

SUBMISSION

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To: Wanganui District Council

From: Wanganui Federated Farmers of New Zealand

Submission on: **Plan Change 39
Archaeological and Other Sites
WANGANUI DISTRICT PLAN**

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We wish to be heard in support of this submission.

1. INTRODUCTION

- 1.1 Farming has a strong presence in Wanganui and contributes significantly to the region. Federated Farmers seeks to uphold and enhance the value of farming. The Wanganui Province of Federated Farmers of NZ therefore thanks the Wanganui District Council (the Council) for this opportunity to provide a submission on the Wanganui District Council Plan Change 39 Archaeological and Other Sites as part of the District Plan Review.
- 1.2 Wanganui District is a rural district and relies heavily on the rural sector to underpin its economy. The Council therefore has an obligation to ensure that activities associated with farming are well provided for under its District Plan.
- 1.3 The following comments are representative of member views and experiences with the management of resources within the Wanganui District. It reflects the fact that resource management and District Council policies and plans impact on our member's daily lives as farmers, members of the local community, landowners and ratepayers.
- 1.4 It is important that it is not viewed as a single submission, but rather as a collective one that represents the opinions and views of our members. We also acknowledge any submissions made by individual members of Federated Farmers.

2. SUMMARY OF RECOMMENDATIONS and KEY POINTS

- 2.1 Wanganui District is a rural district and relies heavily on the rural sector to underpin its economy. This topic is of great concern to our farming members.
- 2.2 Many of our members are impacted by heritage provisions as they own land where historic and archaeological sites are located, and often use their own resources to manage these sites. Our members value heritage, but often the unknown costs or implications of heritage can create a perception that heritage is a burden.
- 2.3 We encourage the Council to ensure that all landowners are aware of how the proposed regulations are likely to impact on their activities, and provide the time for these landowners to respond.
- 2.4 We recommend that the Council offer face to face meetings to landowners with sites mapped on their properties. Note – these face to face meeting are not consistent with landowner catch all 'drop in' meetings.
- 2.5 Federated Farmers recommends that the Council review the list of sites identified in Appendix K, with a view to further eliminate those that are of little value.
- 2.6 We recommend that Proposed Objective 1 is amended to as follows: *Manage inappropriate subdivisions, use and development to ensure that adverse effects on archaeological resource are avoided, remedied or mitigated.*
- 2.7 We recommend that Council waives all resource consent application fees relating to heritage and archaeology, and develops a cost-share arrangement for the archaeological or cultural impact assessment.
- 3.11 We recommend that Objective 3 is amended to as follows: *Recognise and protect the archaeological resource by encouraging close co-operation with hapu, iwi, landowners and the community, including enabling hapu, landowners and the wider community to*

continue to undertake their day to day activities where these activities are compatible with the protection and retention of the resource.

- 3.12 We recommend that Objective 4 is amended to as follows: *Provide information to the community to encourage the protection and retention of the archaeological resource, identifying where relevant, those activities that are consistent with the protection and retention of the resource, and therefore continue to be enabled.*

3. FULL SUBMISSION

Section 2.2 – Reason for Proposed Plan Change

- 3.1 The Section 32 Report sets out as the reason for the proposed policy change, two main issues with which the Plan change seeks to address. 1) a lack of knowledge of the location of archaeological sites and therefore the associated risks to the sites, and 2) the information gathering since the last District Plan review which needs to be reflected in the planning documents.
- 3.2 This topic is of great concern to our farming members. Many of our members are impacted by heritage provisions as they own land where historic and archaeological sites are located, and often use their own resources to manage these sites. Our members value heritage, but often the unknown costs or implications of heritage can create a perception that heritage is a burden.
- 3.3 We note that the Council has undertaken consultation on this matter, which has included letters to landowners providing them information of the known archaeological sites on their properties. We appreciate the Council informing landowners about the placement of these sites on their properties. We however, also encourage the Council to ensure that all landowners are aware of how the proposed regulations are likely to impact on their activities, and provide the time for these landowners to respond.
- 3.4 When developing policy around heritage, the impacts on resource users must be addressed. Resource users do value heritage resources and Council's mechanisms to protect them should include encouragement for resource users. If the effects on landowners are ignored it could be perceived that recognised heritage resources are a hindrance and a liability, resulting in negative consequences all around.
- 3.5 While we understand that the landowners have been provided the necessary links to the Plan Change documentation, we do not believe that this provides the level of necessary support to ensure that the consultation process is sound. Referring to the summary of actions that have been taken with regard to this Plan Change, we note that a number of meetings have been held with various groups including relevant iwi groups. Federated Farmers encourages the Council to ensure that the landowners who have sites mapped on their properties, are also offered face to face meetings to allow these landowners to better understand the possible impact of the plan changes on them, and in addition, ensure that the consultation is fair in the level of support provided to all affected parties. Note – these face to face meetings are not consistent with landowner catch all 'drop in' meetings.

Relief sought:

- 3.6 Federated Farmers recommends that the Council offer face to face meetings to landowners with sites mapped on their properties.

Peer Review of the NZAA table of sites

- 3.7 There are 980 sites identified in Appendix K, with at least two thirds are of these on rural land. Federated Farmers does not believe that these can all be considered as having

equal value and therefore, there needs to be some rigorous culling of any with little value.

- 3.8 In addition, the Chapter 9 preamble suggests there has been some review recently, but there still seems to be an excess of sites that could impact farmers, particularly when there is a 20 m buffer area as well. While the NZAA may be an august body, they are a special interest group, which may tend to err on the side of their passion, when a reasonable person would not. Federated Farmers notes that many of the sites are pre-European, however the previous occupiers have retained little interest in the land, as it is now owned by private owners.

Relief sought:

- 3.9 Federated Farmers recommends that the Council review the list of sites identified in Appendix K, with a view to further eliminate those that are of little value.

Proposed Objective 1

- 3.10 We note that the proposed objective 1 for archaeological sites is:

1. *Manage subdivisions, use and development to ensure that adverse effects on archaeological resource are avoided, remedied or mitigated.*

- 3.11 Objective 1, how it is currently proposed, is not consistent with Section 6 (f) of the RMA, in that it doesn't clarify that 'inappropriate activities' that could damage these sites will be managed. Including the word 'inappropriate' we believe provides greater certainty that only subdivision, use and development that are inappropriate will need management.

Relief sought:

- 3.12 Objective 1 is amended to as follows: *Manage inappropriate subdivisions, use and development to ensure that adverse effects on archaeological resource are avoided, remedied or mitigated.*

Proposed Objective 2

- 3.13 We note that the proposed objective 2 for archaeological sites is:

2. *Reduce the risk of damage to archaeological sites and areas by identifying the known archaeological resource and avoid activities that may damage, modify or destroy that resource, including activities close to the identified site.*

- 3.13 When developing policy around archaeological sites, the impacts on resource users must be addressed. Resource users do value these sites and Council's mechanisms to protect them should include encouragement for resource users. If the effects on landowners are ignored it could be perceived that recognised sites are a hindrance and a liability, resulting in negative consequences all around.

- 3.14 Unknown costs of having to get an archaeologist, heritage or cultural expert in to assess the site, as well as the unknown costs and time delays of having to obtain a resource consent in order to complete the works, and the unknown outcome of a resource consent application can all contribute to a view that these sites are a liability and a burden on the landowner. We note that the Council that it may waive resource consent fees. Federated Farmers supports the waiving of these consent fees, as these can be significant costs of little benefit to the applicant. We consider that an approach that the Council could adopt, would be to waive all fees for these resource consent application, and a cost-share arrangement for the archaeological or cultural impact assessment.

Relief sought:

- 3.14 That Council waives all resource consent application fee relating to heritage and archaeology, and develops a cost-share arrangement for the archaeological or cultural impact assessment.

Proposed Objectives 3 and 4

- 3.15 We note that the proposed objectives 3 and 4 for archaeological sites are:
3. *Recognise and protect the archaeological resource by encouraging close co-operation with hapu, iwi, landowners and the community.*
 4. *Provide information to the community to encourage the protection and retention of the archaeological resource.*
- 3.15 As mentioned earlier, we appreciate that the Council has undertaken consultation with landowners, iwi and the wider community with regard to this plan change. We are however concerned about whether the consultation that has been undertaken has been consistent across stakeholders. We reiterate that these sites have a significant impact on our members as landowners, and therefore we encourage Council to ensure that landowners are enabled where appropriate in Council regulation.
- 3.16 Federated Farmers recommends that landowners are specifically enabled in undertaking their day to day activities and that Objectives 3 and 4 are modified to provide for this. Farming activities for example, currently occur at a number of sites identified. The continuation of these activities often occurs without a loss of protection or retention of the site. This is particularly common for pre European archaeological sites, where the site as it currently stands, is consistent with pastoral farming activities.
- 3.17 We believe that specifically enabling compatible activities is also consistent with the proposed policy 9.3.18, which provides a number of considerations to be taken into account before considering the appropriate management for the identified archaeological resource.

Relief sought:

- 3.18 Objective 3 is amended to as follows: *Recognise and protect the archaeological resource by encouraging close co-operation with hapu, iwi, landowners and the community, including enabling hapu, landowners and the wider community to continue to undertake their day to day activities where these activities are compatible with the protection and retention of the resource.*
- 3.19 Objective 4 is amended to as follows: *Provide information to the community to encourage the protection and retention of the archaeological resource, identifying where relevant, those activities that are consistent with the protection and retention of the resource, and therefore continue to be enabled.*

Rules – Permitted Activity

- 3.20 As with the relief sought for Objective 2 above, Federated Farmers believes that the costs associated with any consent sought or archaeological assessment, should be appropriate cost-recovered. We believe that in the interests of ensuring that the provisions in this Chapter are enabling, resource consents which relate to heritage and archaeological considerations should be waived. In addition, we also encourage the Council to implement a cost-share arrangement for the archaeological or cultural impact assessment.

Relief sought:

- 3.16 That Council waives all resource consent application fees relating to heritage and archaeology, and develops a cost-share arrangement for the archaeological or cultural impact assessment.
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Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers. The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

These comments are representative of member views and reflect the fact that resource management and government decisions impact on our member's daily lives as farmers and members of local communities.

Federated Farmers thanks the Wanganui District Council for considering our submission to Archaeological and Other Sites for the proposed Wanganui District Plan.