

Appendix I: Historic Places Trust Submission



New Zealand Historic Places Trust Pouhere Taonga

NZHPT File No. 33002-273

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Feedback Submission of New Zealand Historic Places Trust Pouhere Taonga to the New Zealand Transport Authority proposed mitigation measures for the Peka Peka to Otaki section of the proposed Roads of National significance in the Kapiti Coast District.

1. New Zealand Historic Places Trust Pouhere Taonga (NZHPT) is an autonomous Crown Entity with responsibilities under the Historic Places Act 1993 to promote the identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand.
2. The proposed Peka Peka to Otaki expressway is still in the development stages, with proposals and reports lacking in sufficient detail for a thorough effects assessment to occur. **NZHPT reserves the right to form a position** as further detailed information and analysis of effects is undertaken.

Heritage Values

3. A historic place under the Historic Places Act 1993 means any land including archaeological sites, buildings, structures and land that forms a place that is part of the historical and cultural heritage of New Zealand and lies within the territorial limits of New Zealand.
4. The proposed expressway will affect a number of registered category 2 historic places under the Historic Places Act 1993 including; Rahui Milk Treatment Station, register no.4102, Rahui Factory Social Hall, register number 4101 and the Otaki Railway Station, register number 4099.
5. The road will affect the Mirek Smisek pottery site and beehive kilns, and Hema Te Ao's house at 230 Otaki Main Road, which are both historic heritage that have not been formally recognised through registration under the Historic Places Act or listing in a district plan. Further research to establish the heritage values of the Mirek Smisek pottery site and beehive kilns has been undertaken by NZTA and has confirmed that the kilns are of significant physical, historical and cultural interest. Little is known of the significance of Hema Te Ao's house at 230 Otaki Main Road.
6. An archaeological site under the Historic Places Act 1993 means any place in New Zealand that was either associated with human activity that occurred before 1900, or is the site of the wreck of any vessel where that wreck occurred before 1900; and may be able through investigation by archaeological methods to provide evidence relating to the history of New Zealand.
7. The proposed expressway relates to 4 archaeological sites recorded by the New Zealand Archaeological Association and one other known site which is yet to be recorded (Hema Te Ao's House). Noted sites are the Otaki Railway Station and Hema Te Ao's House, located at 230 Otaki Main Road. There are three other recorded archaeological midden sites (R25/14, R25/5 and R25/7) which are located in or near the border of the proposed alignment just north of Te Hapua Road.
8. The archaeological scoping report provided by the New Zealand Transport Authority (NZTA) indicates that a number of unrecorded archaeological sites may be disturbed or destroyed in the event the expressway is constructed. There are two areas noted as having high potential for archaeological discovery along the route. These areas are the dune area north of Te Hapua Road and the area located north of Rahui Road in the dune system.
9. A wahi tapu site under the Historic Places Act 1993 means an area of land that contains 1 or more wahi tapu, meaning a place sacred to Māori in the traditional, spiritual, religious, ritual or mythological sense.

10. NZTA have provided a draft copy of a 2003 Cultural Impact Assessment (CIA) by Nga Hapu-o-Otaki. The report identifies a number of wahi tapu sites of importance to Maori, which the proposed expressway may affect. It identifies a number of areas where there is a high likelihood of damage to wahi tapu that are either known or unknown. There is little locational information provided and there is no explanation as to how they might identify or deal with the possibility of unknown wahi tapu being identified.
11. Since the 2003 report the route of the proposed expressway has changed and the CIA needs updating to reflect this change. NZHPT understands that NZTA in partnership with Nga Hapu-o-Otaki are in the process of completing an updated report.
12. Given the lack of information in regards to wahi tapu values, NZHPT is unable to clearly establish what the effects of the proposed expressway may be on wahi tapu values and sites.

Consultation

13. Since mid-2010 NZHPT and NZTA have met to discuss possible routes and effects for this section of the proposed expressway. Concern has been expressed at the potential loss of historic heritage and in response to these concerns NZTA has undertaken more in-depth analysis of the effects of the proposed new road on historic heritage.
14. NZHPT provided a previous feedback submission in relation to this project in April 2011. NZHPT's submission requested further information, detail and consideration of the effects on archaeology, the Otaki Railway Station, Rahui Milk Treatment Station and Social Hall, Mary Crest, Mirek Smíšek Pottery, the Ranui Cottage (known as Himiteawa – Hema Te Ao's house) and the Red Shed Café.
15. Since the public feedback submissions in 2011, the proposed road designation has been altered to avoid Mary Crest and the Red Shed Café.
16. NZHPT's 2011 submission concluded that there was not enough information to form an opinion as to the relative merits of the proposed option in respect to the effects on historic heritage and noted that road designs should ensure the minimum damage, modification or disturbance of archaeological sites, historic places or sites of significance to Maori, including wahi tapu and their associated surroundings.

17. NZHPT's 2011 submission also noted concern at the lack of information provided to the public about the effects of the proposed road on historic heritage in the feedback documents put out for notification.
18. NZHPT is pleased to see that the current round of consultation documentation, the subject of this submission (August 2012), has included information on some of the likely effects of the proposed expressway on historic heritage. As mentioned earlier a notable admission is the lack of information on Maori cultural values and effects on wahi tapu sites.
19. The difference between the consultation in 2011 and the current round of consultation is that NZTA has decided on a preferred alignment and there is a greater level of information available to consider the potential effects of the expressway.

Feedback to proposed mitigation measures

20. There are varying levels of information and detail available to assess the effects on historic heritage along the proposed route. It is hard to offer definitive comment on appropriate mitigation measures when the effects of the proposed road have not been accurately identified.
21. For the Rahui Milk Treatment Station, Rahui Factory Social Hall, the Otaki Railway Station, the Mirek Smisek pottery site and beehive kilns there is sufficient information to able to talk broadly about what mitigation may be appropriate. However further detailed plans are needed in order to confirm effects and the extent to which those effects can be avoided, mitigated or remedied.
22. However in regards to Maori heritage, wahi tapu sites and archaeology the level of detail identifying what will be affected is not available. Based on past experiences with other roading projects we can only speculate as to appropriate mitigation measures for Peka Peka to Otaki.

Otaki Railway Station

23. The proposed expressway will require the relocation of the registered category 2 Otaki Railway Station, register number 4099. The railway line will need to be moved to accommodate the new expressway and the relocation of the railway station to realign it with the new railway lines. NZHPT understands the station will be pivoted on its axis with only a small shift of the building necessary to

accommodate the new rail realignment.

24. Relocation of heritage buildings is considered the last option to avoid demolition of a building, when all other options have failed.
25. Any proposal to relocate the Railway Station should be informed by best practice guidance (appendix 1) and ICOMOS principles (appendix 2). Both NZHPT and best practice outline a strong preference to avoid relocation unless in exceptional circumstances. The ICOMOS charter (2010) states “a structure of cultural heritage value may be relocated if its current site is in imminent danger, and if all other means of retaining the structure in its current location have been exhausted. In this event, the new location should provide a setting compatible with the cultural heritage value of the structure”.
26. However, historically, railway stations have been parallel or tangential to their railway lines. To make ‘sense’ therefore of the station, a small rotation of the building to accommodate the new lines is reasonable even though it is not its historical orientation.
27. When considering the possible relocation of the Otaki Railway Station it is an important factor that it will be relocated within its current site boundaries with little linear displacement, which will keep a connection between its original location and setting. It will be important to also consider the station ‘furniture’, curtilage and position on the site is maintained as closely as possible to its original location.
28. The on-going use of the building for railway purposes is important and NZHPT recognises that it is preferable to maintain the Otaki Railway Station’s use as a train station into the future. When considering relocation of the station, maintaining its alignment to the tracks and its relationship to the local roads is an important consideration.
29. The feedback document provides very limited information as to appropriate mitigation for the proposed relocation. However, NZHPT is supportive of NZTA’s intention to work with NZHPT to share knowledge and develop processes to assist with the management of cultural and heritage resources.
30. Further work needs to be done to develop an in-depth management plan for the relocation of the building, including an update of the conservation plan for the building which would include an assessment of its current condition. The updated conservation report should inform any plan to relocate the building and appropriate mitigation.

31. The Otaki Railway Station is a pre-1900 building and site and will require an archaeological authority under the Historic Places Act. This is discussed in more detail under archaeology below.

Rahui Milk Treatment Station and the Rahui Factory Social Hall

32. The proposed expressway will affect the registered category 2 historic places: the Rahui Milk Treatment Station, register no.4102; and the Rahui Factory Social Hall, register number 4101.
33. In recent years the Milk Treatment Station has received a new life as an olive oil press and storage facility. At one point a restaurant was operating at the site, however this has since closed down. NZHPT understands that the current owner runs the complex as a wedding venue and function centre. Continuation of viable business activities on site is of concern to NZHPT and will affect the long term survival of the buildings.
34. Rahui Road will have a new bridge constructed over the expressway to ensure local east-west connectivity is maintained. Whilst the expressway and the Rahui over-bridge will avoid affecting the actual building fabric, they will be located in close proximity to the Social Hall and Milk Treatment Station. It is expected that the new expressway and Rahui Road overbridge will have negative noise, bulk and dominance effects on the amenity and setting of the Rahui Milk Treatment Station and the Rahui Factory Social Hall.
35. The proposed new expressway and over-bridge will have negative effects on the amenity and setting of the former dairy factory and Social Hall. A combination of screening plantings and noise mitigation need to be considered.
36. The proposed expressway will be 30 meters away from the former dairy factory and just over 10 meters from the Social Hall. A level of planting to screen the expressway from the former dairy factory and Social Hall is proposed.
37. The proposed over bridge is 41 meters away from the former dairy factory and approximately 100 meters from the Social Hall. There is no mitigation proposed for the effects of the over-bridge. A vegetated swale is proposed on the earth mound facing the former dairy factory, which could provide some screening of the over-bridge. However details of planting proposed are not sufficient to establish what mitigation value this planting might have.
38. NZHPT would like to acknowledge that the over-bridge has been moved further

north than in previous designs, which has helped to avoid more severe effects on the amenity and setting of the former dairy factory and Social Hall, than what was originally envisaged.

39. NZHPT understands that NZTA is compiling a detailed analysis of the noise effects along the route that will suggest what type of noise mitigation is necessary to meet NZ noise standards. Given the proximity of the expressway and over bridge to the former dairy factory and Social Hall, NZHPT would expect that a high level of noise mitigation will be necessary to elevate the effects of noise emanating from the new roads.

Mirek Smisek Pottery Site and Beehive Kilns

40. The road will affect the Mirek Smisek pottery site and beehive kilns at Te Horo. Although the site has not been formally recognised through registration under the Historic Places Act or listing in a district plan, research undertaken by NZHPT and Ian Bowman has established heritage values present at the Mirek Smisek pottery, including the site, buildings and beehive kilns. Ian Bowman's report on the kilns and site has confirmed that the kilns are of significant physical, historical and cultural interest.
41. In addition, the collection of buildings and structures on the site are connected to the internationally renowned potter Mirek Smisek and have some heritage value in this regard as a collection. This includes: a pottery studio; the former Te Horo Railway Station (relocated); associated Railway Workers' Hut; and a character villa dating from around 1910 – 1920. There is also an associated lookout tower, attractively landscaped gardens and an interesting forest walk through tree plantings with outlook towards the Tararua ranges. Piles of bricks and glazed pottery samples are still scattered around the site.

The kilns

42. The kilns are noted in the consultation documentation as requiring removal to make way for the expressway. NZHPT understands that this is to allow for vegetated riparian planting to accommodate storm water runoff from the expressway. No specific mitigation is suggested in the consultation document for the effects on the site or to the kilns. Ian Bowman's report recommends that the kilns are carefully deconstructed and re-erected in a sympathetic environment before construction of the roadway begins.
43. NZHPT agrees with Mr Bowman's assessment of heritage significance and his recommendation for the deconstruction and reconstruction of the kilns in a sympathetic environment. Following best practice for relocation of historic

heritage, ideally a sympathetic environment can be found close by the kilns original location.

44. Further consideration and consultation needs to occur in this regard. A detailed deconstruction and reconstruction plan and reconstruction location needs to be developed.

The wider Mirek Smisek Pottery site

45. The effects of the proposed expressway on the site itself will be significant. The site is currently landscaped in planned gardens and is sufficiently distant from the existing state highway one to enjoy a high level of amenity. This will change as the expressway is proposed to be constructed directly adjacent to the pottery studio and in close proximity to the other buildings on site. The beehive kilns will require relocation.
46. The property currently shares an accessway that passes across the railway tracks from state highway one. It appears from the designs presented in the consultation documents that no provision has been made to maintain this accessway. Access will need to be negotiated from one of the local roads, however details of how or where this access may be located have not been provided.
47. Mirek Smisek is a highly significant potter in New Zealand and beyond. His pottery, where much of his important craftwork was carried out, is important to recognise and keep. It represents an opportunity to both retain the heritage of one of New Zealand's most important potters, at a time the craft was emerging.
48. NZHPT recommends that the buildings and kilns be retained in an enclave, relocating them as necessary and planning a respectful and useful grouping in a context of tree plantings in the manner that they are at present. An appropriate land parcel with access to a road will be necessary. NZHPT is concerned that the site is marketable as a residence in the event that the expressway has been built. To this end provision for a house on site is important and NZHPT would prefer to see the villa retained on site.
49. NZHPT recommends a heritage covenant to preserve the remembrance of a place where this important work was done. Such a covenant will not prevent future interested owners from valuing the site and adapting it for their own purposes.
50. In addition, the effects on the amenity of the site from the new expressway being in such close proximity needs to be considered. Noise attenuation and screening of the road should be employed.
51. Any changes to the property and buildings should be recorded, and a photographic

record is recommended.

Archaeology

52. NZTA has provided an archaeological scoping report for archaeology and heritage covering the proposed route, dated August 2011 and compiled by OPUS. The report concludes that the expressway is likely to impact on both recorded and unrecorded archaeological sites and will require an archaeological authority.
53. The consultation material does not accurately identify the effects of the proposal in relation to archaeology. Further detailed archaeological assessment is necessary to establish the full effects of the proposed expressway and thus appropriate mitigation. NZHPT would prefer that in the first instance archaeological sites are avoided. Once an archaeological site is damaged or destroyed the information it contains is gone forever.
54. The consultation material does however suggest that where it is not possible to avoid sites or areas with heritage and cultural values that protocols, study and recording of sites will take place. NZHPT does not believe that the proposed mitigation goes far enough to mitigate the potential damage or loss of archaeological material.
55. Further in-depth archaeological study and analysis of the route needs to occur, particularly in relation to;
 - The location of Tararua Pa and Urupa around the Waitohu Stream and what effects the road will have on the archaeological values of this site.
 - Impact on Otaki Railway Station, a recorded pre-1900 archaeological site. What type of archaeological investigation and specific protocols are proposed?
 - Further detailed information on the location of recorded sites and what impact the road will have on them. Noted sites are the Otaki Railway Station and the pre 1900 house at 230 Otaki Main Road, Hema Te Ao's House. There are three other recorded archaeological midden sites (R25/14, R25/5 and R25/7) which are located in or near the border of the proposed alignment just north of Te Hapua road.
 - There are two areas noted as having high potential for archaeological discovery along the Pekapeka to Otaki Expressway. These areas are the dune area north of Te Hapua Road and the area north of Rahui Road in the dune system.
56. Given the lack of detailed analysis of the proposed expressway's effects on archaeology, determining appropriate mitigation is difficult. However given recent

experiences in the Transmission Gully and Mackays to Peka Peka roading projects, similar mitigation measures used in these roading projects are likely to also be appropriate in for the Peka Peka to Otaki route.

57. Mitigation suggested in relation to other expressways that NZHPT has been involved with include:
- Public open days during archaeological digs;
 - Publications for general public and iwi, academic publications in New Zealand or overseas journals;
 - Public seminars regarding the archaeological work, preparations of a series of fixed interpretive signs to be placed at culturally and/or archaeologically significant or strategic locations;
 - Thematic archaeological studies which add to the knowledge of sites within the close proximity of the area e.g Cambridge expressway and garden soils study
 - Preparation of a complementary set of portable interpretive panels to be supplied to the Kapiti Coast District Council for use and distribution.

Wahi Tapu Values

58. The 2003 CIA by Nga Hapu-o-Otaki, indicates that the proposed expressway may have effects on a number of wahi tapu sites of importance to Maori. The consultation does not identify any wahi tapu sites that will be impacted on, however does mention that a cultural impact assessment is being prepared. Such a report cannot be considered as mitigation, as it is necessary to determine the impact the expressway may have on wahi tapu values.
59. Wahi tapu is defined in the Historic Places Act (1993) as “*a place sacred to Maori in the traditional, spiritual, religious, ritual or mythological sense*”. So effects on wahi tapu values need to be viewed as effects on traditional, spiritual, religious, ritual or mythological aspects of a site, place or object considered wahi tapu.
60. In the first instance NZHPT advocates for avoidance of wahi tapu sites. This is preferable to the loss of wahi tapu values as it is difficult to mitigate losses to traditional, spiritual, religious, ritual or mythological aspects of a site, place or object considered wahi tapu. Depending on the nature and scale of the loss, some types of mitigation and offsetting can be appropriate.
61. Given the lack of clear information in regard to wahi tapu values, NZHPT is unable to establish what the effects of the proposed expressway will be on wahi tapu values

and sites. Given the lack of detailed analysis of the proposed expressways effects on wahi tapu values, determining appropriate mitigation is difficult.

62. NZHPT wishes to be consulted with in regards to any effects of the expressway on wahi tapu sites, in light of further detailed information being provided. Meaningful consultation with iwi and hapu is essential.

NZHPT makes the following recommendations:

Otaki Railway Station

63. Further work needs to be done to develop an in-depth management plan for the relocation of the building, including detailed drawings, an update of the conservation plan which would include an assessment of its current condition. The updated conservation report should inform any plan to relocate the building and appropriate mitigation.

Rahui Milk Treatment Station and the Rahui Factory Social Hall

64. A combination of plantings for screening and noise mitigation need to be considered. The current details of planting proposed is not sufficient to establish what mitigation value this planting might have. NZHPT would expect that a high level of noise mitigation will be necessary to elevate the effects of noise from the new roads.

Mirek Smisek Beehive Kilns

65. A detailed deconstruction and reconstruction plan and reconstruction location needs to be developed.
66. A heritage covenant is recommended to ensure the preservation of the kilns in their new location.

Mirek Smisek Site

67. The buildings and kilns are retained in an enclave, relocating them as necessary and planning a respectful and useful grouping in a context of tree plantings in the manner that they are at present.
68. An appropriate land parcel with access to a road will be necessary. A new access will need to be negotiated from a local road.
69. NZHPT is concerned that the site is marketable as a residence in the event that the expressway has been built. To this end provision for a house on site is important and NZHPT would prefer to see the villa retained on site.

70. A heritage covenant is recommended to preserve the memory) of a place where Mirek Smisek's most important work was done.
71. The effects on the amenity of the site from the new expressway being in such close proximity needs to be considered. Noise attenuation and screening of the road should be employed.
72. Any changes to the property and buildings should be recorded, and a photographic record is recommended.

Archaeology

73. Further detailed archaeological assessment is necessary to establish the full effects of the proposed expressway and thus appropriate mitigation.

Wahi Tapu Sites and Values

74. NZHPT wishes to be consulted with in regards to any effects of the expressway on wahi tapu sites, in light of further detailed information being provided. Meaningful consultation with iwi and hapu is essential.

Yours faithfully,



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