



13/12/2019

File ref: LA054

Taupo District Council,
Private Bag 2005,
Taupo Mail Centre,
Taupo,
3352.
ATTN: Hilary Samuel

Dear Hilary

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA TO PRIVATE PLAN CHANGE 36

This private plan change seeks to rezone a 14.63ha area north of the Whareroa Stream adjoining the Whareroa settlement from Rural Environment Zone to Residential Environment Zone. The Residential Zone would allow a maximum of 160 dwellings, with densities ranging from between 500m² to 1,100m².

TO: TAUPO DISTRICT COUNCIL

FROM: HERITAGE NEW ZEALAND POUHERE TAONGA

1. This is a submission on the following notified private Plan Change:

This notified Private Plan Change seeks to rezone a 14.63ha area north of the Whareroa Stream adjoining the Whareroa settlement from Rural Environment Zone to Residential Environment Zone under the Operative Taupo District Plan. The Residential Zone would allow a maximum of 160 dwellings, with densities ranging from between 500m² to 1,100m².

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

The proposed rezoning that would allow the intensification of the density of the land uses within the Plan Change area.

4. Heritage New Zealand's submission is:

There is likelihood that the proposed activity could have adverse effects on historic heritage, in particular archaeology. Heritage New Zealand Pouhere Taonga (HNZPT) is not opposed to the proposed activities subject to the appropriate ongoing management of historic heritage, in particular archaeology.

5. The reasons for Heritage New Zealand’s position are as follows:

HNZPT is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand’s historical and cultural heritage. HNZPT is New Zealand’s lead historic heritage agency. The Heritage New Zealand Pouhere Taonga Act 2014 protects both recorded and unrecorded archaeology.

The Resource Management Act requires that the protection of historic heritage should be *recognised and provided for* as a Matter of National Importance (Section 6(f)). As the earthworks have the potential to destroy historic heritage, it is important that before the subdivision design is finalised that a new archaeological assessment is undertaken to inform the subdivision design to ensure that any future any earthworks do not adversely affect archaeology.

The Plan Change application has included an Archaeological Survey and Assessment of Effects, prepared for Proprietors Hauhungaroa No 6 by Don Prince, August 2005. This is discussed in the Assessment of Effects for Plan Change 36¹, however this assessment is considered inadequate for the purposes of informing the Plan Change in relation to archaeology for the following reasons:

- The archaeological assessment is dated 2005, making it at least 14 years old. The subject site may have changed since that time and therefore reassessment is required. The new archaeological assessment should include a direct response to proposed Plan Change 36, including the mitigation package outlined in the Plan Change application, which includes replanting, and also the walkways through indigenous vegetation.²
- The application includes a Cultural Impact Assessment-Whareroa North Structure Plan and Whareroa Bridge Crossing, from Tina Porou Consultants Limited, 2008, Authored by: Tina Porou. This assessment has indicated³ that a review of the 2005 archaeological assessment was part of the process for preparing the Cultural Impact Assessment report. Therefore a revised archaeological assessment should be provided to the applicant to inform the Cultural Impact assessment as required.
- Using the 2005 Archaeological assessment HNZPT makes the following comments:
 - HNZPT requires clarification regarding the area of the assessment, as the copy of this assessment has been provided in a black and white copy that does not show the “red” in Figure 1⁴ that was the area of study, therefore HNZPT is unclear if the area of study relates to the area proposed for the Plan Change 36. In the reassessment the study area must clearly relate to Plan Change 36.
 - The assessment clearly advises that areas within the assessment area had “ground surface visibility that ranged from good (pasture block) to restrictive (bush block)”⁵. The Recommendation section⁶ advises that “following

¹ Application to Taupo District Council to Change the Operative Plan, Whareroa North, December 2017, By Lewis Consultancy, pg.20/21

² Application to Taupo District Council to Change the Operative Plan, Whareroa North, December 2017, By Lewis Consultancy, pg.25/26

³ Cultural Impact Assessment-Whareroa North Structure Plan and Whareroa Bridge Crossing, from Tina Porou Consultants Limited, 2008, Authored by: Tina Porou, pg.8, Point 6.

⁴ Archaeological Survey and Assessment of Effects, prepared for Proprietors Hauhungaroa No 6 by Don Prince, August 2005, pg.8.

⁵ Archaeological Survey and Assessment of Effects, prepared for Proprietors Hauhungaroa No 6 by Don Prince, August 2005, pg.2.

⁶ Archaeological Survey and Assessment of Effects, prepared for Proprietors Hauhungaroa No 6 by Don Prince, August 2005, pg.2-second bullet point

vegetation clearance in the bush block and prior to the commencement of earthworks an archaeologist inspects the area so as to determine whether archaeological deposits exist". If the bush block area is to be developed at any stage HNZPT recommends that appropriate vegetation clearance and archaeological inspection occur as part of the archaeological reassessment.

6. Heritage New Zealand seeks the following decision from the local authority:

HNZPT has reviewed the Plan Change 36 Application. We consider that for the purposes of an assessment against s6 (f) of the RMA archaeological matters have not been sufficiently assessed, therefore HNZPT cannot support the conclusion in the Assessment of Effects⁷ that Historic Heritage will not be adversely impacted. This concern would be most appropriately addressed by the application being placed on hold and the applicant undertaking an archaeological assessment to determine the need for an archaeological authority prior to the decision making process on to the Plan Change. This would also fulfil the requirements of the Heritage New Zealand Pouhere Taonga Act 2014.

7. Heritage New Zealand wishes to be heard in support of our submission.

Yours sincerely



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⁷ Application to Taupo District Council to Change the Operative Plan, Whareroa North, December 2017, By Lewis Consultancy, pg.60