

Invitation for Comment on the Waitohi Picton Ferry Precinct Redevelopment

The Waitohi Picton Ferry Precinct Redevelopment is a Listed Project under the COVID-19 Recovery (Fast-track Consenting) Act 2020

Application Name:	Waitohi Picton Ferry Precinct Redevelopment.
EPA Reference:	FTC000014
Applicant:	KiwiRail Holdings Ltd, Port Marlborough, Marlborough District Council and New Zealand Transport Agency
Comments due by:	Thursday, 25 February 2021
Accessing the application:	The full application and supporting documents can be viewed on the EPA website, which can be accessed here: https://www.epa.govt.nz/fast-track-consenting/listed-projects/waitohi-picton-ferry-redevelopment/the-application/ .

An application for insert resource consents has been made by KiwiRail Holdings Ltd, Port Marlborough, Marlborough District Council and New Zealand Transport Agency Limited under the COVID-19 Recovery (Fast-track Consenting) Act 2020 for the Waitohi Picton Ferry Precinct Redevelopment.

To comment on the Waitohi Picton Ferry Precinct Redevelopment application using the form below, please fill in the details and:

- **Email** the form to waitohifasttrack@epa.govt.nz Please mark in the subject line: "Comments on Waitohi Picton Ferry Precinct Redevelopment" (Your name/organisation) by **Thursday, 25 February 2021**; or
- **Post** the form to Waitohi Picton Ferry Precinct Redevelopment, Environmental Protection Authority, Private Bag 63002, Waterloo Quay, Wellington 6140 in time for the form to be received by **Thursday, 25 February 2021**; or
- **Deliver in person** to Environmental Protection Authority, Grant Thornton House, Level 10, 215 Lambton Quay, Wellington by **Thursday, 25 February 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 Waitohi Picton Ferry Precinct Redevelopment Expert Consenting Panel, no later than Thursday, 25 February 2021.

If your comment is not received by the EPA by Thursday, 25 February 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 Waitohi Picton Ferry Precinct Redevelopment application. 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/>.

Comment on the Waitohi Picton Ferry Precinct Redevelopment Fast Track Application

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.

Organisation name (if relevant)	Heritage New Zealand Pouhere Taonga		
*First name	Jamie		
*Last name	Jacobs		
Postal address	PO Box 2629 Wellington 6140		
*Home phone / Mobile phone	027 628 0223	*Work phone	(04) 494 8321
*Email (a valid email address enables us to communicate efficiently with you)	jjacobs@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
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3. Please provide your comments on the Waitohi Picton Ferry Precinct Redevelopment Application

Heritage New Zealand Pouhere Taonga (HNZPT) has identified places of heritage interest and value within the Waitohi Picton Ferry Precinct Redevelopment project area and in its immediate vicinity which will be impacted/affected by the proposed project. The conservation and protection of the Picton Railway Station and the *Edwin Fox Hull* and *Anchor Windlass* are not adequately addressed in the proposed conditions for the consent. Therefore, HNZPT has recommendations and suggested amendments relating to these built heritage places, as well as the proposed conditions relating to archaeology.

Recommendations and proposed condition amendments

HNZPT recommends that the panel be provided with the draft Picton Railway Station Heritage Effects Assessment (WSP, 29 May 2020), or a final version of that report, to assist with the decision-making process as the information in the project information provided by the applicant was not adequate.

Proposed conditions regarding Picton Railway Station and the Edwin Fox Hull and Anchor Windlass

- Condition 1.3 (d) amendment:
The consent holder shall convene a Design Forum, which shall include a representative from each of KiwiRail and Port Marlborough, up to two iwi representatives, including at least one nominated by Te Ātiawa, one representative from Heritage New Zealand Pouhere Taonga, and one independent design expert engaged by the consent holder.
- Condition 2.6 amendment, additional clauses after (d):
 - Set out heritage conservation and temporary protection measures for the building and structures which comprise Picton Railway Station and the *Edwin Fox Hull* and *Anchor*

Windlass, and implementation and monitoring plans, as directed by a Heritage Conservation Management Plan for the project created by a conservation architect;

Proposed condition regarding archaeology

In the proposed conditions of consent, there are conditions relating to Accidental Discovery Protocol (ADP) (conditions 1.8, 2.6 (e) and 5).

If the application for an Archaeological Authority is granted for the project prior to work commencing, then an ADP would not be appropriate or necessary. The condition should be amended to be an advice note giving reference to the Archaeological Authority and Archaeological Management Plan and the requirements and processes under the HNZPT Act 2014.

Comments

1. Picton Railway Station

Picton Railway Station is entered on HNZPT's New Zealand Heritage List/Rārangi Kōrero (the List) as a Category 2 historic place (List No.5392). The extent of HNZPT's listing includes the station building, platform and canopy.

It is also included in the Marlborough District Council Environment Plan's (MDC) schedule of significant heritage resources. The station building has been recognised as a notable building on the New Zealand Rail Heritage Trust of New Zealand's register of rail heritage items.

Picton Railway Station has heritage value because it represented an economically and socially important transport asset and is a fine example of a New Zealand railway station of its era. It also has landmark values in its location near the Cook Strait ferry terminal and northern terminus of the South Island section of State Highway 1.

Project impacts and considerations

It was not initially clear from the application documents whether the work specifically relating to the railway station was included in this set of applications. It now appears that the additions to the railway station will be covered by an Outline Plan of Works under the existing designation.

HNZPT was provided some information, prior to this application, about potential heritage impacts of the proposed project on the Station. HNZPT received a draft Heritage Effects Assessment (WSP, 29 May 2020) as part of this pre-application consultation. HNZPT has been unable to locate this report, or similar heritage assessment/s, in the project documents. As such, HNZPT recommends that the report, or updated version, should be made available to the panel to assist in the decision-making process.

However, the project documentation shows the proposed work adjacent to the railway station (that is covered by this application) would have an impact on the Station (Appendix Ca part 1), in particular potential effects from vibration and dust. As well as adjacent site works, a 12m section of existing platform would need to be demolished to incorporate the new platform extension. The demolition and construction of a new canopy on the lengthened platform may have direct effects on the railway station not covered by a designation (e.g. dust).

It is important that any proposed railway platform additions/extensions and new canopy are compatible with the character and historic values of the existing historic features. In particular, the new canopy should be of a similar scale, materials and form to maintain compatibility with the existing station building, canopy and platform's heritage values. Our understanding is that this will be dealt with through the OPW process.

HNZPT has previously recommended that a heritage conservation plan be prepared to guide any potential works at Picton Railway Station. HNZPT has not seen detailed plans for the proposed works within the extent of the Picton Railway Station list entry and recommends early and on-going engagement between the applicant/s and HNZPT about any proposed changes.

The project documents indicate the building immediately north of the station building is to be demolished/removed as part of the proposed redevelopment. This building does not appear to be included in the extent of the Picton Railway Station list entry and HNZPT has no comment to make regarding its removal at this

time.

2. Edwin Fox Hull and Anchor Windlass

The *Edwin Fox* Hull and Anchor Windlass is entered on the List as a Category 1 historic place (List No.7450) and is a MDC scheduled heritage resource.

The *Edwin Fox* (constructed 1853) has national and international significance as one of the oldest ships remaining in the world. The vessel has immense historic value for her involvement in events that shaped the history of England, Australia and New Zealand, including use during the Crimean War and being the most intact remaining ship that carried convicts to Australia and immigrant settlers to New Zealand. *Project impacts and considerations*

The proposed works do not appear to directly affect the *Edwin Fox* site. However construction activities will be undertaken in close proximity to this site, which is not fully enclosed. Care needs to be taken when working in the vicinity of the *Edwin Fox* Hull and Windlass to avoid any adverse effects on this significant historic place, such as vibration and dust.

In the consultation document (p.17 of Appendix Q) it is noted that project staff have met with representatives of the Museum and the Marlborough Heritage Trust in early July 2020, and that further engagement is planned. This on-going engagement and consultation is encouraged. HNZPT would also appreciate the opportunity to be included in any consultation with regard to the *Edwin Fox* Hull and Windlass.

3. Archaeology

We note that the project site is in close proximity to the location of Waitohi pā and kainga. Pākehā occupation of the area, both above and below the high water mark, started in the late 1840s. Therefore, there is potential for both Māori and early colonial archaeological material within the proposed redevelopment area because there is known to have been pre-1900 activity there.

Project impacts and considerations

The application includes an Archaeological Management Plan memorandum (Appendix Z). It is our understanding that an Archaeological Assessment has been drafted and that an application for an Archaeological Authority will shortly be made to HNZPT. The process for Archaeological Authority can run concurrently with the application under the Fast Track legislation. The conditions relating to archaeology are likely to need amending if an Archaeological Authority is granted to avoid any conflict with the Authority conditions.

Thank you for your comments