

**Theme      Historic Heritage**

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**Total number of submission points on the theme**

665 individual submission points.

**Number of submission points supporting or agreeing with the provisions in the Proposed NZCPS**

341 submissions.

**Number of submission points opposing the provisions in the Proposed NZCPS**

3 submissions.

**Note:** some submissions comment on but do not support or oppose the provisions.

**Key messages within the submissions**

1. There is a requirement for a definition of 'historic heritage in the coastal environment' and clarification of the difference between 'historic heritage' and 'significant historic heritage'.
2. The NZCPS should look to the definition of 'historic heritage' in the Resource Management Act 1991 (RMA) to ensure national consistency in the definition of the term. Section 2 of the RMA includes 'heritage landscapes' in its definition of historic heritage. The RMA does not distinguish between 'historic heritage', 'significant historic heritage' and 'other historic heritage' as the NZCPS does. While significance may vary, all identified historic heritage under the RMA and Historic Places Act 1993 (HPA) is significant.
3. There is an imbalance between the levels of protection provided for natural character and that which is provided for cultural and heritage values. Historic heritage should be a national priority.
4. NZCPS needs to recognise that 'outstanding natural features and landscapes' also have a variety of aesthetic, shared and recognised values, cultural and spiritual values for tangata whenua, archaeological values and historical associations. Identification of a heritage place involves recognising the different values held by communities and the significance of those values. Natural features, landscapes and cultural and heritage values should be interrelated in the NZCPS.
5. NZCPS does not adequately recognise that Maori heritage, identity and mana, is intimately connected to natural coastal landscapes, i.e. Kawhai Harbour. Policies on use and development of the coastal marine area should recognise places of importance to Maori including waahi tapu.
6. Tangata whenua should initiate the process of identification, assessment, and management of historic heritage of significance to Maori so that local government can focus attention on where there is a willingness from iwi to identify sites and develop management techniques.
7. The term 'consultation' is inadequate to describe the relationship that is necessary between local authority and iwi or hapu to achieve the identification, assessment and management of places and areas of significance to Maori. As with land-based heritage, a

consultative and partnership approach with tangata whenua should guide the identification and protection of coastal places of significance to Maori.

8. Historic heritage provisions should work in conjunction with, and refer to the HPA. Other heritage provisions such as those included in the Hauraki Gulf Marine Part Act 2000 should also be taken into account.
9. Compulsory heritage surveys and assessments should be undertaken before any coastal development is allowed.
10. Need regulation to ensure significant historic shipwrecks are not damaged and artefacts stolen.
11. Regional plans should include a schedule of coastal historic heritage of significance.
12. NZCPS needs to be consistent with the RMA, especially in provisions dealing with managing historic heritage and inappropriate subdivision, use and development. The present heritage provisions of the NZCPS simply reflect the value of historic heritage articulated in section 6(f), and do not add any value to the existing framework of the RMA.
13. Monitoring of coastal historic heritage is important.
14. There is a need for greater national consistency in the management of historic heritage in Regional Coastal Plans.
15. Local and regional councils should be given clearer directions on how historic heritage of significance to Maori should be protected, and more direction about the protection of sensitive areas.
16. There are concerns that regional councils will be required to identify features beyond the CMA, when regional council's function only 'controls' effects on heritage within CMA. Territorial local authorities should be responsible for assessing and identifying heritage above mean high water springs in their districts to avoid duplication. There is a requirement for clarity in which authorities are responsible for the identification, assessment and protection of historic heritage within the coastal environment.
17. Inadequate resourcing will affect the ability of local and regional councils to adequately manage coastal historic heritage. Resourcing for the recording and assessment of heritage sites needs to be taken into account and provided for.
18. Attention should be drawn to possible financial support or concessions for charges or rates which may be available to encourage restoration of historic heritage.
19. Heritage assessment must take place prior to any removal of abandoned or redundant structures in the coastal environment.
20. There needs to be an association between Policy 26 'Abandoned or redundant structures in the coastal marine area' and the policies on historic heritage.
21. The destruction or demolition of any historic place, historic area, waahi tapu or waahi tapu area registered under HPA 1993 should be treated as a restricted coastal activity and be included in Schedule I of the NZCPS.
22. Coastal erosion is a significant issue for historic heritage, (i.e. in North Otago a building associated with New Zealand's early refrigerated meat trade is being compromised and is

literally falling into the sea.) Soft engineering responses are required to manage heritage sites being washed away. Integrated management between regional councils, tangata whenua and the New Zealand Historic Places Trust is required to manage coastal heritage hazard risks.

23. Protective buffer areas should separate archaeological and heritage sites from coastal developments.
24. The Department of Conservation should monitor local and regional authorities to ensure the heritage provisions of the NZCPS are being adhered to.
25. Heritage is the responsibility of the New Zealand Historic Places Trust, and therefore the NZCPS is not the avenue for managing heritage issues. Policies 55(c) and 55(d) are an unnecessary duplication of the requirements under the Historic Places Act 1993.
26. NZCPS is a national policy statement and as such should be focussed on identifying national historic heritage priorities, not regional or district priorities.

### **Additional Provisions Sought**

27. Submission 363.8 stated that guidance to regional and district councils for active protection of significant Maori Heritage Landscapes is missing in the NZCPS. It suggests inclusion of policies which actively protect all New Zealanders' significant cultural heritage.
28. Submission 254.37 stated that there is considerable overlap between policies 32 and 34 with respect to heritage, and with Policies 55 to 57. A single heritage policy should be redrafted to incorporate Policies 34 and 55 to 57, which does not simply restate the Resource Management Act, and which has specific relevance to the coastal environment so that it does not simply replicate the general heritage provisions in district plans.