

18 May 2021

File ref: LAO68

Waitomo District Council

By email: [haveyoursay@waitomo.govt.nz](mailto:haveyoursay@waitomo.govt.nz).

Dear Mayor Robertson and Councillors,

**RE. HERITAGE NEW ZEALAND POUHERE TAONGA SUBMISSION ON DRAFT 2021-2031 LONG TERM PLAN CONSULTATION**

1. Thank you for the opportunity to make a submission on the Waitomo District Council Draft Long Term Plan 2021/31 (the Plan).
2. Heritage New Zealand Pouhere Taonga (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 historic and cultural heritage. HNZPT is New Zealand's lead heritage agency.
3. As Waitomo District Council (the Council) already appreciates, well cared for and promoted historic heritage has the potential to be a considerable draw card for tourism and people wanting to move to, or remain in, an area. Heritage plays an important role in creating and engaging a vibrant region, which, in turn fosters local identity and helps build the economy. Support and incentives that councils provide can often be the difference between a historically significant resource falling into disrepair or it being preserved for present and future generations to engage with and learn from.

*Significant projects involving ground disturbance*

4. The Plan proposes a number of projects that throughout the District, including but not limited to:
  - Wastewater projects,
  - Water supply projects,
  - Stormwater projects, and
  - Road and footpath projects.

HNZPT considers that professional archaeological advice from a local archaeologist/s needs to be sought prior to the development of these projects to ensure significant archaeological sites are avoided. HNZPT would welcome the opportunity to be involved at the very early stage of development to advise on the most appropriate heritage management measures for each situation.

**HNZPT seeks** that the provision for these and similar ground disturbance projects is retained subject to including the provision for obtaining archaeological advice including for comprehensive archaeological assessments to determine the need for archaeological authorities, and for works to ensure the preservation of the most important sites as required.

*Climate Change (Pg. 14 consultation document)*

*Background*

5. Current projections suggest that sea levels may rise around New Zealand by up to 1 metre within 100 years<sup>1</sup>. A rise in 0.5 meters will occur, no matter the level of intervention at this stage<sup>2</sup>. The loss of historical and cultural heritage values associated with coastal erosion from sea level rise will be magnitudes greater than any loss of heritage we have seen from other natural events and disasters and will happen over a long period of time. It is possible that without adequate preparation we will not be able to proactively address the issue, and only react as catastrophes arise.
6. Peer reviewed research indicates that a 1m sea level rise will result in approximately 5300 of the archaeological sites around our coastline, or 7.7% of our total archaeological record<sup>3</sup> being underwater. This number doesn't account for the sites impacted by future storm surges and flooding, which will result in significantly greater damage and loss, or Māori ancestral sites that are not evidenced by archaeological means.
7. Damage and loss of cultural and historic heritage has already begun, many archaeological sites and urupa have been reported as eroding in our national media. HNZPT staff have been involved in a number of these cases.
8. HNZPT appreciate that the Council has already allocated funding towards climate change with regard its impact on infrastructure. However, HNZPT considers that consideration needs to be given to the possible impacts that climate change will have on the finite resource that is historic heritage.
9. HNZPT considers that it is important that there is consideration of the climate change risk in the context of the impacts on historic heritage and its potential preservation, where a range of options could be used to resolve the issues around this risk. HNZPT's key interest is that significant historic heritage is able to be protected in the long term. It is important that these conversations are encouraged to start around this sensitive topic. Other work could include a significance assessment of the potentially affected historic heritage that could then inform climate change risk assessment.
10. **HNZPT seeks** that funding is allocated towards climate change risk assessment in the context of the impacts of climate change on historic heritage.

*District Plan (pg. 19 Consultation document)*

11. The Plan continues to make provision for the current review of the District Plan. HNZPT considers that District Plans are vital for the protection of Historic Heritage from inappropriate subdivision, use and development through the inclusion of robust objectives, policies and rules relating to the protection of historic heritage, supported by extensive schedules of identified heritage. While legislation governing land use will change over the time of the Plan, HNZPT considers that it is important that a District Plan review makes provision for this important matter.

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<sup>1</sup> Summarised in *Coastal Hazards and Climate Change: Guidance for Local Government* 2017, Ministry for the Environment, pages 93-99.

<sup>2</sup> A Framework for the National Climate Change Risk Assessment for Aotearoa New Zealand. 2019. Ministry for the Environment, page 19

<sup>3</sup> McCoy, 2018. "The Race to Document Archaeological Sites Ahead of Rising Sea Levels: Recent Applications of Geospatial Technologies in the Archaeology of Polynesia" *Sustainability*: 10:185.

HNZPT seeks the continued funding for the proposed District Plan review process is retained in the Plan and increased to cover the protection of historic heritage as required.

12. Heritage New Zealand does not wish to speak to this submission at a hearing.

Yours sincerely

A handwritten signature in black ink, appearing to be 'B Pick', with a long horizontal flourish extending to the right.

Ben Pick, Area Manager, Lower Northern Office

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