the Hutt Valley and Petone,
- Palliser Bay and the eastern coastline have extensive archaeological sites of significance pertaining to Maori gardening and subsistence economy..


The NZHPT seeks the following relief:

The NZHPT requests that Council undertake further research into identifying regionally significant coastal areas, and develop a schedule to include as a variation to the proposed RPS.

Conclusion

The NZHPT requests that the Council considers the NZHPT's submission and incorporates the amendments recommended in the submission into the proposed RPS.

The NZHPT may wish to attend the hearing.



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