



10 February 2025

Tēnā koutou

## **NZAA SUBMISSION ON THE RESOURCE MANAGEMENT (CONSENTING AND OTHER SYSTEM CHANGES) AMENDMENT BILL**

### *Submitter details*

Full name: New Zealand Archaeological Association Incorporated

Address for service: P.O. Box 6337, Dunedin 9059

Contact: Rebecca Ramsay

Email: [submissions@nzarchaeology.org](mailto:submissions@nzarchaeology.org)

The New Zealand Archaeological Association (NZAA) welcomes this opportunity to provide feedback on the Resource Management (Consenting and Other System Changes) Amendment Bill (**the Bill**). The intent of our submission is to advocate for the ongoing identification, management, protection, and conservation of Aotearoa / New Zealand's cultural heritage.

The key points of our submission are summarised below:

- The NZAA **opposes** the proposed amendments enable councils to use the Streamline Planning Process (SPP) to de-schedule heritage buildings and structures from district plan schedules. The modifications lack evidence-based decision-making and may result in negative heritage outcomes for places of significance.
- There are existing provisions in the RMA which provide a robust method for managing heritage schedules, while ensuring democratic decision-making, allowing for public input, including iwi/hapū and local community views.
- An alternative and preferred approach for providing national direction on historic heritage has been identified by MfE, MCH, and MHUD. This approach aims to better manage historic heritage while aligning with the government's objectives for resource management reform. This alternative option is supported by the NZAA.

### The New Zealand Archaeological Association

The New Zealand Archaeological Association (**NZAA**) is the national organisation for archaeology with over 460 members, spanning professionals, amateurs, students, organisations, businesses, and institutions involved or interested in Aotearoa / New Zealand's archaeology and history. Our primary objectives are to promote and support research into Aotearoa's archaeology and history, while advocating for the protection of archaeological sites.

We achieve this through various means, one of which is engaging with government bodies and local authorities to ensure the recognition and protection of Aotearoa's cultural heritage. An essential aspect of our kaupapa is the management of ArchSite, the national database of recorded archaeological sites. This online service is crucial for the effective management and preservation of archaeological sites. To date, it holds information on more than 78,300 recorded archaeological sites,



the majority of which are of Māori origin. However, many more sites remain unrecorded across Aotearoa.

Archaeological sites and features contain unique and irreplaceable evidence of the human history of Aotearoa / New Zealand. Archaeological research studies all periods of Aotearoa's history and provides details about aspects of people's daily lives, such as what people ate, the tools they used and how their houses were constructed. These details are not always captured by traditional, oral, or recorded histories but are vital for understanding past environments, economies, and lifestyles. The archaeology and history of New Zealand is significant on national and international levels. Aotearoa / New Zealand occupies a unique place in the world due to relatively recent habitation by humans, the earliest of those being the Polynesian ancestors of Māori. Therefore Aotearoa / New Zealand's cultural heritage, specifically through archaeological practice is uniquely placed to examine a story of adaptation and development of a distinctive cultural identity.

Cultural heritage sites, including archaeological sites, buildings, and structures, contribute to national and local identities, as well as to economic and cultural well-being. These sites are vital for understanding our past, enriching our built, natural, and cultural environments, and bolstering New Zealand's tourism industry.

Cultural heritage sites and their associated values should not be seen as barriers to development. Rather, when identified, protected, and enhanced proactively, they can provide significant benefits. These sites are irreplaceable—once damaged or destroyed, they are gone forever.

### Feedback on the Resource Management (Consenting And Other System Changes) Amendment Bill

The NZAA's submission focuses those elements of the Bill under the 'Housing Growth' package, particularly those modifying the process for delisting heritage buildings and structures through the 'streamlined planning process' (SPP).

It is important to recognise that buildings and structures can be components of, or overlap with, other heritage places, including gardens, landscapes, trees, archaeological sites, and places of significance to Māori and other communities. These elements contribute to the collective value of a place and should be considered in any assessment.

The NZAA opposes the proposed amendments to the SPP for the following reasons:

### **Limitations to the development of the Resource Management (Consenting And Other System Changes) Amendment Bill**

- The proposed changes to 'simplify heritage management' lack evidence-based decision-making, adequate timeframes, and sufficient consultation. The Ministry for the Environment's (MfE) Regulatory Impact Statement (RIS) states "*Currently there is a lack of clarity on the problems, little evidence supporting the problems and their impacts other than anecdotes, and*



*a lack of connection between the outcomes of the preferred option and the Government's objectives."*<sup>1</sup>

- The RIS advocates for a national direction on historic heritage as a more effective option. This would provide more comprehensive, nuanced guidance on managing historic heritage, recognising both the benefits of protection and the potential impacts on development.
- Heritage New Zealand Pouhere Taonga (HNZPT) has conducted similar assessments, finding that some district plans lack proper criteria for evaluating heritage sites, a problem that could be addressed through a national direction.<sup>2</sup>
- The NZAA acknowledges that there is room for improving the management of historic heritage across Aotearoa, and we support the development of a national direction on historic heritage.

#### **Existing RMA Provisions for Heritage Delisting (de-scheduling) and Concerns about the SPP:**

- The current RMA provisions, through the Schedule 1 Plan Change process, offer a robust and suitable method for managing heritage schedules in district plans, including the delisting (de-scheduling) of places that no longer meet the criteria for protection, or inclusion of those places that do. This process ensures democratic decision-making, allowing for public input, including iwi/hapū and local community views.
- Expedited delisting procedures could limit meaningful consultation with stakeholders, including iwi/Māori, heritage professionals, and the public. It is crucial that these decisions reflect community values and interests.
- Streamlined processes could result in inconsistent assessments of heritage significance, undermining the integrity of conservation efforts. Thorough evaluations are necessary to assess the true value of heritage sites.
- The proposed amendments to the SPP pose a significant risk of unintended negative heritage outcomes, such as removing protections for heritage places where there is strong community support for their preservation. This could result in the irreversible loss of valuable heritage sites that could benefit current and future generations.
- Streamlining the delisting of heritage sites may also set a dangerous precedent for the removal of other forms of historic heritage, including Māori heritage sites and archaeological sites. Any changes to the SPP should also ensure that new heritage sites meeting the criteria for scheduling are considered.

#### Relief Sought on the Resource Management (Consenting And Other System Changes) Amendment Bill

From the points raised above, the NZAA requests the following relief.

- That the proposed modifications to the SPP to enable the streamlined de-listing (de-scheduling) of heritage buildings and structures are removed.

<sup>1</sup> Ministry for the Environment. 2024. Regulatory Impact Statement: Resource Management Amendment Bill No.2 – Better managing outcomes for historic heritage. Accessed online: <https://environment.govt.nz/assets/RIS-Better-managing-outcomes-for-historic-heritage.pdf>

<sup>2</sup> HNZPT. 2022. National Assessment RMA Plans And Policies – Heritage Provisions 2021. Accessed online via: <https://hnpzpt-rpod-assets.azureedge.net/wfekkkq/national-assessment-rma-plans-2021-full-report.pdf>



NEW ZEALAND  
ARCHAEOLOGICAL  
ASSOCIATION

P.O. Box 6337, Dunedin 9059  
NEW ZEALAND  
nzaa@nzarchaeology.org

---

- The NZAA seek that the government provide further evidence to support decision making into the management of historic heritage. Including through the development of a national direction on historic heritage. This alternative and preferred approach aims to better manage historic heritage while aligning with the government's objectives for resource management reform.