

From: [Barbara Rouse](#)
To: [rapakifasttrack](#)
Cc: [Sheila Watson](#)
Subject: Comments on Rapaki Fast Track Application : Heritage New Zealand Pouhere Taonga
Date: Tuesday, 29 September 2020 4:34:39 pm
Attachments: [HNZPT Comment_Rapaki_Papakainga.pdf](#)

Kia ora

Please find attached Heritage New Zealand Pouhere Taonga comments on the Rāpaki papakāinga development application.

Please contact Sheila Watson (details in application) or me if you need more information.

We look forward to reviewing the draft conditions when they are available.

Nāku Noa,

Barbara

Barbara Rouse PHANZA | Kaiwhakahaere ā-Kōkiri | Manager Statutory Advocacy
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Invitation for Comment on Papakāinga Development – Rāpaki, Christchurch, a listed project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application Name:	<i>Papakāinga Development – Rāpaki, Christchurch</i>
EPA Reference:	<i>FTC000013</i>
Applicant:	<i>Te Mahi Korowai Trust</i>
Comments due by:	<i>12 October 2020</i>

An application has been made by Te Mahi Korowai Trust under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for consent for the construction of 10 residential dwellings and a shared- used building at Rāpaki. The full application and supporting documents can be viewed on the EPA website, which can be accessed here

<https://www.epa.govt.nz/fast-track-consenting/listed-projects/rapaki-christchurch-papakainga-development/application/>

To comment on the Papakāinga Development – Rāpaki, Christchurch application using the form below, please fill in the details and:

- **Email** the form to rapakifasttrack@epa.govt.nz. Please mark in the subject line: “Comments on Rapaki Fast Track Application (Your name/organisation) by 12 October 2020; or
- **Post** the form to Rapaki Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the 12 October 2020; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by 12 October 2020.

Comments must be received by the EPA, on behalf of the Panel, on 12 October 2020

If your comment is not received by the EPA on 12 October 2020 the Panel may decide not to consider your comment. Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapu whose rohe is in the project area in the application, and choose to include comments from the hapu with any comments you may wish to provide.

Important information

Your personal information will be held by the EPA and used in relation to the Papakāinga Development – Rāpaki, Christchurch consent application process. You have the right to access and correct personal information held by the EPA. All information held by the EPA is subject to the Official Information Act 1982.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a corporate entity making comments on this application, your full contact details will be publicly available. For individuals, your name will be publicly available but your contact details (phone number, address, and email) will not be publicly available.

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Comment on the Papakāinga Development – Rāpaki, Christchurch Fast Track Application

All sections of this form with an asterisk (*) are mandatory.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant):	Heritage New Zealand Pouhere Taonga	
First name:*	Sheila	
Last name:*	Watson	
Postal address:	PO Box 4403, Christchurch	
Home phone / Mobile phone:*	027 484 40288	Work phone:* 03 3631881
Email*: (A valid email address enables us to communicate efficiently with you)	swatson@heritage.org.nz	

2. Please provide your comments on the Papakāinga Development – Rāpaki, Christchurch Application

If you need more space, please attach additional pages. Please include your name, page numbers and Papakāinga Development – Rāpaki, Christchurch Application on the additional pages

1. Thank you for the opportunity to comment on the Papakāinga Development Fast Track application in which land use consent is sought by Te Mahi Korowai Trust for the construction of 10 residential units and a shared community building. We have reviewed the information provided, comprising the document titled *Rāpaki: Papakāinga / Kāinga Nohoanga Development*, prepared by Elrick and Co., and the associated Appendices 1-20.
2. Heritage New Zealand 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. Our interest in this application relates to the proposed earthworks which may have the potential to adversely affect archaeological material on this site.
3. We would firstly like to clarify an incorrect statement made in the AEE: Paragraph 48 states 'A search of the New Zealand Heritage List identified that a very small section in the south east corner of the Site is located within the M36/731 buffer area'.
The New Zealand Heritage List does not identify archaeological sites. M36/731, located to the south of the application site, is an identification for an archaeological site recorded in the New Zealand Archaeological Association Site Recording Scheme. It should also be noted that these sites do **not** have defined 'buffer' areas.
4. We note that the application site sits within the The Pāpakainga/Kāinga Nohoanga zone of the

Christchurch District Plan which is intended to facilitate and enable Ngāi Tahu whānau to use and develop ancestral land to support their social, cultural and economic aspirations. As such we support the principle of this application.

5. The site is also located within the Mahaanui Iwi Management Plan Silent File Area 031, which includes places that are considered by Ngāi Tahu to be wāhi tapu and/or wāhi taonga. In some instances, the precise location of these sacred places is not disclosed by whanau.

Under the Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites are defined as any place occupied prior to 1900 that, through investigation by archaeological methods, may provide evidence relating to the history of New Zealand. Under the provisions of the HNZPTA 2014 archaeological sites are protected, and an authority from Heritage New Zealand Pouhere Taonga is required for any works that may modify or destroy an archaeological site.

In the knowledge that this site is located within a silent file area, the applicant has offered an Accidental Discovery Protocol condition. We acknowledge that this is consistent with advice contained in Appendix 3 of the Mahaanui Iwi Management Plan and will be a useful tool to have in place during the excavation works. However, as there has been no advice obtained from a suitably qualified experienced archaeologist to date, we do not consider this singular reactive measure to be sufficient in this circumstance.

6. Heritage New Zealand recommends a proactive approach, promoting avoidance of key archaeological features and mitigation of the impact to the archaeological values wherever possible. To inform these decisions around the avoidance of impact to archaeology, Heritage New Zealand recommends having the site and proposed works assessed by a suitably qualified experienced consultant archaeologist prior to the commencement of any works.

This will not only provide greater certainty around the potential of uncovering archaeological remains but will also reduce the possibility of delays during development. In the event of an accidental discovery of archaeological material all work on site must cease immediately, the site must be secured and Kaitiaki Rūnanga and the Heritage New Zealand Pouhere Taonga Archaeologist notified. A consultant archaeologist must then be appointed to identify the nature of the site. Works affecting the site can only resume once authority from Heritage New Zealand Pouhere Taonga has been obtained and is able to be exercised. This could potentially delay the project anywhere from two weeks to three months depending on the nature and importance of the site.

Therefore, Heritage New Zealand Pouhere Taonga recommends the archaeological risks are identified to provide the applicant with sufficient information to make an informed decision. This will ensure the appropriate treatment of this archaeologically rich area, and help avoid unnecessary delays for the applicant.

7. **Therefore, Heritage New Zealand Pouhere Taonga recommends the following condition is included in the consent should it be granted, to avoid any delays to the project if archaeological sites are discovered during the works:**
The proposal must be assessed by a suitably qualified and experienced archaeologist to determine whether it will or may affect archaeological sites, and recommend whether an archaeological authority under the HNZPTA 2014 should be obtained prior to works starting.

3. We will email you draft conditions of consent for your comment about this application.*

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| ✓ | I can receive emails and my email address is correct | ■ | I cannot receive emails and my postal address is correct. |
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Thank you for your comments