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REGISTRATION OF ARCHAEOLOGICAL SITES UNDER THE HISTORIC PLACES ACT 1980

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This paper summarises the debate about the registration of archaeological sites and reviews the progress of registration under the Historic Places Act 1980. The paper begins by discussing the development of the philosophy and policy of registration (section 1). It then considers how registration has worked in practice, concluding that registration has almost entirely ceased, partly because of concern about its effectiveness as a site protection measure (section 2). In the next section the paper discusses processes related to registration based on past experience (section 3). This account has been prepared as a basis for the consideration of policies and procedures for registration under proposed new Historic Places legislation. There may be moves to give higher priority to registration in future. The new legislation and the organisation and funding of systems based on it are not discussed in this paper.

1. THE PHILOSOPHY OF REGISTRATION

1.1 The Requirement for a Register

An official register of archaeological sites which merit protection according to stated criteria has been recognised as a necessary part of a national programme of site protection for over 20 years (see Green 1963; McKinlay 1973: 60 and 122). The Historic Places Amendment Act 1975 section 4, 9G, and the Historic Places Act 1980 section 43, have required the establishment and maintenance of such a register. It is expected that new historic places legislation will also require the registration of archaeological sites.

The entering of an archaeological site into the register (registration as discussed in this paper) is not to be confused with registering an archaeological site under the Land Transfer Act 1952 (provided for in the Historic Places Amendment Act 1975 section 4, 9J, and the Historic Places Act 1980 section 51). In this latter process, the New Zealand Historic Places Trust (NZHPT) may, where a site is considered to be of sufficient importance, require the District Land Registrar to note the existence of the site on the certificate of title of the land. Neither is the entering of an archaeological site into the register to be confused with recording of a site in the New Zealand Archaeological Association (NZAA) site recording scheme. The distinctions between registration, noting on certificate of title and recording are discussed in more detail below.

1.2 The 1975 System and its Objectives

The legal objectives of registration under the Historic Places Amendment Act 1975 were:

- (1) To declare the presence of a site meeting the definition of 'archaeological site' (section 2).
- (2) To serve as notification to owners to ensure their awareness of archaeological sites (section 4, 9G (2)).
- (3) To provide a basis for the protection of sites through the listing of registered sites in district planning schemes (section 4, 9K (1)).

Other perceived benefits of registration were:

- (1) To establish evidence, usable in legal proceedings, as to the presence and importance of sites, and knowledge of them.
- (2) To establish long term procedures to verify, update and expand the NZAA site record file, and so to provide a cumulatively substantial database for site protection on a national scale.

Registration did not extend the protection afforded to all sites by the legislation. Damage to any site, registered or not, was prohibited except with the authority of the NZHPT (section 4, 9F). However, registration was designed to assist protection in practice by ensuring awareness of the existence and importance of sites, so that, for example, owners or others planning the development of land knew of their legal obligation to enter the authority system if damage to sites was intended.

In preparing for the implementation of the Historic Places Amendment Act 1975, the NZHPT set up a computer index for archaeological records, called the New Zealand Register of Archaeological Sites. In this system, the records were to be accorded one of three levels of status - C, B, or A. Records in the status C category were to be NZAA site recording scheme records for sites which had not been registered under the Historic Places Amendment Act 1975. Records in the status B or status A categories were to be for sites which had been registered. Any status C sites verified in the field, notified to the landowner and registered (according to section 4, 9G (2)) were to be upgraded to status B. Any status B sites which had been surveyed in the field by a registered surveyor were to be upgraded to status A. (For these and other details see Challis 1978.)

It should be understood that this system did not constitute a classification of the importance of sites like the A,B,C system in use for classifying historic buildings. Status B registration was seen as being open to any sites assessed in the field as meeting the definition of 'archaeological site' in section 2 of the Act, so that, in the long term, large numbers of sites would be registered, through a process whereby status C NZAA records were progressively verified and notified to owners. There was no intention that there would be any limit to the number of sites which might be registered as status B, or that any criteria

of selectivity would be applied. On the other hand, status A was seen as appropriate to sites of particular scientific, cultural or historical importance which had been surveyed by a registered surveyor. It was expected that status A sites might be noted on the certificate of title of the land (Historic Places Amendment Act 1975, section 4, 9J (1)). Unregistered sites were to be, in the short term, all records not upgraded to status B, and in the long term were to be records not meeting the definition in the legislation, being destroyed, badly damaged, unverified, find spots or otherwise unlocated.

These proposals for a system of archaeological site records with three levels of status were never fully implemented. The systematic review of the legislation and its implementation associated with the passage of the Historic Places Act 1980 led to a reassessment of the scope and scale of registration. Particular merits of the system as conceived before 1980 were its integration with the NZAA site recording scheme, the verification of the existence of sites in the field as the basis of registration, and the consequent clarity about the status and reliability of information.

1.3 Alternative Approaches under the Historic Places Act 1980

Under the Historic Places Act 1980 the legal objectives of registration remained broadly unchanged (section 43 and 47). However, concerns were expressed within the NZHPT that earlier expectations of registering large numbers of sites were too ambitious, would be too slow in achieving national coverage, would not receive general public or territorial authority support, and could not be achieved with existing NZHPT staff and finance. Rethinking of objectives and strategies was called for, and an alternative approach to registration was advocated within the NZHPT: to select and register a limited number of sites of demonstrably high relative significance which the NZHPT would attempt to protect with the powers and resources at its disposal (New Zealand Historic Places Trust 1982). That is, it was proposed that in authority situations (section 46) the NZHPT would direct its resources mainly at the protection of registered sites. This proposal resembled the system for classifying historic buildings, in that each site nominated for registration was to have an individual citation explaining its significance and justifying the act of registration.

There was extensive discussion during the early 1980s of the two approaches: either an extensive open register of any sites meeting the legal definition, verified in the field and notified to landowners, or a small select group of sites justified by citations. At its 1983 Annual General Meeting in Napier, the NZAA resolved that the register should comprise any sites with verified archaeological evidence, and that for sites of outstanding merit additional means of protection should be adopted. Later that year, after further discussions, a policy document was adopted by the NZHPT Board (New Zealand Historic Places Trust 1983). The register was to be a broadly based, open-ended list of sites which met the legal definition, for which existence, location and land ownership had been verified in recent field assessment. The policy was that proposals for registration should normally have been evaluated in the context of

specific area surveys or development related surveys. Sites thought particularly outstanding could be nominated individually on the basis of agreed criteria or selected by searching aerial photographs.

The conclusion was therefore a compromise inclusive of both approaches. Sites of demonstrably high value were to be registered on a case by case basis, but up to 100% of verified sites in an area could be registered. Generally in practice, criteria were set up and registration was applied selectively (discussed below). The computer index of archaeological site records operated by the NZHPT became known as the Site Index to the NZAA site recording scheme. An unambiguously single category register became operational. Citations were not required.

The philosophy, advocated by the NZAA, that any verified site could be registered was seen to survive. Factors in the survival of this approach were:

- (1) Registration of a few sites in an area or of one site on a property devalues the remainder in the eyes of owners, managers or planners, by implying that the unregistered sites may be considered of no significance. This may reduce the chances of their survival (McKinlay and Sheppard 1983: 14).
- (2) Some aspects of site significance cannot be reliably assessed without excavation, so that selective registration can be hard to justify. In particular, citations justifying registration were seen as neither credible nor effective on the basis of surface evidence alone.
- (3) A selective register policy was not in keeping with the philosophy of the other archaeological protection provisions of the legislation (specifically section 46) which applied to all sites, registered or not (Sheppard 1983: 3).
- (4) Registration of sites from different localities or regions one at a time was administratively difficult and relatively expensive per site, involving land title records and plans held in different parts of the country, whereas registration of groups of sites, following area surveys which produced ownership data in the same field operation, was administratively cheaper per site (Sheppard 1983: 3).

2. REGISTRATION UNDER THE HISTORIC PLACES ACT 1980

A variety of projects have contributed to a register of archaeological sites which by 1991 had over 1,000 entries. This may be regarded as a significant achievement, given that in most cases these projects were short term and were not followed up or extended into other areas as those involved anticipated. Some of these projects are discussed below, in generally chronological order.

2.1 Western Bay of Plenty

In 1980 Bruce McFadgen directed a project of site identification and location at Athenree near the northern end of Tauranga Harbour, a small area where sites were numerous, largely unrecorded, and facing threat by horticultural

development (McFadgen 1982a). About 300 sites were recorded in the Athenree area. They were recorded individually in the NZAA site recording scheme, but were entered into the register in groups defined by certificate of title areas. About 60 entries in the register resulted. The Athenree project was significant in the registration debate. From it the administrative implications of notifying owners and occupiers emerged, and predictions were made of the time necessary to establish a representative register for the entire country. This fuelled suggestions for selective registration in order to achieve speedier and cheaper results (Sheppard 1983: 1).

In 1981, selected sites (18 out of 202 recorded) on Matakana and Rangiwaia Islands were nominated for registration on grounds of state of preservation, representative or unusual characteristics, and extent (McFadgen and Walton 1981). In contrast with Athenree, the sites were never registered. Although many were impressive field monuments and most were expected to contain undisturbed archaeological remains, they had been selected on the basis of surface evidence. Under the selective citation system which was by then being advocated within the NZHPT, it was argued that it was not possible to make a strong enough case for the registration of any site in the area individually without subsurface investigation. This experience encouraged opposition to the citation system.

2.2 Individual Nominations

In 1982, the NZHPT invited its regional committees, NZAA district filekeepers, practising archaeologists and others to nominate for registration sites which they regarded as particularly significant, and to prepare citation forms. Few replies with completed citations were received but, as a result of this process, between one and 40 sites were registered in each of about 40 territorial authority areas (e.g. Northland Regional Committee recommendations: Edmonds Ruins and Limestone Island). Sites on the same certificate of title as nominated sites were often registered at the same time on grounds of efficiency, and also to avoid giving the message to owners that any sites remaining unregistered were of no importance. For example, all known sites in Whitireia Park, Porirua, were registered. In this way, the selectivity implied by individual nominations was overlaid by an element of open-endedness.

2.3 East Coast and Eastern Bay of Plenty

In the early 1980s the nomination of sites for registration was part of an established structure of objectives for archaeological work by NZHPT staff (New Zealand Historic Places Trust 1983: 11). Accordingly, in the period 1982 to 1987, sites were nominated for registration by Kevin Jones on the basis of area surveys undertaken as part of his research and protection activity in Whakatane District and on the East Coast. Registration documentation for some of these (over 200 sites) was produced by contracted archaeological and drafting staff. Criteria for registration were drawn up for application in particular areas (Jones 1984a; 1984b; 1987). Although these various sets of criteria related to the

archaeological characteristics of specific areas and were not designed for universal application, there was common ground between them. Sites warranting permanent protection or which could usefully be subject to further investigation were nominated on the basis of simply stated criteria of type, scale, condition, sub-surface remains, rarity and historical association. Middens and site complexes with pit numbers greater than about five and with associated terracing or fortifications were included. Largely destroyed or heavily worn sites, and isolated or small groups of storage pits, were excluded unless they appeared to be physically closely related to poorly understood horticultural activity or in distinctive geomorphological settings. Sub-surface investigations to test the nominations were not undertaken. Recommendations for registration made after 1983 were presented in list form, as citations were no longer required.

It is suggested that this approach to registration was successful and cost-effective in flagging interest in archaeological sites for the NZHPT, owners and territorial authorities. The approach has remained in occasional use to propose lists of sites for inclusion in district planning schemes (Jones 1992).

2.4 Otago

Following the suggestion of Dr Neil Begg, then Chairman of the NZHPT, in 1983, Atholl Anderson directed a project to select for registration 200 sites from the 2,000 already recorded in Otago (Anderson 1984). The sites were to be good examples of pre-European Maori and early European evidence meriting preservation. A matrix of five periods and five subregions was set up and, within each cell, grounds for choice of sites included representativeness as a site type, structural features, site contents, and historical or traditional associations. All proposals were checked in the field and plotted on aerial photographs, maps and plans. Landowners and occupiers were found and consulted, and Maori authorities were involved and consented to the registrations. By the end of 1985, 117 sites had been registered.

The project was regarded as a successful application of the principle that on any scale of values some sites are more important than others, and that such sites should be identified. It was intended that this method should be applied to other regions, but this did not occur.

2.5 Coastal Tasman Bay

In 1985 Steve Bagley carried out a project to nominate sites on the Tasman Bay coastline for registration and to prepare documentation (Bagley 1985a). Many previously recorded sites were revisited for the purposes of assessment of archaeological significance, and Maori groups were consulted. Sites were ranked on a five point scale, rank 1 being the highest. Ranking criteria included site condition, site type, research value, Maori values and public values. Out of 71 sites assessed, 26, generally of ranks 1 and 2, were registered. Recommendations for management were made.

The project was regarded as very successful. It was intended that it

should be on-going to other project areas throughout the Nelson region. Although priorities and costings were drawn up (Bagley 1985b), this did not occur.

2.6 New Zealand Forest Service

Archaeologists employed by the New Zealand Forest Service in the period 1975 to 1987 divided sites into three groups for the purposes of site management (Jones 1981: 170): A, sites to be preserved; B, a holding category pending further assessment or investigation; and C, sites which could be modified conditional on authority from the NZHPT. Survey reports indicated the management group assigned to sites (e.g. Coster and Johnston 1980; Brassey 1986), and state forest checklists were produced summarising the data (e.g. Furey 1986). Most of this work was in the northern North Island. Sites graded A, a total of about 350, were routinely registered by the NZHPT until 1987. It was known that changes in the management of state owned forests were likely, and it was intended that in such circumstances registration would assist the continued recognition of sites meriting protection.

2.7 The Situation since 1987

The foregoing summary indicates that registration has never been a consistent routine national programme. Its progress was hindered throughout the 1980s by delay in the appointment of a staff member in the NZHPT to handle the administration of registration (New Zealand Historic Places Trust 1983: 11).

Since 1987, very few registrations have been processed. Registration has been pursued where specific circumstances relating to planning processes or development threats have made it a desirable step towards achieving site protection. For example, in 1992, at the request of the Department of Conservation (DOC), the NZHPT is proceeding to register sites assessed as of national significance on the Otuataua and Matukurua stonefields, areas the subject of appeals to the Planning Tribunal over the non-inclusion of the stonefields in the Manukau City District Scheme.

The reasons why registration has virtually ceased may include:

- (1) In 1987 the archaeological staff of the NZHPT (established within the Department of Internal Affairs) were relocated to DOC, where ongoing programmes of protection of sites on land not managed by DOC is given lesser priority in some quarters. DOC is conducting historic resource inventories in some regions, but this work often focuses on selected European historic structures, frequently on land held or managed by DOC (e.g. Whelan 1989), and has not generally included archaeological surveys of the sort relevant to registration.
- (2) Although registration appeared to be a simple mechanism of notification to owners, a serious problem arose with notification of subsequent owners. Noting on certificates of title, the secure mechanism for ensuring that

notification of the existence of sites is automatically transferred to subsequent owners and occupiers, was prohibitively costly as a routine measure. Costs of establishing location, documentation and administration varied, but sums of at least \$1,000 were generally incurred per title entry. The alternative mechanism, listing on district schemes, accompanied by appropriate ordinances, was not systematically advocated, pursued or supported, perhaps in part because the NZHPT did not have the regionally based staff resources to achieve it. (NZHPT regional officers appointed in the 1980s were not required to focus on archaeological protection work.)

- (3) Although section 46 of the Historic Places Act 1980 (the authority provisions) might appear to be powerful in site protection, experience showed its weakness when faced with an unco-operative developer, particularly in circumstances of appeal to the Minister of Internal Affairs (section 48). Under these circumstances, registration of a site was seen to be ineffective in preventing site modification or destruction. There was little enthusiasm for operating registration as a means of selecting sites which the NZHPT should attempt to use its fullest powers to protect, given that it could not guarantee the safety of the selected sites (Sheppard 1983: 4), and given that the survival chances of sites not selected might be reduced by their being seen to be of less significance.

It is noted that the effectiveness of registration as a site protection measure has never been formally evaluated. Brief field assessments at Athenree (see 2.1) in 1986-1987 indicated that about 50% of sites registered in 1981 may have been destroyed (Bruce McFadgen, pers. comm.). It would be instructive to evaluate the consequences of the Otago, Tasman Bay and New Zealand Forest Service registrations (see 2.4, 2.5 and 2.6).

3. PROCESSES RELATED TO REGISTRATION

3.1 Field Work

Registration has generally been based on current or purpose-designed field projects which verified site existence, location, extent and ownership. Although survey areas have varied in scale from regions to specific land titles, archaeological field work has been established as the foundation of registration. This prevents the registration of destroyed areas of sites, and areas within certificates of title which have no archaeological evidence. Credibility with owners and occupiers, with territorial authorities and at public or legal hearings dictates this.

It is also necessary to ensure that registration remains appropriate, by establishing whether registered sites continue to exist. Registered sites should be inspected periodically. A minimum interval of five years is suggested. In this connection, under any new legislation, the registration of previously registered sites under any transfer provisions would require verification of site existence prior to the notification of current owners. Where any doubt exists it

would be necessary to inspect such sites in the field.

Substantial progress was made in the early 1980s on field work and recording procedures associated with registration (McFadgen 1982b; 1982c). Standardised procedures for field notes were drawn up. Archaeological site land title forms were used to demarcate the areas of land, within certificates of title, on which the archaeological sites lay. This was seen to be an essential step, requiring archaeological expertise.

Any field work which leads to the identification and assessment of sites could result in registrations, and it would be in the interests of efficiency, site protection and cumulative results that it should do so. The costs of registration could be minimised by being seen as a marginal addition to the costs of other activity. Grants could be made available to the projects of outside agencies to encourage this. Registration could again be structured in as a routine objective of DOC and NZHPT projects.

3.2 Site Records

A vital principle of the original New Zealand Register of Archaeological Sites system (see 1.2) was that updated site record information would be routinely lodged in the NZAA site recording scheme. A principal benefit of registration as originally conceived was that it should inject motivation and discipline into record keeping and ensure use of the national system.

One consequence of the failure of registration to take root as originally planned is that little of the archaeological field survey work of the past 15 years, other than the location of new sites, has been fed into the site recording scheme. While the results of such field work may be present in reports and correspondence files, updating of site records has generally not occurred. Unfortunately, a common pattern is that, for sites which may have been revisited many times, no more than a comment of a few lines written 25 years ago may exist for them in the files (Challis 1992: 2). This provides a poor basis for relations with owners and territorial authorities, and an uncertain basis for mapped inventories and research. The cumulative record-updating implications of registration merit restating.

Any new procedures for registration under new historic places legislation may raise again the question of the relationship between the register and the NZAA site recording scheme. In the past it has been determined that all registered archaeological sites should retain NZAA site numbers, and it is suggested that this should continue. A numeration structure within the register which has the NZAA site recording scheme as the basis (see Challis 1978), allows the register to remain in step with the site recording scheme. This should avoid the mistake of allowing unrelated databases to develop. The prospect otherwise is that proliferating NZHPT, DOC, territorial authority and other independent information systems, separately updated, would lead to compounding problems of inaccessibility and incompatibility. All site inspections and re-inspections should result in site condition reports. All site records and condition reports should be filed in the NZAA site recording scheme. Other authorities and bodies should be encouraged to contribute to the NZAA site

recording scheme, and should be discouraged from establishing independent primary databases.

3.3 Selection Criteria for Registration

Criteria for registration have varied. For example, in Otago a selective matrix was set up; at Athenree all proven archaeological sites were included; on the East Coast various simple criteria of scale, form and condition were applied to different areas; and management criteria associated with New Zealand Forest Service assessments have also been accepted. The criteria common to all approaches are that the sites meet the definition of an archaeological site in the legislation, have been verified and assessed in the field in an area context, have been accurately located and have been plotted in relation to land title. Sites not meeting the definition in the legislation or not relating to stated criteria, and areas of land seen to be devoid of archaeological evidence, should be excluded from registration. While national guidelines can be developed, there is merit in recognising that archaeological sites and landscapes vary from locality to locality and region to region, and that criteria have been successfully drawn up and applied regionally and in the context of individual field projects. This does not imply separate national and regional categories in the register.

3.4 Maori Consultation

Here and elsewhere in this paper, Maori consultation should be read to mean consultation with whanau, hapu and iwi, Maori or Moriori as appropriate.

A flow diagram of registration procedures dated 1984 (Sheppard 1984: 7) omitted Maori consultation except where sites were on Maori land. This was because registration was understood as a formal process whereby owners and occupiers were advised of their obligations in relation to legal protection of sites already recorded and about which information was held in the public domain. It was expected that Maori liaison generally occurred at the field work stage. However, it is unlikely that in all cases the long term information flow implications of site recording and registration were discussed fully with Maori. It is known that some Maori communities, although encouraging site recording in the context of agreed site protection activity, are unhappy about general public availability of site location information. The history of the registration and de-registration of sites at Waipoua, Northland, indicates the intention of the NZHPT to act in good faith in relation to the tangata whenua. It also indicates the need for an effective on-going operational partnership, involving continuous communication and co-operative understanding with Maori at local and regional level, in order to achieve the guardianship of Maori archaeological sites in a culturally appropriate manner (New Zealand Historic Places Trust 1991: 37-41). Implementation of processes of co-operation and consultation is operationally complex and requires discussion at all levels, and would appear to dictate a regional and/or local approach to registration programmes. Maori heritage management programmes or marae-based cultural resources surveys could link

successfully into registration and follow-up protection.

Therefore, registration of Maori archaeological sites in particular areas should be subject to protocols agreed to by the appropriate Maori groups. Any provision for publication of lists of registered sites would require flexibility to follow any protocols or policies arising from consultations with Maori regarding disclosure of information about Maori archaeological sites.

3.5 Liaison with Owners and Occupiers

Accurate definition of the existence and extent of sites in the field in relation to land title, allowing definition of owner and occupier, is necessary to registration. The procedure has typically involved the use of aerial photographs and cadastral maps (McFadgen 1982c), obtaining of certificates of title, marking up of archaeological site land title forms, and determination of ratepayers. Personal contact should be made with owners and/or occupiers to obtain permission for field inspection. It is not envisaged that instrument survey by a registered surveyor (and noting on the certificate of title) would be routine, but it would be justified in some cases. The essential task should be to exclude areas with no archaeological value, and to include in registration any areas on adjacent properties with archaeological sites so that adjacent owners are treated equally.

Notification of owners and occupiers has generally been handled by postage of form letters. It is suggested that it is in the interests of site protection to make prior personal contact with owners and occupiers to discuss the process and effects of registration so that the papers are understood and are not unexpected. It is also suggested that it is necessary to provide for further personal contact at intervals, in the context of re-inspecting registered sites, so that interest in site protection can be reinforced and contact made with any new owners and occupiers. Such preparatory and follow-up liaison requires a regional rather than a centralised focus of operation.

3.6 Effectiveness of Registration in Site Protection

The possibility that about 50% of the sites registered at Athenree in 1981 may have been destroyed within five years (see 2.1 and 2.7) encourages the view (discussed in 2.7 (3)) that registration may be ineffective as a site protection measure. On the other hand, the same experience indicates that field validation and condition reporting in the registration process provides a basis for monitoring site condition and depletion (McFadgen 1982b: 2). It confirms that registration should not be seen as an end in itself, but relates to updating of databases, follow-up liaison for site protection, and policy formulation.

Ensuring that subsequent owners are aware of the presence of sites is an important dimension of effectiveness. It should be possible to achieve this through noting on certificates of title and by negotiating heritage covenants. These procedures are appropriate for sites exhibiting outstanding values. However they are administratively costly. Neither do they guarantee the protection of the sites, as some covenanted sites have been destroyed by

subsequent owners in apparent ignorance. There appears to be no alternative to periodic re-inspection and liaison with current owners and occupiers if site survival is to be encouraged.

It is suggested that listing in district schemes should be accepted as the primary mechanism for the transfer to new owners of information about the existence of registered sites. This is the mechanism linked with registration in the legislation. It should be effective in conjunction with periodic re-inspection and liaison with owners. Listing in district schemes is not necessarily a particularly flexible mechanism. Additions or deletions may have to await scheme changes. Trends towards increased emphasis on public notification and objection procedures reduce the feasibility of other approaches, such as reference to a separate list of sites which may be altered at any time. The link between district schemes and the monitoring of development processes is clear, however. It provides a mechanism for the recognition and protection of sites, but not an alternative to personal contact.

It is therefore suggested, the Athenree experience notwithstanding, that registration has a place in archaeological site protection theory and practice. On the basis of programmes of registration and follow-up field inspection and liaison, clear impressions of rates of survival and destruction should emerge. This would form a basis for national and regional site protection policy, strategy and advocacy, and a justification for decision making in situations of proposed site destruction.

3.7 National Coverage

The registration programmes of the 1980s were not consistent or on-going and resulted in an uneven distribution of registered sites. National coverage and consistency of application were recognised as objectives but were not achieved. Credibility and the claims of site protection for all regions suggest that registration should be co-ordinated as a national programme to include cumulative progress in all regions. In the absence of other factors, it is suggested that programmes should be prioritised in relation to the timing of district scheme reviews. Any presentation of the register in whole or part should be accompanied by a statement indicating the progress of registration and its state of coverage.

3.8 Regional Focus

It has been suggested that registration programmes require Maori consultation, field inspection, access to data sources on owners and occupiers, and preparatory liaison with owners and occupiers, prior to registration. It has also been pointed out that, after registration, ongoing Maori consultation, periodic re-inspection and site condition reporting, and follow-up liaison with owners and occupiers are necessary. It is hard to see how continuity of monitoring and response, and liaison with Maori, owners and managers, can be effectively achieved except through actively on-going regionally based archaeological services. Area surveys relating to registration and condition

reporting could be considered as a routine component of regional archaeological programmes.

4. SUMMARY

Over 1,000 archaeological sites have been registered under the Historic Places Act 1980. National coverage and consistency of application have not been achieved. Over the last five years registration has almost entirely ceased.

Following long debate, it was established that the register should be a broadly based, open ended list of sites which meet the legal definition, and for which existence, location and land ownership have been verified in recent field assessment. Areas devoid of archaeological evidence should be excluded from registration. For sites of outstanding merit, additional means of protection should be adopted.

The objectives of registration are to establish the presence of sites, to notify owners, and to provide a basis for protection through the listing of registered sites in district schemes. It is recognised that registration will not be successful in preventing site destruction on all occasions. Its effectiveness as a site protection measure has been questioned, but has never been formally evaluated. It is suggested that the act of registration is not an effective end in itself, but relates to updating of databases, follow-up liaison for site protection, and policy formulation. Listing in district schemes provides a legal mechanism for the recognition and protection of sites. Periodic re-inspection of registered sites provides a context for contacting new owners and occupiers and encouraging site protection.

Registration programmes require field work for site recording and re-inspection. On-going partnership with iwi, liaison with owners and occupiers, and relationships with territorial authorities are essential. As archaeological sites and landscapes vary across the country, there is scope for criteria to be drawn up and applied regionally. A regional or district level of operation is therefore necessary. Registration could be co-ordinated nationally to ensure consistency.

Integration of archaeological data bases, focused in the NZAA site recording scheme, is of the utmost importance. All those involved should be encouraged to contribute to the NZAA scheme and to use numeration systems based on it. Otherwise, proliferating unrelated data bases will lead to compounding problems of inaccessibility and incompatibility. The updating of data bases through programmes of registration and follow-up field inspection would provide information on site survival and destruction, and provide a basis for site protection policy, strategy, decision making and advocacy nationally and regionally.

The new Historic Places legislation may place higher priority on registration. This would require the establishment of the necessary policy and funding arrangements for a new national programme of registration of archaeological sites. The contribution of all sectors of the archaeological community could be sought and financially supported. The registration programme could be accelerated to achieve nationwide scope within the 1990s.

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ABBREVIATIONS

DOC Department of Conservation
NZAA New Zealand Archaeological Association
NZHPT New Zealand Historic Places Trust

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