

**RPS**

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**From:** grayeshattky@gmail.com  
**Sent:** Friday, 3 September 2021 2:08 p.m.  
**To:** RPS  
**Cc:** David Ritchie; COHT Heritage Coordinator  
**Subject:** Submission by Central Otago Heritage Trust  
**Attachments:** Submission re ORC RPS 3 Sep 21(Final).pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Submission - Sector stakeholder

Greetings,

Please see attached submission on behalf of the Central Otago Heritage Trust

Kind regards,  
Graye Shattky  
Trustee

## CENTRAL OTAGO HERITAGE TRUST

*The Central Otago Heritage Trust (COHT) was established in 2008. Trustees are elected by Central Otago's heritage organisations to represent their collective interests for the preservation, protection and celebration of Central Otago's rich heritage legacy.*

### Written Submission on Proposed Otago Regional Policy Statement 2021

#### To: Otago Regional Council

The Central Otago Trust (COHT) could not gain an advantage in trade competition through this submission.

The COHT is not directly affected by an effect of the subject matter that:

- a. Adversely affects the environment; and
- b. Does not relate to trader competition or the effects of trade competition.

We wish to be heard in support of our submission.

If others make similar submissions, we will consider presenting jointly with them at the hearing.

Signed:



**Name:** DG Shattky

**Position:** Trustee

**Organisation:** Central Otago Heritage Trust

**Date:** 3 Sep 2021

**Contact person:** DG Shattky

**Email:** [grayeshattky@gmail.com](mailto:grayeshattky@gmail.com)

**Cc:** [centralotagoheritagetrust@gmail.com](mailto:centralotagoheritagetrust@gmail.com)

**Postal address:** 10 Coulson Place, Alexandra

#### Our Submission:

The COHT appreciates this opportunity to respond to the Proposed Regional Policy Statement. Our Trust's submission addresses the topic: *HCV- HH Historical and Cultural Values as well as the definitions that underpin that topic.*

#### Summary of Submission:

The Trust would like to see 'Historic Heritage', addressed more holistically to include both tangibles and intangibles, thus extending the scope of that definition beyond physical heritage. We believe this shift in emphasis will achieve the principal purpose of identifying, recognising, protecting and enhancing the cultural values of Otago's heritage.

We are seeking the definition of "historic heritage" to include a reference to heritage values. We propose adding the following wording to paragraph (b) of the definition of "Historic Heritage":

“(b) Includes –

... heritage values associated with natural and physical resources”

We are also seeking that the objectives and policies are adjusted to prioritise the recording and sharing of information concerning heritage values, particularly where the Council is considering proposals for the modification or destruction of heritage sites.

### **What’s in a definition?**

The Trust submits that our common understanding of a subject relies on the use of precise language, in this instance, the definition of ‘historic heritage’ provided by the Resource Management Act (RMA) means all those “*natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures*”, deriving from archaeological, architectural, historic or cultural qualities. \* See Appendix 1 Definitions

Perhaps more helpfully, UNESCO and ICOMOS NZ classify historic heritage qualities as ‘tangible’ or ‘intangible’. Tangible or ‘built’ qualities are readily observed in the form of historic buildings, remnant stone buildings or reflected by historic artifacts displayed in museums.

Intangible qualities such as heritage values linger in surviving documents, letters, diaries and photographs; together with recorded stories and memories recalled by those who lived or worked in those buildings and used those artifacts, comprising what heritage circles consider to be ‘cultural heritage’.

PORPS21 uses various terms when referencing heritage matters e.g., heritage, historic heritage values, historic heritage resources and cultural values, without clearly defining or reflecting their specific meanings in the context they are used; the Sec 32 Evaluation Report accompanying the PORPS, while not challenging the meanings of these terms, points to ‘*inconsistency*’ and ‘*confusion*’ arising from their incorrect use. The trust considers that adjusting the definition as proposed above will contribute to achieving the objectives and policies of the PORPS21, particularly as it relates to the oral tradition of passing on knowledge about heritage to future generations.

Appendix 1 has a summary of the various forms of definitions of historic heritage. The trust favours a definition that more closely follows that which is defined by UNESCO.

### **MW- Mana whenua**

The Trust applauds the inclusion of this chapter as providing valuable insights into a holistic worldview in which philosophy (Whakawhanaukataka), environment (Ki uta ki tai) and heritage values (Wāhi Tūpuna) are virtually inseparable. This elucidation usefully foreshadows the PORPS21’s subsequent separate provision for the preservation and protection of Kāi Tahu’s historical and cultural values.

### **HCV – Historical and Cultural Values**

COHT considers it unfortunate if not remiss, that this Topic, intended to provide for Otago’s heritage legacy, provides no description or summary of that legacy. Instead, it presents without explanation, what seem at first, to be two unrelated chapters, the first *HCV-WT Wāhi Tūpuna*, the second *HCV-HH- Historic Heritage*.

### **HCV-WT- Wāhi Tūpuna**

This chapter clearly acknowledges Kāi Tahu as *mana whenua* and establishes clear objectives specifically designed to identify and protect Kāi Tahu’s cultural landscapes and associated values. Kāi Tahu are enabled by these provisions to exercise *kaitiakitaka* (guardianship) of their Wāhi Tūpuna.

COHT notes that this section is solely concerned with the identification, protection and management of Kāi Tahu’s cultural landscapes, cultural sites, cultural impacts and cultural values but provides no connection to the wider topic of Otago’s heritage legacy. None-the-less, COHT supports both the intent and consequent implementation of the policies proposed in this section, but requests that appropriate cross references are made between these chapters to acknowledge they are not to be interpreted in isolation.

### **HCV-HH-Historic Heritage**

The COHT has already noted (see *HCV-Historical and Cultural Values*) the lack of any summary or description of Otago’s heritage legacy and considers that without reference to an understanding of that background, this section would better achieve the policies and objectives of the PORPS21 and provide for the protection of “Otago’s unique historic heritage” if descriptive content of Otago’s heritage legacy was included. Including a section to that effect would better identify heritage values of relevance to particular Otago communities.

This commentary is not the place to attempt such a summary, but we do suggest that this chapter must begin by acknowledging that Otago’s heritage legacy takes account of several different cultures who have in common, the fact that they each chose to come to New Zealand from Elsewhere. Just as PORPS 21 acknowledges Kāi Tahu’s cultural legacy, so to it must acknowledge the cultural values imported by non-Māori from Elsewhere.

Over a significant timespan their descendants have established generational roots by transforming landscapes and building thriving communities. They have all contributed to a multi-cultural society which is presently in the process of integrating strong elements of Māori culture; a continuing story which future iterations of this PORPS21 are likely to recognise as a distinctly New Zealand culture.

### **Objectives and Values**

The intended objective of this chapter is that “*that historic heritage contributes to the region’s character, sense of identity and social, cultural and economic well-being, and is preserved for future generations*” and provides direction for recognising, identifying and managing heritage values across the region. The Trust considers it is here the document has a distinct change of style and tone. Whereas **Wāhi Tūpuna** clearly sets out to protect Māori cultural values, **Historic Heritage** focuses primarily on the tangible values of historic places, buildings and areas without attempting to identify and provide for the continuing protection and management required to maintain their heritage values.

The Trust considers that it is necessary to more clearly express the priority given to the protection of heritage values not just heritage sites. The Trust considers that taking this step will assist decisions being made for purpose of the preservation of heritage values.

## **Conclusion**

The COHT submits that the PORPS21 could better achieve heritage outcomes for the Otago Region by:

- a) recognising and describing heritage values across various ethnicities
- b) providing direction for the preservation of memorials and cemeteries or similar sites by setting priorities for those features
- c) setting out policies which will encourage and support the collection of oral histories and genealogy records or other documentation of heritage values (particularly about those sites that are the subject of a resource consent application for modification) and have those records accessible and available to the public.

## **Relief Requested**

The COHT requests that the Chapter HCV-HH-Historic Heritage be revised by changing the definition of historic heritage as set out above and by introducing appropriate policies and objectives to enhance the recording and preservation of heritage values.

## **Appendix 1**

### **Definitions**

**NB.** Where no NZ authority exists or more complete definitions are available, we cite the International Council on Monuments and Sites (ICOMOS) of which New Zealand is a member.

- **Heritage** is our legacy from the past, what we live with today, and what we pass on to future generations. (UNESCO)
- **Historic heritage** (*Resource Management Act*) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities (alt. values): archaeological; architectural; cultural; historic; scientific; technological; 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.
- **Cultural heritage value/s** (UNESCO and ICOMOS NZ) means possessing aesthetic, archaeological, architectural, commemorative, functional, historical, landscape, monumental, scientific, spiritual, symbolic, technological, traditional, or other tangible or intangible values, associated with human activities.
- **Tangible value** (ICOMOS) means the physically observable cultural heritage value of a place including archaeological, architectural, landscape, monumental, scientific or technological values.
- **Intangible value** (ICOMOS) means the abstract cultural heritage value of the meanings or associations of a place\*including commemorative, historical, social, spiritual, symbolic, or traditional values. \*In practice also applies to historic artifacts, items, documents, photos, recorded stories and memories.
- **Cultural Landscapes** means an area possessing cultural heritage values arising from the relationships between people and the environment. Cultural landscapes may have been designed such as gardens or have evolved from human settlement and land use over time, resulting in a diversity of distinctive landscapes in different areas. Associative cultural landscapes such as sacred mountains, may lack tangible cultural elements but may have strong intangible cultural or spiritual associations.
- **Wāhi tūpuna** means places important to Māori for their ancestral significance and associated cultural and traditional values.
- **Mana whenua** means customary authority exercised by an iwi or hapu in an identified area.