



08/11/2018

File ref: LA054

Waipa District Council,  
Private Bag 2402,  
Te Awamutu,  
3840.

To the Hearings Panel

**RESPONSE OF HERITAGE NEW ZEALAND POUHERE TAONGA TO THE S42A HEARING REPORT FOR THE NOTIFIED PRIVATE PLAN CHANGE 11: BARDOWIE INDUSTRIAL PRECINCT, HAUTAPU**

1. The proposed private plan change request seeks to amend the Waipa District Plan by amending current zoning on the subject site to facilitate Industrial activity, a campus hub and various other changes to rules for example signage.
2. The specific provisions of the proposal that Heritage New Zealand's submission related to were that the proposal will result in earthworks, which has the potential to damage the finite archaeological resource, both recorded and unrecorded. Heritage New Zealand Pouhere Taonga (Heritage New Zealand) supported the proposed activities subject to the appropriate ongoing management of historic heritage, in particular archaeology.
3. The archaeological assessment contained within the application by Clough & Associates Ltd, Entitled Proposed Plan Change 11 to the Waipa District Plan-Bardowie Industrial Precinct: Archaeological Assessment, Prepared for Bardowie Investments Ltd, dated 24 July 2018, notes three archaeological sites that have been previously recorded within the Plan Change area, being archaeological sites S15/474, S15/475 and S15/476. Heritage New Zealand considers these sites are representative of gardening soils which are recognised as a rapidly diminishing finite resource within the Waipa District and therefore worthy of preservation. It is worth noting that relatively little is known about Polynesian horticultural sites in New Zealand, including this type of site characterised by, among other things, the deliberate modification of soils.
4. As a way of meeting the considerations of the Resource Management Act that requires that the protection of historic heritage should be *recognised and provided for* as a Matter of National Importance (Section 6(f), in its submission Heritage New Zealand sought:
  - the following two methods can be undertaken in the context of this Plan Change to avoid damage or modification to archaeological sites;
    - a. The inclusion of these sites onto the Waipa District Council District Plan maps, and
    - b. That the applicant undertakes a site development plan to guide the future development of the site and allow for the avoidance of the archaeological sites.
5. In response to these submission points the reporting planner has, at section 5.8.7 of the s42A report has advised the following:

*"BIL has not lodged a further submission to this submission however it is understood that their 5.8.7intention is to seek a Heritage NZ authority to modify or destroy the sites. Given the outcome of any Heritage NZ process is unknown at this stage, and weighting will need to be given to the views of*

*iwi/hapu, the most appropriate response would be to include the sites on the Structure Plan and include clauses within the Structure Plan documentation that the sites shall either be protected or be subject to an approved Heritage NZ authority”.*

6. In response Heritage New Zealand would support the inclusion in the Decision of the recorded archaeological sites on the Structure Plan as a helpful tool to assist in the avoidance of inadvertent damage that may occur. As modification or destruction of an archaeological site, either recorded or unrecorded can only occur through the Heritage New Zealand authority process the inclusion of an advice note/s to that effect within the Structure Plan as part of the Decision would be of benefit to users of the Structure Plan.
7. Suitable advice notes are already contained within Section 22-Heritage and Archaeology of the Waipa Plan, and I repeat them here for your convenience:  
*“Advice Notes:*
  1. *The Heritage New Zealand Pouerua Act 2014 makes it unlawful for any person to destroy, or modify the whole or any part of an archaeological site without the prior authority of Heritage New Zealand. Sites associated with human activity that occurred before 1900 are protected, whether or not they are recorded with Heritage New Zealand. An authority to destroy or modify any archaeological evidence is required from Heritage New Zealand under the Heritage New Zealand Pouerua Act 2014 prior to the works commencing. This is the case regardless of whether the land on which the site is located is designated, or a resource or building consent has been granted.*
  2. *Appendix N3 contains the known archaeological sites of the Waipa District based on New Zealand Archaeological Association records as at 2009. Sites are marked with a number and ‘X’ symbol on the Planning Maps. Additional archaeological sites may have been identified since the notification of this Plan. For this reason people are also referred to the NZAA Database. Consultation with Heritage New Zealand is advisable.*
  3. *In the event of accidental discovery of archaeological features or artefacts, Heritage New Zealand has a procedure that must be followed. Contact Heritage New Zealand for further information”.*
8. Thank you for the opportunity to respond to the s42A report. I request that this letter is tabled for the consideration of the Hearings Panel as part of their decision making process.

Yours sincerely



Ben Pick-Area Manager- Lower Northern Office