Tēnā koutou,

The New Zealand Archaeological Association (NZAA) would like to make a submission regarding the Resource Management Review Panel’s issues and options paper titled Transforming the resource management system: opportunities for change - Issues and options paper published November 2019. The NZAA is the premier organisation representing the discipline and field of archaeology in New Zealand, the country’s unique archaeology, and the professional body of New Zealand archaeologists.

Across the country there are numerous organisations responsible for or have a strong interest in heritage protection regulated under various pieces of legislation, most notably, the RMA and the HNZPT Act. Additionally, the Department of Conservation, the Ministry for Culture and Heritage, the Ministry for the Environment, Heritage New Zealand Pouhere Taonga, local authorities, iwi, hapū, and community groups all play a role in identifying, recording and protecting New Zealand’s heritage.

Under the RMA historic heritage is defined¹ as “those natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures” and includes:

- historic sites, structures, places, and areas; and
- archaeological sites; and
- sites of significance to Māori, including wāhi tapu; and
- surroundings associated with the natural and physical resources

The protection of historic heritage from inappropriate subdivision, use, and development is listed as a matter of national importance in Part 2 section 6 (f) of the RMA. Additionally, protecting customary rights is recognised as a matter of national importance (section 6 (e)), through protecting the “relationship of Māori and their culture and traditions within their ancestral lands, water, sites, wāhi tapu, and other taonga”. Furthermore, the definition of historic heritage specially includes sites of

¹ RMA Part 1, Section 2(1)
significance to Maori and section 8 of the RMA requires decision makers to take into account the principles of the Treaty of Waitangi.

Under the Issues and Options Paper, the NZAA makes the following high-level statements:

- We support the recognition and stronger protection of historic heritage and protected customary rights (Part 2, Section 6 (e) and (f)) as matters of national importance and encourage the development of further national direction (policy and planning standards) for these matters.
- We advocate for the ongoing recognition and provisions to provide for the protection of historic heritage as required by the RMA.
- We endorse more proactive management of New Zealand’s historic heritage resources and advocate for achieving positive heritage outcomes.
- We support the greater incorporation and recognition of te ao Māori (the Māori world) in New Zealand’s resource management framework.
- We support monitoring council performance in meeting Treaty requirements, promotion of issues of significance to Māori, and the continuation of building Māori capability and capacity in the resource management system.
- We encourage further integration of environmental and heritage protection, land and natural resource use and infrastructure decision-making, including funding and financing.
- We support the integration and alignment of Climate Change Response Act (CCRA) within the RMA, including policy to address climate change mitigation and adaptation.
  - With regards to heritage this may include the stronger weight to achieve appropriate adaptive reuse and retention of heritage building to ensure sustainable reuse of existing resources and ensure adaptation solutions proactively consider and improve resilience of historic heritage resources.
- We support the establishment of improved data gathering and reporting processes on the condition of and effects on historic heritage.

The New Zealand Archaeological Association look forward to seeing the final report prepared by the Panel and would be glad to provide advice or assistance in any steps the Resource Management
Review Panel takes in ensuring legislative protection for the nation’s unique cultural, archaeological and historic heritage resources.

Ngā mihi,

New Zealand Archaeological Association

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