

# Your Comment on the Waihoehoe Precinct

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.

<b>Organisation name (if relevant)</b>	Heritage New Zealand Pouhere Taonga		
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<b>Submission prepared by</b>	Bev Parslow		
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## 2. \*We will email you draft conditions of consent for your comment

Y	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
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## 3. Please provide your comments on this application

### General comment on application and recommendation

**Thank you for the opportunity to comment on the resource consent application. Heritage New Zealand Pouhere Taonga (HNZPT) has assessed the application, with input from specialist regional heritage staff, including those with Māori heritage expertise.**

HNZPT generally supports this resource consent for the conversion of the project area from rural to intensive residential development.

There are no listed or scheduled historic places within the subject project area.

The wider Drury area has a number of notable historical associations relating to Māori settlement and activity, early European settlement, the New Zealand Wars, development of transport and industry, and rural activities from the mid-19th to the mid-20th centuries. The Waihoehoe precinct project area includes a recorded archaeological site R12/1122-The Drury Tramway/Mineral Railway. There are other recorded archaeological sites and a 19<sup>th</sup> century historic villa in the surroundings to the project area.



	<p>HNZPT seeks amendments/deletions to the proposed resource consents conditions, to ensure improved integration between the resource consent and archaeological authority process and also seeks an additional condition related to the provision of historic heritage interpretation. The amendments and deletions sought by HNZPT are contained in the table below.</p>
<b>Maori heritage values</b>	<p>The application documents outline engagement undertaken and (CIAs) provided to the applicant by Ngāi Tai Ki Tamaki, Ngāti Tamaoho, Ngaati Whanaunga, Ngāti Te Ata and Te Akitai Waiohua. Consultation is anticipated to be ongoing. Provision is needed to ensure public interpretation is provided identifying Māori Ancestral footprint in the project area.</p>
<b>Archaeological sites</b>	<p>The Waihoehoe precinct project area includes a portion of the extents of the recorded archaeological site R12/1122-The Drury Tramway/Mineral Railway. There are other recorded archaeological sites and a 19<sup>th</sup> century historic villa in the surroundings to the project area. HNZPT considers that there is potential for unrecorded archaeology within the project area.</p> <p>HNZPT therefore supports the recommendation that the proposal should be subject to an archaeological authority and also seeks amendments/deletions to the resource consents proposed conditions, to ensure improved integration between the resource consent and archaeological authority process. HNZPT seeks a condition related to the provision of heritage interpretation.</p> <p>HNZPT acknowledges the AEE’s advice of the applicant’s intentions to apply for an authority. However, the archaeological monitoring conditions as are proposed are not appropriate. The Heritage New Zealand Pouhere Taonga Act is required to be given effect as a legal requirement, as these works effect a recorded site and the potential for further unrecorded sites of both European and Maori origin as are identified in the archaeological assessment. Therefore this monitoring can only occur in the context of an archaeological authority, not a resource consent.</p>

### Recommendations on applicant’s proposed conditions

Proposed condition number	Discussion	Change requested
Proposed <b>new</b> condition relating to the provision of historic heritage interpretation	<p>The archaeological potential, as discussed in the Archaeological Assessment by Clough and Associates, refers to European sites, R12/1122-The Drury Tramway/Mineral Railway, which is also part of the surrounding development area that is subject to a suite of fast-track consents. The potential</p>	<p><b>HNZPT seeks a new condition as follows:</b></p> <p><i><u>“Prior to the completion of the development, the consent holder shall provide a Historic Heritage Interpretation Plan for the project area, including detail that relates to the nature, location, and timing of the installation of all such signage, in consultation with Heritage New</u></i></p>

## FAST-TRACK CONSENTING

Waihoehoe Precinct

	<p>for unrecorded archaeological sites relating to both Maori and historic Military/ European, occupation is also noted.</p> <p>Accordingly, HNZPT considers a separate condition under the heading of Historic Heritage is appropriate with respect to interpretation of the 19<sup>th</sup> C historic sites and Māori Ancestral footprint in the area.</p>	<p><u>Zealand Pouhere Taonga, to the approval of Auckland Council.</u></p>
<p><b>Amend</b> proposed Condition 4- Pre-start meeting</p>	<p>HNZPT seeks that the pre-start meeting condition is amended to include a discussion relating to the other regulatory permissions applicable to the site, including the HNZPT Archaeological Authority.</p> <p>For completeness, HNZPT also seeks the inclusion into condition 4 of a copy of the Archaeological Authority being included into the list of items to be provided at the pre-start meeting.</p> <p>This will assist to ensure clarity regarding the requirements relating to these permissions and will ensure an integrated approach at the time of earthworks.</p>	<p><b>That condition 4 is amended in two places as follows (additions underline):</b></p> <p><i>“The purpose of the meeting is to discuss the erosion and sediment control measures, earthworks methodologies, stormwater management, relevant management plans, timeframes for works to ensure all relevant parties are aware of and are familiar with the conditions of this consents <u>and other regulatory processes applicable to the site including Archaeological Authorities issued under the HNZPT Act 2014 and the Accidental Discovery Protocol as advised by the project archaeologist”</u>.</i></p> <p>Under the heading, “The following information must be made available at the pre-start meeting” a new requirement is to be included as follows: New bullet point</p> <ul style="list-style-type: none"> <li>• <u>“A copy of the HNZPT archaeological authority”</u></li> </ul>
<p><b>Delete</b> proposed condition 51- Archaeological Features.</p>	<p>As the archaeological assessment identifies the potential for recorded site R12/1122 and unrecorded archaeological sites to be affected by the works, an archaeological authority is required to be obtained under the HNZPTA.</p> <p>Accordingly, archaeological monitoring as proposed in condition 51 is specifically provided for under the HNZPTA and conditions of an archaeological authority.</p> <p>The proposed condition 51 duplicates the requirements of the HNZPT and may</p>	<p>Delete condition 51-Archaeological Features;</p> <p><del>51. The consent holder must engage a suitably qualified archaeologist during the earthwork operations authorised under this consent to monitor the earthworks. The archaeologist is to be present when works are undertaken within the estimated alignment of R12/1122 and during vegetation clearance and planting adjacent to Waihoehoi Stream, as shown in the archaeological assessment listed in Condition 1.</del></p>



	conflict with conditions imposed by an archaeological authority. HNZPT seeks that condition 51 is deleted.	
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**Thank you for your comments**