



**WHANGANUI  
DISTRICT COUNCIL**  
Te Kaunihera a Rohe o Whanganui

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## **Submission on a Publicly Notified Plan Change to the Whanganui District Plan**

*Resource Management Act 1991 In accordance with Form 5 - RM (Forms, Fees and Procedure) Regulations 2003*

**To:** Whanganui District Council, PO Box 637, Whanganui

**This is a submission on:** Plan Change 63 Historic Heritage to the Whanganui District Plan.

**Closing Date:** 09/02/2025

**Date received:** 07/02/2025

**Submission Reference Number #:** 10

**Submitter:**

Heritage New Zealand Pouhere Taonga

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**Attachments:**

HNZPT Submission.pdf

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- No

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- N/A

## **Submission points**

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**Point 10.1**

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

**demolition** In relation to historic heritage: Defacing, destroying or dismantling of a heritage item or a component of a heritage conservation area in whole.

**Support/Oppose/Amend:** Support

**Submission**

HNZPT supports the proposed definition of demolition in Plan Change 63 (PC63).

**Relief sought**

Retain definition in PC63.

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**Point 10.2**

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

**Heritage conservation** means all the processes of recording, understanding, and caring for an item so as to safeguard its historic heritage value, prioritising respect for existing fabric, associations, meanings and use.

**Support/Oppose/Amend:** Support

**Submission**

HNZPT supports the definition of Heritage Conservation in Plan Change 63.

**Relief sought**

Retain definition in PC63.

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**Point 10.3**

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

**Heritage conservation plan** means an objective report which documents the history, fabric, and historic heritage value of an item, assesses its historic heritage significance, describes its condition, and makes comprehensive recommendations for the conservation of the item, including how the item will be maintained to prevent neglect.

**Support/Oppose/Amend:** Support

**Submission**

HNZPT supports the definition heritage conservation plan which is taken from the definition of conservation plan in the ICOMOS New Zealand Charter.

## Relief sought

Retain definition in PC63.

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### Point 10.4

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

<b>heritage item</b>	An item of historic heritage, including a landscape, place, precinct, work, monument, structure or building of historical architectural, archaeological, aesthetic, social, cultural, technical, scientific or natural heritage significance.
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**Support/Oppose/Amend:** Support

### Submission

HNZPT supports the definition of heritage item in Plan Change 63.

## Relief sought

Retain definition in PC63.

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### Point 10.5

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

<b>integrity</b>	means the wholeness or intactness of a place, including its meaning and sense of place, and all the tangible and intangible attributes and elements necessary to express its historic heritage value.
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**Support/Oppose/Amend:** Support

### Submission

HNZPT supports the definition of integrity relating to historic heritage in plan change 63.

## Relief sought

Retain as in PC63.

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### Point 10.6

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

<b>Maintenance and Repair</b>	in relation to historic heritage, means regular and on-going protective care of a place to prevent deterioration and to retain its historic heritage value. To make good any decayed or damaged heritage fabric using identical, closely similar, or otherwise appropriate material.
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**Support/Oppose/Amend:** Amend

### **Submission**

HNZPT supports the proposed definition of maintenance and repair. However, it would be beneficial if the definitions are separated similar to the format of the ICOMOS New Zealand Charter and the HNZPT guide.

Retaining only the definitions of maintenance and repair, and giving these activities permitted activity status will simplify the plan, and improve clarity and certainty for plan users and owners of heritage places.

### **Relief sought**

Amend the definition to create two separate definitions as follows:

Maintenance in relation to historic heritage, means regular and ongoing protective care of a place to prevent deterioration and to retain its cultural heritage value.

Repair, in relation to historic heritage, means to make good decayed or damaged heritage fabric using identical, closely similar, or otherwise appropriate material.

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## **Point 10.7**

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

General

**Support/Oppose/Amend:** Oppose

### **Submission**

Definition of Minor Works and Maintenance.

HNZPT recommends deleting the definition of minor works and maintenance. The notified plan has already defined 'maintenance'. By having a term defined differently create confusion to the plan users.

### **Relief sought**

Delete definition of minor works and maintenance.

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## **Point 10.8**

**Section:** Definitions

**Sub-section:** Definitions

**Provision**

**setting**

means the area around and/or adjacent to a place of cultural heritage value that is integral to its function, meaning, and relationships. Setting includes the structures, outbuildings, features, gardens, curtilage, airspace, and accessways forming the spatial context of the place or used in association with the place. Setting also includes cultural landscapes, townscape, and streetscapes; perspectives, views, and viewshafts to and from a place; and relationships with other places which contribute to the historic heritage value of the place. Setting may extend beyond the area defined by legal title, and may include a buffer zone necessary for the long-term protection of the historic heritage value of the place.

**Support/Oppose/Amend:** Amend

## **Submission**

HNZPT supports the inclusion of a definition of Setting which is taken from the ICOMOS New Zealand Charter. However, for the purposes of the district plan, a more concise definition is preferred. The second half of the definition creates an understanding of setting which is overly broad and would be very difficult to administer in practice.

## **Relief sought**

Amend the definition of setting by deleting from the words “~~Setting also includes cultural landscapes ...~~”.

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## **Point 10.9**

**Section:** SASM – Sites and areas of significance to Maori

**Sub-section:** General

**Provision**

General

**Support/Oppose/Amend:** Support

## **Submission**

HNZPT supports the section of Tangata Whenua Cultural Values.

## **Relief sought**

Retain section on Tangata Whenua Cultural Values subject to any feedback from mana whenua.

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## **Point 10.10**

**Section:** SASM – Sites and areas of significance to Maori

**Sub-section:** Objectives

**Provision**

General

**Support/Oppose/Amend:** Support

## **Submission**

HNZPT supports the SASM objectives and policies.

## **Relief sought**

Retain objectives and policies subject to any feedback from mana whenua.

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## **Point 10.11**

**Section:** HH – Historic Heritage

**Sub-section:** General

**Provision**

General

**Support/Oppose/Amend:** Amend

**Submission**

Historic Heritage Introduction.

HNZPT acknowledges the classification of built heritage into Class A and Class B heritage items.

The New Zealand Heritage List/Rārangī Kōrero should also be mentioned in the HH Chapter, as there is often confusion among members of the public between the two lists/schedules.

**Relief sought**

Include the following in the introduction:

The New Zealand Heritage List Rārangī Kōrero is established by the Heritage New Zealand Pouhere Taonga Act 2014. The List can include buildings, sites, archaeological sites, wāhi tapu, wāhi tupuna, and wāhi tapu area. The New Zealand Heritage List Rārangī Kōrero is administered by Heritage New Zealand Pouhere Taonga.

Many, but not all, of the Class A and Class B heritage items in the heritage schedules are also included in the New Zealand Heritage List Rārangī Kōrero.

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**Point 10.12**

**Section:** HH – Historic Heritage

**Sub-section:** General

**Provision**

General

**Support/Oppose/Amend:** Amend

**Submission**

Archaeology paragraph.

HNZPT supports the information regarding archaeology included in the introductory section of the historic heritage chapter. HNZPT suggests relocating the “note” relating to archaeological authority (currently situated at the end of the historic heritage chapter) to the introduction section of the chapter.

**Relief sought**

Relocate the following note to the introduction part of the Historic Heritage chapter:

It is an offence to modify or destroy any archaeological site without an authority from Heritage New Zealand, under the Heritage New Zealand Pouhere Taonga Act 2014. Where earthworks is proposed to take place within or surrounding an archaeological site the person undertaking the proposed earthworks should consult with a qualified archaeologist and Heritage New Zealand prior to commencing any earthwork.

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**Point 10.13**

**Section:** HH – Historic Heritage

**Sub-section:** Issues

**Provision**

**Support/Oppose/Amend:** Amend

**Submission**

HNZPT generally supports the issues identified in the plan change. HNZPT also recommends including archaeology as an issue in this section, so that the 'issues' section more closely flows down to the objectives, policies, and rules. It may also be an improvement to combine issues HH-I3 and HH-I5 into one issue.

**Relief sought**

Add the following:

HH-I6: Archaeological sites may be lost through the development/ redevelopment of sites and through land use activities.

Combine HH-I3 and HH-I5 as follows:

HH-I3: Loss of historic heritage through change of use, lack of use or neglect, and/or because of economic constraints.

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**Point 10.14**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

HH-P3

**Support/Oppose/Amend:** Amend

**Submission**

Policies HH-P1 and HH-P3 could be combined as both refer to heritage schedule appendices.

**Relief sought**

Consider combining policies HH-P1 and HH-P3 into one policy.

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**Point 10.15**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

General

**Support/Oppose/Amend:** Oppose

## **Submission**

While there is a long list of policies, there is nothing which specifically refers to maintenance or repair. HNZPT recommends including a policy to address this topic. Our recommended wording is taken from the Wellington City 2024 District Plan.

### **Relief sought**

Add the following policy relating to maintenance and repair:

Encourage the maintenance and repair of built heritage where undertaken in accordance with recognised conservation principles and methods.

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## **Point 10.16**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

HH-P4

**Support/Oppose/Amend:** Support

## **Submission**

HNZPT supports the protection of historic heritage resource from inappropriate subdivision, use and development.

### **Relief sought**

Retain HH-P4.

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## **Point 10.17**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

HH-P6

**Support/Oppose/Amend:** Amend

## **Submission**

Policies HH-P5 and HH-P6 could be combined into one policy. We also note that HH-P5 is repeated in the notified plan change.

### **Relief sought**

Amend as follows:

HH-P5: Ensure when alterations and additions to scheduled historic heritage items including scheduled interior items are undertaken that adverse effects on the heritage items are avoided, remedied or mitigated.



**Point 10.18**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

**HH-P7**

**Support/Oppose/Amend:** Support

**Submission**

HNZPT supports enabling the adaptive reuse of heritage items provided the adverse effects of the activity on heritage values and the surrounding environment can be avoided, remedied or mitigated.

**Relief sought**

Retain HH-P7.

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**Point 10.19**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

**HH-P12**

**Support/Oppose/Amend:** Amend

**Submission**

In accordance with s6(f) of the RMA, the primary policy direction for scheduled archaeological sites should be protection, rather than 'sustainable management'.

**Relief sought**

Amend HH-P12 as follows:

HH-P12 Protect archaeological sites from inappropriate development~~Enable the sustainable management of the archaeological resources by considering:~~

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**Point 10.21**

**Section:** HH – Historic Heritage

**Sub-section:** Policies

**Provision**

**HH-P15**

**Support/Oppose/Amend:** Amend

### Submission

HNZPT recommends modifying HH-P15 to reflect that in the event that an archaeological authority is obtained, it is not appropriate to implement an Accidental Discovery Protocol for archaeological sites.

### Relief sought

Amend HH-P15 as follows:

Implement Accidental Archaeological Discovery Protocols of wāhi tapu or archaeological sites except for in the event where an Archaeological Authority has been obtained from Heritage New Zealand.

Note: An Archaeological Authority must be obtained from Heritage New Zealand prior to any earthworks that may modify or destroy an archaeological site. The Accidental Discovery Protocol does not apply when an archaeological authority has been issued under the Heritage New Zealand Pouhere Taonga Act 2014.

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### Point 10.22

**Section:** HH – Historic Heritage

**Sub-section:** Rules - Class A Heritage Items

#### Provision

HH-CA-R1	1. Minor Works and Maintenance.	
	2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, alterations and/or additions provided that:	<b>Permitted</b>
	a. The works are not in a building listed for interior values in Appendix A – Heritage Items. b. The works do not change or alter the external physical footprint or appearance of the building.	<b>(PER)</b>

**Support/Oppose/Amend:** Amend

### Submission

HNZPT supports a permitted activity rule maintenance and repair, as written in HH-CAR1.

However, in line with our other points, the rule should refer to the definitions of 'maintenance' and 'repair', rather than 'minor works and maintenance'.

### Relief sought

Amend the permitted activity rule to refer to the definitions of 'maintenance' and 'repair', rather than 'minor works and maintenance'.

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### Point 10.23

**Section:** HH – Historic Heritage

**Sub-section:** Rules - Class A Heritage Items

#### Provision

1. Maintenance and repairs that do not comply with rule HH-CA-R1.

Council's discretion is restricted to:

HH-CA-R2	<ul style="list-style-type: none"> <li>a. Works affecting the identified historic heritage values in Appendix A - Heritage Items</li> <li>b. The area of works that fails to comply with the meaning of Minor Works and Maintenance.</li> </ul> <p>2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building listed for interior values in Appendix A – Heritage Items</p>	<p><b>Restricted Discretionary</b></p>
	<p>Council's discretion is restricted to:</p> <ul style="list-style-type: none"> <li>a. Works affecting the identified historic heritage values in Appendix A - Heritage Items.</li> <li>b. Content of any Heritage Conservation Plan.</li> <li>c. Degree of alteration to existing floor plan and dimensions.</li> <li>d. Extent of the loss of integrity of heritage fabric in primary spaces such as foyers, lobbies, stairs and corridors.</li> <li>e. Degree of alteration to significant architectural features and finishes including skirtings, panelling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.</li> </ul>	<p><b>(RDIS)</b></p>

**Support/Oppose/Amend:** Amend

### Submission

HNZPT recommends deleting the first part of HH-CA-R2 relating to maintenance and repair.

HNZPT supports a restricted discretionary activity for interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A – Heritage Items.

HNZPT recommends amending 2(d) and 2 (e) as the examples of building areas/components are not comprehensive and would not apply to every building. More inclusive and general wording 'in areas of greatest heritage significance' would be more appropriate.

### Relief sought

As a consequential amendment to the submission point on HH-CA-R1, delete:

- ~~1. Maintenance and repairs that do not comply with HH-CA-R1. Council's discretion is restricted to:~~
- ~~a. Works affecting the identified heritage values in Appendix A – Heritage Items~~
  - ~~b. The area of works that fails to comply with the meaning of Minor Works and Maintenance.~~

Amend as follows:

1.2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A – Heritage Items.

Council's discretion is restricted to:

- a. ...
- b. ...
- c. ...
- d. Extent of the loss of integrity of heritage fabric in primary spaces such as foyers, lobbies, stairs and corridors areas with greatest heritage significance.

e. Degree of alteration to significant architectural features and finishes including skirtings, paneling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.

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## Point 10.24

**Section:** HH – Historic Heritage

**Sub-section:** Rules - Class A Heritage Items

### Provision

1. Alterations or additions that affect the exterior of a heritage item within Appendix A – Heritage Items.

Consideration will include:

- a. The extent to which the historic heritage values including the design of the item and its context of heritage are likely to be retained, protected and / or enhanced.
- b. Whether the activity is likely to have cumulative adverse effects on heritage values.
- c. In the case of relocation of a heritage building, measures that may be necessary to protect the fabric of the building during relocation.
- d. Potential for the re-use and/or recycling of any heritage fabric from the heritage item.
- e. Consideration of any relevant Whanganui District Council design guidelines.
- f. The extent and effect of any earthworks, tunnelling, digging, vibration or excavation that may destabilise the item, structure, place or area.
- g. The results of any consultation undertaken including any written advice obtained as follows:
  - i. In the case of the site having identified tangata whenua values, comment from the relevant iwi.
  - ii. Any recommendations of Heritage New Zealand Pouhere Taonga, and the New Zealand Archaeological Association File Keeper.
  - iii. Where the site history indicates that there may be historical artefacts or other physical remains, any advice obtained from a suitably qualified and experienced archaeologist.

**HH-CA-R3**

**Discretionary**

**Note:** All advice obtained is to be provided to the Council with the resource consent application.

**(DIS)**

- h. The reasons for the proposed activity and reasons why the alternative less adverse options for achieving the same or similar outcome have been discounted. For clarification, reasons for discounting alternative options can include amongst other matters financial cost, natural hazards, safety and technical feasibility.
- i. The creation and upkeep of a recording of heritage features of the item in its original Place (eg. photos of existing vistas for public record of the history of the Place).
- j. Any proposals to strengthen integrity and historic heritage value of the item, including the benefits of alterations for the purpose of implementing Building Code upgrades for seismic, fire and access purposes.
- k. Any proposals to strengthen or replace high risk

elements, such as parapets, façade decoration and chimneys, with high quality light-weight material.

- I. The extent to which the proposed alterations, additions to or demolition of a scheduled heritage item have been informed by the advice of qualified professionals such as conservation architects, heritage consultants, engineers and quantity surveyors as appropriate. Such advice should include a thorough analysis of the alternative options available and the extent of professional advice obtained and should be proportional to the scale and intensity of the effects of the works being undertaken.

**Support/Oppose/Amend:** Amend

**Submission**

HNZPT supports a discretionary activity status for alterations or additions that affect the exterior of a heritage item within Appendix A – Heritage Items.

However, there is no rule controlling new buildings and structures within the setting of a Class A heritage item. As such, HNZPT recommends an additional clause to HH-CAR3 to address this gap in the rules.

**Relief sought**

Retain as in PC63, with the following addition:

2. New buildings and structures, except buildings less than 10m<sup>2</sup>, within the setting of a scheduled heritage item.

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**Point 10.25**

**Section:** HH – Historic Heritage

**Sub-section:** Rules - Class A Heritage Items

**Provision**

1. Demolition, partial demolition, relocation, defacing, destroying or dismantling of a heritage item or a component of a heritage item within Appendix A – Heritage Items.

**HH-CA-R4**

**Notes:**

1. Non-complying activities will generally be publicly notified.

**Non-  
Complying  
(NC)**

**Support/Oppose/Amend:** Support

**Submission**

HNZPT supports a non-complying activity status for demolition of scheduled historic heritage for Class A heritage items.

**Relief sought**

Retain as in PC63.

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## Point 10.26

**Section:** HH – Historic Heritage

**Sub-section:** Rules - Class B Heritage Items

**Provision**

<b>HH-CB-R1</b>	1. Minor Works and Maintenance.	
	2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, alterations and/or additions provided that: a. The works are not in a building scheduled for interior values in Appendix A – Heritage Items. b. The works do not change or alter the external physical footprint or appearance of the building.	<b>Permitted (PER)</b>
	3. Works that do not impact on the historic heritage values as identified in the Scheduling Reports in Appendix A - Heritage Items.	

**Support/Oppose/Amend:** Amend

### Submission

HNZPT supports a permitted activity rule maintenance and repair, as written in HH-CBR1.

However, in line with our other points, the rule should refer to the definitions of 'maintenance' and 'repair', rather than, 'minor works and maintenance'.

### Relief sought

Amend HH-CB-R1 to refer to the definitions of 'maintenance' and 'repair', rather than 'minor works and maintenance'.

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## Point 10.27

**Section:** HH – Historic Heritage

Rules - Class B Heritage Items

**Sub-section:**

**Provision**

**HH-CB-R2**

- Maintenance and Repairs that do not comply with HH-CB-R1. Council's discretion is restricted to:
  - Works affecting the identified heritage values in Appendix A - Heritage Items.
  - The area of works that fails to comply with the meaning of Minor Works and Maintenance.
- Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A - Heritage Items.

Council's discretion is restricted to:

- Works affecting the identified historic heritage values in Appendix A - Heritage Items.
- Content of any Heritage Conservation Plan.
- Degree of alteration to existing floor plan and dimensions.
- 

Extent of the loss of integrity of heritage fabric in the primary spaces such as foyers, lobbies, stairs and corridors.

- Degree of alteration to significant architectural features and finishes including skirtings, panelling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.

3. Works, including alterations and additions that:

- affect the exterior of the building, if identified as a historic heritage value within Appendix A - Heritage Items; or
- affect the context and/or setting of the item, if identified as a historic heritage value within Appendix A - Heritage Items.

Council's discretion is restricted to the:

- Impact of works on the identified historic heritage values in Appendix A - Heritage Items;
- Content of any Heritage Conservation Plan;
- Compatibility of the design and materials with the form, proportions and fabric of the heritage item;
- Relationship to open space, setting and surrounds;
- Impact on significant public views;
- Extent to which any adverse effects are necessary to enable long-term use;
- Extent to which changes are reversible.

## **Restricted Discretionary**

**(RDIS)**

Amend

**Support/Oppose/Amend:**

### **Submission**

HNZPT recommends deleting the first part of HH-CA-R2 relating to maintenance and repair, as a restricted discretionary activity.

HNZPT supports a restricted discretionary activity for interior alterations in a building scheduled for interior values, for exterior alterations and additions, and for works affecting the context and setting of the item.

HNZPT recommends amending 2(d) and 2 (e) as the examples of building areas/components are not comprehensive and would not apply to every building. More inclusive and general wording 'in areas of greatest heritage significance' would be more appropriate.

Clause 3(b) of this rule - 'works affecting the context and setting' is rather ambiguous, and it would be preferable to make this clause more specific. Amending the reference to 'new buildings and structures within the setting of a scheduled heritage item' would add certainty to this rule.

## **Relief sought**

Amend as follows:

~~1. Maintenance and Repairs that do not comply with BB-CB-R1. Council's discretion is restricted to:~~  
~~a. Works affecting the identified heritage values in Appendix A – Heritage Items~~  
~~b. The area of works that fails to comply with the meaning of Minor Works and Maintenance.~~

2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A - Heritage Items.

Council's discretion is restricted to:

a. ...  
b. c. d. Extent of the loss of integrity of heritage fabric

~~primary spaces such as foyers, lobbies, stairs and corridors~~ in areas with greatest heritage significance.

e.

~~Degree of alteration to significant architectural features and finishes including skirtings, paneling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.~~

3. Works, including alterations and additions that:  
a. affect the exterior of the building, if identified as a historic heritage value within Appendix A - Heritage Items; or  
b. New buildings and structures, except buildings less than 10m<sup>2</sup> in size, within the setting of a scheduled heritage item.

~~b. affect the context and/or setting of the item, if identified as a historic heritage value within Appendix A - Heritage Items.~~

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## **Point 10.28**

HH – Historic Heritage

### **Section:**

Rules - Class B Heritage Items

### **Sub-section:**

### **Provision**

## **HH-CB-R3**

- Demolition, partial demolition, relocation, defacing, destroying or dismantling or a heritage item or a component of a heritage conservation area, or relocation of heritage item within



Consideration will include:

- The extent to which the historic heritage values including the design of the item and its context of heritage are likely to be retained, protected and / or enhanced.
- Whether the activity is likely to have cumulative adverse effects on historic heritage values.
- In the case of relocation of a heritage item, measures that may be necessary to protect the fabric of the building during relocation.
- Potential for the re-use and/or recycling of any heritage fabric from the item.
- Consideration of any relevant Whanganui District Council design guidelines.
- The extent and effect of any earthworks, tunnelling, digging, vibration or excavation that may destabilise the site, structure, place or area.
- The results of any consultation undertaken including any written advice obtained as follows:
  - In the case of the Place having identified tangata whenua values, comment from the relevant iwi.
  - Any recommendations of Heritage New Zealand Pouhere Taonga, and the New Zealand Archaeological Association File Keeper.
  - Where the Place history indicates that there may be historical artefacts or other physical remains, any advice obtained from a suitably qualified and experienced archaeologist. All advice obtained is to be provided to the Council with the resource consent application.

**Note:**

- The reasons for the proposed activity and reasons why the alternative less adverse options for achieving the same or similar outcome have been discounted. For clarification, reasons for discounting alternative options can include amongst other matters financial cost, natural hazards, safety and technical feasibility.
- The creation and upkeep of a recording of heritage features of the historic heritage in its original Place (eg. photos of existing vistas for public record of the history of the Place).
- Any proposals to strengthen integrity and heritage value of the building, including the benefits of alterations for the purpose of implementing Building Code upgrades for seismic, fire and access purposes.
- Any proposals to strengthen or replace high risk elements, such as parapets, façade decoration and chimneys, with high quality light-weight material.
- The extent to which the proposed alterations, additions to or demolition of a scheduled heritage item have been informed by the advice of qualified professionals such as conservation architects, heritage consultants, engineers and quantity surveyors as appropriate. Such advice should include a thorough analysis of the alternative options available and the extent of professional advice obtained and should be proportional to the scale and intensity of the effects of the works being undertaken.

**Discretionary**

**(DIS)**

Support

**Support/Oppose/Amend:**

**Submission**

HNZPT supports a discretionary activity for partial demolition, relocation, defacing, destroying or dismantling of a heritage item or a component of a heritage conservation area, or relocation of Class B Heritage Items.

**Relief sought**

## **Point 10.29**

HH – Historic Heritage

### **Section:**

Rules - Archaeological Sites

### **Sub-section:**

### **Provision**

#### **HH-ARCH-R1**

- Earthworks activities not within a buffer area as identified in Appendix K, and which complies with HH-ARCH-S1.
- Activities on sites where an Archaeological Authority has been obtained for the works.
- Earthworks activities on sites within the North West Structure Plan and not identified in Appendix K, a person suitably qualified in mana whenua cultural history or archaeology certifies in writing that the proposed earthworks will not damage or destroy any identifiable wāhi tapu.

#### **where**

:

#### **Notes**

- Earthworks are also regulated in .

#### **EW-Earthworks**

- Recorded archaeological sites and wāhi tūpuna are identified on the Planning Map.

#### **Permitted**

#### **(PER)**

Amend

#### **Support/Oppose/Amend:**

#### **Submission**

HNZPT generally does not support a permitted activity for rules relating to Earthworks on scheduled archaeological sites, except for very limited ground disturbance of land which has already been disturbed, replacement of fence posts on existing fence alignments, and burials within existing urupā.

As provided in Section 6(f) of the RMA, any earthworks beyond this should be subject to an assessment including potential effects on archaeological values and a cultural impact assessment – and should be at least a restricted discretionary activity.

Furthermore, it is inappropriate to have a blanket rule which makes activities permitted where an archaeological authority has been obtained.

The resource consent process for works in a scheduled significant archaeological site serve a different purpose to the granting of an archaeological authority for the same place.

### Relief sought

Delete the following clause:

~~2. Activities on sites where an Archaeological Authority has been obtained for the works:~~

Add the following clauses to the permitted activity rule:

The following activities are permitted, where the activity is for:

a. burials within an existing urupā; orb. the installation of fence posts, provided the land disturbed is limited to that which is necessary to maintain an existing fence; orc. gardening and cultivation (excluding any associated land disturbance that permanently alters the profile, contour or height of the land); ord. grazing of livestock; ore. the maintenance or repair of existing tracks and culverts provided the area, extent and volume of land disturbed is limited to that which is necessary

to maintain an existing track and culvert along its existing alignment.

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### Point 10.30

HH – Historic Heritage

#### Section:

Rules - Archaeological Sites

#### Sub-section:

#### Provision

#### HH-ARCH-R2

- Earthworks activities affecting an Archaeological or Wāhi Tupuna item, including buffer area, recorded in Appendix K.
- Earthworks activities on sites within the North West Structure Plan and not identified in Appendix K, a person suitably qualified in mana whenua cultural history or archaeology certifies in writing that the proposed earthworks will not damage or destroy any identifiable wāhi tapu. In relation to 1) and 2) above, Council restrict its discretion to:  
**except where**

- The extent to which individual elements of historic heritage value are affected, and
- Any written approval obtained from mana whenua representatives.
- Whether a cultural impact assessment prepared in liaison with mana whenua for the specific development proposed, has been included with the application and any recommendations of that assessment.
- Mitigation measures, including measures identified in any assessment prepared under , to avoid, remedy

or mitigate any identified adverse effects of the activity on the cultural values associated with any identified wāhi tapu.

#### **HH-ARCH-S2**

- The location and extent of earthworks and extent of any exclusion areas, buffers or setbacks; and
- Mitigation measures, including rehabilitation planting and the plant species used in rehabilitation planting.

#### **Restricted Discretionary**

**(RDIS)**

Support

**Support/Oppose/Amend:**

#### **Submission**

HNZPT supports a restricted discretionary activity for earthworks on scheduled archaeological sites.

#### **Relief sought**

Retain as in PC63

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#### **Point 10.31**

HH – Historic Heritage

**Section:**

Standards

**Sub-section:**

**Provision**

HH-ARCH-S1 Archaeological Discovery Protocol

Amend

**Support/Oppose/Amend:**

#### **Submission**

HNZPT in general supports the Archaeological Discovery Protocol (ADP) in the Standards – HH-ARCH-S1.

Although it is acknowledged that clause 1 of the standard specifies that the ADP applies where no archaeology authority exists for the work, the situations where the ADP does and does not apply should be made more specific and stated more strongly.

Clause j of the ADP should be separated out and included as a separate note, as it is not actually part of the protocol to be followed, but constitutes advice/warning about the requirement for an archaeological authority.

#### **Relief sought**

Include the following after the Discovery Protocol:

The above protocol does not apply when an archaeological authority issued under the Heritage New Zealand Pouhere Taonga Act 2014 is in place.

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#### **Point 10.32**

HH – Historic Heritage

**Section:**

Standards

**Sub-section:**

**Provision**

#### **HH-ARCH-S2**

Amend

**Support/Oppose/Amend:**

#### **Submission**

HNZPT in general supports the standard HHARCH- S2 in relation to archaeology.

The first paragraph should be amended, as assessments by a qualified archaeologist are not the same as a cultural impact assessment by someone competent in that area.

Archaeological sites are not necessarily wāhi tapu (or even Māori in origin) and not all wāhi tapu are also archaeological sites.

#### **Relief sought**

Amend the first paragraph:

Applications under HH-ARCH-R2 must be accompanied by assessment by a person suitably qualified in mana whenua cultural history, , confirming the location within the site of any identifiable wāhi tapu or archaeological site which...

~~ana cultural impactand/or an archaeological assessment by a qualified archaeologistor archaeology~~

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#### **Point 10.33**

Appendix A – Heritage Items

**Section:**

General

**Sub-section:**

**Provision**

General

Amend

**Support/Oppose/Amend:**

#### **Submission**

A number of entries in Appendix A have incorrect New Zealand Heritage List/Rārangī Kōrero references, and incorrect addresses. HNZPT requests that all entries are checked for accuracy in terms of list references, address and legal descriptions.

In addition, the heading should read HNZPT instead of HPT.

Notes on particular heritage items:

- Item number 4 has a different name according to HNZPT records and is a Historic Place Category 1 listed building. This should be classified as Class A in the District Plan.
- Items 26 and 45 are not in the New Zealand Heritage List/Rārangī Kōrero.
- Item 463 Haslemere has the wrong list number – should be 7513 instead of 7531.
- St Paul's Putiki is included in the New Zealand Heritage List/Rārangī Kōrero – Category 1, List number 9718.
- Duigan's Buildings at 23 Ridgway Street is included in the New Zealand Heritage List/Rārangī Kōrero – Category 1, List number 1996.

### **Relief sought**

Amend as follows:

Item Number 4: , Cooks Gardens, 976 Item Number 26: Delete: .Item Number 45: delete: .Item number 463: Item number 421: Item number 79:

~~Clock Tower~~ Fire Watchtower (Former) ~~Cat 2 Class B~~ Historic Place Category 1 Class A.  
~~959 Cat 2~~  
~~979 Cat 2~~  
~~7513 7531~~  
~~1996 Cat 1~~  
~~9718 Cat 1~~

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### **Point 10.34**

Appendix A – Heritage Items

#### **Section:**

General

#### **Sub-section:**

#### **Provision**

General

Oppose

**Support/Oppose/Amend:**

### **Submission**

Appendix A – Cameron Blockhouse

The Cameron Blockhouse (Category 1 on New Zealand Heritage List/Rārangī Kōrero – List number 7179) is not included in Appendix A. As this place has outstanding heritage values it should be included in the district plan as a Class A place.

## **Relief sought**

Add the following entry in Appendix A:

Cameron Blockhouse, State Highway 3 Marangai. HNZPT List 7179 Category 1, Class A.

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### **Point 10.35**

Appendix K – Archaeological Sites

**Section:**

General

**Sub-section:**

**Provision**

General

Support

**Support/Oppose/Amend:**

**Submission**

Removal of Geological Items

HNZPT supports the removal of geological items from the schedule of archaeological sites, for example items 51, 191, and 211, from Appendix K.

## **Relief sought**

Retain as notified in PC63.

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### **Point 10.36**

Appendix K – Archaeological Sites

**Section:**

General

**Sub-section:**

**Provision**

General

Amend

**Support/Oppose/Amend:**

**Submission**

Minor errors and corrections.

A number of entries in Appendix K are incorrectly recorded as being included in the New Zealand Heritage List/Rārangī Kōrero. These references should be deleted.

### **Relief sought**

Amend as follows:

Item 309 - House (Waireka) – delete: Item 314 - House (Walford House) – delete:

~~HNZPT 980 Cat 2~~

~~HNZPT Cat 2~~





HERITAGE NEW ZEALAND  
POUHERE TAONGA

Tairangahia a tua whakarere;  
Tatakihia nga reanga o amuri ake nei  
Honouring the past; Inspiring the future

File ref: 33002-081

5 February 2025

Whanganui District Council  
101 Guyton Street  
Whanganui

Email: [planningpolicy@whanganui.govt.nz](mailto:planningpolicy@whanganui.govt.nz)

Tēnā koe,

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON WHANGANUI DISTRICT PLAN  
CHANGE 63 – HISTORIC HERITAGE**

1. This is a submission on the Whanganui District Plan Change 63 (PC63).
2. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.
3. HNZPT could not gain an advantage in trade competition through this submission.
4. The specific provisions of the proposed plan that the HNZPT submission relates to are detailed in the attached table (Attachment 1).
5. The reasons for the HNZPT submission are detailed in Attachment 1.
6. HNZPT seeks the decisions as described in the table in Attachment 1.

7. Heritage New Zealand Pouhere Taonga wishes to be heard in support of its submission.
8. If others make a similar submission, Heritage New Zealand Pouhere Taonga will consider presenting a joint case with them at a hearing.

Yours sincerely



Jamie Jacobs  
Kaiwhakahaere Matua / Director Takiwā o Te Pūtahi a Māui /Central Region  
Heritage New Zealand Pouhere Taonga

Attachment:

1. Heritage New Zealand Pouhere Taonga Submission Table on Whanganui Plan Change 63.

Address for service

Heritage New Zealand Pouhere Taonga

Takiwā o Te Pūtahi a Māui

PO Box 2629

Wellington 6140

Ph: 04 494 8325

Contact person: Dean Raymond, Kaiwhakahaere ā Takiwā

Email: [draymond@heritage.org.nz](mailto:draymond@heritage.org.nz)

<b>Attachment 1</b>  <b>Submission of Heritage New Zealand Pouhere Taonga on Whanganui District Council Plan Change 63</b>  <u>Underline</u> = include and <del>Strikethrough</del> = delete				
Point	Proposed Plan Provision	Support/ Oppose	Reason for Submission	Relief sought by Heritage New Zealand
<b>Part 1 – Definitions</b>				
	Definition of Demolition	Support	HNZPT supports the proposed definition of demolition in Plan Change 63 (PC63).	Retain definition in PC63.
	Definition of Heritage Conservation	Support	HNZPT supports the definition of Heritage Conservation in Plan Change 63.	Retain definition in PC63.
	Definition of Heritage Conservation Plan	Support	HNZPT supports the definition heritage conservation plan which is taken from the definition of conservation plan in the ICOMOS New Zealand Charter.	Retain definition in PC63.
	Definition of Heritage Item	Support	HNZPT supports the definition of heritage item in Plan Change 63.	Retain definition in PC63.
	Definition of Integrity	Support	HNZPT supports the definition of integrity relating to historic heritage in plan change 63.	Retain as in PC63.

	Definition of Maintenance and Repair	Amend	<p>HNZPT supports the proposed definition of maintenance and repair. However, it would be beneficial if the definitions are separated similar to the format of the ICOMOS New Zealand Charter and the HNZPT guide.</p> <p>Retaining only the definitions of maintenance and repair, and giving these activities permitted activity status will simplify the plan, and improve clarity and certainty for plan users and owners of heritage places.</p>	<p>Amend the definition to create two separate definitions as follows:</p> <p><u>Maintenance in relation to historic heritage, means regular and ongoing protective care of a place to prevent deterioration and to retain its cultural heritage value.</u></p> <p><u>Repair, in relation to historic heritage, means to make good decayed or damaged heritage fabric using identical, closely similar, or otherwise appropriate material.</u></p>
	Definition of Minor Works and Maintenance	Oppose	<p>HNZPT recommends deleting the definition of minor works and maintenance. The notified plan has already defined 'maintenance'. By having a term defined differently create confusion to the plan users.</p>	<p>Delete definition of minor works and maintenance.</p>
	Definition of Setting	Amend	<p>HNZPT supports the inclusion of a definition of Setting which is taken from the ICOMOS New Zealand Charter. However, for the purposes of the district plan, a more concise definition is preferred. The second half of the definition creates an understanding of setting which is overly broad and would be very difficult to administer in practice.</p>	<p>Amend the definition of setting by deleting from the words "<del>Setting also includes cultural landscapes ...</del>".</p>

Part 2 – Sites and Areas of Significance to Māori				
	Tangata Whenua Cultural Values	Support	HNZPT supports the section of Tangata Whenua Cultural Values.	Retain section on Tangata Whenua Cultural Values subject to any feedback from mana whenua.
	SASM – Objectives and Policies	Support	HNZPT supports the SASM objectives and policies.	Retain objectives and policies subject to any feedback from mana whenua.

Part 2 – Historic Heritage				
	Historic Heritage Introduction	Amend	<p>HNZPT acknowledges the classification of built heritage into Class A and Class B heritage items.</p> <p>The New Zealand Heritage List/Rārangi Kōrero should also be mentioned in the HH Chapter, as there is often confusion among members of the public between the two lists/schedules.</p>	<p>Include the following in the introduction:</p> <p><u>The New Zealand Heritage List Rārangi Kōrero is established by the Heritage New Zealand Pouhere Taonga Act 2014. The List can include buildings, sites, archaeological sites, wāhi tapu, wāhi tupuna, and wāhi tapu area. The New Zealand Heritage List Rārangi Kōrero is administered by Heritage New Zealand Pouhere Taonga.</u></p> <p><u>Many, but not all, of the Class A and Class B heritage items in the heritage schedules are also included in the New Zealand Heritage List Rārangi Kōrero.</u></p>

	Archaeology paragraph	Amend	<p>HNZPT supports the information regarding archaeology included in the introductory section of the historic heritage chapter.</p> <p>HNZPT suggests relocating the “note” relating to archaeological authority (currently situated at the end of the historic heritage chapter) to the introduction section of the chapter.</p>	<p>Relocate the following note to the introduction part of the Historic Heritage chapter:</p> <p><u>It is an offence to modify or destroy any archaeological site without an authority from Heritage New Zealand, under the Heritage New Zealand Pouhere Taonga Act 2014. Where earthworks is proposed to take place within or surrounding an archaeological site the person undertaking the proposed earthworks should consult with a qualified archaeologist and Heritage New Zealand prior to commencing any earthwork.</u></p>
	HH – Issues	Amend	<p>HNZPT generally supports the issues identified in the plan change. HNZPT also recommends including archaeology as an issue in this section, so that the ‘issues’ section more closely flows down to the objectives, policies, and rules. It may also be an improvement to combine issues HH-I3 and HH-I5 into one issue.</p>	<p>Add the following:</p> <p><u>HH-I6: Archaeological sites may be lost through the development/ redevelopment of sites and through land use activities.</u></p> <p>Combine HH-I3 and HH-I5 as follows:</p> <p><u>HH-I3: Loss of historic heritage through change of use, lack of use or neglect, and/or because of economic constraints.</u></p>

	HH-Policies HH-P1 and HH-P3	Amend	Policies HH-P1 and HH-P3 could be combined as both refer to heritage schedule appendices.	Consider combining policies HH-P1 and HH-P3 into one policy.
	HH policy on maintenance and repair	Oppose	While there is a long list of policies, there is nothing which specifically refers to maintenance or repair. HNZPT recommends including a policy to address this topic. Our recommended wording is taken from the Wellington City 2024 District Plan.	Add the following policy relating to maintenance and repair:  <u>Encourage the maintenance and repair of built heritage where undertaken in accordance with recognised conservation principles and methods.</u>
	HH-P4	Support	HNZPT supports the protection of historic heritage resource from inappropriate subdivision, use and development.	Retain HH-P4.
	HH-P5 and HH-P6	Amend	Policies HH-P5 and HH-P6 could be combined into one policy.  We also note that HH-P5 is repeated in the notified plan change.	Amend as follows:  HH-P5: Ensure when alterations and additions to <u>scheduled</u> historic heritage items <u>including scheduled interior items</u> are undertaken that adverse effects on the heritage items are avoided, remedied or mitigated.  Delete the repeated HH-P5 and HH-P6



	HH-P7	Support	HNZPT supports enabling the adaptive reuse of heritage items provided the adverse effects of the activity on heritage values and the surrounding environment can be avoided, remedied or mitigated.	Retain HH-P7.
	HH-P12	Amend	In accordance with s6(f) of the RMA, the primary policy direction for scheduled archaeological sites should be protection, rather than 'sustainable management'.	Amend HH-P12 as follows:  HH-P12 <u>Protect archaeological sites from inappropriate development</u> <del>Enable the sustainable management of the archaeological resources</del> by considering:
	HH-P15, and the following note	Amend	HNZPT recommends modifying HH-P15 to reflect that in the event that an archaeological authority is obtained, it is not appropriate to implement an Accidental Discovery Protocol for archaeological sites.	Amend HH-P15 as follows:  Implement Accidental Archaeological Discovery Protocols of wāhi tapu or archaeological sites <u>except for in the event where an Archaeological Authority has been obtained from Heritage New Zealand.</u>  Note: An Archaeological Authority must be obtained from Heritage New Zealand prior to any earthworks that may modify or destroy an archaeological site. <u>The Accidental Discovery Protocol does not apply when an archaeological authority has been issued under the Heritage New Zealand Pouhere Taonga Act 2014.</u>

	Rules – HH-CA-R1	Amend	<p>HNZPT supports a permitted activity rule maintenance and repair, as written in HH-CA-R1.</p> <p>However, in line with our other points, the rule should refer to the definitions of ‘maintenance’ and ‘repair’, rather than ‘minor works and maintenance’.</p>	Amend the permitted activity rule to refer to the definitions of ‘maintenance’ and ‘repair’, rather than ‘minor works and maintenance’.
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	Rules – HH-CA-R2	Amend	<p>HNZPT recommends deleting the first part of HH-CA-R2 relating to maintenance and repair.</p> <p>HNZPT supports a restricted discretionary activity for interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A – Heritage Items.</p> <p>HNZPT recommends amending 2(d) and 2 (e) as the examples of building areas/components are not comprehensive and would not apply to every building. More inclusive and general wording ‘in areas of greatest heritage significance’ would be more appropriate.</p>	<p>As a consequential amendment to the submission point on HH-CA-R1, delete:</p> <p><del>1. Maintenance and repairs that do not comply with HH-CA-R1. Council’s discretion is restricted to:</del></p> <p><del>a. Works affecting the identified heritage values in Appendix A – Heritage Items</del></p> <p><del>b. The area of works that fails to comply with the meaning of Minor Works and Maintenance.</del></p> <p>Amend as follows:</p> <p><del>1.</del> <u>2.</u> Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A – Heritage Items.</p> <p>Council’s discretion is restricted to:</p> <p>a. ...</p> <p>b. ...</p> <p>c. ...</p> <p>d. Extent of the loss of integrity of heritage fabric in <del>primary spaces such as foyers, lobbies, stairs and corridors</del> <u>areas with greatest heritage significance.</u></p>
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				e. <del>Degree of alteration to significant architectural features and finishes including skirtings, paneling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.</del>
	Rules – HH-CA-R3	Amend	<p>HNZPT supports a discretionary activity status for alterations or additions that affect the exterior of a heritage item within Appendix A – Heritage Items.</p> <p>However, there is no rule controlling new buildings and structures within the setting of a Class A heritage item. As such, HNZPT recommends an additional clause to HH-CA-R3 to address this gap in the rules.</p>	<p>Retain as in PC63, with the following addition:</p> <p><u>2. New buildings and structures, except buildings less than 10m<sup>2</sup>, within the setting of a scheduled heritage item.</u></p>
	Rules - HH-CA-R4	Support	HNZPT supports a non-complying activity status for demolition of scheduled historic heritage for Class A heritage items.	Retain as in PC63.
	Rules - HH-CB-R1	Amend	<p>HNZPT supports a permitted activity rule maintenance and repair, as written in HH-CB-R1.</p> <p>However, in line with our other points, the rule should refer to the definitions of ‘maintenance’ and ‘repair’, rather than, ‘minor works and maintenance’.</p>	Amend the rule to refer to the definitions of ‘maintenance’ and ‘repair’, rather than ‘minor works and maintenance’.

	Rules - HH-CB-R2	Amend	<p>HNZPT recommends deleting the first part of HH-CA-R2 relating to maintenance and repair, as a restricted discretionary activity.</p> <p>HNZPT supports a restricted discretionary activity for interior alterations in a building scheduled for interior values, for exterior alterations and additions, and for works affecting the context and setting of the item.</p> <p>HNZPT recommends amending 2(d) and 2 (e) as the examples of building areas/components are not comprehensive and would not apply to every building. More inclusive and general wording 'in areas of greatest heritage significance' would be more appropriate.</p> <p>Clause 3(b) of this rule - 'works affecting the context and setting' is rather ambiguous, and it would be preferable to make this clause more specific. Amending the reference to 'new buildings and structures within the setting of a scheduled heritage item' would add certainty to this rule.</p>	<p>Amend as follows:</p> <p><del>1. Maintenance and Repairs that do not comply with BB-CB-R1.</del></p> <p><del>Council's discretion is restricted to:</del></p> <p><del>a. Works affecting the identified heritage values in Appendix A – Heritage Items</del></p> <p><del>b. The area of works that fails to comply with the meaning of Minor Works and Maintenance.</del></p> <p>2. Interior structural works associated with earthquake strengthening, fire protection, accessibility upgrades, interior alterations and/or additions in a building scheduled for interior values in Appendix A - Heritage Items. Council's discretion is restricted to:</p> <p>a. ...</p> <p>b.</p> <p>c.</p> <p>d. Extent of the loss of integrity of heritage fabric <del>primary spaces such as foyers, lobbies, stairs and corridors</del> <u>in areas with greatest heritage significance.</u></p> <p><del>e. Degree of alteration to significant architectural features and finishes</del></p>
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				<p><del>including skirtings, paneling, doors, picture rails, pressed metal ceilings, woodwork and wallpaper.</del></p> <p>3. Works, including alterations and additions that:</p> <ul style="list-style-type: none"> <li>a. affect the exterior of the building, if identified as a historic heritage value within Appendix A - Heritage Items; or</li> <li><del>b. affect the context and/or setting of the item, if identified as a historic heritage value within Appendix A - Heritage Items.</del></li> <li>b. <u>New buildings and structures, except buildings less than 10m<sup>2</sup> in size, within the setting of a scheduled heritage item.</u></li> </ul>
	Rules - HH-CB-R3	Support	HNZPT supports a discretionary activity for partial demolition, relocation, defacing, destroying or dismantling of a heritage item or a component of a heritage conservation area, or relocation of Class B Heritage Items.	Retain as in PC63.

	Rules - HH-ARCH-R1	Amend	<p>HNZPT generally does not support a permitted activity for rules relating to Earthworks on scheduled archaeological sites, except for very limited ground disturbance of land which has already been disturbed, replacement of fence posts on existing fence alignments, and burials within existing urupā.</p> <p>As provided in Section 6(f) of the RMA, any earthworks beyond this should be subject to an assessment including potential effects on archaeological values and a cultural impact assessment – and should be at least a restricted discretionary activity.</p> <p>Furthermore, it is inappropriate to have a blanket rule which makes activities permitted where an archaeological authority has been obtained.</p> <p>The resource consent process for works in a scheduled significant archaeological site serve a different purpose to the granting of an archaeological authority for the same place.</p>	<p>Delete the following clause:</p> <p><del>2. Activities on sites where an Archaeological Authority has been obtained for the works.</del></p> <p>Add the following clauses to the permitted activity rule:</p> <p><u>The following activities are permitted, where the activity is for:</u></p> <ul style="list-style-type: none"> <li>a. <u>burials within an existing urupā;</u> <u>or</u></li> <li>b. <u>the installation of fence posts, provided the land disturbed is limited to that which is necessary to maintain an existing fence;</u> <u>or</u></li> <li>c. <u>gardening and cultivation (excluding any associated land disturbance that permanently alters the profile, contour or height of the land); or</u></li> <li>d. <u>grazing of livestock; or</u></li> <li>e. <u>the maintenance or repair of existing tracks and culverts provided the area, extent and volume of land disturbed is limited to that which is necessary</u></li> </ul>
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				<u>to maintain an existing track and culvert along its existing alignment.</u>
	Rules - HH-ARCH-R2	Support	HNZPT supports a restricted discretionary activity for earthworks on scheduled archaeological sites.	Retain as in PC63
	Standards – HH-ARCH-S1. Archaeological Discovery Protocol	Amend	<p>HNZPT in general supports the Archaeological Discovery Protocol (ADP) in the Standards – HH-ARCH-S1.</p> <p>Although it is acknowledged that clause 1 of the standard specifies that the ADP applies where no archaeology authority exists for the work, the situations where the ADP does and does not apply should be made more specific and stated more strongly.</p> <p>Clause j of the ADP should be separated out and included as a separate note, as it is not actually part of the protocol to be followed, but constitutes advice/warning about the requirement for an archaeological authority.</p>	<p>Include the following after the Discovery Protocol:</p> <p><u>The above protocol does not apply when an archaeological authority issued under the Heritage New Zealand Pouhere Taonga Act 2014 is in place.</u></p>



	HH-ARCH-S2	Amend	<p>HNZPT in general supports the standard HH-ARCH-S2 in relation to archaeology.</p> <p>The first paragraph should be amended, as assessments by a qualified archaeologist are not the same as a cultural impact assessment by someone competent in that area.</p> <p>Archaeological sites are not necessarily wāhi tapu (or even Māori in origin) and not all wāhi tapu are also archaeological sites.</p>	<p>Amend the first paragraph:</p> <p>Applications under HH-ARCH-R2 must be accompanied by <del>an</del> <u>a cultural impact</u> assessment by a person suitably qualified in mana whenua cultural history, <u>and/or</u> <u>an archaeological assessment by a qualified archaeologist</u> <del>or archaeology</del>, confirming the location within the site of any identifiable wāhi tapu or archaeological site which...</p>
Part 4 – Appendix A				

	<p>Appendix A – Historic Heritage Items</p> <p>Multiple minor errors and corrections</p>	Amend	<p>A number of entries in Appendix A have incorrect New Zealand Heritage List/Rārangi Kōrero references, and incorrect addresses. HNZPT requests that all entries are checked for accuracy in terms of list references, address and legal descriptions.</p> <p>In addition, the heading should read HNZPT instead of HPT.</p> <p>Notes on particular heritage items:</p> <ul style="list-style-type: none"> <li>Item number 4 has a different name according to HNZPT records and is a Historic Place Category 1 listed building. This should be classified as Class A in the District Plan.</li> <li>Items 26 and 45 are not in the New Zealand Heritage List/Rārangi Kōrero.</li> <li>Item 463 <i>Haslemere</i> has the wrong list number – should be 7513 instead of 7531</li> <li><i>St Paul's Putiki</i> is included included in the New Zealand Heritage List/Rārangi Kōrero – Category 1, List number 9718</li> <li><i>Duigan's Buildings</i> at 23 Ridgway Street is included in the New Zealand Heritage List/Rārangi Kōrero – Category 1, List number 1996.</li> </ul>	<p>Amend as follows:</p> <p>Item Number 4: <del>Clock Tower</del> <u>Fire Watchtower (Former)</u>, Cooks Gardens, 976 <del>Cat 2 Class B</del> <u>Historic Place Category 1 Class A</u>.</p> <p>Item Number 26: Delete: <del>959 Cat 2</del>.</p> <p>Item Number 45: delete: <del>979 Cat 2</del>.</p> <p>Item number 463: <u>7513</u> <del>7531</del></p> <p>Item number 421: <u>1996 Cat 1</u></p> <p>Item number 79: <u>9718 Cat 1</u></p>
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	Appendix A – Cameron Blockhouse	Oppose	The Cameron Blockhouse (Category 1 on New Zealand Heritage List/Rārangī Kōrero – List number 7179) is not included in Appendix A. As this place has outstanding heritage values it should be included in the district plan as a Class A place.	Add the following entry in Appendix A:  <u>Cameron Blockhouse, State Highway 3 Marangai. HNZPT List 7179 Category 1, Class A</u>
<b>Part 4 – Appendix K</b>				
	Removal of Geological Items	Support	HNZPT supports the removal of geological items from the schedule of archaeological sites, for example items 51, 191, and 211, from Appendix K.	Retain as notified in PC63.
	Appendix K – Archaeological Sites  Minor errors and corrections	Amend	A number of entries in Appendix K are incorrectly recorded as being included in the New Zealand Heritage List/Rārangī Kōrero. These references should be deleted.	Amend as follows:  Item 309 - House (Waireka) – delete: <del>HNZPT 980 Cat 2</del>  Item 314 - House (Walford House) – delete: <del>HNZPT Cat 2</del>