



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: 28/01/2025

Submission Reference Number #: 2

Address for service:

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Attachments:

WDC Historic and Archaeological Site Project FINAL Final REPORT MARCH 21 2011.pdf

WDC Historic and Archaeological Site Project FINAL Final REPORT MARCH 21 2011.pdf

Heritage NZ email.pdf

Possible Sites.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?

- **N/A**

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

- **N/A**

Submission points

Point 2.1

Section: DELETED Appendix K – Archaeological and Wahi Tupuna

Sub-section: Appendix K - Archaeological and Wahi Tupuna

Provision

Note: To avoid confusion, numbers without items are marked as Blank

Note**: Sites without an indicated Buffer shall default to an estimated buffer of 50m . These sites have not been specifically researched. The Historic Places Act applies regardless of any District Plan Buffer specified so care should be taken beyond any buffer also. No buffer shall apply to sites recorded as wahi tupuna.

Support/Oppose/Amend: Amend

Submission

In my experience dealing with council regarding these sites many staff are unaware that a great deal of these "sites" are unconfirmed/possible sites... & accordingly impose unjustified restrictions.

Page 15 of the WDC Historic Place and Archaeological Site Identification Project (the document that established many of these sites) states "Many of the places identified in Appendix B can be considered to be archaeological sites. Further research, including ground visits, would be necessary before most sites could be recorded or in some cases even assessed. Additionally many of these sites were only ever listed as possible sites, identified from 1942 aerial photography.

Without first properly confirming the 499 sites associated with this note, deleting it would surely be negligent & no doubt lead to ongoing unnecessary issues for those working in proximity to them.

Relief sought

The note**: in particular that "these sites have not been specifically researched" **should not** be removed & the 499 sites that this note pertains to should (unless they have actually been confirmed) be either removed or clearly listed as unconfirmed/possible sites in the new Appendix K

Point 2.2

Section: Appendix K – Archaeological Sites

Sub-section: Appendix K - Archaeological Sites

Provision

254	5 Pits	50m	1776964	5577105.998
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Support/Oppose/Amend: Oppose

Submission

This site has never been verified.

In the **WDC Historic Place and Archaeological Site Identification Project** it was identified as a possible site (642) based on 1942 aerial photography. This document states on page 15 "Further research, including ground visits, would be necessary before most sites could be recorded or in some cases even assessed"

Kathryn Hurren (Senior Archaeologist, Heritage NZ) was unable to identify anything significant in the area from the 1942 aerial photography. She went on to say; "In terms of the District Plan sites should be verified as archaeological before being put in district plans as archaeological sites. Sites that are based on historic information and/or plans should be visited and verified as otherwise you end up with a site in the district plan that is not actually physically present. This causes issues for landowners who may end up with rules around a site that does not actually exist." & also; "As noted above it is not in the New Zealand Archaeological Association Site Recording Scheme but is in the District Plan. If Whanganui District Council have identified the site and placed it on the plan then they should have the site verified and included in the New Zealand Archaeological Association." (see email attached)

Michael Taylor (Head Archaeologist, Archaeology North) Author of the **WDC Historic Place and Archaeological Site Identification Project** has been to site & agreed that although there were some ground features, it was highly unlikely there were any pits in the area. He is happy to be contacted for further information.

This site has caused issues several times in the past & I have repeatedly had to provide information/evidence to support the fact that it should not exist.

Relief sought

Remove site 254 from the district plan.

Address the many similar sites & either properly investigate them, or clearly note that they are only possible sites & remove any restrictions associated with them, or remove them from the district plan.

Point 2.3

Section: Appendix K – Archaeological Sites
Sub-section: Appendix K - Archaeological Sites
Provision

254	5 Pits	50m	1776964	5577105.998
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Support/Oppose/Amend: Oppose

Submission

After cross referencing the 67 "Possible" sites from the Historic Place and Archaeological Site Identification Project with the *new* Appendix K it appears that all except 3 have been removed. 64 sites identified by historic aerial photography or google imagery have been removed. 2 sites that were identified by other means have remained. Site 254 remains.

Site 254 is the only site of the 65 "possible sites" identified by aerial imagery that has not been removed.

This makes me wonder if it is an oversight that it was not removed, or if maybe there is some other reference council has to it that has made site 254 stand out.

I have attached a document listing details of the above sites.

I also feel it would be worthwhile for council to consult with Archaeology North regarding sites that were identified in the Historic Place and Archaeological Site Identification Project, & how best to incorporate the sites that have not been "specifically researched" into the district plan.

Relief sought

Remove Item 254 (5 pits) from Appendix K - Archaeological Sites