



Submission on a Publicly Notified Plan Change to the Whanganui District Plan

Resource Management Act 1991 In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003

To: Whanganui District Council, PO Box 637, Whanganui

This is a submission on: Plan Change 63 Historic Heritage to the Whanganui District Plan.

Closing Date: 09/02/2025

Date received: 07/02/2025

Submission Reference Number #: 11

Address for service:

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Attachments:

WJ and BJ Simmons Submission.pdf

I wish to be heard: No

I am willing to present a joint case: No

Could you gain an advantage in trade competition in making this submission?

- No

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- Yes

Submission points

Point 11.1

Section: Appendix K – Archaeological Sites

Sub-section: Appendix K - Archaeological Sites

Provision

General

Support/Oppose/Amend:

Submission

With the last plan change on this matter having occurred only nine years ago, (PC39), we are keen to know what new general and site-specific rules might be proposed.

Notwithstanding the inevitability that our site will be lost to residential subdivision and development within a few years, council should hold and share with landowners, inventory data on significant sites; must recognise the cost to landowners of managing and protecting these sites, and should act against inappropriate development pressures rather than facilitating them. In our case, the harm is done and is irreversible.

Relief sought

1. Focus on advocacy, advice, education and non-regulatory protection measures for all but the most important sites as per Option 3.
 2. Actually help landowners to protect verified sites in a tangible and beneficial way.
 3. Not add more impediments, restrictions and costs for landowners with sites on their properties.
 4. Help to make the process of obtaining authorisation to unravel the layers of protection on sites where this is necessary, in a less bureaucratic, expensive, arbitrary or problematic way.
 5. Provide or prescribe for financial assistance or other relief to landowners disadvantaged by the presence of sites and the rules applied to them.
 6. Not be excessive or draconian by being set at a level which is commensurate with the significance, importance and vulnerability of individual sites.
 7. Ensure all rules applied to any site are appropriate and based on accurate, recent information collected from that site rather than being the result of a desk exercise.
 8. Properly consider the likely impact of any rules on the landowners' use of their property and the lost opportunity, enjoyment, freedom and rights affected by such rules.
 9. Provide an avenue for landowners to challenge any rules imposed where they are considered to be punitive, inadequate, impractical or inappropriate, with agreed solutions to be given priority over bureaucratic edicts.
 10. Make a substantial difference to the on-going protection of the many sites which have already endured for more than a century in private care, without having been listed, visited, surveyed, mapped or foisted with rules.
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Point 11.2

Section: Appendix K – Archaeological Sites

Sub-section: General

Provision

General

Support/Oppose/Amend: Amend

Submission

We support council reducing the inventory list in Appendix K of the plan by leaving off unverified sites while improving inventory data on the significant, verified sites but we feel that a number of additional council-initiated steps would be appropriate.

Relief sought

(1) Council should provide a rates remission to landowners who willingly protect any verified sites on their properties which affect or impede development or use on their properties. This would offset the lost opportunity costs and financial costs of owning and working around the sites.

Point 11.3

Section: Appendix K – Archaeological Sites

Sub-section: General

Provision

General

Support/Oppose/Amend: Amend

Submission

We support council reducing the inventory list in Appendix K of the plan by leaving off unverified sites while improving inventory data on the significant, verified sites but we feel that a number of additional council-initiated steps would be appropriate.

Relief sought

(2) Council should reciprocate the goodwill of landowners by providing them with efficient low-cost or no-cost pathways through the consenting minefield over land where sites occur, and should develop support mechanisms, procedures and policies to ensure landowners are not faced with unreasonable costs, unreasonable limitations or impositions and impediments on their land use.

Point 11.4

Section: Appendix K – Archaeological Sites

Sub-section: General

Provision

General

Support/Oppose/Amend:

Submission

We support council reducing the inventory list in Appendix K of the plan by leaving off unverified sites while improving inventory data on the significant, verified sites but we feel that a number of additional council-initiated steps would be appropriate.

Relief sought

(3) Council should support landowners seeking reasonable relief or from variation to site protection measures imposed (including buffers), including when the retention of a site of minor importance may prove to be unreasonably limiting, expensive or unsustainable. Impasses may occur when site protection measures such as buffers or fences are over-zealously applied. Council must support the appropriate and economically sustainable use and enjoyment of private freehold land, which will always be first priority for landowners.

Point 11.5

Section: Appendix K – Archaeological Sites

Sub-section: General

Provision

General

Support/Oppose/Amend:**Submission**

We support council reducing the inventory list in Appendix K of the plan by leaving off unverified sites while improving inventory data on the significant, verified sites but we feel that a number of additional council-initiated steps would be appropriate.

Relief sought

(4) As was done for the NW Structure Plan, council should undertake at its cost, verification and assessment of significant sites likely to require on-going protection measures, especially where rules create effects or limitations for landowners' legitimate use or enjoyment of their properties.