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# What is Aught, but as 'tis Valued? An analysis of strategies for the assessment of cultural heritage significance in New Zealand

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# What is Aught, but as 'tis Valued?<sup>1</sup> An analysis of strategies for the assessment of cultural heritage significance in New Zealand

Sara Donaghey

#### Abstract

A clear strategy for assessing the significance of historic places is a prerequisite for effective cultural resource management. This paper reviews the context for significance assessment, examines the criteria and framework for its operation and identifies specific areas of imbalance and under-performance relating to the classification, assessment and evaluation of historic places in New Zealand. A comparative analysis of the Monuments Protection Programme (England) indicates considerable potential for the introduction of selective elements of the English system to New Zealand. This report makes a number of recommendations to improve the system for assessing the significance of historic heritage and then considers the wider implications of its impact on management priorities and operating systems. The issues raised unequivocally demonstrate the need for a comprehensive review of the strategic options for cultural resource management in New Zealand, together with an explicit statement of commitment to historic heritage.

**Key Words**: Heritage Significance; Assessment; Cultural Resource Management; New Zealand; Monuments Protection Programme; Maori

Today, the accelerating pace of societal development demands the inclusion of cultural heritage as part of a national policy of sustainable resource development. In New Zealand there has been widespread concern for a number of years that cultural heritage is viewed as a luxury item; insufficient public awareness of cultural heritage issues and the accompanying scale of loss of sites, buildings and landscape elements has been well documented since McFadgen's observations in the 1960s<sup>2</sup> and more

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<sup>1.</sup> Shakespeare: Troilus and Cressida.

<sup>2.</sup> B. McFadgen, 'Legislative problems in the protection of New Zealand prehistoric sites', New Zealand Archaeological Association Newsletter, Vol. 9, No. 3, 1966, pp. 92–102.

recently, the arguments neatly summarised by McLean.<sup>3</sup> Political apathy, bicultural complexities, inadequate resources and a hotchpotch of methodological approaches have bedevilled the management of cultural heritage. Major differences in interpretation and application caused by ill-conceived legislative reform have led to inconsistent and reactionary behaviour by heritage practitioners.

The identification and assessment of historic places is the crucial first step in the creation of any cultural heritage landscape. Thorough surveys and consistent assessment criteria to determine the nature and extent of all types of heritage places—built heritage, archaeological and traditional sites and areas—are essential components of this process. Precisely how this is done, whether it is done effectively and to what ends, forms a major theme linking the contents of this article.

This paper outlines the management strategies for assessing the significance of the historic heritage resource of New Zealand and considers the extent to which these management objectives are fully integrated into the heritage environment. Where deficiencies are identified, it suggests improvements for increased effectiveness drawing on international best practice in general and the Monument Protection Programme in particular.

# Register of the Historic Places Trust

The Historic Places Act 1993 (HPA) specified the registration of historic places, historic areas, wahi tapu (Maori sacred sites) and wahi tapu areas, outlined assessment criteria, detailed two categories of historic place, specified a broad identification and listing process and designated the Historic Places Trust as the lead body for the identification and assessment of heritage.

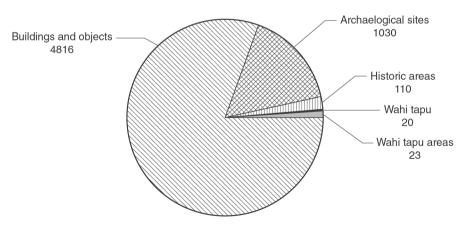


Figure 1. Registered items by type.

<sup>3.</sup> G. McLean, 'The lie of the land? The politics and practice of national level identification and assessment in New Zealand 1955–95', in *The politics of inheritance: architectural heritage conference*, Auckland: UNITEC, 1997.

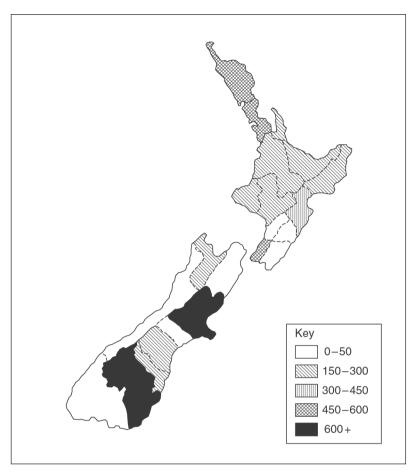


Figure 2. Distribution of registered places in New Zealand.

An analysis was performed on data from the paper file of the Auckland Register of the New Zealand Historic Places Trust to determine its effectiveness.

Figure 1 shows the total number of registered items recorded. The majority of buildings are of European origin, historic places outnumber archaeological sites by 4:1 and there are no marae (meeting places) on the Register, arguably amongst the finest examples of New Zealand's indigenous heritage. The overall impression is of a disproportionate representation of historic places.

Figure 2 shows the distribution of registered places countrywide. The majority of registrations occur within the two territorial authorities of Otago and Canterbury on the South Island, which suggests a lack of standardised criteria in the selection process and an uneven distribution across the country.

Figure 3, registered places 1975–1999 in New Zealand, shows that the peak period of registrations occurred in the 1980s; the rate of registration has since declined dramatically and now averages less than forty per year.

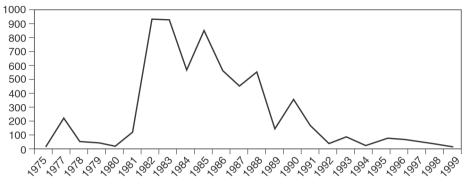


Figure 3. Registrations, 1975-1999.

At present, the Register is designed to identify and protect only a minority of places whose importance is determined according to inadequate and biased criteria. The analysis of the Register of the Historic Places Trust brings into question the overall adequacy of the data for analysis, suggesting that the first 800 years of New Zealand's human history are inadequately represented by surviving historic heritage. The Register is a poor reflection of the richness and diversity of historic heritage in view of the serious imbalances identified in all categories. Equally significant is the fact that it is not possible to estimate the proportion of registered items to the total historic heritage resource because no such quantification exercise has ever been undertaken. A comprehensive review and evaluation of all historic places is long overdue.

# The Monuments Protection Programme: England

The Monuments Protection Programme (MPP) was set up in 1986. Fairclough<sup>4</sup> described the Programme as 'a comprehensive review and evaluation of England's archaeological resource, designed to collect information which will enhance the conservation, management and public appreciation of the archaeological heritage'.

The Programme has the following principal objectives:

- to review and evaluate existing information about sites of archaeological and historical interest in order to identify sites of national importance;
- to recommend to the Secretary of State which monuments of national importance should be protected by law, notably by scheduling;
- to collate information on the condition of nationally important monuments to provide a guide to resource requirements for their conservation and future preservation;

<sup>4.</sup> G. Fairclough, *The monuments protection programme 1986–96 in retrospect*, London: English Heritage, p. 1.

 to use the MPP's national perspective to help frame an improved response to the problems of managing inadequately documented and poorly understood areas of the archaeological record.<sup>5</sup>

A combination of the detailed and comprehensive local database, the Sites and Monuments Records (SMR), together with the National Archaeological Record maintained by the Royal Commission on the Historical Monuments of England, provides baseline information for the MPP—the most systematic and extensive evaluation of England's archaeological resource ever undertaken.

Eight non-statutory criteria govern the selection of monuments of national importance. The eight criteria are: survival/condition, period, rarity and representivity, diversity of feature, documentation, group value, potential, and diversity of form.

The programme of national evaluation is substantially complete. A total of 18,500 monuments have been scheduled and 47% of the Schedule has been revised; a tremendous achievement.

#### Discussion

Table 1 provides a comparison of measures in New Zealand and England and a guide to the order of this discussion.

# Legislation

Legislation forms the essential framework for strategic planning within the context of resource management. The Ancient Monuments and Archaeological Areas Act containing the Register of Scheduled Monuments is the cornerstone of heritage legislation in England; scheduled monuments receive automatic statutory protection from which there are limited grounds for appeal. The system is tightly managed and endorsed from the highest government level. In New Zealand, registered sites do not receive automatic protection, as there is generous provision for appeal through the Resource Management Act 1991 (RMA) The Historic Places Trust has a role similar to its counterpart English Heritage but lacks the equivalent level of government resourcing and appreciation of its function as a key heritage protection agency. Moreover, the Trust is a non-governmental organisation (unlike English Heritage) and, despite its statutory functions, lacks influence. The Register is primarily a source of information that can be used to identify and assess heritage items and advocate their protection. Contrary to popular belief, however, the registration process was not designed to provide permanent physical protection for any historic site or place.

<sup>5.</sup> Ibid., p. 2.

Table 1 Comparison of measures

New Zealand	Topic	England
Historic Places Act	Legislation	Ancient Monuments and Archaeological Areas Act 1979
Register of the Historic Places Trust	System	Schedule of ancient monuments
Buildings and objects; archaeological sites; historic areas; wahi tapu; wahi tapu areas	Classification	Single monuments; urban areas; landscapes
Included	Historic buildings	Excluded if in use
Varied statutory criteria	Assessment	Eight non-statutory criteria
	National importance	
Selective, based on the nomination of a small number of places	Representative selection	Comprehensive, systematic criteria cover all periods and styles
NZAA Site Recording Scheme	Evaluation	Sites and Monuments Record; National Monuments Record
Archaeological site types	Typological descriptions	Monument class descriptions
None	National evaluations	For specific projects
Ranked, categories I and II	Evaluation procedure	Single, ranked and scored list
Poor	Local authority integration	Good
Poor; uncoordinated	Heritage database	Good; co-ordinated
Inadequate 77 (1996–1997); 8 (1999–2000)	Resourcing Registration rate	Adequate 1,800 p.a.

In principle, the two major pieces of heritage legislation, the HPA and RMA, were each designed with a separate purpose: identification and assessment of historic places was to be covered by the HPA and protection by the RMA. Accordingly, regional councils and territorial authorities were intended to have important roles in

providing for historic and cultural heritage protection and management under the RMA. However, integration between identification and protection measures was never endorsed and remains fragile.

This paper recommends the following actions:

- establish a national agency to ensure consistency and co-ordination across the heritage arena;
- establish the Trust as the national lead body for the care and protection of historic heritage;
- strengthen the provisions of the HPA whereby historic places receive automatic statutory protection with only limited grounds for appeal;
- clarify the conditions under which authorities for any activity affecting a site may be granted;
- develop guidelines for interpreting the criteria for registration in a non-statutory format.

# Classification

Both New Zealand and England share similarities in their respective classification systems, as shown in Table 2.

Despite the introduction of the broader concept of 'historic place' in 1993, the Register continues to be divided inappropriately into historic buildings and archaeological sites. Since 1993, no archaeological sites, gardens or other cultural landscapes have been registered. Is the concept of historic place workable in practice? The suggestion of separate registers for different types of historic place, including Maori heritage, with separate assessment criteria would, one feels, only add to the confusion.

The process of classification must also be considered. The MPP has developed a separate methodology for each of the three categories of 'monument'. By contrast, in New Zealand, all categories are assessed to the same criteria, whilst Maori sites require no assessment at all. In New Zealand, historic buildings are included

Table 2 Classification of historic places/ancient monuments

New Zealand	England
Buildings and objects	Single monuments
Archaeological sites	Single monuments
Historic areas	Urban areas/landscapes
Wahi tapu	Single monuments
Wahi tapu areas	Landscapes

regardless of whether they are in use or not; in England, buildings still suited to active use are excluded but protected in other legislation.

Archaeological issues. The practical difficulties involved in assessing and protecting more than 50,000 sites currently listed on the New Zealand Archaeological Association (NZAA) Site Record File have forced archaeologists to favour action only when a site is threatened. The protection afforded to all archaeological sites in HPA provisions is largely illusory. Notwithstanding this, no site has been registered since 1991.

Another reason for the slow pace of registration is that little of the archaeological field survey work of the past fifteen years, other than the location of new sites, has been fed into the site recording scheme and thence been available to inform registration decision.<sup>6</sup> There is also the issue of the unspectacular—the pits and middens resulting from everyday, predominantly Maori activities in the past that fit poorly into register-type formats. Allen<sup>7</sup> has commented that such places are unlikely to qualify for listing in a selective system of registration based on 'importance' or to have an application to destroy them refused, as under the existing registration criteria only the most spectacular individual historic sites are likely to gain registration.

#### Recommendations:

- substitute a single category of historic place comprising buildings, artefacts and archaeological sites all subject to the same assessment criteria;
- consider the application of MPP methodology to the existing categories of historic areas, wahi tapu and wahi tapu areas;
- remove from the Act the category of buildings in use as historic places; these are best managed by planning legislation and local authority processes;
- establish a national programme of archaeological site recording, upgrade, assessment and monitoring;
- establish procedures to ensure all site information is fed into the Site Record File of the NZAA;
- consider defining more historic areas comprising interrelated sites and their settings;
- clarify the distinction between registered and recorded sites;
- establish a pilot project to investigate pits, middens and other site types not qualifying for registration;
- promote registration as a protection measure.

<sup>6.</sup> A. Challis, 'Registration of archaeological sites under the Historic Places Act 1980', *Archaeology in New Zealand*, Vol. 35, No. 4, 1992, pp. 228–242.

<sup>7.</sup> H. Allen, *Protecting historic places in New Zealand*, Auckland: Department of Anthropology, University of Auckland, 1998.

# Assessment

Comprehensive criteria and methodology with clear guidelines for defining national importance and representativeness must be established as an integral part of the registration process. The Register must be seen as a dynamic document subject to an ongoing process of review in accordance with sound criteria applied consistently throughout the country.

The key issue is whether the national Register should include a limited number of 'nationally significant' registered items, which a national agency would attempt to protect, or whether the Register should be a 'nationally representative' list of places meeting the HPA 1993 criteria.

National importance. The New Zealand scheme is confusing in its assumptions and unsystematic in application. Both relative and essential components are mixed with criteria ranging from unique, through regional to community values in a bewildering diversity of approaches. The term 'importance' is commonly used in the groupings of historic places and assessment approaches found in the HPA, but its relevance to the assessment process is largely illusory. National importance is almost exclusively conveyed by the designation of places as category I or II; other approaches are relegated to minor weighting. Moreover, historic areas, wahi tapu and wahi tapu areas are not subject to any system of classification or ranking.

A representative selection. Archaeologists have begun to question the merits of systems (such as scheduling and registering) that give precedence to the individual site over a representative area. Cleere<sup>8</sup> argued that a valid selection should consist of a representative sample drawn from the known totality of the national heritage. Fowler's artistic metaphor makes this clear: 'the whole canvas of the archaeological environment, not just the blobs of brightest paint upon it, is what makes the picture'. <sup>9</sup>

Allen<sup>10</sup> believes the problem is caused by basing the selection on historical assumptions that are too narrow and favours the preservation of a sample of all (archaeological) sites to avoid the bias towards the unique and spectacular that some ranking systems create. The alternative to large-scale land management to protect historic values is the creation of conservation zones in district plans. However, placing such a responsibility entirely with local authorities is also contentious.

In England, comprehensive, systematic criteria cover all periods, styles and monument types to ensure that a representative selection of sites and monuments is chosen for protection. As is apparent in New Zealand, a selective system, based on the nomination of a small number of places, does not result in a selection

<sup>8.</sup> H. Cleere, Archaeological heritage management in the modern world, London: Unwin Hyman, 1989.

<sup>9.</sup> P. Fowler, 'What price the man-made heritage?', Antiquity, Vol. 61, 1987, pp. 409-415 (p. 413).

<sup>10.</sup> Allen, op. cit.

demonstrating the variety and cultural diversity of the nation's heritage. Historic buildings are vastly over-represented, whilst archaeological sites and places of significance to Maori form an unrepresentative minority. There is nothing intrinsically wrong with preserving the unique for the very reason of its singularity; the difficulty lies in establishing an equitable balance between what is extraordinary and a representative selection of the ordinary.

This suggests the following recommendations:

- remove all of section 23 of the HPA detailing the criteria for registration. Replace it with a transparent assessment procedure based on the eight non-statutory criteria for determining national importance used by the MPP supplemented, where necessary, with provisions to satisfy the protection of places of spiritual value to Maori;
- periodically review all entries on the Register;
- clarify and simplify interpretive information regarding assessment;
- ensure that a representative selection of historic places is selected for protection by comparison to the known resource, following a national quantification exercise;
- develop clear guidelines to assist the implementation of registration policy.

#### Evaluation

Successful decision making depends ultimately on our knowledge and understanding of what we are trying to preserve. Research and inquiry that enables this are essential components in managing the resource. The NZAA Site Recording Scheme is the national database for New Zealand. However, the system of national evaluation at present suffers from a number of inadequacies that have been documented by the author, as described below.<sup>11</sup>

The Site Recording Scheme Upgrade Project. A programme of national evaluation is essential to establish what is nationally important, even if it is not necessarily going to be registered. This will enable strategic responses to conservation management at local authority and national level. A recent national initiative by the NZAA, the Site Recording Scheme Upgrade Project, should help address some of these issues, as it aims to upgrade the information contained in the 52,422 recorded archaeological sites in the country district by district.<sup>12</sup>

This innovative project deserves to succeed; however, its long-term future can only be secured by connection to a government heritage agency to ensure adequate resources.

<sup>11.</sup> S. Donaghey, 'A fading landscape: strategies for managing the cultural heritage resource', in *Management and International Business*, Auckland: Massey University, 2000.

<sup>12.</sup> L. Bowers, 'Annual Report 2000. The NZAA Site Recording Scheme Upgrade Project', *Archaeology in New Zealand*, Vol. 43, No. 2, 2000, pp. 95–97.

Typological descriptions. The monument class descriptions are a key component of MPP evaluation procedures supporting the identification and classification of major site types identified in the SMRs on a thematic basis in New Zealand. The handbook of archaeological site recording<sup>13</sup> provides a taxonomy of twenty-six major site types and has the potential to provide an excellent starting point for devising a typological inventory of historic places similar to the MPP. Projects need to be specially commissioned to gather information on inadequately researched and documented areas of the archaeological resource to be instigated in New Zealand, as occurs in England.

Evaluation procedures. At present, there is both community and professional involvement in site identification and processing of registrations in New Zealand, but it is apparent that the process lacks strategic direction, and any meaningful public involvement in the final decision-making process. Inconsistencies within the current procedures for evaluation include a lack of consistency in determining significance, confusion over the categorisation of historic places and the role of stakeholder groups.

There is also a wide variation in the criteria and processes used for registration and differences in the amount and quality of information held about individual places.

Ranking. There are marked differences in ranking procedures between the two countries. In New Zealand, historic places are designated category I and II by HPA 93 in an attempt to rank places in terms of their 'special' or 'outstanding' significance or value but, in reality, do little more than represent a spurious degree of ranking. In these circumstances, the term 'national importance' is rendered meaningless. By contrast, a single ranked list based on a transparent scoring system defines monuments of national importance in England.

Ranking systems have received a mixed press in New Zealand archaeological practice. Both Walton and Allen<sup>14</sup> have been highly critical of ranking methodology.

However, the advantage of a ranking system is its rigour, transparency and consistency, and thus its defensibility under challenge; proposals for listing new items can also be assessed against the same criteria as existing listed items. Provided the advice of Startin<sup>15</sup> is followed and scoring is seen explicitly as an aid to

<sup>13.</sup> New Zealand Archaeological Association, *Archaeological site recording in New Zealand*, Auckland: New Zealand Archaeological Association, 1999, pp. 1–138.

<sup>14.</sup> ICOMOS and NZHP Trust, 'Register workshop', in *The crucial first step*, Wellington: New Zealand Historic Places Trust, 1997; H. Allen, 'Protection for archaeological sites and the NZ HPT Register of Historic Places, Historic Areas, Wahi Tapu and Wahi Tapu Areas', *Archaeology in New Zealand*, Vol. 37, No. 3, 1994, pp. 205–207.

<sup>15.</sup> B. Startin, 'Assessment of field remains', in Hunter and Ralston (eds) Archaeological resource management in the UK: an introduction, Stroud: Alan Sutton Publishing, 1993, pp. 184–196.

judgement, not a replacement for it, supported by continual reassessment and revision, then the validity of the system as confirmed by the success of the MPP must speak for itself.

A thematic framework. A carefully constructed register should be capable of reflecting and shaping a broad perception of history and heritage. One of the ways in which this can be achieved is by classifying or grouping similar heritage items according to chronological, cultural, or functional characteristics. A thematic framework such as that proposed by McLean<sup>16</sup> would undoubtedly tighten the focus of the Register. The existence of a set of national standards and a consistent approach to registration would provide a benchmark for the assessment of significance and legitimise the registration process.

Historic areas. The concept that the context of historic places and the grouping of places and buildings has equal importance to individual places and buildings is well established in cultural heritage studies. In New Zealand, the hypothesis that 'the whole may be more than the sum of its parts' applied to historic heritage, is recognised in those sections of the HPA relating to historic areas and wahi tapu areas. Indeed, nowhere is this better expressed than in the holistic view of a culturally meaningful landscape posited by Maori in which ecological and cultural relationships are tied into a single web. Unfortunately, the number of registered items in each category is not great, and there has been no comprehensive, systematic approach towards historic area registration in New Zealand.

New Zealand lags behind in its recognition and development of archaeological conservation zones, environmentally sensitive areas and cultural landscapes compared with England. Recent MPP initiatives such as the Historic Landscapes Project show that an inclusive approach to landscape evaluation used in tandem with other conservation developments in countryside management can be used successfully to promote a common national framework for conservation decisions within the larger context of planning and agricultural policies.<sup>17</sup> There is no reason why the adoption of a similar broad-brush approach should not be successful in New Zealand.

#### Recommendations:

• remove categories I and II historic places from the HPA and substitute a single category consistent with the remaining unranked elements—historic areas, wahi tapu and wahi tapu areas.

<sup>16.</sup> G. McLean, Meanings to an end: a draft national thematic framework for historic places in New Zealand, Wellington: New Zealand Historic Places Trust, 1996, pp. 1–67.

<sup>17.</sup> English Heritage, Archaeology review 1996-97, London: English Heritage, 1997.

- develop the Register as an indicative reference to places of significance to Maori rather than a 'list' of places of significance, as suggested by Richardson; <sup>18</sup>
- introduce a ranked, scored methodology for historic places and historic areas based on a single list;
- ensure consistency in the application of evaluation criteria throughout the registration process;
- devise a comprehensive classification for all known site types as working documents based on the system and taxonomy of the NZAA;
- reintroduce area/regional programming to increase the volume of registered sites and improve the accuracy of site record details;
- charge a national heritage agency with the task of co-ordinating site upgrade and assessment projects;
- ensure that industrial heritage and buildings in an urban environment are protected through the statutory planning process by listing in district plans, through zoning or the creation of 'Environmentally Sensitive Areas'.

# Maori Heritage

The Maori ancestral landscape is essential to any discussion of cultural heritage values; however, many issues concerning the identification and selection of Maori sites of outstanding significance and value have yet to be resolved. Also, the rate of registration of sites of significance to Maori has been unacceptably slow.

#### Recommendations:

- clarify and strengthen the protection of sites of Maori.
- establish clear criteria to determine sites of national significance to Maori consistent with principles of indigenous cultural ownership.

#### Local Authority Issues

A persistent and major anomaly has been the lack of any explicit allocation of heritage protection and management functions between central and local government and the Trust, on the one hand, and between the HPA and RMA, on the other. This has led to uneven and inconsistent application and interpretation of the purposes and principles of the RMA with regard to cultural heritage management through statutory provisions in district plans both by local and regional authorities. The RMA does not indicate how cultural heritage should be managed in terms of district plan scheduling, whilst links to the HPA and the registration process remain unclear.

<sup>18.</sup> B. McFadgen, 'Legislative problems in the protection of New Zealand prehistoric sites', New Zealand Archaeological Association Newsletter, Vol. 9, No. 3, 1966, pp. 92–102; P. Richardson, Review of the Historic Places and Historic Areas Sections of the Historic Places Trust's National Register, Wellington: New Zealand Historic Places Trust, 2000.

Identification at territorial authority level is often unsystematic, based on a variety of uncoordinated assessment methods and rarely comprehensive, leading to an aesthetic or elitist view of the role of heritage management in which only the 'crème de la crème' is protected.

In England, local authority involvement in heritage protection is firmly established; sites and monuments are considered in regulatory and planning processes whilst the SMR database is a management responsibility of the local authority. In New Zealand, the performance of territorial authorities in the field of heritage protection is highly variable, ranging from proactive authorities with their own cultural heritage strategies to those having scant regard for heritage items and who are content to leave heritage management to the Trust.

#### Recommendations:

- clarify and strengthen the links between the HPA and the RMA; in particular, ensure the identification and assessment function of the Trust is complemented by the protection mechanisms of local government;
- clarify national standards for heritage assessment at local authority level;
- establish nationally agreed methodology for identifying cultural heritage in district plans and integrating registered places in district plans;
- include local historic heritage schedules in district plans; all nominations to be considered against national assessment criteria.

# The Heritage Database

Decision making to inform effective significance assessment strategies requires quality information to be readily available. Richardson<sup>19</sup> has called into question the adequacy of the Trust's information database on registered items. He viewed the Register within the broader context of other databases and schedules of land-based heritage in New Zealand, and concluded that it provided only a partial listing of places of recognised heritage value.

#### Recommendations:

- set up a comprehensive and retrievable heritage database that records all relevant information in a standardised format. Such a database would operate as the primary information source for management decisions about the heritage resource;
- establish quality standards incorporating clear policy guidelines.

#### Resourcing

Improved levels of funding are a sine qua non for effective heritage management.

<sup>19.</sup> Richardson, op. cit.

#### Recommendations:

- direct resources to support the development of assessment frameworks, the gathering of information and the maintenance and development of expertise and information systems and to implement management decisions affecting the resource:
- increase current levels of funding to permit efficient management of the assessment and registration process.

# Rate of Registration

The rate at which the MPP schedules sites has been a crucial factor in the success of the Programme. A 'headline' target of 1,200–1,800 scheduling recommendations each year has been achieved since inception. By contrast, the registration rate in New Zealand has been extremely slow in recent years. Moreover, the registration process remains almost entirely reactive; registrations are put forward on an *ad hoc* basis rather than as part of a systematic programme of identification, selection and protection.

#### Recommendation:

• set a target rate of 500 registrations each year for the next ten years.

At this point, international comparisons serve a useful comparative purpose. Let us look briefly at procedures in two other countries, the USA and Australia. In the USA, the National Parks Service (NPS) co-ordinates the identification, evaluation and protection of historic and archaeological resources, the most significant of which are listed on the National Register of Historic Places maintained by the NPS. The list includes districts, buildings, sites, structures and objects of local, regional or national significance. However, listing on the Register does not guarantee protection of items or areas, which occurs most effectively at state or local government level.<sup>20</sup>

In Australia, the Australian Heritage Commission manages the Register of the National Estate comprising in excess of 11,000 places of national significance, mainly historic buildings and places, although registration does not ensure protection. Organisation and administration at state level is the preferred and more effective means of managing the heritage.<sup>21</sup>

<sup>20.</sup> Parliamentary Commissioner for the Environment, *Historic and cultural heritage management in New Zealand*, Wellington: Parliamentary Commissioner for the Environment, 1996.

<sup>21.</sup> Parliamentary Commissioner for the Environment, *Historic and cultural heritage management in New Zealand. Background report: case studies*, Wellington: Parliamentary Commissioner for the Environment, 1996.

#### Conclusion

Few would deny that the present New Zealand Register requires a thorough overhaul. In its current format it is a poor reflection of the diversity of the country's historic heritage both in terms of the selection of places of national importance and those places chosen as representative of the nation's heritage. Far more attention must be paid to the place of heritage in the wider cultural landscape; the holistic panorama of historic areas and relict landscapes as perceived by Maori. National coordination must ensure consistency across common assessment mechanisms and a standardised evaluation and methodology at all levels of government—national, regional and local—set in place. Moreover, the current criteria must be flexible enough to accommodate changing perceptions of value and international guidelines. Registration must become a political priority; the Register must embody a sense of national collective identity inclusive of all heritage values.

The MPP is an example of an overseas system with proven success in heritage resource management. This comparative analysis has identified significant differences between management systems in England and New Zealand. However, it has also identified a congruence that signalled a degree of fit sufficiently close to enable a transfer of principle and methodology. A formative comparative evaluation of the two systems suggests that there is considerable potential, as yet unrecognised, for the application of the MPP to improve existing systems of heritage management in New Zealand.

The recommendations put forward would substantially improve the performance and effectiveness of the heritage management system, particularly in the areas of statutory provision, classification, assessment, evaluation and protection of the heritage resource. Other significant improvements would accrue over sensitive issues of Maori heritage, strengthened integration with local authority procedures, the RMA and the planning process, and to the community, business and private sectors.

It is not feasible to attempt to explore and conserve the entire heritage resource but rather to set in place procedures for its effective management, with the proviso that registration is only one aspect of modern heritage regulation. Today, this must include research-driven conservation, environmental land management schemes and new approaches to landscape conservation and sustainability.

These proposals must be underpinned by raising the profile of historic heritage as a national asset for succeeding generations to enjoy. A prevailing climate of underinvestment and reduced funding for public-sector projects has made successive governments unwilling or unable to consider historic heritage as a worthy recipient of Treasury largesse. Such a cavalier attitude towards a finite, non-renewable resource can no longer be tolerated; the conservation of New Zealand's heritage places is non-negotiable. A shift in public awareness and attitudes is required; one that will transform the profile of historic heritage to ensure it becomes truly expressive of New Zealand's national and cultural identity.