

From: [Gerald Carter](#)
To: [RPS](#)
Subject: Proposed Otago Regional Policy Statement 2021
Date: Friday, 3 September 2021 2:31:53 p.m.
Attachments: [20210903142420587.pdf](#)
[Gerald Carter Submission on Proposed Otago Regional Policy Statement 2021.pdf](#)

Hi,

Please find attached my submission

Regards

Gerald Carter

Written Submission on Proposed Otago Regional Policy Statement 2021

(Submissions must be received by Otago Regional Council by 3 pm Friday 3 September 2021)

To: Otago Regional Council

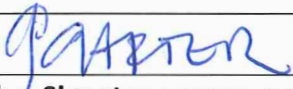
1. **Name of submitter** (full name of person/persons or organisation making the submission. Note: The submissions will be referred to by the name of the submitter)

Gerald Carter

2. This is a submission on the **Proposed Otago Regional Policy Statement 2021**.
3. I **could not** (Select one) gain an advantage in trade competition through this submission. (See notes to person making submission)
4. I **am not** (Select one) directly affected by an effect of the subject matter of the submission that
- adversely affects the environment; and
 - does not relate to trade competition or the effects of trade competition (See notes to person making submission)
5. I **wish** (Select one) to be heard in support of my submission
6. If others make a similar submission, I **will** (Select one) consider presenting a joint case with them at a hearing

7. Submitter Details

- a. **Signature of submitter** (or person authorised to sign on behalf of submitter)



- b. **Signatory name, position, and organisation** (if signatory is acting on behalf of a submitter organisation or group referred to at Point 1 above)

Name GERALD CARTER

Position

Organisation

- c. **Date**

03 Sept 2021

Address for service of submitter (This is where all correspondence will be directed)

- d. **Contact person** (name and designation, if applicable)

Gerald Carter

- e. **Email:**

gerald@cartersmith.co.nz

f. Telephone:

021 373538

g. Postal address (or alternative method of service under section 352 of the Act):

766 Christchurch Akaroa Road

8. My submission is: Please refer to the attached document

<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	
<i>The specific provisions of the proposal that my submission relates to are:</i> <i>(Please enter the relevant objective, policy, method, or 'other' provision reference where possible. For example, 'AIR-01'.)</i>	<i>I support or oppose the specific provisions or wish to have them amended.</i> <i>(Please indicate "support" or "oppose" or "amend")"</i>	<i>The reasons for my views are:</i>	<i>I seek the folk local authority</i> <i>(Please be as clear as possible and include any alternative provision amendments)</i>

Note: Additional rows for each separate provision or submission point should be added as required.

Written Submission on Proposed Otago Regional Policy Statement 2021

My name is Gerald Carter

I was on the panel advising the ORC in matters relating to "Heritage"
I am a trustee of the Waitaki Whitestone Geopark Trust

In the review process I made a number of submissions / suggestions in that the current policy document makes no recognition of geological or archeological "heritage"

After significant time and commitment it was disappointing that not a single suggestion or comment was included in the draft document.

For instance, the Moeraki Boulders have no protection as "items of geological interest" but rather their protection comes obtusely through the "Coastal" section and indeed because they are famous.

Below are the specifics of this submission

Delete the word "Historic" from the term "Historic Heritage" and replace with "Cultural & Natural Heritage" throughout the document

UNESCO defines these as

Cultural Heritage

- a) *monuments: architectural works, works of monumental sculpture and painting, elements or structures of an archaeological nature, inscriptions, cave dwellings and combinations of features which are of outstanding value from the point of view of history, art or science;*
- b) *groups of buildings: groups of separate or connected buildings, which because of their architecture, their homogeneity or their place in the landscape, are of outstanding value from the point of view of history, art or science;*
- c) *sites: works of man or the combined works of nature and man, and areas including archaeological sites, which are of outstanding value from the historical, aesthetic, ethnological or anthropological point of view.*

Natural Heritage

- a) *natural features consisting of physical and biological formations or groups of such formations, which are of outstanding value from the aesthetic or scientific point of view;*
- b) *geological and physiographical formations and precisely delineated areas, which constitute the habitat of threatened species of animals and plants of outstanding value from the point of view of science or conservation;*
- c) *natural sites or precisely delineated natural areas of outstanding value from the point of view of science, conservation or natural beauty.*

The word “Historic” is largely a European term relating to people and objects or indeed just being famous and significantly detracts and minimises the term “heritage”

ORC Policies

HCV-HH-P3 – Recognising *historic heritage*

Include “Geological Heritage”

HCV-HH-M7 – District Plans

(e) including historic heritage alert layers in plans to inform the public about areas where there is a high probability of the presence of heritage values, particularly archaeological and geological values,

(4) require the use of accidental discovery protocols as conditions on *resource consents* and notices of requirement for *earthworks* or other activities that may unearth archaeological or features.

Add

“.....particularly archaeological and geological values,

”.....or geological features”

HCV-HH-M8 – Incentives and education

(2) rates relief and *resource consent* fee waivers for activities that involve the retention of historic heritage places or areas.

Delete the word “historic”

HCV-HH-PR2 – Principal reasons

Otago is a region rich in *historic heritage*, with a diversity of significant cultural and *historic heritage* places and areas that contribute to its special character and identity. *Historic heritage* encompasses historic sites, *structures*, places, and areas; archaeological and geological sites; sites of significance to Māori (including wāhi tapu) and the broader surroundings and landscape in which they are situated. The heritage resources in Otago are reflective of the history that helped to shape the region, and is representative of the different cultures, industries and institutions that contributed to its development. Historic heritage landscapes in the coastal *environment* are specifically recognised in Policy 17 of the New Zealand Coastal Policy Statement.

Add “.....archaeological and geological sites”

APP6 – Identification criteria for places and areas of historic heritage

Include

**Geological The natural range (diversity) of geological (rocks, minerals, fossils),
geomorphological (landforms, topography, physical processes), soil and**

hydrological features. It includes their assemblages, structures, systems, and contributions to landscapes

The subsequent identification of places and areas with *historic heritage* that have special or outstanding values or qualities will be based on their significance or value as relating to one or more of the following criteria:

Add

The extent that the place represents our geological diversity

Gerald Carter
03 September 2021