

NEW ZEALAND

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Submission on the Review of the New Zealand Coastal Policy Statement

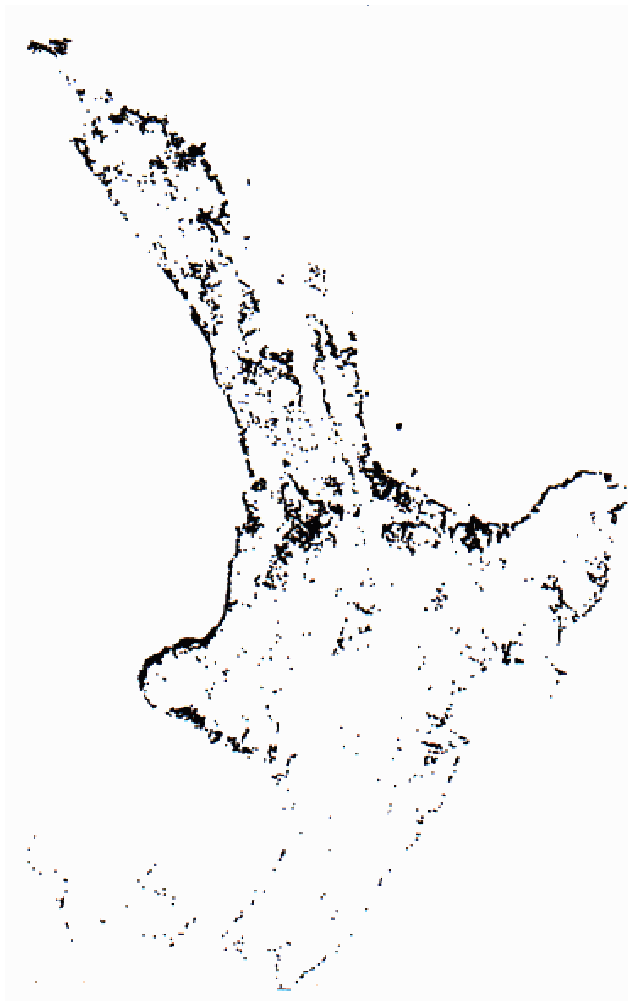
The interest of the Association is in the protection and suitable management of historic heritage located within the coastal environment.

It might be thought that heritage sites located within the coastal environment is limited to shipwrecks. This is far from the case. Maori sites below HWM include clearances of stones for canoe landings and fish traps. European sites include wharves, navigation markers, ballast dumps, slipways and debitage.

The Association manages a national site recording scheme with 55,000 archaeological sites recorded within it. Many of the sites that are recorded are coastal sites. Marine sites are included but it is far from comprehensive for sites below HWM

Maori made extensive use of the marine resources in the past, and it is not surprising that many of the recorded archaeological sites are located close to the sea. The attached figure plots only known pa sites from our site recording scheme. As can be seen for the North Island they effectively define the coastline. Many of these sites are not only of historic heritage value, they are often located on prominent landscape features, making them visually significant as well.

Sites other than pa – such as undefended occupation sites - would show a similar pattern.



It should be clear from this that a great part of our heritage at risk of destruction by development is in the coastal environment.

Present Coastal Policy Statement

The present CPS contains very little in regard to historic heritage. The recent elevation of historic heritage to s6 of the RMA means this cannot continue.

The new provision s12(1)(g) in the RMA also needs consideration. It restricts the use of the coastal marine area such that one cannot destroy, damage, or disturb any foreshore or seabed (other than for the purpose of lawfully harvesting any plant or animal) in a manner that has or is likely to have an adverse effect on historic heritage. Consents cannot be assessed against this constraint unless there is good knowledge of historic heritage.

The Oceans Policy working group paper on Marine Heritage (see <http://www.oceans.govt.nz/libraryElements/stg2workdoc/07-Culture-and-Heritage.doc>),

came to some significant conclusions:

“There is inadequate provision under existing mechanisms for the protection of marine cultural heritage. The main reasons for this are:

- Inadequate research and information on where sites are located
- Lack of national guidance on the prioritisation and appropriate resourcing of marine cultural heritage protection in relation to other marine issues
- Inadequate uptake of protection tools currently available, and the limited range of tools available in the marine environment compared to on land.

These problems are illustrated by:

- inadequate provision in regional coastal plans for identifying and managing heritage values through the resource consent process. Very few regional coastal plans contain provisions that identify archaeological sites or sites of historic or cultural heritage, or include rules that control adverse effects upon them.”

We endorse these conclusions.

Inventories

There is only one Region that has an adequate inventory of the historic heritage sites, located in the area below HWM part of the coastal environment, the Auckland Regional Council. While other councils may have included general statements, they are not linked to heritage registers that identify the sites to be covered by the policies.

Effectiveness and Need

Clearly the present CPS is quite inadequate in respect of protecting and managing historic heritage.

The CPS needs to give a clear direction to the regions:

- of the importance of historic heritage in the coastal environment, and
- of the need for heritage registers for policies to be effective.

Thank you for the opportunity to submit

Garry Law
President