

Invitation for Comment on Te Ara Tupua – Ngauranga to Petone Shared Path at Ngauranga to Petone.

The Te Ara Tupua – Ngauranga to Petone Shared Path is a Listed Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application Name:	Te Ara Tupua – Ngauranga to Petone Shared Path
EPA Reference:	FTC000001
Applicant:	New Zealand Transport Agency
Comments due by:	11 December 2020
Accessing the application:	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/te-ara-tupua/

An application for resource consents and notice of requirement has been made by New Zealand Transport Agency under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for Te Ara Tupua – Ngauranga to Petone shared path.

To comment on the Te Ara Tupua application and notice of requirement using the form below, please fill in the details and:

- **Email** the form to tearatumuafasttrack@epa.govt.nz. Please mark in the subject line: “Comments on Te Ara Tupua – Ngauranga to Petone Shared Path” (Your name/organisation) by 11 December 2020; or
- **Post** the form to Te Ara Tupua – Ngauranga to Petone Shared Path, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the 11 December 2020; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by 11 December 2020. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

Comments must be received by the EPA, on behalf of the Te Ara Tupua – Ngauranga to Petone Expert Consenting Panel, no later than 11 December 2020.

If your comment is not received by the EPA by 11 December 2020 the Panel is not required to consider your comment (although it may decide to). 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 hapū whose rohe is in the project area in the application, and choose to include comments from the hapū 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 Te Ara Tupua – Ngauranga to Petone shared path consent application and notices of requirement process. You have the right to access and correct personal information held by the EPA.

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.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

Comment on the Te Ara Tupua – Ngauranga to Petone shared path Fast Track Application

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:*	Barbara		
Last name:*	Rouse		
Postal address:	P O Box 2629, Wellington 6140		
Home phone / Mobile phone*:	027 6840833	Work phone*:	04 472 4341
Email*: (A valid email address enables us to communicate efficiently with you)	brouse@heritage.org.nz		

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

2. We will email you draft conditions of consent/notices of requirement for your comment.*

- | | |
|--|--|
| <input checked="" type="checkbox"/> I can receive emails and my email address is correct | <input checked="" type="checkbox"/> I cannot receive emails and my postal address is correct. |
|--|--|

3. Please provide your comments on the Te Ara Tupua – Ngauranga to Petone shared path Application

If you need more space, please attach additional pages. Please include your name, page numbers and Te Ara Tupua Application on the additional pages

Heritage New Zealand Pouhere Taonga comments

The project has significant benefits in enhancing the area, active transport options and providing interpretation and enhancing connection of people with places of historical and cultural significance, particularly as set out in the Cultural Impact Assessment.

This submission addresses potential effects on historic heritage, both places entered on the New Zealand Heritage List Rārangi Kōrero and places on and district plan heritage schedules [Greater Wellington Region, Wellington City Council, Hutt City Council]. It also address the process for managing effects on archaeological sites.

Heritage New Zealand Pouhere Taonga has reviewed the Technical Report 13 Ngā Ūranga ki Pito-One shared path project- Historic Heritage Assessment dated 21 September 2020 by Mary O’Keefe. This assessment concludes that ‘the Project is unlikely to adversely affect heritage sites and features. No known historical structures or features are affected by the Project work.’¹

Potential items to address:

In the proposed works there are three site aspects to consider – the actual 5 metre wide pathway, the wider site [where there may be construction impact or storage during construction] and the site on the edge of the proposed works including linked area to the previous Stage 1 works.

This submission considers whether historic heritage may:

- be affected during the works or require removal or partial removal.
- need temporary protection from the works

No potential damage or removal of built heritage is noted in the report.

Built Heritage

Within the wider area of the project, one historic place is both on the New Zealand Heritage List and scheduled in the Hutt City district plan, and one unlisted place is scheduled in the district plan:

Anzac Memorial Flagpole [and associated garden]

- New Zealand Heritage List # 9438, Historic Place Category 1. The Listing includes the ANZAC Memorial Flagpole, its fittings fixtures and plaque, and a curtilage including the pohutukawa and gum trees.²
- This is located between the current stage of cycle way works and the proposed new stages on the southern boundary of the railway station platform near the ramp. ³

¹ Page 1 of Technical Report 13 Ngā Ūranga ki Pito-One shared path project- Historic Heritage Assessment dated 21 September 2020 by Mary O’Keefe

² The Listing extent is different to council scheduling and includes the garden and memorial stone. Further information is on <https://www.heritage.org.nz/the-list/details/9438>

³ Heritage New Zealand has previously recommended a Maintenance Schedule, placing a Historic Reserve on the place and enlarging the curtilage [2012].

- The Anzac Flagpole is **also** scheduled in the Hutt City Council District Plan map A5 in 14F.

Stone Wall remnant

- This is located in front of the Woollen Mills site and is scheduled in the Hutt City Council District Plan, SH2 A5.

While there is no known built heritage within the proposed project it is noted that the Anzac Memorial Flagpole with associated garden and plaque is at the junction of this stage of the proposed pathway and the first stage works which are underway.⁴ If protection has not been provided at the junction of the two projects [existing and proposed] Heritage New Zealand recommend:

- **a conservation specialist prepare a Temporary Heritage Protection Plan by for any built heritage that may be affected in the area during construction [as part of the Construction Methodology], particularly for the Listed extent of ANZAC Flagpole and garden.**

Archaeological sites

The Heritage New Zealand Pouhere Taonga Act provides an approval process for modification or destruction of archaeological sites, including opportunities for obtaining archaeological information. The authority process is separate from the fast-track consenting process.

The Historic Heritage Assessment Technical Report recommends that to ensure that the archaeological resources of 'the Project area are properly managed that Waka Kotahi apply for a general archaeological authority for the full extent of the works'.⁵ The project archaeologist subsequently reports that a draft archaeological assessment has been prepared and authority applications will be submitted as soon as practicable for areas of potential archaeology.⁶ The remainder of the area, largely reclaimed land, has a low potential for archaeology and an accidental discovery protocol (ADP) will apply.

Waka Kotahi has not applied for an archaeological authority as at 25 11 2020, and it is recommended that they lodge an application as soon as possible. Heritage New Zealand Pouhere Taonga will continue to liaise directly with Waka Kotahi over archaeological authority requirements.

Two proposed conditions AH.1 and AH.2 address the process for responding to any accidental discovery of archaeological material in any areas affected by the project not subject to an authority.⁷ Heritage New Zealand supports these conditions.

⁴ Heritage New Zealand did not receive resource consent for Melling to Petone walkway.

⁵ Page 1 of Technical Report 13 Ngā Ūranga ki Pito-One shared path project- Historic Heritage Assessment dated 21 September 2020 by Mary O'Keefe

⁶ Mary O'Keefe, pers comm. 8 December 2020

⁷ Proposed Designation and Resource Consent Conditions | 12 October 2020 | Page 20