

# Invitation for Comment on Faringdon South West and South East Development

Faringdon South West and South East Development is a Referred Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

<b>Application name</b>	Faringdon South West and South East Development
<b>EPA reference</b>	FTC000032
<b>Applicant/s</b>	Hughes Developments Limited
<b>Comments due by</b>	19 July 2021
<b>Accessing the application</b>	<a href="https://www.epa.govt.nz/fast-track-consenting/referred-projects/faringdon/the-application/">https://www.epa.govt.nz/fast-track-consenting/referred-projects/faringdon/the-application/</a> .

An application has been made by Hughes Developments Limited (the applicant) under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (the act) for resource consent for Faringdon South West and South East Development (the project).

To comment on the project application, please fill in the details on the attached form and:

- **Email** the form to [Faringdon.fasttrack@epa.govt.nz](mailto:Faringdon.fasttrack@epa.govt.nz) . Please mark in the subject line: “Comments on Faringdon South West and South East Development Fast Track Application (Your name/organisation) by **19 July 2021**”; or
- **Post** the form to Faringdon South West and South East Development Fast Track Application, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by the **19 July 2021**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by **19 July 2021**. Please note that due to potential changes in COVID-19 Alert Levels our reception may not be open to the public. We suggest phoning ahead to check.

Comments must be received by the EPA, on behalf of the Faringdon South West and South East Development Expert Consenting Panel, no later than **19 July 2021**.

If your comment is not received by the EPA by **19 July 2021** the Panel is not required to consider your comment (although it may decide to). Under the COVID-19 Recovery (Fast-track Consenting) Act 2020 there is no right to seek a waiver of the time limit.

If you are an iwi authority you may share the consent application with hapū whose rohe is in the project area in the application, and choose to include comments from the hapū with any comments you may wish to provide.

## Important information

Your personal information will be held by the EPA and used in relation to the project consent application process. You have the right to access and correct personal information held by the EPA.

A copy of your comments, including all personal information, will be provided to the Expert Consenting Panel and the applicant.

All comments received on the application will be available on the EPA website.

If you are a corporate entity making comments on this application, your full contact details will be publicly available. For individuals, your name will be publicly available but your contact details (phone number, address, and email) will not be publicly available.

Please do not use copyright material without the permission of the copyright holder.

All information held by the EPA is subject to the Official Information Act 1982.

More information on the fast-track consenting process can be found at <https://www.epa.govt.nz/fast-track-consenting/about/>.

# Your Comment on the Faringdon South West and South East Development

All sections of this form with an asterisk (\*) are mandatory.

## 1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

<b>Organisation name (if relevant)</b>	Heritage New Zealand Pouhere Taonga
<b>*First name</b>	Barbara
<b>*Last name</b>	Rouse
<b>Postal address</b>	
<b>*Home phone / Mobile phone</b>	
<b>*Email (a valid email address enables us to communicate efficiently with you)</b>	brouse@heritage.org.nz
<b>Submission prepared by:</b>	Arlene Baird
<b>Contact details:</b>	abaird@heritage.org.nz

## 2. \*We will email you draft conditions of consent for your comment about this application

<input checked="" type="checkbox"/>	I can receive emails and my email address is correct	<input type="checkbox"/>	I cannot receive emails and my postal address is correct
-------------------------------------	--	--------------------------	--

## 3. Please provide your comments on this application

If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages

### 1.0 REVIEW

Heritage New Zealand Pouhere Taonga (Heritage New Zealand) has reviewed the resource consent application to subdivide and develop two sites in Rolleston, Selwyn for the purpose of enabling the delivery of 970 houses, two neighbourhood centres and associated infrastructure and amenities. The project intends to contribute to achieving a well-functioning urban

environment in the Rolleston area and additional housing capacity to meet current and projected demand.

## **2.0 ASSESSMENT**

Heritage New Zealand provide the following comments:

### **Historic places:**

The area which is subject to the resource consent application does not contain any historic heritage sites currently listed on the New Zealand Heritage List Rārangī Kōrero or scheduled in the Operative or Proposed Selwyn District Plan.

### **Cultural heritage:**

The applicant commissioned a Cultural Values report which was provided by Mahaanui Kurataiao and included as Appendix P of the application. The proposals were also presented to rūnanga representatives from both Te Ngāi Tūāhuriri and Te Taumutu Rūnanga. No concerns were raised, but conditions relating to accidental discovery protocols during earthworks and being mindful of Ngāi Tahu subdivision values were recommended.

Heritage New Zealand supports the consultation and participation of the above to ensure that any adverse effects are mitigated and that Māori heritage is recognised within the design of the development.

### **Archaeology:**

Under the Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites are defined as any place occupied prior to 1900 that, through investigation by archaeological methods, may provide evidence relating to the history of New Zealand. Under the provisions of the HNZPTA 2014 archaeological sites are protected, and an authority from Heritage New Zealand Pouhere Taonga is required for any works that may modify or destroy an archaeological site.

There are no known archaeological sites within the proposed development boundary. However, a number of archaeological sites have been recorded in the area in the past as a result of research undertaken. Many of these relate to European farmers settling in this area during the nineteenth century – for example a sod hut (M36/273), and a complex of farm buildings (M36/746). There may be similar remains within the application areas, but to our knowledge this area has not yet been assessed.

The applicant has offered an Accidental Discovery Protocol condition for the South West development (condition 60 – page 15 of Appendix B). We acknowledge that this is consistent with advice contained in the Mahaanui Iwi Management Plan and recommendations from Te Ngāi Tūāhuriri and Te Taumutu Rūnanga relating to accidental discovery protocols during earthworks. This will be a useful tool to have in place during the excavation works. However, as no advice has been obtained from a suitably qualified archaeologist, we do not consider this singular reactive measure to be sufficient.

Heritage New Zealand recommends a proactive approach, promoting avoidance of potential archaeological features and mitigation of the impact to any archaeological values wherever possible. To inform these decisions around the avoidance of impact to archaeology, Heritage New Zealand recommends having the site and proposed works assessed by a suitably qualified

experienced consultant archaeologist prior to the commencement of any works. It should be noted that an Archaeological Assessment covers different and wider matters than the Cultural Values report that has been provided.

This approach will not only provide greater certainty around the potential of uncovering archaeological remains but will also reduce the possibility of delays during development. That is, were the proposed approach of using an Accidental Discovery Protocol used, and then archaeological material discovered, then all work on site must cease immediately, the site must be secured and Rūnanga and the Heritage New Zealand Pouhere Taonga Archaeologist notified. A consultant archaeologist must then be appointed to identify the nature of the site. Works affecting the site can only resume once authority from Heritage New Zealand Pouhere Taonga has been obtained and is able to be exercised. This could potentially delay the project anywhere from two weeks to three months depending on the nature and importance of the site.

### **3.0 RECOMMENDATIONS**

Heritage New Zealand recommends the following conditions of consent:

Xx An assessment of the site and proposed works is undertaken by a suitably qualified consultant archaeologist prior to the commencement of any works. This assessment will examine the extent of the pre-1900 occupation of the site in the past and the scope of the proposed works and will determine whether an archaeological authority will be required for the project. Should the assessment conclude that an archaeological authority is not required, then the following Accidental Discovery Protocol conditions should be included for both the South West and South East developments.

Xx Accidental Discovery Protocol

In the event that an unidentified archaeological site is located during works, the following applies;

1. Work shall cease immediately at that place and within 20m around the site.
2. The contractor must shut down all machinery, secure the area, and immediately advise the Site Manager.
3. The Site Manager shall secure the site and immediately notify the Heritage New Zealand Pouhere Taonga Archaeologist. Further assessment by an archaeologist may be required.
4. If the site is of Maori origin, the Site Manager shall immediately notify the Heritage New Zealand Pouhere Taonga Archaeologist and the appropriate iwi groups or kaitiaki representative of the discovery, and ensure site access to enable appropriate cultural procedures and tikanga to be undertaken, as long as all statutory requirements under legislation are met (Heritage New Zealand Pouhere Taonga Act 2014, Protected Objects Act 1975). Further assessment by an archaeologist may be required.
5. If human remains (koiwi) are uncovered, the Site Manager shall immediately advise the Heritage New Zealand Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative and the above process under 4 shall apply. Remains are not to be moved until such time as iwi, NZ Police and Heritage New Zealand have responded.

6. Works affecting the archaeological site and any human remains (koiwi) shall not resume until Heritage New Zealand gives written approval for work to continue. Further assessment by an archaeologist may be required.
7. Where iwi so request, any information recorded as the result of the find, such as a description of location and content, is to be provided for their records.
8. Heritage New Zealand will advise if an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 is required for works to continue.

*Advice note: It is an offence under s87 of the Heritage New Zealand Pouhere Taonga Act 2014 to modify or destroy an archaeological site without an authority from Heritage New Zealand irrespective of whether the works are permitted or a consent has been issued under the Resource Management Act.*

- Xx Prior to commencing work, the Consent Holder shall ensure that all persons involved in, or supervising works onsite are familiar with the Accidental Discovery Protocol.
- Xx The Accidental Discovery Protocol shall be clearly displayed and accessible on site at all times during work under this consent.

Thank you for your comments