

Melissa Pearson

From: James Robinson <jrobinson@heritage.org.nz>
Sent: Friday, 20 December 2024 4:56 pm
To: Melissa Pearson
Cc: Bill Edwards; info@planheritage.co.nz
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan
Attachments: APPENDIX B version with maps 20 December 2024.docx

Tena koe Melissa

Bill and I have provided maps for most of the Heritage New Zealand submission on the District Plan.

Please see the attached word document containing the original submission text now with relevant maps.

Wishing you all a great Christmas and Happy New Year.

Kia ora mai ra

James Robinson

Dr James Robinson | Senior Archaeologist Northland | Heritage New Zealand Pouhere Taonga | PO Box 836, 21 Hobson Ave, Kerikeri 0245 | Ph: 0272490864 www.heritage.org.nz

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From: Bill Edwards <BEdwards@heritage.org.nz>
Sent: Friday, 20 December 2024 1:21 pm
To: James Robinson <jrobinson@heritage.org.nz>
Subject: FW: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

From: Melissa Pearson <melissa.pearson@slrconsulting.com>
Sent: Monday, 16 December 2024 1:44 pm
To: Bill Edwards <BEdwards@heritage.org.nz>; John and Adina Brown <info@planheritage.co.nz>
Cc: James Robinson <jrobinson@heritage.org.nz>
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Kia ora Bill,

Thank you for the update on this work and for providing the first instalment of information. Looking forward to seeing whatever else comes through. Thank you for ccing in John directly so he can pick up this information and assess it in his report.

John – as per other supplementary information that we've received from submitters in the last few months, please consider in your report and append to your report as well so other submitters can see the information you were provided.

Thanks,

Melissa Pearson

Principal Consultant - Planning

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O +64 9 303 0311

M +64 220 102 850

E melissa.pearson@slrconsulting.com

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From: Bill Edwards <BEwards@heritage.org.nz>

Sent: Monday, December 16, 2024 1:40 PM

To: Melissa Pearson <melissa.pearson@slrconsulting.com>; John and Adina Brown <info@planheritage.co.nz>

Cc: James Robinson <jrobinson@heritage.org.nz>

Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Kia ora Melissa,

- a) We are producing maps which support our written material. First is for the Te Waimate area attached.
- Te Waimate Historic Heritage Area
- The proposed heritage area is an improvement on the current Heritage precinct however it still does not protect the landscape from undue development or change of land use.
 - Pastoral farming in New Zealand was first established at Te Waimate, including in the valley north of the Mission Station. This area is now under threat from horticultural farming practises that include structures associated with kiwi fruit and avocado orchards. These structures include tall posts and netting detrimentally impact on the vista and character of the location. The proposed heritage area excludes most of this valley. We request that the heritage area be extended to include the valley through to the top of the bush escarpment and ridge situated immediately north of the Mission Station.
 - We also recommend controls associated with the change of land use from pastoral farming to horticulture. Cropping need not be included.

Nga mihi

Bill

Bill Edwards Area Manager, Northland| Heritage New Zealand Pouhere Taonga |Northland Area Office, 21 Hobson Ave, PO Box 836 Kerikeri 0245, New Zealand | Ph: (64 09) 407 0470| DDI: (64 09) 407 0471| Visit www.heritage.org.nz and learn more about New Zealand's heritage places

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From: Melissa Pearson <melissa.pearson@slrconsulting.com>
Sent: Monday, 16 December 2024 10:45 am
To: Bill Edwards <BEwards@heritage.org.nz>; John and Adina Brown <info@planheritage.co.nz>
Cc: James Robinson <jrobinson@heritage.org.nz>
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Kia ora Bill and James

Just following up after our pre-hearing meeting that hopefully Mike filled you in on before leaving HNZ. Will there be any additional material for John Brown to consider prior to completing his report? Mike indicated that there was some supporting material that could be provided, including section 32AA assessments, but nothing has come through. John is aiming to finish his first draft over the Christmas break, so we're running out of time to receive and assess any new supporting material.

Kind regards,

Melissa Pearson

Principal Consultant - Planning

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O +64 9 303 0311
M +64 220 102 850
E melissa.pearson@slrconsulting.com

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From: Bill Edwards <BEwards@heritage.org.nz>
Sent: Thursday, October 17, 2024 10:50 AM
To: John and Adina Brown <info@planheritage.co.nz>; Melissa Pearson <melissa.pearson@slrconsulting.com>; Mike Butler <MButler@heritage.org.nz>

Cc: James Robinson <jrobinson@heritage.org.nz>

Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Kia ora John,

Yes it will be good to catch up, Mike what time and date suits you/

Kind regards

bill

From: John and Adina Brown <info@planheritage.co.nz>

Sent: Wednesday, 16 October 2024 10:55 am

To: Melissa Pearson <melissa.pearson@slrconsulting.com>; Mike Butler <MButler@heritage.org.nz>

Cc: Bill Edwards <BEdwards@heritage.org.nz>; James Robinson <jrobinson@heritage.org.nz>

Subject: Re: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Hi Everyone!

Look forward to catching up with you all again!

Cheers

John

John Brown

Director

Plan.Heritage Limited

48 Lake Road, Narrow Neck Auckland 0624

Tel: 094458953

Mobile: 02102973641

Email: info@planheritage.co.nz

Website: www.planheritage.co.nz

From: Melissa Pearson <melissa.pearson@slrconsulting.com>

Sent: Tuesday, 15 October 2024 11:44 am

To: Mike Butler <MButler@heritage.org.nz>

Cc: John and Adina Brown <info@planheritage.co.nz>; Bill Edwards <BEwards@heritage.org.nz>; James Robinson <jrobinson@heritage.org.nz>

Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Hi Mike

Apologies for the delay in hearing from me – I am also the reporting officer for the Rural topics for FNDC and the hearing for that is coming up in December, so that’s been taking most of my focus!

I wanted to let you know that FNDC are finalising the engagement of John Brown as the heritage specialist who will be supporting me prepare my section 42A report on the Heritage topic. John and I were hoping to meet with you sometime in mid-November to discuss the HNZPT submission on the Far North PDP, including any additional information that you can supply in support of the requested relief.

Could you and/or Bill please let us know your availability to meet in mid-November, ideally some time between the 5-15 November? It will probably have to be an online meeting given that you’re in Dunedin and John and I are both based in Auckland. Also, as per your email from July, if there is any additional information that you can supply now, please send that through to John and myself as soon as possible.

Kind regards,

Melissa Pearson

Principal Consultant - Planning

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O +64 9 303 0311

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E melissa.pearson@slrconsulting.com

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From: Mike Butler <MButler@heritage.org.nz>
Sent: Tuesday, July 30, 2024 12:27 PM
To: Melissa Pearson <melissa.pearson@slrconsulting.com>
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Thank you Melissa.

Mike

From: Melissa Pearson <melissa.pearson@slrconsulting.com>
Sent: Tuesday, July 30, 2024 12:11 PM
To: Mike Butler <MButler@heritage.org.nz>
Cc: Bill Edwards <BEwards@heritage.org.nz>; James Robinson <jrobinson@heritage.org.nz>
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Thanks for that Mike.

I can confirm that the attached submission documents are the ones that I am looking at when considering the HNZ requests that fall under the Heritage topic.

Any additional information that you or Bill can send through to support your submission points in advance of briefing the heritage specialist would be appreciated. Once we have engaged the heritage specialist I will sit down with them and work out a strategy for addressing the points raised in submissions. I will also ask them to allow for time to engage in pre-hearing conferencing with HNZ, no problem with using Teams.

I look forward to receiving any additional information that you may have, otherwise I will be back in touch later once a specialist is engaged and we're in a position to engage.

Kind regards,

Melissa Pearson

Principal Planning and Policy Consultant - Planning

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From: Mike Butler <MButler@heritage.org.nz>
Sent: Tuesday, July 30, 2024 11:41 AM
To: Melissa Pearson <melissa.pearson@slrconsulting.com>
Cc: Bill Edwards <BEdwards@heritage.org.nz>; James Robinson <jrobinson@heritage.org.nz>
Subject: RE: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Hi Melissa, thanks for your email and our discussion. We all discussed your discussion and email just now at our regular Northland Planning Meeting.

Bill advised that we have s32AA information we can send through straight away (e.g. Waitangi) based upon our submission for the s42A for areas and are very happy to meet to discuss other issues also via a pre-hearing. I may need to use Teams as I'm in Dunedin currently.

I'm presuming that Bill would be in touch to co-ordinate an appropriate time / materials.

Kind regards,
Mike Butler

Planner Northern Region

From: Melissa Pearson <melissa.pearson@slrconsulting.com>

Sent: Tuesday, July 30, 2024 10:42 AM

To: Mike Butler <MButler@heritage.org.nz>

Subject: FW: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

You don't often get email from melissa.pearson@slrconsulting.com. [Learn why this is important](#)

Kia ora Mike,

Great to chat with you this morning about some potential pre-hearing engagement with HNZ on the proposed Far North District Plan.

Please see the email below that I sent to the Northland office last week. It would be great if someone could respond with some further information about how HNZ would like to engage on the heritage topic in advance of the hearing in May next year.

Kind regards,

Melissa Pearson

Principal Planning and Policy Consultant - Planning

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M +64 220 102 850

E melissa.pearson@slrconsulting.com

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From: Melissa Pearson <melissa.pearson@slrconsulting.com>

Sent: Monday, July 22, 2024 2:12 PM

To: infonorthland@heritage.org.nz

Cc: Chloe.Mackay@fnhc.govt.nz; Jaimee Cannon <Jaimee.Cannon@boffamiskell.co.nz>

Subject: Heritage New Zealand Pouhere Taonga submission on the proposed Far North District Plan

Kia ora Sherry and Bill,

I am contacting you on behalf of the Far North District Council (FNDC) policy team – I am a consultant planner who has been engaged by FNDC to manage the historical heritage topic as part of the proposed Far North District Plan (PDP) hearings. The historical heritage topic is currently scheduled to be heard as part of Hearing Stream 13 (Historic and cultural values). Although this hearing stream is not scheduled to be heard until May 2025, FNDC are looking to get underway with further specialist heritage advice to assist with evaluating submissions.

The Heritage New Zealand Pouhere Taonga (HNZ) submission was one of the most extensive in terms of requested changes to the Heritage Areas, particularly with respect to areas, features or landscapes that HNZ considers should be included or excluded from various Heritage Area overlays (as set out in Appendix A of the submission). The submission also references Appendix B as part of the submission, being the feedback provided by HNZ on the draft Far North District Plan prior to notification.

Now that I have reviewed the HNZ submission, including Appendices A and B, I wanted to reach out and see if there was any additional information or evidence that HNZ has, or would like to draw my attention to, to support the submission prior to engaging a heritage expert to input into the section 42A report. I'm mindful of the fact that the HNZ submission appears to primarily rely on the information set out in Appendices A and B, most of which has already been reviewed and considered by Plan.Heritage (the heritage experts that informed the notified version of the PDP).

If HNZ has any additional information to share to support their submission, or if you feel that an informal pre-hearing discussion would assist with FNDC better understanding the HNZ position, please let me know. I'm hoping to brief and engage a heritage expert in the next month and it would be good to provide as much information as possible upfront to inform their analysis.

If you have any further questions about the process or would like to discuss things further you can also call me on 022 010 2850, otherwise email is fine.

Kind regards,

Melissa Pearson

Principal Planning and Policy Consultant - Planning

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E melissa.pearson@slrconsulting.com

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HERITAGE NEW ZEALAND
POUHERE TAONGA

26 October 2021

Far North District Council

Attention: Greg Wilson (greg.wilson@fndc.govt.nz)

Copy to: tammy.wooster@fndc.govt.nz
theresa.burkhart@fndc.govt.nz

By email: letsplantogether@fndc.govt.nz

Dear Greg, Tammy, and Theresa

FEEDBACK OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE DRAFT HERITAGE AREAS IN THE FAR NORTH.

Heritage New Zealand Pouhere Taonga thanks the Council for re-opening the feedback/ submission process for consideration of the draft Heritage Areas currently promoted within the Draft Far North District Council District Plan. Our feedback is set out as follows:

Heritage New Zealand Pouhere Taonga

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

Historic heritage is a matter of national importance under Section 6(f) of the Resource Management Act 1991 (the RMA).

The Heritage New Zealand Pouhere Taonga Act 2014 provides protection for all archaeological sites, whether recorded or not.

Review of Plan Heritage Limited Stage 1 and 2 Resource Reports June 2020

The Plan Heritage Limited reports are subject to the following three significant constraints:

- a) The "Constraints" section of the Stage 1 report (page 6 of 89) describes that *"the report is a review of the existing Historic Heritage Areas in the Far North District Plan only"*.
- b) *"The review was primarily a desk top exercise"*.
- c) *"The report does not represent the views of iwi regarding the significance of the place to them. Cultural significance of the place to iwi can only be assessed by tangata whenua"*.

As a result of the above three constraints, Heritage Plan Ltd did not consider the Far North district on a holistic basis and as a result has not considered other areas of the Far North that

should also be made a 'heritage area' in the proposed District Plan. If the consultants had been briefed on a holistic approach, then the number and the spread of the heritage areas may well be very different considering the manifold heritage resources of the Far North district

Heritage New Zealand considers that additional heritage areas are required and these are listed and described later in this document.

It is our considered view that the key driver for selection of heritage areas should be "*peoples matched with places and landscapes*" including stories as to why people are associated with places, events that shaped the area, and key amongst this is cultural relevance.

The consultant report does not include input from tangata whenua. It is of primary importance that the Council engages with tangata whenua as to the proposed heritage areas (included the proposed additional heritage areas), boundaries of the same, and associated Draft District Plan rules. Sections 2 and 8 of the Resource Management Act 1991 -require this.

Section 74 of the Resource Management Act 1991 requires the Council to take into account any relevant planning documents prepared by Iwi or Hapu and lodged with the Council. It appears that the consultant has considered the contents of the Iwi /Hapu Management Plans (page 24 of 89), however those plans being rangatiratanga and kaitiaki do not align with the hard-line proposed heritage boundaries such as roads or property boundaries. The markers for heritage areas should not be defined by roads but by maunga (mountains) and awa (rivers), and other topographical features which were and are still as traditional markers. Geographical features define the towns and places, by being placed adjacent to rivers, harbours or constrained by valley systems.

It is essential that the world views of Iwi are heard and considered, however we could not locate evidence within the documentation to confirm whether Iwi consultation had occurred prior to the release of the Draft District Plan.

One Set of Rules

The existing heritage areas differ significantly from each other, for example Puerua Heritage Area contains the most intact and significant prehistoric gardening system in the Eastern Pacific, whilst Russell is commonly known for its built colonial heritage, pa sites, Te Maiki (Flagstaff Hill) and early colonial occupation and structures. These two areas are an example of the diversity between the heritage areas for which one set of rules simply put, will not do justice to either area. We provide more detail on the "one set of rules" later in this feedback document.

General Comments

Heritage New Zealand Pouhere Taonga Northland Area staff have driven to each of the heritage areas and viewed the existing and proposed new boundaries for these areas. It is abundantly clear from examining these areas that the proposed heritage areas need to be reconsidered in the context with the surrounding environment with thought given as to why the areas were originally settled.

Also evident is the need for multiple heritage layers to be applied to some of the heritage areas with tighter development controls applying close to the centre of the areas, and other controls where vista protection is the primary focus. This includes protecting vistas from land and sea. The Council's consultant archaeologists have recommended that *"further work is required to define 'sub areas'"* (page 252 of 259), yet Council has not done this. We support the consultant archaeologist's recommendation for sub areas and welcome further engagement on this matter.

For example, there is a need to protect the entrance accessways to the heritage areas from detrimental development, plantings, and signage etc. An example as to where this is required is the entrance to Russell that involves the unsightly landfill (this could be addressed through extensive native plantings).

Review of Proposed Heritage Area Boundaries

The following comments relate to each of the proposed heritage areas as described within the Draft District Plan:

a) Paihia Heritage Area

- It should be noted that in the Paihia Cemetery in the rear yard of the Church of Paul and Henry Williams contains Maori burials. This is not referenced in the archaeologist's report.
- We support the recommendation of the consultant archaeologists (page 51 of 259) for the inclusion of the Waitangi Islands - Motu o Rangī, Motuarahi, Motu Maire and Kuia Rongouru / Taylor Island because of their historical, contextual and spatial relationship. They are of significance to iwi and are listed with Heritage New Zealand Pouhere Taonga as wahi tapu.
- The heritage area should also include the Paihia Village Green scenic reserve, and the historic library at 2 Williams Road.
- There needs to be development restrictions on the entire ridge (behind the Church) that overlooks the Bay. This is a prominent ridge that contains Pa, archaeology and other artifacts. It is the backdrop for the town and provides a visual escapement from the bay encapsulating the town.
- An additional sub area is recommended for the area south of the river Te Haumai to include the settlement of Tohitapu as also suggested by Plan Heritage Limited (Page 51 of 259).
- See MAP A at the end of this document

b) Rangihoua Historic Area

The promoted are Heritage Area is deemed to be appropriate.

c) Kororareka Russell Heritage Area

We have viewed the Kororareka Russell Heritage Area in conjunction with representatives of the community and the Kororareka marae to get feedback.

It is extremely evident that the proposed heritage area will not protect Russell

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Peninsula from adverse and detrimental development. There are already examples of building development that is completely out of character and scale in the area.

Heritage New Zealand Pouhere Taonga requests the following:

- That the heritage area be considered when standing upon Te Maiki (Flagstaff Hill). From this vantage point one can see across Kororareka towards Waikare Inlet, eastward out to Motorua Island, northward to the Black Rocks and west towards Waitangi and Paihia. These viewshafts need to be protected and conserved from inappropriate development especially those on ridgelines, such as the yellow large dwelling situated on the ridge to the east and the large box style dwelling situated at the base of Tapeka Pa (known to locals as the cassette player)
- Pa sites need to be included in the Heritage Area. There is a rich history associated with pa sites. They simply cannot be left out.
- We advocate a separate heritage layer for the entrance to the Russell Peninsula starting from the Russell Whakaparara Road intersection. This area is to provide a visual protection from further adverse development (Matawhi Bay contains examples of poor design), including promotion of native visual buffer planting. Russell is situated on a peninsula and the plan needs to take into account the special character of this peninsula.

In addition to the boundary defined within the draft district plan, we request that a further planning layer be applied to the east and north for the balance of the peninsula that will prevent development on the ridgelines, restrict exterior colours to the heritage colour palette and control reflectivity. This is to include Long Beach and the area behind. It is essential that development is considered from when viewed not only from land but also from the Bay. It is of note that no buildings can be seen when viewing from Te Maiki west from the Bailey's farm (adjacent Waitangi Mountain Bike Park) right around to the north to the Nine Pin. That vista has by fortune only not been built out. The planning controls in the draft district plan need to ensure that the viewshafts remain

d) Pouerua Historic Heritage Area

- The proposed heritage area is a significant expansion on the current area, but that expansion is generally in a southern direction towards Moerewa that encompasses only a few recorded archaeological sites, inclusive of a pa site, but otherwise a landscape that does not appear to be of heritage value. The area does not contain any Stonefield sites and appears to be in modern pastoral farming. We would like to have clarification why this area is included in the report.
- The boundary as extended slightly to the north does include a significant cultural landscape containing various pa sites and stone structures.
- It is evident that there needs to a continuous connection between the proposed Pouerua Heritage Area through to State Highway 12 and north of

State Highway 1 through to the proposed southern boundary of the proposed Te Waimate Historic Heritage Area. This would protect the foreground vista through to the ridge pa sites from State Highway 1.

- The focus of this heritage area should be on the Maunga and the stone gardens with very strict controls. The local community supported this at its recent community meeting. The balance area (proposed extension area) could be subject to less restrict rules. The context of the area is that the volcanic soils have been the driver of the rich cultural landscape that includes, gardens, pa, kainga and early colonial buildings.

e) Rawene Historic Heritage Area

- Rawene township is situated at the northern end of a peninsula that leads into the Hokianga Harbour. Rawene's vehicle access is from Twin Coast Discovery Highway via State Highway 12 from the south and from Kohukohu to the north via the car ferry. Due to the prominent location of the township, it is visible from both the Hokianga Harbour and land. The township with its unique character, historic buildings, and rich history is a tourism destination on the Twin Coast Discovery Highway. Many local business' cater for day travellers.
- It seems that Plan Heritage Limited has defined the proposed heritage area boundary from "*lots which fall within the early township that are distinctly different (earlier) subdivision form, and which are shown in historical aerial topography to have generally been developed by 1942*". Unfortunately, that mapped area excludes some very important places.
- Heritage New Zealand recommends that the proposed heritage area be expanded to include the Hokianga Health Enterprise Trust facility (hospital) - first free hospital service, the cemetery that contains the remains of ancestors (located diagonally opposite the hospital) and the Rawene Domain. In addition, adjacent to the camping ground contains a site of significance to Maori and needs to be incorporated into the heritage area. [\(see MAP F at the end of this document\)](#)
- A further sub area should include the entire peninsula and contain lesser rules that protect the entrance way view to the township by design, colour and shape and set back rules.
- Furthermore, there needs to be restrictions the prevent development on the ridge line of the peninsula as the viewshafts need to be protected when looking to Rawene across the harbour
- Heritage New Zealand also recommends that a Pou or entry marker be established on the earth mound situated on the north-western corner of the State Highway 12 intersection.

f) Te Waimate Historic Heritage Area

- o The proposed heritage area is an improvement on the current Heritage precinct however it still does not protect the landscape from undue development or change of land use.

- o Pastoral farming in New Zealand was first established at Te Waimate, including in the valley north of the Mission Station. This area is now under threat from horticultural farming practises that include structures associated with kiwi fruit and avocado orchards. These structures include tall posts and netting that detrimentally impact on the vista and character of the location. The proposed heritage area excludes most of this valley. We request that the heritage area be extended to include the valley through to the top of the bush escarpment and ridge situated immediately north of the Mission Station. [\(see attached MAP G at end of document\)](#)
- o We also recommend controls associated with the change of land use from pastoral farming to horticulture. Cropping need not be included.

g) Kerikeri Heritage Precinct (Heritage Character Area)

- Access via Landing Road needs to be treated as the entrance to the heritage area and reflected through building restrictions on height, colours, non-reflective building materials, shape and design elements.
- The rules should encourage native vegetative planting as means to lessen the visual amenity impact of buildings on the heritage area.
- The heritage area should be extended to include the Kerikeri Inlet as this is the original gateway to Kororipo Pa and Town Basin. The visual view shaft needs protection.
- It is important that the ridgelines form the boundary of the inner heritage area to prevent inappropriate development that will impact on the Town Basin area.
- Heritage New Zealand is happy to see the Kerikeri Heritage Area Pat B in the proposed District Plan. This additional area addresses issues we raised in our submission.

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h) Kohukohu Historic Heritage Area

We are supportive of the retention of the existing Heritage Area boundary as proposed.

i) Mangonui and Rangitoto Peninsula Historic Heritage Area

We are supportive of the proposed heritage areas insofar as the extent of the proposed boundaries for Mangonui and Rangitoto Peninsula / Butler Point Area, however we consider that the boundary needs to be extended to include the entire harbour and associated adjacent ridge line perimeter. Our comments are as follows:

- The reason that both Māori and Europeans settled at Mangonui and Rangitoto was because of the harbour itself. It provided shelter, ki moana, and was a gateway and stepping location for departures back to the Pacific and Hawaii and for trading. The entire harbour was utilised as evidenced by the recorded archaeology associated with Paewhenua Island, that included flaking floors, flax industry, and mill etc.

A number of pa sites including at Rangikapiti, Rangitoto, Taemaro Road (P04/70) and others are located at the entrance to and surrounding the

harbour. Vistas to and from these pa sites need protection, including a prohibition on plantation planting on the pa sites - (P04/70) contains a pine plantation. These pa sites clearly demonstrate the spread of pre-European occupation around the perimeter of Mangonui Harbour. These pa sites are related visually and through whakapapa.

- It is important that the open areas of Butlers Point are protected from any further building development. This land is a backdrop to Mangonui Township and Rangitoto Pa. That area also contains a significant number of recorded archaeological sites.
- Heritage New Zealand requests that the proposed heritage areas be progressed, but with an additional sub layer comprising the balance of the harbour area up to the perimeter ridgeline. Controls need to be sufficiently assertive to prevent development upon the ridgelines, or protruding above the ridgelines, and adoption of recessive colours and non-reflective building materials in the sub-area. By doing so the landscape character of the harbour will be retained.
- [Heritage New Zealand is happy to see the Mangonui and Rangitoto Peninsula Heritage Area Part B being included in the proposed District Plan. This additional area addresses issues we raised in our submission](#)

Additional Heritage Areas

Heritage New Zealand Pouhere Taonga requests feedback to the Council that the following places also be included within the District Plan as heritage areas:

- Waitangi. [\(see MAP H at the end of this document\)](#)
- Kaeo. [\(see MAP I at the end of this document\)](#)
- Whangaroa Harbour area [\(not included with maps as most of the values are Maori and therefore tangata whenua need to have input rather than Heritage New Zealand\)](#)
- Kawakawa Township. [\(see MAP J at the end of this document\)](#)
- Oruru Valley. [\(see MAP K at the end of this document\)](#)
- Omapere / Opononi. [\(still to be mapped\)](#)
- Te Ahu Ahu Area (Bounded by Remuera Settlement Road, SH 1 and SH 15 + Lake Omapere). The consultant's report suggests a separate heritage area for this landscape which contains numerous highly visible pa sites and early field systems (page 121 Of 259). [\(still to be mapped\)](#)
- Northern War Sites [\(still to be mapped\)](#)
 - o Ruapekpeka
 - o Ohaewai
 - o Okaihau
 - o Puketutu
 - o Waikaire
- Ahipara. [\(still to be mapped\)](#)
- All islands within the Bay of Islands. [\(see MAP L at the end of this document\)](#)
 - o Early contact sites.
 - o Early settlement sites Mangahawea
 - o Early European explorers Cook, DuFresne
- Early contact sites.
- Early settlement sites Mangaheawea
 - o Early European explorers Cook, DuFrense
- Cape Reinga [\(not included with maps as most of the values are Maori and therefore tangata whenua need to have input rather than Heritage New Zealand\)](#)
 - o Spiritual

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Further Commentary

Heritage Fund

Heritage New Zealand Pouhere Taonga strongly encourage the Council to re-establish a heritage fund that is accessible to both private and corporate owners of historic or scheduled buildings and structures. This is particularly relevant when heritage is such an important driver of the local tourism economy and links people and places to their heritage. It provides a sense of belonging and attachment.

We provided a written and verbal submission to the Long-Term Plan on this matter but received no response.

Scheduling

We request that the Council proceeds with a progressive approach to scheduling heritage items and places within the district plan. It is disappointing that the Council continues to simply apply a fall-back stance insofar that it will only schedule items that are listed with Heritage New Zealand Pouhere Taonga. The Council needs to be proactive in scheduling as it affords greater protection than HNZPT listing affords.

Examples include our prior provision of information to the Council and request to schedule 24 places in the general Whangaroa locality and also Oruru Valley as these are significant cultural landscapes to Iwi.

Cultural Landscapes

The Draft District Plan states:

"Historic heritage resources can be areas, places, sites, buildings or structures either individually or as a group. Buildings, structures, site and places are scheduled in [APP3- Schedule of historic sites, buildings and objects](#). Heritage Areas are identified and mapped in the District Plan, and primarily recognise a concentration of scheduled heritage buildings, but also recognise roads and open space".

It is essential that the Council also recognises cultural landscapes and includes this in the above paragraph. Cultural landscapes are connections with awa, maunga and other geographic features.

Policies

HH-PI

The policy statement: *"Identify Historic Heritage resources that contribute to an understanding of the Far North's history, identity and cultural and historical themes, and assess their significance in relation to the following values as detailed in the Northland Regional Council Policy 4.5.3..."* is in conflict with Council's stated position *"it is not financially viable to identify all historic heritage resources and for some cultural reasons some resources should not be formally identified (e.g. burial grounds)".*

When Heritage New Zealand Pouhere Taonga provides the Council with extensive data on sites and requests that these be scheduled, it is a reasonable expectation that the Council will abide by its legal requirements as set out in s.6 of the Resource Management Act 1991 and afford protection by scheduling.

HH-P2

This policy statement reflects the need for the Council to re-establish its heritage fund and furthermore employ heritage staff. This is essential if the Council considers heritage to be important.

HH-P4

This needs to include a requirement that any proposed demolition of a heritage resource needs to be independently assessed by a suitably qualified professional and under guidance of Heritage New Zealand Pouhere Taonga.

HH-P7

An archaeological site assessment from a suitably qualified archaeologist and reference to Heritage New Zealand Pouhere Taonga is required before any earthworks of a recorded or unrecorded archaeological or heritage site occurs. This needs to be included in the Proposed District Plan.

HH-P8

An archaeological site assessment from a suitably qualified archaeologist and reference to Heritage New Zealand Pouhere Taonga is required before any earthworks of a recorded or unrecorded archaeological or heritage site occurs. This needs to be included in the Proposed District Plan.

HH-P9

Some pastoral activities are not appropriate for heritage sites. For example, running heavy stock on pa sites in winter or when the ground is soft will pug the land and this can result in irreparable land damage and erosion. It is requested that HH-P9 be appropriately qualified.

HH-P12

The proposal contained within HH-P12 is supported. However, we note that Council needs to outline how it will implement these measures viz rates relief and heritage incentive fund. Item c - *"obtaining, recording and sharing information about historic heritage"* is also supported but a major move to achieve this must be for Council to proactively schedule historic of heritage places and items. If it does not do so then HH-P12 is meaningless.

HH-P14

The link to "scheduled ...and reasonable cause" is too weak. We request that reference to all archaeological sites whether recorded or not be included. It is of note that not all archaeological sites are recorded and certainly not listed and as Council has indicated that it will only schedule based on HNZPT's listings then there is a huge gap in protection afforded by HH-P14.

HH-P19

Subdivision needs to be subject to consultation with Heritage New Zealand Pouhere Taonga and Department of Conservation. Subdivision in itself generally precedes building development. The subdivision itself is not normally of concern, but once the title issues the

developer or owner of the additional title(s) usually expects to be able to build a dwelling or other structure and it is these structures and associated infrastructure such as driveways, outbuildings, and gardens etc that can detrimentally impact on the heritage landscape. This is why Heritage New Zealand Pouhere Taonga must be part of the consenting process for subdivisions in these areas.

HH-RS

Small excavations can have large impacts on archaeology. Continuously undertaking small excavations can lead to damage. HH-RS needs to be replaced such that no earthworks in a heritage area are a permitted activity but are rather they are subject to the need for archaeological advice and consultation with Heritage New Zealand Pouhere Taonga.

An exception to this is standard pastoral farming activities such as re ploughing paddocks for cropping or re seeding grass, and clearing existing drains etc.

HH-RIS

This needs to be captured as a rolling update as Heritage New Zealand Pouhere Taonga generates new listings.

Stone Walls

There are a number of locations in the district where historic (pre-1900) stone walls are prevalent, for example the Edmonds Ruins area, Pakaraka, west of Kaikohe, State Highway One near Okaihau, Oromahoe and Kerikeri.

Heritage New Zealand Pouhere Taonga wants these walls protected from damage and inappropriate development. We ask that the Council includes within the proposed District Plan provision for the blanket protection of historic stone walls and to schedule known stone walls. In this regard, we are prepared to provide our known inventory of the various stone walls to assist with the scheduling process.

Some of the walls are being used as farm/ stock fences being the original purpose of construction, but also some are used as residential or curtilage fences.

We request the following provisions be adopted:

- Resource consent required to modify historic stone walls in anyway (modification should not be a permitted activity).
- Noxious plant control encouragement.
- Prevent tree planting immediately adjacent the walls as the roots of trees will in the long term disturb the wall.
- Require that wall capping stones be maintained or installed where missing.
- Provide background text as to how the walls add to the character and visual amenity of the area and district. They provide a sense of place.

Invitation

We welcome the opportunity to discuss our feedback in more detail and where appropriate provide advice that will advance the protection and enhancement of the Far North's historic and special areas and communities.

Yours sincerely



Bill Edwards

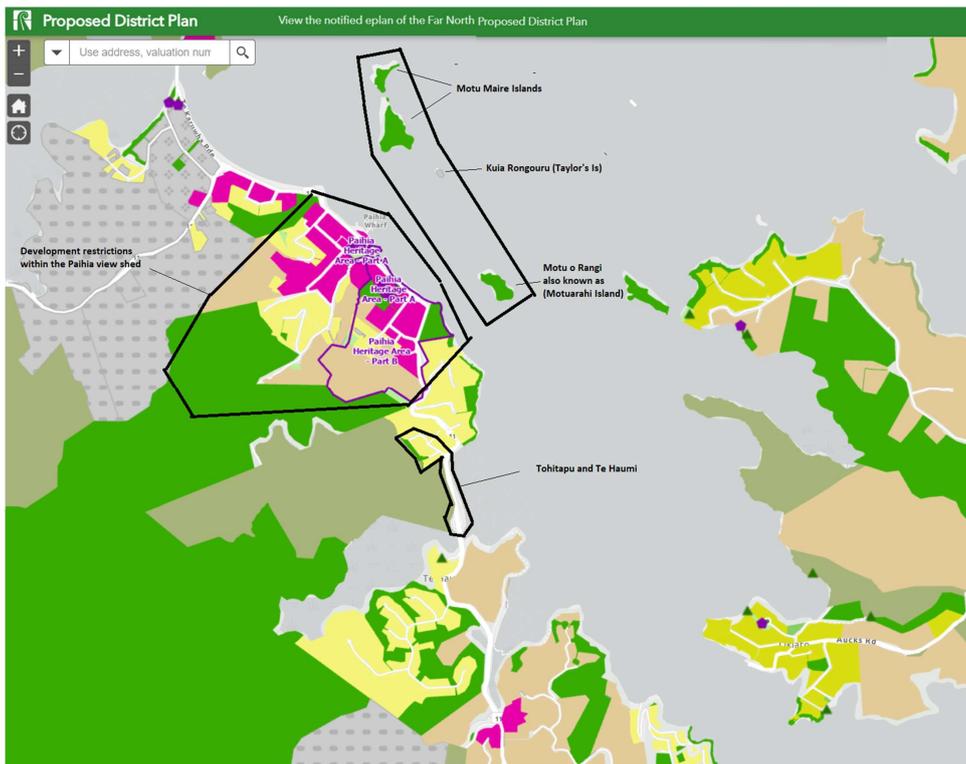
Area Manager Northland

[Additional maps created at request of FNDC to clarify the HNZ evidence](#)

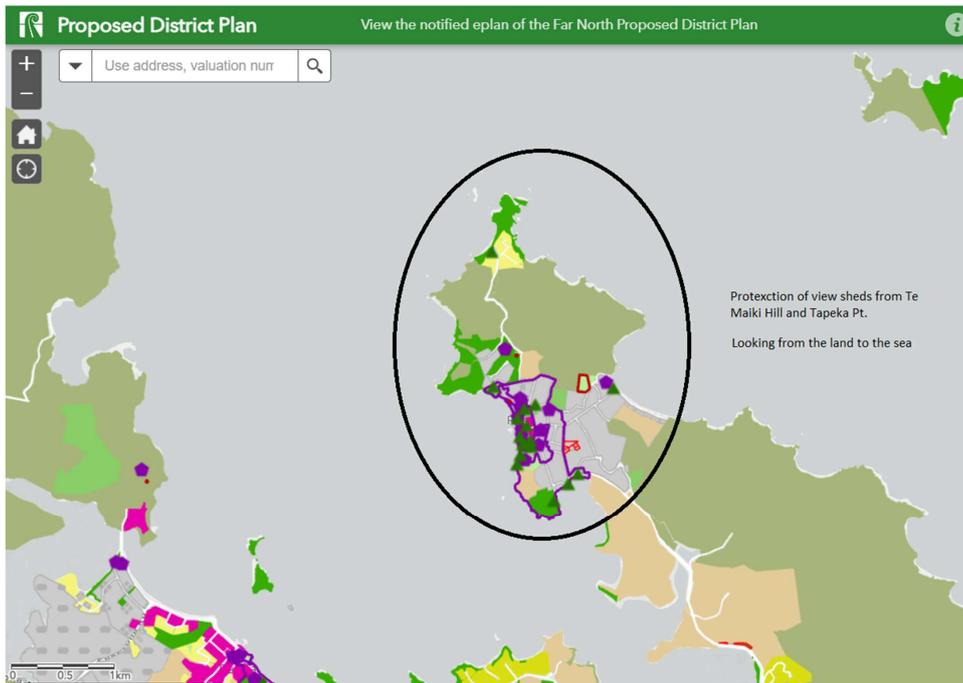
[Map A: Paihia, Waitangi Islands and Tohitapu/Te Haumi](#)

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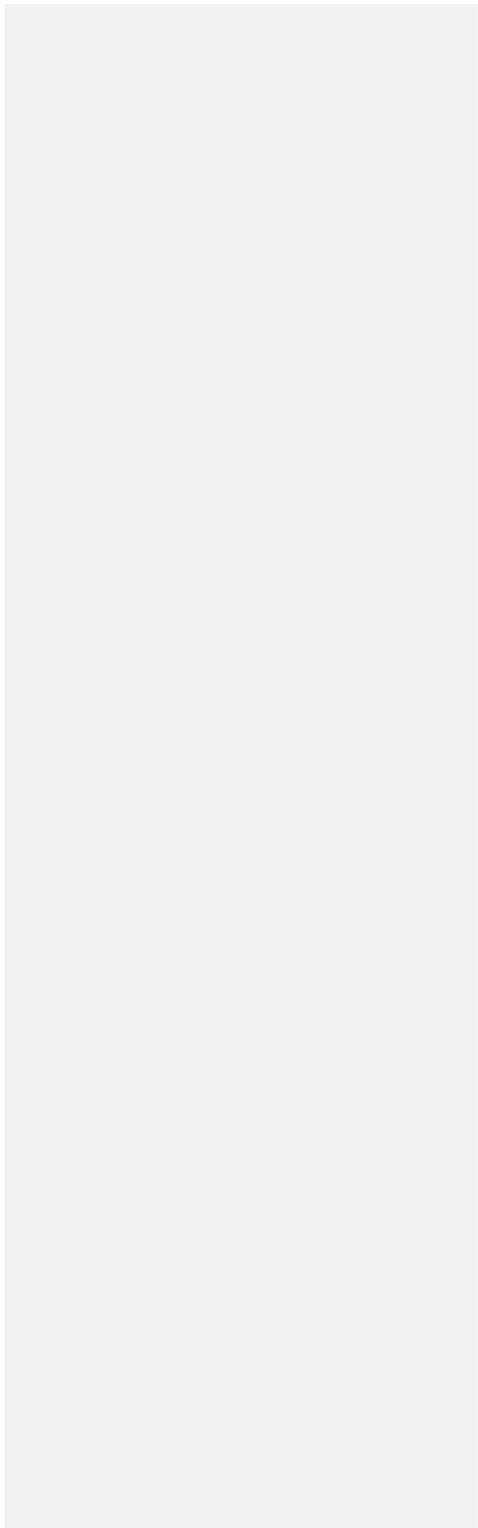
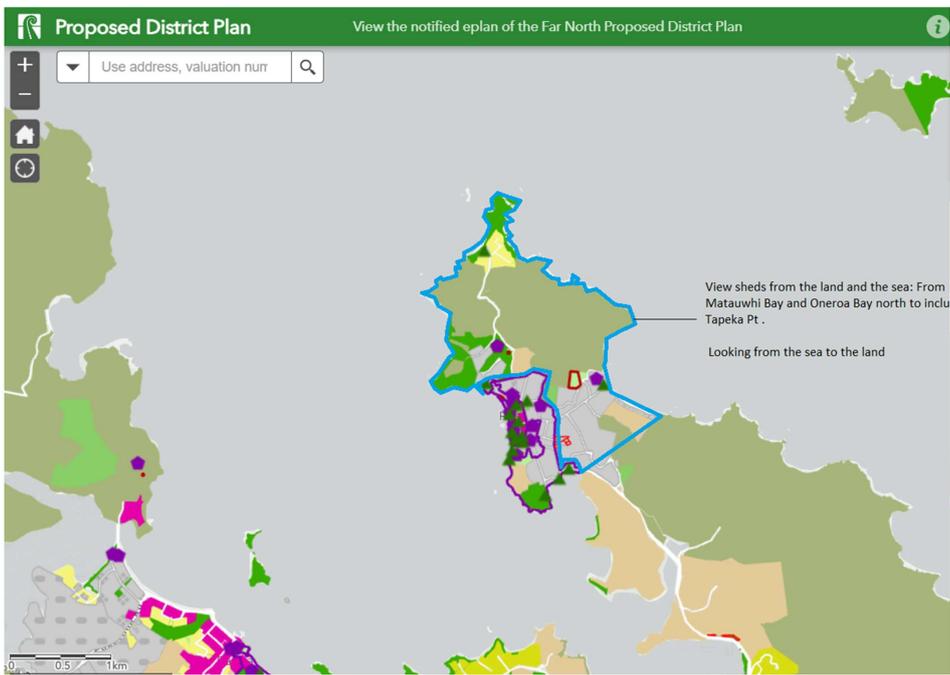
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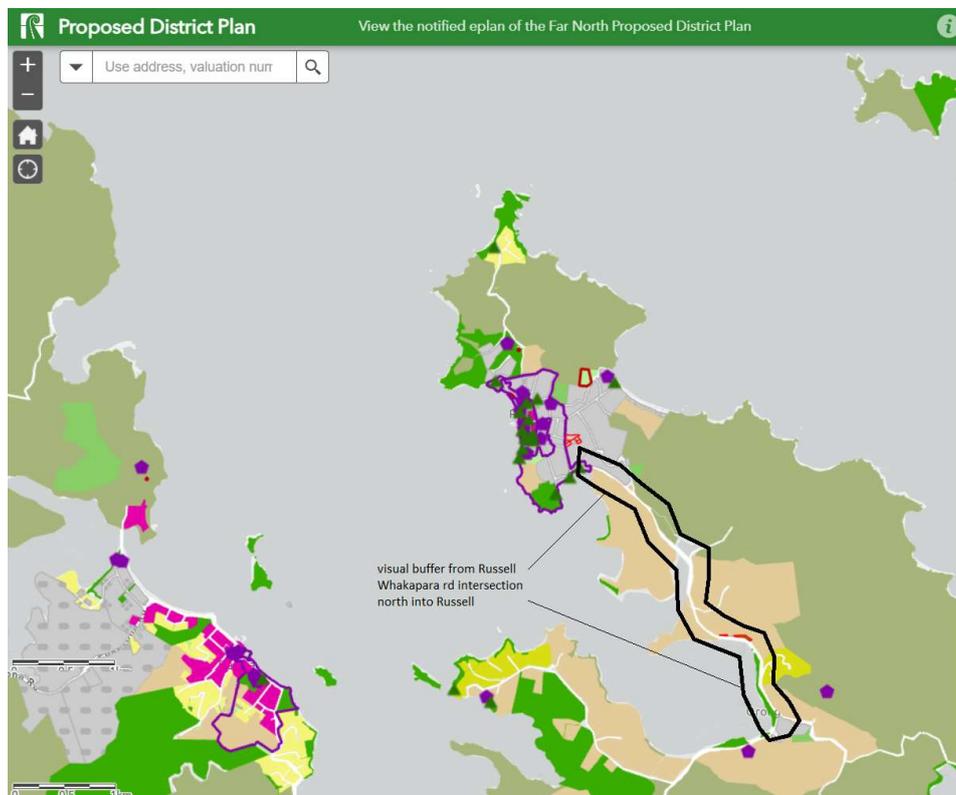
[MAP B Russell Kororareka view sheds looking in from the sea](#)



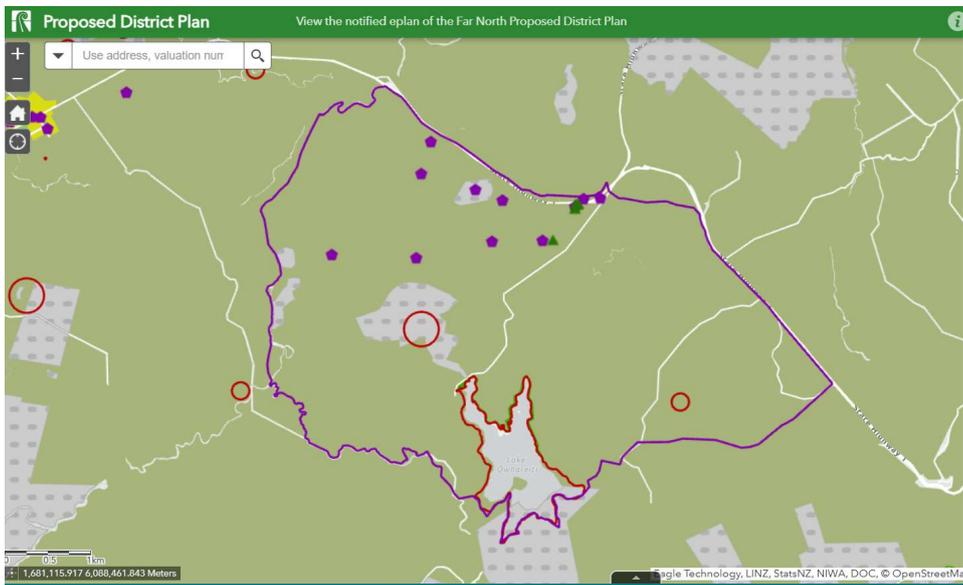
MAP C Russell Kororareka view sheds looking out from the land



[MAP D Whakapara Russell Rd protected view shed](#)



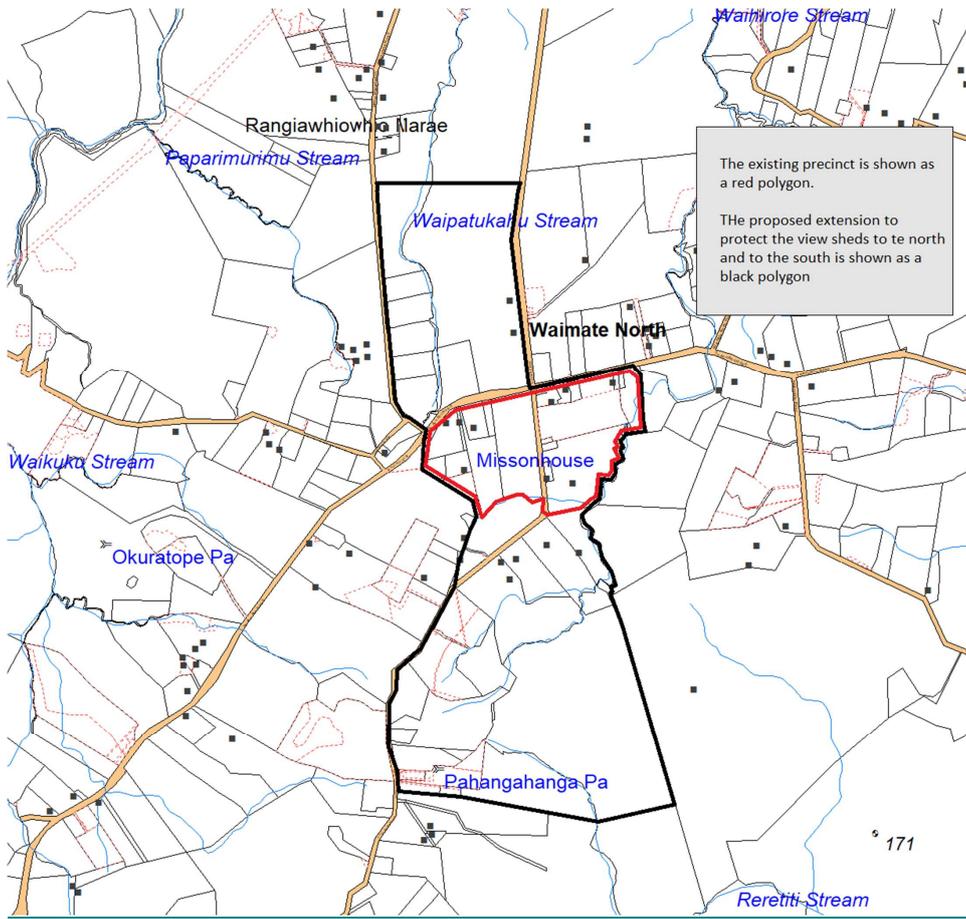
[MAP E Puerua heritage precinct - keep as mapped](#)



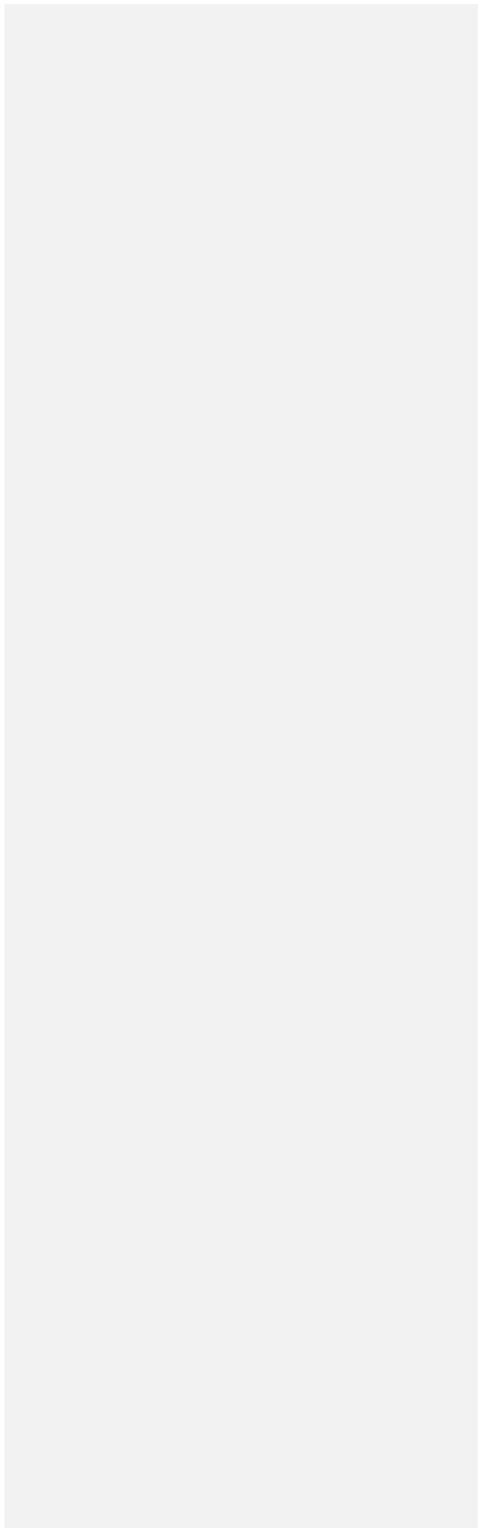
[MAP F Rawene Heritage Area part C - Hospital and cemetery](#)



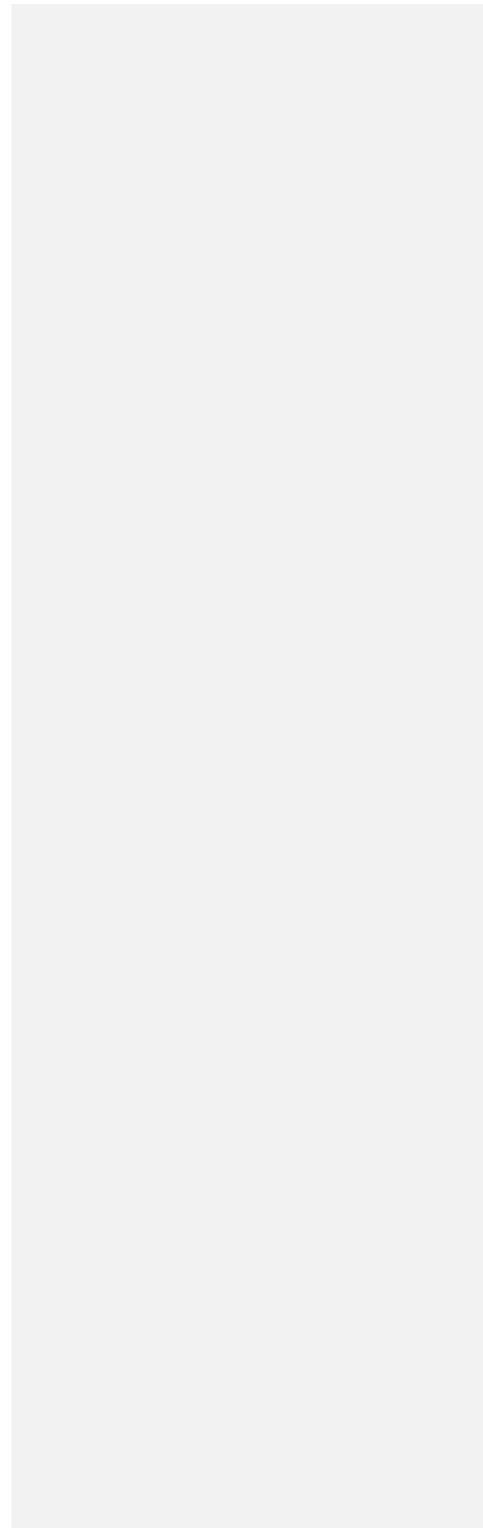
[MAP G Heritage precinct existing plus proposed extension](#)



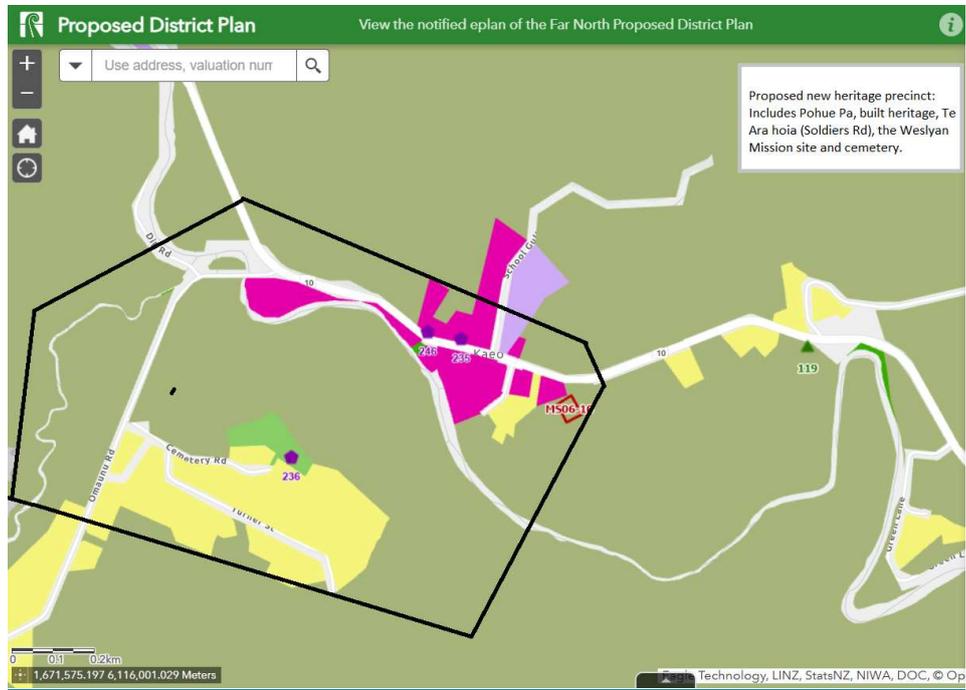
The existing precinct is shown as a red polygon.
The proposed extension to protect the view sheds to the north and to the south is shown as a black polygon



[MAP H Waitangi special area](#)



[MAP | Kaeo Heritage Precinct \(new\)](#)



[MAP J Kawakawa Heritage Precinct \(new\)](#)

Proposed District Plan View the notified eplan of the Far North Proposed District Plan

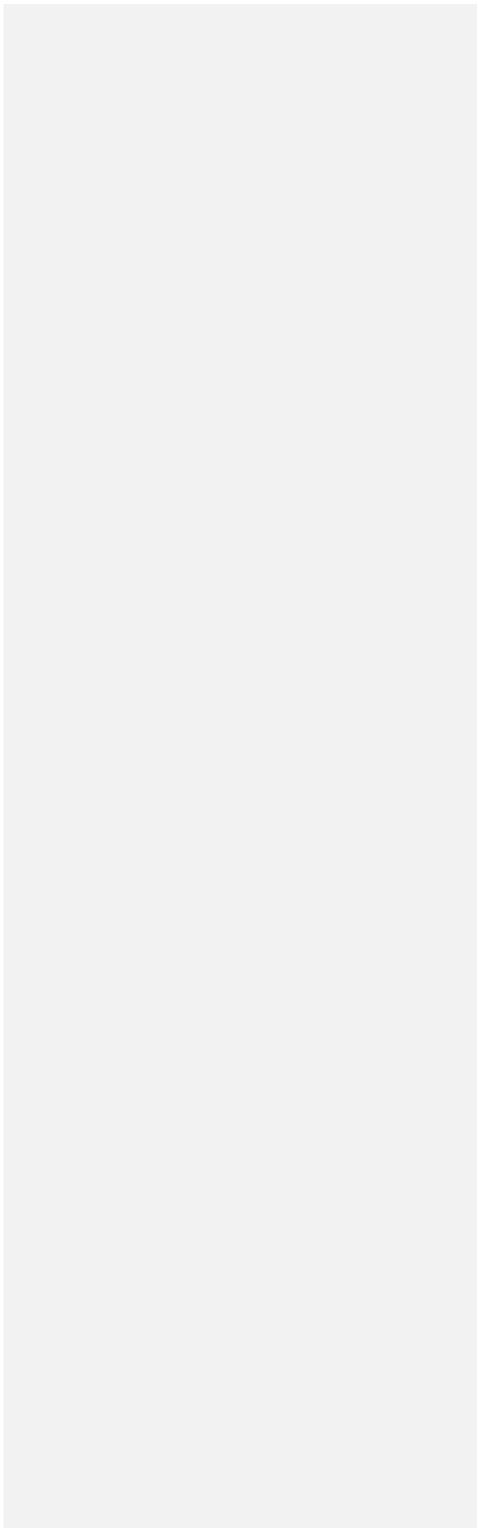
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Proposed Heritage area - Kawakawa:
This recognises the array of heritage buildings including the rail infrastructure, early residential homes and hotels, and the recent Category 1 listed Hunderwasser Toilets.

It is important to protect these places for long term tourism potential.

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+ 1,696,054.826 6,085,614.482 Meters

Technology, LINZ, StatsNZ, NIWA, DOC, © Op



MAP K Oruru Valley Heritage Precinct (new)



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