

Ātiawa ki Whakarongotai comment on further information from Kāpiti Coast District Council

1 July 2026

1. This comment has been prepared by Ātiawa ki Whakarongotai Charitable Trust in response to the further information provided by Kāpiti Coast District Council (KCDC) at the request of the Hearing Panel's Minute 3, in relation to Proposed Plan Change 3 – Kārewarewa Urupā.

Comments on archaeological matters in association to Kārewarewa urupā.

2. With regards to KCDC's response on archaeological matters, we wish to highlight a range of considerations that might inform the Hearing Panel's assessment.
3. Policy SASM-P1 in the District plan sets out the policy that the Schedule of Wāhanga are identified for. The purpose of this policy is that wāhi tapu and other places and areas significant to Māori are protected from inappropriate land use, which may affect the physical features and non-physical values of the place or area.
4. We feel it is necessary to highlight that whilst some archaeological values may be identified in association to wāhi tapu and sites of significance, they do not in any way define or determine wāhi tapu and sites of significance. Archaeological values such as sites are distinct values that have no actual bearing on the cultural value of a wāhi tapu or site of significance. Wāhi tapu and sites of significance exist completely distinct as cultural values, regardless of whatever the particular archaeological values may or may not be. We highlight this as we have considerable experience of archaeology being something of a red herring in relation to understanding wāhi tapu and sites of significance.
5. There are also a range of practical reasons as to why archaeological assessments and records can be very limited in what they might indicate about wāhi tapu and sites of significance:
 - a. Records of archaeological sites do not reflect a full assessment of a landscape to determine its archaeological various values. They instead identify a range of sites that have been identified in an ad hoc manner, often inadvertently as a consequence of development. The absence of an

archaeological record does not mean a site doesn't have archaeological values, only that none of have been found there. It is not unusual, particularly in Waikanae, that areas where there has been development have recorded sites, whereas undeveloped areas have fewer recorded sites, because there simply hasn't been any activity that would uncover them.

- b. Identifying archaeological sites does rely upon land users volunteering discovery information. Noting prior prosecutions in the area in relation to modifying archaeological sites without authority, it is well known locally that discoveries of sites can be made that are never recorded.
 - c. Where land use isn't occurring, landowners would have to consent to archaeological assessments even of areas that are known independently to have values. In the case of Kārewarewa, requests from the Wellington Archaeological Society to assess the urupā prior to development in response to known values were declined by the landowner.
6. This is something that is being better understood and managed more recently, particularly through the work of Pouhere Taonga Heritage NZ.
7. As referenced in our oral submissions, Heritage New Zealand's "Guide to the Management of Historical Heritage: District Plans." provides helpful guidance on this point.¹ At Section 16.3 it sets out that the criteria for scheduling sites and areas of significance to Māori should be developed by a partnership of councils, iwi and hapū, and may include a range of values that include wāhi tapu, cultural, historical and metaphysical values. In this list, archaeology is not identified as a criteria.
8. In support of comments made by KCDC we agree that the cemetery designation and underpinning Native Land Court partition requested by our tūpuna for a certain urupā is a far clearer indication of the nature and location of the values that are proposed for scheduling.
9. In light of the above we would be concerned if ad hoc archaeological site information is for some reason utilised to inform decisions that determine cultural values.

¹ Heritage New Zealand, Pouhere Taonga, 2022. "Guide to the Management of Historical Heritage: District Plans." <https://hnpzpt-prod-web.azurewebsites.net/media/i2mo2c4z/guide-to-the-management-of-historic-heritage-district-plans.pdf>

Consideration of Wāhanga Rima

10. We also note KCDC's information regarding Wāhanga Rima and thought it may be helpful to add the following interpretation of Wāhanga Rima, from our experience proposing and applying it.
11. In both the case of Takamore and Taewapirau areas, they have core urupā that are scheduled as Wāhanga Tahi, with much wider connected areas of significance, referred to as wāhi tūpuna (ancestral sites), scheduled as Wāhanga Rima. The Wāhanga Rima areas have cultural values that relate to occupation, historical events, resources and so on. Whilst there is a chance of kōiwi discovery in these wāhanga rima, particularly given the nature of moving skirmishes in our recent history, these are not known discrete areas. Wāhanga Rima deals with these types of sites that have a mixed value.
12. In the case of Kārewarewa, the developed half of the urupā does not fit these criteria for Wāhanga Rima. It does not have a mixture of cultural values in this sense. It is one half of one distinct highly tapu cemetery or urupā.
13. The equivalent use of Wāhanga Rima in relation to Kārewarewa, would in fact be to schedule the entire urupā as Wāhanga Tahi (undeveloped and developed), all the land and water surrounding Kārewarewa, i.e. surrounding the land proposed for Wāhanga Tahi and Rua, as Wāhanga Rima. The surrounding area being a mixture of historical cultivation, pā, and mahinga kai sites, and so on. We are not seeking this in this Plan Change, although there would be in our view grounds for this. Hopefully that aids in understanding the stark contrast in value between the developed half of Kārewarewa, and the Wāhanga Rima sites.
14. In their decision to decline the archaeological authority application for Barrett Drive (in the proposed Wāhanga Rua area), we believe Heritage New Zealand expressed a good understanding of the nature of the site proposed as Wāhanga Rua:

“Heritage New Zealand also believes that whether or not the urupā has been desecrated, excavated, disturbed, or modified, it retains its tapu. Therefore, the Maori values of the urupā/kōiwi tangata are significant and tapu to iwi/hapu of Te Ātiawa and warrants full preservation”²
15. They went further to say:

² This is found in the Heritage New Zealand Pouhere Taonga, 14 September 2021, Internal Assessment of Barrett Drive application, page 9, as provided by KCDC in their further information at Attachment A – d(3)

“The granting of the archaeological authority is not in line with the Purposes and Principles of the Act. Heritage New Zealand Pouhere Taonga cannot in good conscience grant an archaeological authority that allows development on a property which is within the bounds of a known Maori Cemetery referred to as Kārewarewa Urupā”³

16. This demonstrates an understanding of the contrasting values understood to exist in the area proposed for Wāhanga Rua, as opposed to the Wāhanga Rima areas at Takamore and Taewapirau where authorities are regularly granted, often with support from mana whenua, in line with the much less significant, and nuanced, values.
17. As much as possible, the area proposed as Wāhanga Rua, should not have a pathway for further development, beyond the limited provisions Wāhanga Rua provides.

Comment on accidental discovery protocols

18. We agree with the view expressed by KCDC, that accidental discovery protocols are not appropriate mechanisms to deal with managing the effects of development to wāhi tapu.
19. Their purpose is to mitigate the effects to modifying or destroying values at either known lower value sites, or sites where there is merely a potential that discovery could occur. This mitigation is often rationalised as arising from discovery providing for the valuable recovery of information about archaeology that would otherwise not be known, and deemed valuable.
20. We refer to the view of Heritage New Zealand in their Internal Assessment of the Barrett Drive application in the proposed Wāhanga Rua area again, and how they determined ADPs to be an inadequate tool.

“This may be sufficient for mitigating the effects on archaeological evidence in this case, but archaeological information recovery is not necessarily mitigation for effects on broader cultural values especially if kōiwi tangata are disturbed”⁴

21. We thank the Hearing Panel for their consideration of our comments.

Nā mātou o Ātiawa ki Whakarongotai

³ Ibid. p.5

⁴ Ibid.