



27<sup>th</sup> August 2020

Thames-Coromandel District Council  
515 Mackay Street  
Private Bag  
Thames 3540

Attention: Bruce Baker, Senior Policy Planner

Dear Sir or Madam

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA**

**PROPOSED THAMES-COROMANDEL DISTRICT PLAN – VARIATION 3 ‘TAIWAVE CATCHMENT  
STRUCTURE PLAN’**

**To:** Thames-Coromandel District Council

**Name of submitter:** Heritage New Zealand Pouhere Taonga

**1. This is a submission on the following request for a variation to the Proposed Thames-Coromandel District Plan (the proposal):**

To insert a new structure plan into Section 27 of the Proposed District Plan for a site located at 790C Hot Water Beach Road, Hot Water Beach. The proposed structure plan will enable subdivision for 45 ‘rural-residential’ lots and dwellings on an existing rural lot at Hot Water Beach. The purpose of the structure plan “... is to provide for the development and use of the land for rural residential purposes within a conservation framework established for the enhancement and protection of the ecological values and biodiversity of the site”.

**2. Heritage New Zealand could not gain an advantage in trade competition through this submission.**

**3. The specific provisions of the proposal that Heritage New Zealand’s submission relates to are:**

- Incomplete archaeological assessment and absence of proposed provisions to ensure further archaeological assessment is completed to inform future subdivision, development of dwellings and associated infrastructure, and ecological and landscape management plans.
- Consultation with Joe Davis Chairman of the Ngāti Hei Trust.

**4. Heritage New Zealand’s submission is:**

- Heritage New Zealand is an autonomous Crown Entity with statutory responsibilities under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation, and conservation of New Zealand’s historical and cultural heritage.

**Archaeology**

- The 2019 archaeological assessment completed by CFG Heritage notes that survey of the property did not include proposed conservation areas identified in the Taiwawe Catchment

Structure Plan and the Taiwawe Stream and tributaries were not assessed in any detail. These areas have the most archaeological potential and previous Maori land use would have been in association with these areas and it is possible that archaeological evidence associated with this use may exist within these vegetated stream areas.

- While the assessment identified no archaeological features along the route walked and cuttings viewed, this does not mean there is no risk of encountering archaeological remains as the future sites planned for the property are developed, and further archaeological assessment will be needed once earthworks and subdivision plans etc. are known.
- Although Variation 3 states that development will require restoration and protection of ecological values, landscaping, restoration and planting for conservation purposes, and pest control, these aspects do not appear to have been assessment in the current archaeological report.
- Similarly, while no buildings are proposed to be erected within conservation areas, provision is made for activities within these areas such as the construction of tracks, steps, signs and stiles, which also have not been assessed in the report.
- The October 2019 archaeological assessment would appear not to have been fully informed by the full suite of supporting reports to the structure plan proposal, including the Landscape, Ecological and Geotechnical Assessments, with the field survey route not appearing to correspond to landscape units/development compartments/concept/proposed subdivision plans included in these reports.
- Heritage New Zealand therefore seeks that the proposed Taiwawe Catchment Structure Plan is amended to include appropriate provisions requiring further archaeological survey and assessment is undertaken and is utilised to inform the future subdivision of 790C Hot Water Beach Road, the location of building platforms, accessways, effluent and stormwater disposal fields, and other attendant infrastructure associated with development of the property and individual lots, to ensure archaeological remains are avoided in the first instance.
- Further to this amendments to the proposed Taiwawe Catchment Structure Plan should be made to ensure the Ecological Management Plan and Landscape Management Plan are both informed by additional archaeological field survey and assessment to ensure that any plantings do not damage and avoid any archaeological remains.
- This will also enable any pre-1900 features located to be recorded as an archaeological site with the New Zealand Archaeological Associated (NZAA) ArchSite database, and assist with determining whether an archaeological authority pursuant to the Heritage New Zealand Pouhere Taonga Act (2014) may be required.

#### **Iwi Consultation**

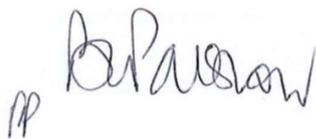
- Heritage New Zealand note the iwi consultation that has been drawn upon, relating to the site and the wider neighbouring areas, and the extensive consideration of matters raised specific to Ngāti Hei in informing the proposed structure plan. We seek however that the consultation is extended to ensure the views of Joe Davis, Chairman of the Ngāti Hei Trust are confirmed and considered prior to any decision to approve Variation 3.

**5. Heritage New Zealand seeks the following decision from the local authority:**

- That the variation is not approved until such time as:
  - The Taiwawe Catchment Structure Plan is amended to include provisions requiring further archaeological field survey and assessment to inform subdivision and development, including the proposed Ecological Management Plan and Landscape Management Plan, to ensure archaeological remains are avoided in the first instance.
  - The views of Joe Davis, Chairman of the Ngāti Hei Trust are sought and taken into consideration.

**6. Heritage New Zealand does wish to be heard in support of our submission.**

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sherry Reynolds', with a small 'SR' monogram to the left.

Sherry Reynolds  
Director Northern Region

Address for Service:

Susan Andrews

PO Box 105 291, Auckland

09 307 9920

[sandrews@heritage.org.nz](mailto:sandrews@heritage.org.nz)