

Submission – Plan Change 39 Archaeology

Please accept this email as a submission on the proposed changes to the plan regarding archaeological sites in the Wanganui District. My apologies for not making a more substantial submission but time is limited and this is a very thorny and complex subject.

The whole Whanganui area is a massive archaeological site. Unfortunately it now contains only scattered remnants of very important, representative and accessible sites and a very large number of sites which are insignificant, obscure, in poor condition, never visible to the public due access problems, add nothing to our understanding of historic settlement and land use and essentially have no proven archaeological value.

Many remain only through the goodwill of landowners and are only recorded due to the reports of landowners. This goodwill and kaitiakitanga must be preserved and fostered for the most important sites.

Many sites are insignificant and potentially an impediment to legitimate land use or development. Locking such sites up indefinitely is not justified in terms of the contribution such sites make to our historic heritage, balanced against the cost of lost opportunity - borne by landowners. This needs to be considered seriously by planning staff in terms of how they develop local policies on this matter. A balanced, reasonable and pragmatic approach is called for.

The intent of the proposals is acceptable but the instrument proposed is excessive. All of these sites are already protected by statute and arguably do not need additional protection. Nevertheless the maintenance of a register locally, for the benefit of council and landowners combined with council advice to landowners regarding their obligations, is supported in principle.

I fully support council advocating via mechanisms in the district plan, the protection of these sites where they are significant, representative, in a condition which provides insight on prior habitation/land use and where their protection does not unreasonably impede long-going land use or modern development needs. The most representative and significant sites are where most of the council attention should be directed. A pro-active approach to developing site management plans for the most important sites, in collaboration with landowners, is the next logical step. All of the sites should be identified in LIM reports if they are not already so that landowners understand any potential impacts that the sites may have on land use.

Using district plan provisions to beat up landowners with historic sites will see many unrecorded sites disappear permanently if landowners feel threatened by the plan change provisions. The plan provisions need to be consultative and accommodating. There are at least 20 significant sites within 1.5km of my Otamatea property which are not recorded. Under current land use, these sites will likely last for several hundred more years but if landowners feel threatened by council plan change proposals, these sites will probably be erased.

Until proper site assessments can be undertaken to establish the importance of the sites council is flying largely blind with nothing but a list. The protective legislation already in place offers blanket protection and an additional layer of bureaucracy by council, together with their cost and the public angst generated, will not be useful to anybody and will see important sites disappear.

Lastly I am disappointed to see council freely publicising information regarding sites on private land. There is no need for this information to be shared with the wider public as it could create trespass problems or direct minority group interest at the legitimate use of freehold private land where often, no legal access is afforded to the sites.

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