



HERITAGE NEW ZEALAND
POUHERE TAONGA

13 July 2023

Te Tai o Poutini Plan Submissions,
388 Main South Road
Paroa
Greymouth 7805
By email: info@tppp.nz

Tēnā koe,

HERITAGE NEW ZEALAND POUHERE TAONGA FURTHER SUBMISSION ON THE PROPOSED TE TAI O POUTINI PLAN

To: Te Tai o Poutini Plan Submissions
Name of submitter: Heritage New Zealand Pouhere Taonga (HNZPT)

Submitter details

1. This is a further submission by HNZPT in respect of submissions on the Proposed Te Tai o Poutini Plan.
2. HNZPT has an interest in the proposal that is greater than the interest of the general public. Heritage New Zealand Pouhere Taonga 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 historic heritage.

Submission details

3. HNZPT's further submissions are set out in Appendix 1.

Submission at the Hearing

4. HNZPT wishes to be heard in support of its further submissions. If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.

Ngā mihi,

Dr Christine Whybrew
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Heritage New Zealand Pouhere Taonga

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FURTHER SUBMISSIONS OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE NOTIFIED PROPOSED TE TAI O POUTINI PLAN

Submission Point	Submitter	Plan section / Relief sought by submitter	Support/ Oppose	Reason for HNZPT further submission	Relief sought: Allow/Disallow
602.024	Department of Conservation (S602)	Strategic Overview: Submitter requests that the Strategic Overview recognises the protection of natural and physical resources and that matters of national importance also includes cultural and heritage values.	Support	HNZPT supports this submission, which also aligns with HNZPT submission S140.009.	Allow
S466.013	The O'Conor Institute Trust Board (S466)	HH-R1: Submitter requests rule HH-R1 be amended so that internal alterations not affecting the external appearance of the historic heritage building are permitted.	Oppose	Some interiors are a significant part of the heritage item. In such cases the interior is identified in Schedule 1A 'Historic Heritage Items and Areas'. The Plan's definition for 'heritage fabric' states that an interior element, feature, material, or finish is only considered to be heritage fabric where it is specifically identified in Schedule One Historic Heritage Items and Areas. HNZPT does not therefore consider the proposed amendment to be necessary, and it could be misleading in relation to interiors that are included on the schedule.	Disallow
S478.056	Frank and Jo Dooley (S478)	HH-R1: Submitter requests rule HH-R1 be amended so that internal alterations not affecting the external appearance of the historic heritage building are permitted.	Oppose	Some interiors are a significant part of the heritage item. In such cases the interior is identified in Schedule 1A 'Historic Heritage Items and Areas'. The Plan's definition for 'heritage fabric' states that an interior element, feature, material, or finish is only considered to be heritage fabric where it is specifically identified in Schedule One Historic Heritage Items and Areas. HNZPT does not therefore consider the proposed amendment to be necessary, and it could be misleading in relation to interiors that are included on the schedule.	Disallow
S524.009	Federated	a) Definition: Submitter considers the definition of 'heritage professional' is too onerous	a) Oppose b) Support	a) HNZPT disagrees with this submission as it strongly supports the clear definition of a heritage professional within the Plan. The definition is not	a) Disallow b) Allow

	Farmers of New Zealand (S524)	<p>and states the matter is best addressed in the rules for historic heritage.</p> <p>b) HH-R2: Submitter requests rule HH-R2 be amended to refer to 'heritage professional' rather than 'heritage architect'.</p>	Oppose	<p>onerous and is in line with several other District Plans regarding qualification and experience. Providing a definition avoids ambiguity when it comes to assessments and other work required by the rules of the Historic Heritage chapter and ensures that advice or works are provided by adequately qualified and experienced persons.</p> <p>b) HNZPT agrees with the second part of this submission that 'heritage professional' should be used in HH-R2, rather than 'heritage architect' which is not defined within the plan.</p>	
S524.045	Federated Farmers of New Zealand (S524)	<p>a) HH-R3(1d): Submitter requests that rule HH-R3(1d) be reworded to allow the installation of fence posts to maintain an existing fence or line along its existing alignment;</p> <p>b) HH-R3(2): Submitter requests the deletion of HH-R3(2).</p>	Oppose	<p>a) HNZPT opposes a change in the wording of 1d as the definition of earthworks specifically excludes 'disturbance of land for the installation of fence posts'. As such there is no need for this amendment.</p> <p>b) HNZPT considers that deleting HH-R3(2) would pose a risk to archaeological sites from the effects of earthworks. The permitted activity status relates to earthworks in a Schedule One heritage item or area. Including the requirement for an authority or ADP commitment means any person undertaking earthworks in these places must consider archaeological values and which approach is appropriate. In HNZPT's experience without an advice note or specific reference to the HNZPTA there is an increased risk that historic heritage is lost through earthworks proceeding without an understanding and awareness of the potential for archaeology and appropriate recording and monitoring in place. An authority is required by law when a site is being modified or destroyed. This obligation cannot be contracted out of, and the ADP commitment will not entail additional cost or time to the applicant. Note also that HNZPT previously submitted that the title of this rule be amended to 'HH-R3 - Minor Earthworks in a Historic Heritage</p>	<p>a) Disallow</p> <p>b) Disallow</p>

S524.046 S524.137 S524.138	Federated Farmers of New Zealand (S524)	HH-R4 to R6: Submitter requests deletion of definition for 'heritage professional' in HH-R4, HH-R5 and HH-R6 and replace in chapter with 'suitably qualified heritage professional'.	Oppose	HNZPT disagrees with this submission and strongly supports the clear definition of a heritage professional within the Plan. Providing a definition avoids ambiguity when it comes to assessments and other work required by these rules and ensures that advice or works are provided by adequately qualified and experienced persons. The term 'suitably qualified heritage professional' is not defined within the Plan.	Disallow
S602.054	Department of Conservation (S602)	HH-R5: Submitter requests that rule HH-R5 be amended to require that either an Archaeological Authority is granted or the written approval of Heritage New Zealand Pouhere Taonga is provided.	Part Support	HNZPT agrees that new infrastructure connections to heritage items have the potential to affect the fabric of the building, and the requested amendment would ensure that the applicant consults with HNZPT on the appropriateness of any new infrastructure connections. However not all proposals will require an archaeological authority or written approval and therefore we would suggest that a requirement for consultation with HNZPT would be more appropriate.	Allow with some rewording: Controlled Where: 1. The new infrastructure connection is to a historic heritage building listed in Schedule One.; and 2. Consultation has taken place with Heritage New Zealand Pouhere Taonga.
S602.007	Department of Conservation (S602)	Submitter requests the review and spelling of all Māori words and the use of macrons on Māori words, throughout the whole plan.	Support	HNZPT supports this submission.	Allow
S602.055	Department of Conservation (S602)	HH-R7 and HH-R8: Submitter requests that a point of discretion is added to HH-R7 and HH-R8 considering whether consultation with and feedback from HNZPT has occurred.	Support	HNZPT supports the additional consultation that would be required by this amendment.	Allow

S602.057	Department of Conservation (S602)	<p>SASM-P8: Submitter requests policy SASM-P8 be amended to also require engagement with HNZPT where the site is an archaeological site or contains a heritage item, as significant cultural sites and significant heritage sites are not mutually exclusive.</p>	Oppose	<p>HNZPT supports the principle of ensuring consultation with HNZPT, but this activity would already be subject to rules under the Historic Heritage chapter. We therefore do not consider additional reference within this rule to be necessary.</p>	Disallow
S602.059	Department of Conservation (S602)	<p>SASM-R7: Submitter requests rule SASM-R7 be amended to require an archaeological authority or HNZPT written approval.</p>	Support	<p>HNZPT supports the principle of consultation that would be required by this amendment, however not all proposals will require an archaeological authority or written approval. We therefore suggest that a requirement for consultation with HNZPT would be more appropriate.</p>	<p>Allow with some rewording: Where an Archaeological Authority is required by Heritage New Zealand—Pouhere Taonga, any extraction is undertaken in accordance with it, or the written approval of Heritage New Zealand—Pouhere Taonga is provided; Consultation has taken place with Heritage New Zealand Pouhere Taonga.</p>
S524.047	Federated Farmers of New Zealand (S524)	<p>SCHED 1B: Submitter requests removal of SCHED 1B Schedule of Archaeological Sites, as there are no rules associated with the Schedule and it is not a complete list of archaeological sites on the West Coast.</p>	Oppose	<p>HNZPT opposes this submission as although it is not a complete list of all archaeological sites on the West Coast/Te Tai Poutini, there are rules that apply to these sites and therefore inclusion of the Schedule is appropriate.</p>	Disallow

S524.053	Federated Farmers of New Zealand (S524)		<p>SASM-R2: Submitter requests the rewording of SASM-R2 to allow greater flexibility for new fence posts along an existing fence line.</p>		Oppose	<p>HNZPT does question why these sites have been chosen for inclusion, above other sites. This is set out in our submission point S140.073 which requests clarification on why these particular sites have been included and recommends assessment be undertaken to justify their inclusion.</p>	<p>This follows the intent of their submission S524.045 in relation to HH-R3, which we have also commented on. HNZPT accepts the revised wording of SASM-R2 would be an appropriate permitted activity but questions the need for a specific point relating to fence posts when the definition of earthworks within the Plan excludes 'disturbance of land for the installation of fence posts'.</p>		Disallow
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