



01 May 2019

Waikato Regional Council,
By Email to Steve Rice

To whom it may concern

HERITAGE NEW ZEALAND POUHERE TAONGA RESPONSE TO BLOCK 2 HEARINGS REPORT FOR THE HEALTHY RIVERS PLAN CHANGE

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead historic heritage agency. Heritage New Zealand advocates for Historic Heritage through a range of processes including submissions to statutory and non-statutory process.
2. HNZPT (submitter ID 68939) made a submission to the Healthy River Plan Change that sought the following amendments:
 - that an additional bullet point (Submission point ID-PC1-3091) be added to the list in section 3.11.1.1 "Intrinsic values – History".

Riparian zones may contain physical evidence, known or as yet undiscovered, of the relationship between iwi and the river,
 - that an advisory note be added to section 3.11.5 (Submission point ID-PC 1-3102) to ensure that landowners implementing the provisions of Plan Change 1 are aware of their obligations under the Heritage New Zealand Pouhere Taonga Act 2014 not to modify or destroy any archaeological site, whether recorded or not, without obtaining an authority (consent) from Heritage New Zealand.
3. As advised in the HNZPT submission some of the information in the regional plan is out of date with regard the HNZPT Act 2014 and there would be benefit in updating matters with a current advice note. (a related submission point (ID-PC1-3109) has been assigned for an advice note to direct people to HNZPT for advice on such matters)
4. The HNZPT submission was discussed in the Block 1 Hearings Report, specifically at pg. 35 of that report and is attached as Appendix 1 to this letter. HNZPT accepts the view in the report that the addition to Section 3.11.1.1 is not appropriate, however was pleased at the view expressed in the report that the advice note could be appropriate, possibly in the Farm Environment Plan (FEP) section.
5. Reference to HNZPT in Appendix B to the Hearings Report indicates that aspects of the HNZPT submission has been discussed or addressed within the body of the Block 2 report. On review this does not appear to be the case.
6. HNZPT continues to seek the inclusion of an advice note relating to the need to observe the provisions of the HNZPT 2014 when undertaking earthworks. Such advice notes are common in

Regional and District Plans to inform landowners of their statutory obligations and as suggested by the Block 1 report, could most usefully be part of the FEP section.

7. HNZPT welcomes any queries that you may have in regard to this letter. I can be contacted on 07 577 4535, or cmcalley@heritage.org.nz

Yours Sincerely



Carolyn McAlley

Planner for Lower Northern Office

B2.4.4. Mana Atua Values

186 Numerous submissions are on the Mana Atua – Intrinsic Values, seeking specific additions to or deletions from the values and uses identified. The submissions received on each value are assessed below.

Ancestry and history

187 The ancestry and history value identifies the relationship iwi have with the Waikato and Waipā Rivers. Eight submissions are on this value, two submitters support the provisions and seek the value is retained. Of the remaining submissions, three matters are raised where amendments are sought. Submissions on the waterbodies the value applies to and iwi groups referenced have already been addressed.

188 Heritage NZ submit that PC1 does not give effect to Section 6(f) of the RMA as the values described do not include historical heritage, specifically archaeological sites. Heritage NZ state that the Waikato and Waipā Rivers and environs are the location of a significant archaeological resource and that a large range of works could be undertaken in riparian areas as a result of PC1. Heritage NZ seek that an additional sentence is included stating that *“Riparian zones may contain physical evidence, known or as yet undiscovered, of the relationship between iwi and the river.”*

189 Officers consider that the amendment sought by Heritage NZ is not appropriate to include in the Ancestry and History value as it does not align with the existing statements. The statements describing the intrinsic value define intangible matters regarding relationships, identity and spirituality. The suggested amendments from Heritage NZ are focused on physical attributes and protection of them during mitigation work that PC1 may lead to and therefore are considered to not align with the intention of this value. However, a note to this effect may be appropriate, possibly in the FEP section.

Ecosystem health

190 Twelve submissions are on the intrinsic value of ecosystem health, of these, two submitters supported the provisions and seek no changes.

191 Fish and Game seek that a new bullet point is included to state “freshwater standards are set to achieve ecosystem health”. Officers consider it unnecessary to include this statement as it does not describe a use or provide additional context to the significance of ecosystem health as an outcome, rather it seems to provide a link to the water quality standards Table 3.11-1. The link between the values, freshwater objectives, attributes and attribute states is already addressed through the recommended changes to the introductory paragraph of Section 3.11.1.

192 Several submitters¹³ have suggested a number of amendments to the values or statements associated with ecosystem health. The suggested additions include:

- Greater emphasis on the significance of wetlands, including recognition that wetlands require clean water to achieve ecosystem health and that artificial flood storage can be detrimental;
- Recognition of the importance of rivers for spawning and in providing access to food sources; and
- Specific acknowledgement of lakes, ensuring lake water quality is good and lakes are dominated by submerged native aquatic plants.

¹³ DoC, Fish and Game, Hamilton, M