

# HEARING

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To: Central Hawke's Bay District Council  
Hearing Panel

Regarding: **Proposed District Plan**  
Hearing Stream 4  
Tangata Whenua and Historic Heritage.

Date: 15 June 2022

Statement by: **RHEA DASENT**  
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**FEDERATED FARMERS**

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1. Federated Farmers welcomes this chance to present to the Hearing Panel during Hearing Stream 4 for: *Tangata Whenua, Mana Whenua, Ngā Tangata Whenua O Tamatea, Sites and Areas of Significance to Māori, Papakāinga and Kaumātua Housing and associated Marae-based Development, Historic Heritage and Notable Trees.*
2. My name is Rhea Dasent, I am a senior regional policy advisor for Federated Farmers. I was the author of the Federated Farmers' submission and further submissions on the proposed District Plan. This work has been done in consultation with local Central Hawke's Bay members, and with my own knowledge about how district plans impact farmers. My own views are closely aligned with those of Federated Farmers, due to my own farming background.
3. Federated Farmers submission on both Heritage and Sites and Areas of Significance to Maori matters can be grouped into these themes:
  - a. Identification and mapping;
  - b. Farming uses can continue;
  - c. Alternative methods to achieve outcomes;
4. Federated Farmers values and respects heritage and Sites and Areas of Significance to Maori. Like many other public good resources (such as Outstanding Natural Landscapes, Significant Natural Areas) heritage resources are often found on rural land that is actively used for farming. This means we have to balance reasonable use of the land and building resources with the protection of heritage values. Normal farming must be enabled to continue.

## Identification and Mapping

5. Federated Farmers supports the concept of listing heritage items in HH-SCHED2 and sites in SASM-SCHED3, and associated mapping. This allows landowners and resource users to clearly see where sites are in relation to their properties and find further information in the schedules.
6. Clear and accurate information is vital for the schedules and maps to be fit for purpose. Farmers need good quality information so they can manage their activities around the site and avoid damage. Evidence is needed before a site is identified, as the regulatory consequences need to be justified. However some of the mapping and schedule listings are inaccurate or incomplete.
7. It is the Council's responsibility to ensure that the identification of special sites in its District Plan are precise and correct. The Council should not rely upon on landowners to lodge submissions to ensure sites are accurate, as they may not have that knowledge. I use some examples below, to demonstrate where the information is incomplete, or the mapping is inaccurate, but the onus falls on the Council must ensure that all sites are correct.
8. Here is a map of a Federated Farmers member's property at Takapau, which contains the Outstanding Natural Feature of the Three Sisters hills at the northern of Nga-Kaihinaki-a Whata Range and Whata Kokako. As can be expected for such a distinctive landscape feature, an historic site *HH-65 Te Pā Horehore* and a Site of Significance to Maori *SASM-25 Hore Hore Pā* are present.

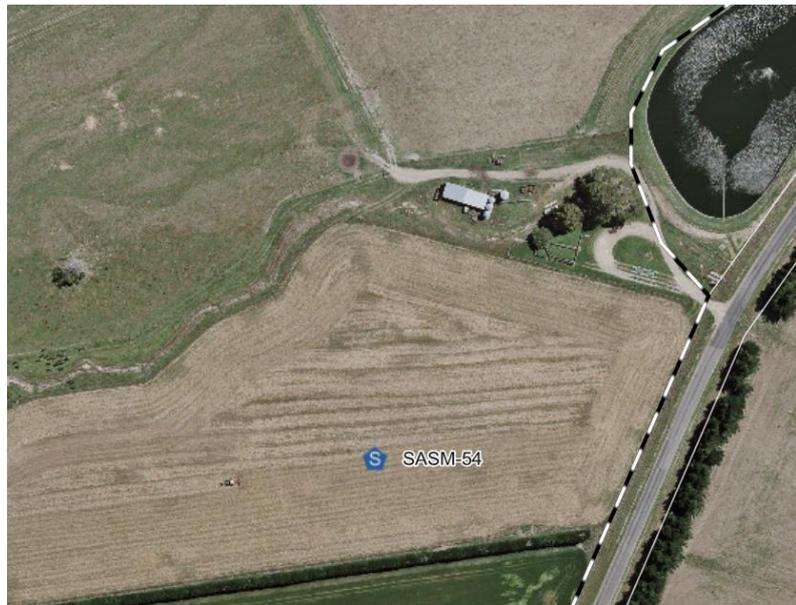


9. Luckily this member knows the heritage features on his property well, as he was able to identify that HH-65 was in the wrong location, and it should be aligned with SASM-25. The Section 42a Report recommends to accept this in paragraph 12.5.1.
10. Most Sites of Significance are located around features that are easily identifiable on the ground – urupa or pa. Landowners are likely already aware of these types of sites and have a fair idea as to their extent, making it easier to comply with the rules. However Wahi Tapu sites are harder to spot, and some appear to be in the middle of paddocks. It concerns me that these property owners may not know where these sites are.
11. Site of Significance 38 below is listed in the schedule as Wahi Tapu, no further information is provided. The pinned marker in the middle of the paddock looks random. We don't know how big the site may be, or whether it is referring to a specific feature or more of a location of a past event. Wahi Tapu is defined in the Heritage New Zealand Pouhere Taonga Act 2014 as meaning *a place sacred to Māori in the traditional, spiritual, religious, ritual, or mythological sense*. The landowner tells me that there is a fenced off gravesite under three large oak trees at the bottom of the picture, which is on Regional Council esplanade land. Perhaps this is intended to be the Site of Significance? More information is needed, but it appears that SASM-38 is incorrectly located and incorrectly identified as a Wahi Tapu site when it might be an urupa.



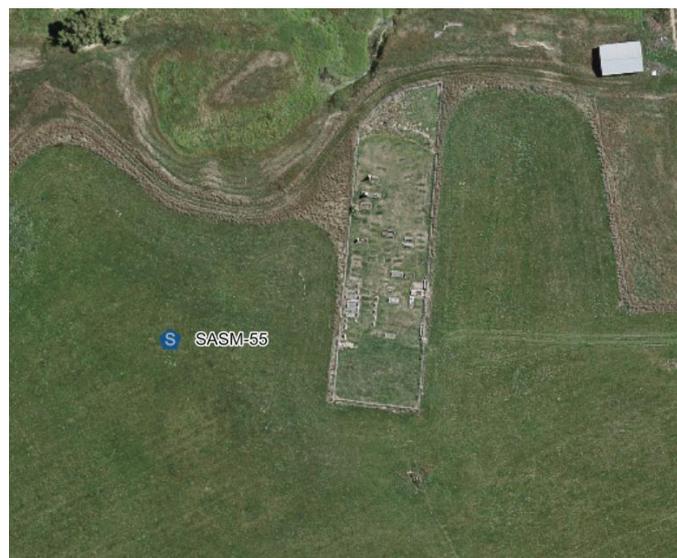
12.

This Site of Significance 54 below is listed in the schedule as an ururpa. Again, the pinned blue marker in the middle of the paddock looks like a random placement on the map. The landowner says his father was verbally told that there is a possible site on his property, but no accurate information about what it is and its location has ever been provided. The farmland has long been developed as pastoral grazing and cropping, yet to his knowledge no items have been found. I would suggest that this site should be removed from the schedule as it is either inaccurate and on the wrong property, or there's not enough evidence to suggest it is present.



13.

It appears that the urupa listed as SASM-55 below needs to be re-aligned on the map to its correct position. This is a clearly defined site, so easier to look after and manage activities around.



14. In order to comply with Sites of significance regulations, landowners must have confidence as to the location and extent of the sites on their property.

### Existing uses to continue.

15. Federated Farmers submitted that existing uses must be enabled to continue, both in the Historic Heritage chapter (submission S121.150) and the Sites and Areas of Significance to Maori chapter (submission S121.165.)
16. We are pleased that the Section 42a report recommends to accept our submission to add a new objective specific to heritage buildings to this effect:  
*HH-O3 To promote the continued use of heritage buildings in the District where this encourages their retention, restoration and maintenance.*
17. However we also sought that primary production activities on existing farms also continue in Sites of significance.
18. Being able to maintain and repair farm fencing is vitally important for farmers. Replacing broken posts is necessary for fence integrity. Posts need to be imbedded into the soil at a depth to withstand the strain of taught wires. A fence with a broken post will leak livestock. The permitted status of SASM-R4 for maintenance of existing farm fences and farm tracks within a SASMS CHED3 site is supported.
19. Grazing is an activity that is already occurring on many sites and will have existing use rights, such as on Te Horehore Pa on the Three Sisters hills example. The Department of Conservation guide<sup>1</sup> discusses stock grazing as a method that can be positive for site maintenance, keeping grass short and preventing weeds and shrubs from becoming established.
20. Cultivation will also be occurring, and this will only disturb the top layer of soil as cultivation done using disks or tines work the top 20-40cm of soil, harrowing or direct drilling methods which work the top 5-10cm. If it has already been occurring as part of an existing farm, then it must be allowed to continue. It is likely that effects would have occurred decades ago when mechanical cultivation first appeared in New Zealand, and people were less knowledgeable about sites of significance.
21. If the site of significance is more about the location rather than being a physical feature, adverse effects of existing farm activities will be limited.

### Alternative Methods

22. I think there is a bit of an information vacuum for sites of significance that the District Plan needs to address in the methods section.
23. Heritage New Zealand Pouhere Taonga has [information pamphlets](#) for archaeological sites, but these are not farmer/landowner focussed and are brief.

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<sup>1</sup> Kevin L. Jones for Department of Conservation *Caring for archaeological sites: Practical guidelines for protecting and managing archaeological sites in New Zealand* page 44.

24. Unless there is an accompanying archaeological site, Sites of Significance to Maori do not come under the jurisdiction of Heritage New Zealand, rather the local tangata whenua. I appreciate that printed educational material will be a challenge for them to produce. The Council must fill the gap and make the connection between the person who owns the property and the tangata whenua who have a significant site on that property.
25. District Plan policies such as SASM-P5 *to establish a schedule or key hapu and/or tangata whenua representatives* will be helpful so knowledge can be transferred first hand.
26. The first landowner example with Te Horehore Pa already has a good working relationship with tangata whenua and has grazing management and practices approved by them, where and where not to cultivate and excavate, and have access agreements all in place without the need for District Plan regulation.
27. Comparing SASM methods with Heritage Chapter methods, we see that the Heritage chapter has method for waiving some consent fees:
- HH-M3 Incentives: *All resource consent applications relating solely to safety alterations for heritage items will be processed free of charge to encourage the preservation of heritage items in the District.*
28. And HH-M2 for Education, Advocacy and Information Sharing:
- Working with Heritage New Zealand Pouhere Taonga, local historical societies and tangata whenua to promote public awareness of the importance of heritage values.*
- Supporting applications to the National Heritage Preservation Incentive Fund for the conservation of significant heritage places in private ownership (Note this fund is only available to Category 1 historic places).*
- Providing public education and information about heritage items in the District.*
29. The SASM chapter has an information sharing method SASM-M6 which I'm unsure of whether this includes landowners.
30. Federated Farmers seeks a new method in the SASM chapter, which is included in Key Issue 14 of the Tanagata Whenua Overview Report.
- Support landowners to manage, maintain and preserve sites and areas of significance to Māori, including by:
1. increasing awareness, understanding and appreciation within the local community of the presence of and importance of identified sites and areas of significance to Māori;
  2. encouraging landowners to engage with local tangata whenua and/or marae and develop positive working relationships in respect of the ongoing management and/or protection of sites or areas of significance to Māori;
  3. providing assistance to landowners to preserve, maintain and enhance sites and areas of significance to Māori;
  4. Waiving consent and processing fees

31. Finally I will touch on public access. As with other mapped items on private property, the permission of the landowner is needed before access can occur.
32. The Planning Maps may give the impression that sites are freely available for the public to visit. However landowners need to know about people accessing their property so they can highlight hazards, set conditions, postpone or refuse. The member with Te Horehore Pa has a standing access arrangement with the tangata whenua, I'm sure other farmers have similar arrangements.

