

DOC ID  
13/28268

New Zealand Historic Places Trust  
Pouhere Taonga



18 April 2013

Whangarei District Council  
Private Bag 9023  
Whangarei 0148



Submission no RR-09

Attention: ~~Heather McNeal~~  
Policy and Monitoring Department

Cc. Whangarei Racing Club  
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Private Plan Change (Plan Change 113) Ruakaka Racecourse, Whangarei Racing Club

**Submission of the New Zealand Historic Places Trust Pouhere Taonga in relation to the Private Plan Change by the Whangarei Racing Club for land re-zoning of the Ruakaka Racecourse**

The proposed plan change relates to the 50 hectares of land owned by the Whangarei Racing Club on the coast at the end of Peter Snell Road, Ruakaka, legally described as Lot 2 DP210980 CT NA 139A/702.

The plan change proposes to rezone the racecourse site from Coastal Countryside Environment to a new zone being the Ruakaka Equine Environment ("REE"). That REE would provide for equine (horse) activities as well as residential and other non-equine related activities such as educational activities, visitor accommodation and events.

The plan change proposes four precincts with activities being of either permitted status, requiring consent as a discretionary activity, or requiring a Management Plan to first be submitted for the consideration of Council.

The New Zealand Historic Places Trust ("NZHPT") operates under the Historic Places Act 1993. Included as the purpose of that Act is:

*"To promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand."*

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The NZHPT meets these purposes in a number of ways. This includes advocacy and active involvement in the resource management process, including encouraging and assisting Councils in using their powers under the Resource Management Act 1991 ("RMA") for heritage.

**This submission relates to:**

The potential effects of the proposed plan change on archaeology.

**The NZHPT's submission is:**

Under section 6(f) of the RMA, the protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance. Section 2 of the RMA defines what historic heritage is, and includes natural and physical resources with archaeological value (among other values), including archaeological sites. Under section 104(1) of the RMA, a territorial authority must consider Part 2 matters (which includes section 6(f)) when making a decision on the application. Therefore, effects on archaeological sites must be taken into account by the Whangarei District Council when considering the Plan Change application.

NZHPT would like to draw the applicant's attention to the proliferation of recorded archaeology in the wider environment. Part 2.1 of the application contains a Map, with the area directly to the south west of the racecourse identified under "Current Use" as "Developed Residential". Six midden/oven recorded archaeological sites are present on this neighbouring site, with a further midden/oven recorded on the adjoining site directly to the south. As the environment is also a coastal area, it is likely to have been utilised historically and this indicates that further unrecorded archaeology may be present.

The Assessment of Environmental Effects ("AEE") provided with the application does not mention archaeology, the existence of which does not appear to have been contemplated. As such, the potential effects, if any, of the proposed activity on archaeology have not been assessed.

Therefore the application should provide a description of the archaeological values of the locality and an assessment of the effects that the plan change may have on these values and how such effects are proposed to be avoided, remedied or mitigated.

Further, undertaking an archaeological assessment at this stage in the process will provide greater certainty for the applicant in planning their future development.

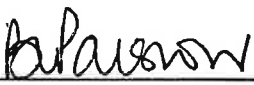
NZHPT would also like to draw the applicant's attention to an observation during review of the AEE, on archaeological grounds. Part 3.1 "*History of the Area*", outlines the relationship of Patuharakeke to the area. Acknowledgement is made to Patuharekeke's "*claim of a long traditional relationship with the application site and surrounding area. The hapu have held mana over both land and water resources and other taonga through numerous generations of*

*occupation and use". Reference is made to, "A Cultural Effects Assessment Report [that] was commissioned of the Patuharakeke Te Iwi Trust Board and describes the traditional and cultural relationships with the site and its surrounds. The report is Attachment 3 to this Section 32 Report". Attachment 3 contains a traffic assessment and did not provide any clarification on the relationship of Patuharakeke, or history of the site, which may have been of assistance in terms of archaeology. It is important to emphasise that cultural elements and heritage are not one in the same however, in some cases there are relationships between the two.*

**The NZHPT seeks the following decision:**

1. That an archaeological assessment be undertaken to determine whether there are unrecorded archaeological remains that maybe affected by the proposal (including any associated construction activity). If necessary, the findings of the assessment can be used to amend the proposal, or used as a basis of the plan change provisions.

**The NZHPT does wish to be heard at a future hearing regarding this application.**

*RP*   
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