



HERITAGE NEW ZEALAND  
POUHERE TAONGA

30 September 2022

Te Tai o Poutini Plan Submissions,  
PO Box 66,  
Greymouth 7840

Tēnā koe,

**HERITAGE NEW ZEALAND POUHERE TAONGA 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. 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.
2. HNZPT could not gain an advantage in trade competition through this submission.

**Submission details**

3. HNZPT has considered the notified Proposed Te Tai o Poutini Plan. This letter and associated Appendices form our submission.

**The specific provision of the proposal that HNZPT's submission relates to is:**

4. The specific provisions of the Plan that our submission relates to are those which have a direct or indirect effect on the identification, protection and management of heritage resources. Please refer to Appendix 1 for full details.

**Our submission is:**

5. Te Tai Poutini West Coast has a wealth of unique and important history. This plays a central role in generating a feeling of identity and wellbeing, as well as encouraging intergenerational connection. The identification and protection of important historic heritage items can enhance the value and appreciation of the district to those who live and work there as well as to those who visit, in many cases also generating economic benefits. We therefore consider the appropriate management of the region's finite heritage resources to be essential.

6. HNZPT supports many aspects of the Proposed Plan and acknowledges the work undertaken to date to improve the heritage provisions that were lacking in the Operative District Plans.
7. However, adequate resource management requires a clear strategic direction relating to heritage protection backed by robust, unambiguous rules. It also requires sufficient information for identified heritage items to justify their inclusion in the Plan, to promote understanding of their values and to enable decisions to be well informed. HNZPT submits that the provisions of the Proposed Plan only go part way to meeting those requirements.
8. Please refer to Appendix 1 for our full submission.

**We seek the following decisions:**

9. HNZPT seeks amendments to strengthen and clarify provisions within the Proposed Plan as they relate to the management and protection of historic heritage.
10. Please refer to Appendix 1 for full details of the specific relief sought.

**Submission at the Hearing**

11. HNZPT wishes to be heard in support of this submission.

Ngā mihi,



**Dr Christine Whybrew**  
**Acting Director Southern**

Address for Service:

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Appendix 1: Submission of Heritage New Zealand Pouhere Taonga

Appendix 2: Suggested definitions for the criteria listed in Schedule One

Appendix 3: Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol

**APPENDIX 1 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE NOTIFIED PROPOSED TE TAI O POUTINI PLAN**

HNZPT Ref #	Provision to which submission relates	Support / Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
001	PART 1 – Introduction and General Provisions / Interpretation – Ngā Whakamāramatanga / Definitions - Ngā Tautuhinga / ‘Additions and alterations’	Support	HNZPT supports the inclusion of a detailed definition of ‘additions and alterations’ specifically relating to historic heritage items.	<b>Retain</b> as proposed.
002	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Archaeological site’	Oppose	We note that there is an automatic link for the word ‘site’ within the wording of the definition. This link provides an inaccurate definition of the word ‘site’ in relation to archaeology. An archaeological site is one which was associated with human activity and may provide evidence relating to the history of New Zealand, regardless of title or legally defined allotments.	<b>Amend:</b> HNZPT requests the automatic link be removed from the word ‘site’ within this definition.
003	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Heritage fabric’	Part Oppose	<ol style="list-style-type: none"> <li>1. HNZPT supports this definition of heritage fabric, however we note that there is an automatic link for the word ‘site’ within the wording of the definition. This link provides an inaccurate definition of the word ‘site’ in relation to archaeology.</li> <li>2. HNZPT promotes the inclusion of interiors when recording a property but accepts the TToP’s approach of only including interiors where they are specifically identified in SCHED1A Historic Heritage Items and Areas. We support clarification of this point in the definition of ‘heritage fabric’.</li> </ol>	<b>Amend:</b> HNZPT requests the automatic link be removed from the word ‘site’ within the definition of ‘heritage fabric’.

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004	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Heritage professional’	Support	HNZPT supports this clear definition of a heritage professional, which will avoid ambiguity when it comes to assessments and other work required by the rules of the Historic Heritage chapter.	<b>Retain</b> as proposed.
005	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Maintenance’	Support	HNZPT supports the definition of maintenance specifically in relation to historic heritage.	<b>Retain</b> as proposed.
006	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Relocation’	Support	HNZPT supports the distinction between ‘relocation’ of a heritage item to a new site and ‘repositioning’ of a heritage item within its existing site. Clearly defining these as two separate activities will avoid the potential for confusion or ambiguity.	<b>Retain</b> as proposed.
007	Part 1 – Interpretation Ngā Whakamāramatanga / Definitions Ngā Tautuhinga / ‘Repositioning’	Support	HNZPT supports the distinction between ‘relocation’ of a heritage item to a new site and ‘repositioning’ of a heritage item within its existing site. Clearly defining these as two separate activities will avoid the potential for confusion or ambiguity.	<b>Retain</b> as proposed.
008	PART 1 – Introduction and General Provisions / Interpretation – Ngā Whakamāramatanga / Abbreviations – Ngā Whakapototanga / ‘NZHPT Act’	Oppose	The wording and abbreviations are incorrect. The correct abbreviation is ‘HNZPT Act’ and the correct full term is ‘Heritage New Zealand Pouhere Taonga Act 2014’.	<b>Amend:</b> HNZPT requests the abbreviation be amended to <del>NZHPT Act</del> <b>HNZPT Act</b> and the full term be amended to <del>New Zealand Pouhere Taonga Act 2014</del> <b>Heritage New Zealand Pouhere Taonga Act 2014</b>

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009	PART 2 – District Wide Matters / Strategic Direction – Te Pae Tawhiti / Strategic objectives / Urban form and development UFD-01	Oppose	<p>HNZPT supports objective UFD-01, in particular the re-use and development of existing buildings.</p> <p>However, we note that the proposed Strategic Directions do not include any objectives which promote the identification, recognition and protection of historic places or heritage items which are significant to the West Coast/Tai o Poutini’s wider character and cultural heritage.</p> <p>The Strategic Directions chapter sets the scene in determining the most important issues within the district which all other chapters within the plan must be consistent with. We submit that such an objective should be included as recognition of the important contribution that historic heritage makes to the district’s character and identity, and as an overarching acknowledgement that significant heritage will be protected from inappropriate subdivision, use, and development.</p>	<p><b>Amend:</b> HNZPT requests the inclusion of an additional point in UFD-01:</p> <p><b><u>x. Promotes the identification, recognition and protection of heritage resources which are significant to the West Coast/Tai o Poutini’s character and cultural heritage, to ensure their protection for future generations.</u></b></p>
010	PART 2 – District Wide Matters / EIT / ENG Energy – Te Pūngao / ENG – P4	Support	HNZPT supports Policy ENG-P4 which seeks to minimise any actual or potential effects from new energy activities when located within or adjacent to historic heritage items or areas.	<b>Retain</b> as proposed.
011	PART 2 – District Wide Matters / EIT / Infrastructure – Te Tūahanga / Overview	Support	HNZPT supports the clarification contained in the overview stating, ‘Where an infrastructure activity is located within an overlay area (as identified in the	<b>Retain</b> as proposed.

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			planning maps) then the relevant overlay provisions apply'. We note that the Overlay Chapters include Historic Heritage.	
012	PART 2 – District Wide Matters / EIT / Transport – Te Tūnuku / Overview	Oppose	<p>HNZPT supports the clarification contained in the overview stating, 'Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply'. However, we note that the listed Overlay Chapters do not include Historic Heritage.</p> <p>We request additional wording be added as per the overview in the infrastructure chapter (point 011 above).</p>	<p><b>Amend:</b> HNZPT requests the wording be amended: 'Overlay Chapters - the Overlay Chapters have provisions in relation to Sites and Areas of Significance to Māori; Ecosystems and Indigenous Biodiversity; Natural Features and Landscape; Natural Character and Margins of Waterbodies; Natural Hazards; <b>Historic Heritage</b> and the Coastal Environment. Where a transport activity is located within an overlay area (as identified in the planning maps) then the relevant overlay provisions apply'.</p>
013	PART 2 – District Wide Matters / HAZ / Hazardous Substances – Ngā Matū Mōrearea / HS – P2	Support	HNZPT supports policy HS-P2 which seeks to ensure that new or expanded major hazard facilities are located away from natural, historic and cultural overlay areas.	<b>Retain</b> as proposed.
014	PART 2 – District Wide Matters / HAZ / Hazardous Substances – Ngā Matū Mōrearea / HS – P3	Support	HNZPT supports policy HS-P3 which seeks to ensure that the establishment or expansion of significant hazardous facilities maintain adequate separation distances from sensitive activities and valued natural, cultural and historic heritage features.	<b>Retain</b> as proposed.

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015	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / Overview	Part Oppose	<p>HNZPT supports the inclusion of advisory notes regarding archaeology in the overview of the Historic Heritage chapter – firstly providing the definition of an archaeological site and secondly explaining responsibilities under the HNZPT Act 2014. Owners or applicants may not fully understand the definition of an archaeological site or that a resource consent does not automatically allow the activities to occur on such a site. This clarification is important to ensure that archaeological sites are not damaged through lack of understanding.</p> <p>However, we request some clarification regarding the pre-1900 date. Although the HNZPTA 2014 defines an archaeological site as that associated with human activity that occurred <i>before 1900</i>, the RMA does not identify such a timeframe. We promote that the Te Tai o Poutini Plan should enable protection of all archaeological sites within Schedule One regardless of date.</p>	<p><b>Amend</b> HNZPT requests the wording be amended: <b><u>‘Under the Heritage New Zealand Pouhere Taonga Act 2014</u></b>, Archaeological sites are any place in Aotearoa New Zealand (including buildings and structures) that are associated with pre-1900 human activity, where there is evidence relating to the history of New Zealand that can be investigated using archaeological methods. There are a large number of archaeological sites identified in the West Coast/Te Tai o Poutini. While all <b><u>pre-1900</u></b> archaeological sites are protected under Heritage New Zealand Pouhere Taonga Act 2014, archaeological sites of particular significance to the community on the West Coast/Te Tai o Poutini are included in Schedule One and the Historic Heritage rules also apply to these archaeological sites. <b><u>This schedule can also contain post-1900 sites which have archaeological significance.</u></b> Alongside this, the New Zealand Archaeological Association has identified a list of archaeological sites of Māori origin. These are included in Appendix Ten for information.’</p>
016	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / Overview	Oppose	When archaeological sites are referred to as ‘site’, e.g., in the Historic Heritage chapter overview, the automatic definition box provides the National Planning Standard definition (i.e., area of land under a single title	<p><b>Amend:</b> HNZPT requests that in relation to archaeology, any reference to ‘site’ is removed and the full term ‘archaeological</p>

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			etc). This is not the correct definition of the word in relation to an archaeological site and is therefore misleading. This could be overcome by not using the abbreviation 'site', but rather always using the full term 'archaeological site'.	site' is always used.
017	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / Overview	Oppose	The Proposed Plan provides the National Planning Standard definition for 'earthworks', however this definition is incorrect when referencing the Heritage New Zealand Pouhere Taonga Act 2014 because it is too narrow – specifically, earthworks in the NPS definition 'excludes gardening, cultivation, and disturbance of land for the installation of fence posts', but the HNZPTA 2014 refers to any 'activity that will or may modify or destroy'. HNZPT therefore requests that when referring to the HNZPTA 2014, the term 'works' or 'works within an archaeological site' is used rather than 'earthworks'.	<b>Amend:</b> HNZPT requests the wording be amended: 'If you discover a previously unknown archaeological site (for example, when you are undertaking <del>earth</del> works) you must stop any work that could affect the <b>archaeological</b> site and contact HNZPT for advice on how to proceed.'
018	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – P3	Support	HNZPT supports the clarification of criteria to be used when assessing items for inclusion within SCHED1. This will assist owners and other Plan users to understand why a building or structure has been scheduled and what heritage values it holds.	<b>Retain</b> as proposed.
019	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – P4	Support	The conservation of a heritage building is usually facilitated by the place serving a useful purpose and for this reason, HNZPT actively promotes adaptive reuse. Such development has potential to elongate the life of a	<b>Retain</b> as proposed.



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			<p>heritage item, which may otherwise be unviable.</p> <p>HNZPT therefore supports policy HH-P4 which seeks to enable the use, including adaptive reuse, of scheduled historic heritage items, while ensuring that their identified values are maintained.</p>	
020	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – P5	Part Oppose	<p>HNZPT supports the principle of policy HH-P5 but considers that alterations for the primary purpose of improving structural performance, fire safety or physical access, should also where possible, be undertaken in a way that does not detract from an item of historic heritage value. The relevant rule, HH-R2, adequately addresses this. We therefore request the removal of point b) in the policy as it misleadingly indicates that these alterations may not need to meet with part a).</p>	<p><b>Amend:</b> HNZPT requests the wording of policy HH-P5 be amended: ‘When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered:</p> <ul style="list-style-type: none"> <li>a) Any external alteration will not significantly detract from an item of historic heritage value; <del>or</del></li> <li><b>b) The alterations are for the primary purpose of improving structural performance, fire safety or physical access.’</b></li> </ul>
021	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – P6	Part Oppose	<p>HNZPT supports the principle of policy HH-P6 but submits that, as the Councils are unlikely to have in-house heritage expertise, consideration of the seven points should be undertaken by a suitably qualified heritage professional.</p>	<p><b>Amend:</b> HNZPT requests the wording of policy HH-P6 be amended: ‘When considering proposals for relocation or repositioning of historic heritage items identified in Schedule One, the following matters shall be <del>considered</del>: <b>assessed by a</b></p>

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				<u>suitably qualified heritage professional:...</u>
022	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – P9	Part Support	HNZPT supports the principle of this policy, but considers Council should make the commitment to undertake a 10-year work programme to accurately map <u>all</u> NZAA sites, prioritising those of Māori origin.	<b>Amend:</b> HNZPT requests the wording of HH-P9 be amended: ‘The Councils will work with Heritage New Zealand Pouhere Taonga and Poutini Ngāi Tahu to create a yearly work programme which will enable all NZAA sites <del>of Māori origin</del> on Te Tai o Poutini to be accurately mapped within the next ten years, <u>prioritising sites of Māori origin</u> . These will be included in the Planning Maps as a Plan Change’.
023	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – R1	Part Oppose	<p>The ICOMOS NZ Charter advises that where it is necessary to employ new materials, they should be distinguishable from the original. HNZPT is concerned that the wording of this rule does not make this clear and may not always result in distinguishable new work. As this is a permitted activity, we consider this should be made clear within the rule.</p> <p>HNZPT recommends that where such repair or maintenance work is not distinguishable, then the new materials should be date stamped.</p> <p>HNZPT also submits that all of these points should be met for the activity to be permitted, therefore the ‘or’ should instead be ‘and’.</p>	<b>Amend:</b> HNZPT requests the wording of HH-R1 be amended: 1. Where: a) There are no changes to the extent, floor levels, form, proportion and scale of the item; b) There are no changes to the design, texture, or form of the fabric; c) Use of materials other than those that are the same as the original, or most significant fabric, or the closest equivalent; <del>or</del> <b>and</b> d) There is no damage to the building or

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				<p>structure as a consequence of affixing scaffolding.</p> <p><b><u>2. Where repair or maintenance work is not distinguishable from the original fabric, then the new materials should be date stamped.</u></b></p>
024	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – R3 Minor Earthworks	Part Oppose	<p>HNZPT supports the principle of policy HH-R3 which enables earthworks only where either an archaeological authority has been obtained or an Accidental Discovery Protocol commitment has been completed. However the word ‘site’ in the rule title is linked to the automatic definition box which provides the National Planning Standard definition (i.e., area of land under a single title etc). This is not the correct definition of the word in relation to an archaeological site and is therefore misleading. This could be overcome by not using the term ‘site’, but rather using the full term ‘archaeological site’.</p>	<p><b>Amend</b>  HNZPT requests the wording of rule HH-R3 be amended:  ‘HH-R3 - Minor Earthworks in a Historic Heritage Area or <b>Archaeological</b> Site identified in Schedule One’</p>
025	PART 2 – District Wide Matters / HCV / Historic Heritage – Ngā Tuku Ihotanga / HH – R4 Relocation or Repositioning of a Historic Heritage item	Oppose	<p>The ICOMOS NZ Charter advises that the on-going association of a structure or feature of heritage value with its location, site, curtilage and setting is essential to its authenticity and integrity.</p> <p>HNZPT considers the relocation of a heritage item from its original setting should be avoided. Rare instances may arise where the relocation of a heritage item is a</p>	<p><b>Amend:</b>  HNZPT requests that historic heritage items be provided with greater protection from inappropriate repositioning or relocation, through amending the proposed activity status as follows:</p> <p>Repositioning a heritage item within its existing area or site: <b>Discretionary activity</b></p>

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			<p>last resort to avoid demolition or loss, such as from sea level rise or other imminent and unavoidable danger. In these instances, repositioning or relocation may be a viable solution, but only when all other means of retaining the structure in its current location have been exhausted.</p> <p>HNZPT considers the proposed status of relocation or repositioning of a Historic Heritage item as a controlled activity does not provide sufficient protection, nor does it send the message that relocation is a last resort.</p>	Relocating a heritage item to a new area or site: <b>Non-complying activity.</b>
026	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – R6 Repairs and Maintenance, Earthquake strengthening, Fire Protection and Accessibility Upgrades where Permitted Activity standards are not met, or Additions and Alterations to Historic Heritage Items identified in Schedule One	Oppose	HNZPT does not support the inclusion of ‘Repairs and Maintenance, Earthquake strengthening, fire protection and accessibility upgrades where Permitted Activity standards are not met’ and ‘Additions and Alterations and associated earthworks’ in the same rule. These are very separate activities and grouping them together has the potential to be confusing for Plan users.	<b>Amend:</b> HNZPT requests, for ease of use and clarity, that ‘Repairs and Maintenance, Earthquake strengthening, fire protection and accessibility upgrades where Permitted Activity standards are not met’ and ‘Additions and Alterations and associated earthworks’ be considered under separate rules.
027	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – R6 Repairs and Maintenance, Earthquake strengthening, Fire Protection and Accessibility Upgrades where Permitted Activity standards are not met....	Oppose	<ol style="list-style-type: none"> <li>HNZPT considers the term ‘compatibility’ could be ambiguous. To avoid uncertainty, we recommend this be reworded.</li> <li>HNZPT considers the inclusion of ‘façade’ in point c. is too specific and may be seen to attribute more value to the heritage item’s façade than other external features.</li> </ol>	<b>Amend:</b> HNZPT requests the wording of a) and c) be amended: ‘Discretion is restricted to: a) <del>Compatibility of</del> the form <b>and</b> materials <del>and setting with in</del> <b>relation to</b> the Historic Heritage item <b>and its setting;</b>

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				<p>b) Methods to minimise the loss or destruction of the values which contribute to the item's Historic Heritage values as assessed by a suitably qualified heritage professional;</p> <p>c) <del>Compatibility of</del> the treatment of the exterior, <del>including the façade;</del></p>
028	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – R7 Relocation or Repositioning of a Historic Heritage item	Oppose	HNZPT considers the proposed status of relocation or repositioning of a Historic Heritage item does not provide sufficient protection, nor does it send the message that these activities are a last resort. Refer to comments in point 025 of this submission.	<b>Amend:</b> HNZPT requests that relocation be a non-complying activity and repositioning be a discretionary activity. Please refer to HNZPT request contained in point 025 above.
029	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – R8 New Buildings or Structures and associated earthworks within a Historic Area identified in Schedule One	Support	HNZPT supports the matters of discretion associated with rule HH-R8, which seek to minimise the effects of new structures in Historic Areas and to ensure they are compatible with existing structures and features.	<b>Retain</b> as proposed.
030	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – R9 Demolition and Destruction of a Historic Heritage item or Historic Area	Oppose	<p>Under section (6)(f), the RMA identifies the protection of historic heritage as a matter of national importance.</p> <p>The impact of demolition of a heritage item is irreversible and as more heritage buildings are lost, we increasingly lose touch with the history and origins of our surroundings.</p>	<b>Amend:</b> HNZPT requests Demolition and Destruction of a Historic Heritage item or Historic Area be identified as a non-complying activity.

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			Today's heritage items are tangible remains of the West Coast's rich and unique history. HNZPT therefore strongly advocates for demolition and destruction of heritage items to be a non-complying activity.	
031	PART 2 – District Wide Matters / HCV / Historic Heritage - Ngā Tuku Ihotanga / HH – M1	Support	HNZPT strongly supports the Council's commitment to support owners of historic heritage items to maintain their assets through Council appropriate resources, as detailed in Other Methods.	<b>Retain</b> as proposed.
032	PART 2 – District Wide Matters / SASM Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori / SASM – P1	Support	HNZPT supports SASM-P1 which seeks to protect the values of significant sites and cultural landscapes from the adverse effects of subdivision, use and development while enabling their values to be enhanced through ongoing Poutini Ngāi Tahu access and cultural use.	<b>Retain</b> as proposed.
033	PART 2 – District Wide Matters / SASM Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori / SASM – P3	Part Oppose	HNZPT recommends that the ADP is only adopted where an Archaeological Authority has not been issued by HNZPT.	<b>Amend:</b> HNZPT requests the wording of SASM-P3 be amended: b. Upon accidental discovery of kōiwi (skeletal remains) or urupā ensure that the Accidental Discovery Protocol in Appendix Four is followed, <b><u>unless an Archaeological Authority has been issued by Heritage New Zealand Pouhere Taonga.</u></b>

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034	PART 2 – District Wide Matters / SASM Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori / SASM – P7 – P9	Support	HNZPT supports the measures in SASM – P7 to P9 identifying practical methods to manage activities on significant sites.	<b>Retain</b> as proposed.
035	PART 2 – District Wide Matters / SASM Sites and Areas of Significance to Māori - Ngā Wāhi Tāpua ki te Māori / SASM – P8	Part Oppose	HNZPT recommends that the ADP is only adopted where an Archaeological Authority has not been issued by HNZPT.	<b>Amend:</b> HNZPT requests the wording of SASM-P8 be amended: b. The accidental discovery protocol in Appendix Four is adopted for any earthworks <b><u>unless an Archaeological Authority has been issued by Heritage New Zealand Pouhere Taonga;</u></b>
036	PART 2 – District Wide Matters / SUB - Subdivision - Te Wawaetanga / SUB – O3	Support	HNZPT supports SUB-O3 which seeks to ensure that proposed subdivision design and development protects significant historical and Poutini Ngāi Tahu features and resources and responds to the physical characteristics and constraints of the site and surrounding environment.	<b>Retain</b> as proposed.
037	PART 2 – District Wide Matters / SUB - Subdivision - Te Wawaetanga / SUB – P3	Support	HNZPT supports SUB-P3 which seeks to enable subdivision where it will not compromise the identified characteristics and values identified in the Historic Heritage chapter and will achieve its relevant objectives and policies.	<b>Retain</b> as proposed.

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038	PART 2 – District Wide Matters / SUB - Subdivision - Te Wawaetanga / SUB – R10 - Subdivision of Land in Areas of Historic Heritage Overlay or Sites of Significance to Māori Overlay	Support	<p>Inappropriate subdivision can have an adverse impact on historic heritage sites and sites of significance to Māori. HNZPT therefore supports this dedicated rule for subdivision proposals in the Historic Heritage or SASM overlays.</p> <p>HNZPT also supports the provision that applications to subdivide a lot with a Historical Heritage feature will always be limited notified to HNZPT.</p>	Retain as proposed.
039	PART 2 – District Wide Matters / EW - Earthworks - Te Huke Whenua / Overview	Part Oppose	<ol style="list-style-type: none"> <li data-bbox="902 660 1563 1086">1. The Earthworks overview provides the NPS definition for ‘earthworks’, however this definition is incorrect when referencing the HNZPTA 2014 because it is too narrow – specifically, earthworks in the NPS definition ‘excludes gardening, cultivation, and disturbance of land for the installation of fence posts’, but the HNZPTA 2014 refers to any ‘activity that will or may modify or destroy’. HNZPT therefore requests that when referring to the HNZPTA 2014, the term ‘works’ or ‘works within an archaeological site’ is used rather than ‘earthworks’.</li> <li data-bbox="902 1129 1574 1374">2. HNZPT supports the archaeological advice note within the overview of the Earthworks chapter, which will act as a reminder for owners to check the status of their land prior to undertaking work. For clarity, and to ensure the Plan user understands the extent of archaeological requirements, we also request additional wording.</li> </ol>	<p><b>Amend:</b>  HNZPT requests the wording be amended: <b><u>‘EarthwWorks and land disturbance affecting archaeological sites may also require authorisation under the Heritage New Zealand Pouhere Taonga Act 2014. The Heritage New Zealand Pouhere Taonga Act 2014 makes it unlawful for any person to modify or destroy, or cause to be modified or destroyed, the whole or any part of an archaeological site without the prior authority of Heritage New Zealand. <b>This is regardless of whether the site is scheduled in Te Tai o Poutini Plan or not, and is in addition to any resource consent obtained.</b>’</u></b></p>



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040	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho	Support	HNZPT supports the list of criteria to assess the suitability of items for inclusion in SCHED1A.	<b>Retain</b> as proposed.
041	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho	Oppose	HNZPT notes that this chapter does not include individual assessments to determine the significance of Historic Heritage buildings, structures or items. Such assessments are essential for understanding why the item has been scheduled and what specific features or values warrant protection. Without such assessments it can prove difficult for owners to understand why their item is important or for Council to justify decisions on resource consents.	<b>Amend:</b> HNZPT requests an assessment of each item included in SCHED1A be provided. This assessment should identify the item’s heritage values and justify their protection under SCHED1A.
042	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho	Oppose	HNZPT notes that this chapter does not provide definitions for the Historic Heritage Values listed in SCHED1A. Without these definitions it can prove difficult for owners or Plan users to understand what these Historic Heritage Values include or mean.	<b>Amend:</b> HNZPT requests the inclusion of definitions for the Historic Heritage Values, either within the Historic Heritage policies or at the start of SCHED1A. Suggested definitions are attached as Appendix 2 of this submission.
043	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Support	HNZPT supports the protection, through inclusion in SCHED1A, of listed items that are currently either unscheduled, or not fully scheduled, in the Buller District Plan:  HH5 – Denniston Historic Area	<b>Retain</b> as proposed.

HNZPT Ref #	Provision to which submission relates	Support / Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
			HH6 – Griffiths Foundry Furnace HH9 – Archer House, 75 Queen Street HH23 – Stone house HH24 – Utopia Lodge HH27 – Big River Quartz Mine HH30 – Oddfellows Hall HH42 – Miss Bells Log Cabin	
044	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Support	HNZPT supports the protection, through inclusion in SCHED1A, of listed items that are currently either unscheduled, or not fully scheduled, in the Grey District Plan:  HH43 – Waipuna Station Homestead HH45 – Waiuta Historic Place HH47 – Runanga Miners Hall HH65 – Heatherbell Hotel HH71 – Greymouth Railway Station Historic Area HH80 – Regent Theatre	<b>Retain</b> as proposed.
045	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Support	HNZPT supports the protection, through inclusion in SCHED1A, of listed items that are currently either unscheduled, or not fully scheduled, in the Westland District Plan:  HH84 – Kumara Swimming Pool HH85 – Customhouse (former) HH103 – Totalisator Building HH105 – Ross Historic Area HH108 – Guy Menzies Landing Site HH114 – Hendes Gallery	<b>Retain</b> as proposed.

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046	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Support	HNZPT supports the identification, in SCHED1A, of any specific interior elements of importance. This will assist owners and Plan users to better understand the important features of their property and encourage them to contact Council prior to undertaking any works.	<b>Retain</b> as proposed.
047	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Oppose	Heritage item HH3 in SCHED1A refers to registration, which could be confusing for the Plan user. We recommend this be amended to refer to the schedule.	<b>Amend:</b> HNZPT requests the wording in the Extent column of HH3 be amended to: ‘...The concrete wall is included in, and marks the boundary of, the <b>registration scheduled extent.</b> ’
048	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Oppose	Heritage item HH24 in SCHED1A refers to registration, which could be confusing for the Plan user. We recommend this be amended to refer to the schedule.	<b>Amend:</b> HNZPT requests the wording in the Extent column of HH24 be amended to: ‘...The modern addition to the rear of Utopia Lodge (Former) is excluded from the <b>registration scheduled extent.</b> ’
049	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Oppose	Heritage item HH27 in SCHED1A refers to Appendix 1 of the map in the registration report, which could be confusing for the Plan user. We recommend this reference be removed.	<b>Amend:</b> HNZPT requests the following wording in the Extent column of HH27 be removed: ‘...( <del>Refer to map in Appendix 1 of the registration report for further information.</del> )’
050	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items	Oppose	Heritage item HH88 in SCHED1A refers to the List entry, which could be confusing for the Plan user. We	<b>Amend:</b> HNZPT requests the wording in the Extent

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	and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A		recommend this be amended to refer to the schedule.	column of HH88 be amended to: '...The timber cottage on the land parcel is not included in the extent of the <del>List entry</del> <b>scheduled extent.</b> '
051	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Oppose	Heritage item HH96 in SCHED1A refers to an extent map tabled at the Rārangī Kōrero Committee, which could be confusing for the Plan user. We recommend this reference be removed.	<b>Amend:</b> HNZPT requests the following wording in the Extent column of HH96 be removed: ' <del>...{See extent map tabled at the Rārangī Kōrero Committee meeting on 30 April 2019.</del> '
052	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Historic Heritage Items and Areas and Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1A	Oppose	<p>One of the purposes of the New Zealand Heritage List Rārangī Kōrero is as a source of information about historic places for the purpose of the RMA (HNZPTA s65(3)). The assessment process is currently underway for the Seddon House Site, Kumara to be included on the List.</p> <p>This site is not currently included on HH-SCHED1A. As HNZPT advocates for all Listed Historic Places to be included on district plan schedules, we submit that this site be included on HH-SCHED1A.</p>	<p><b>Amend:</b> HNZPT requests that HH-SCHED1 be amended to include:</p> <p><b><u>Seddon House Site</u></b> <b><u>740-742 Otira Highway (State Highway 73)</u></b> <b><u>KUMARA</u></b></p> <p><b><u>Legal Description: Seddon House Historic Reserve (NZGZ 1981, p. 24; NZGZ 1988, p. 2396 and NZGZ 1989, p. 5301), Westland Land District</u></b></p> <p><b><u>Extent: 'Extent includes the land described as Seddon House Historic Reserve (NZGZ 1981, p. 24; NZGZ 1988, p. 2396 and NZGZ 1989, p. 5301), Westland Land District</u></b></p>

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				<b>and the structures known as Seddon House Site thereon’.</b>
053	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	HNZPT supports the inclusion of the archaeological sites in SCHED1B, but without an associated assessment the question may be raised as to why these particular sites have been included and what is the justification for their inclusion.	<b>Amend:</b> HNZPT requests clarification on why these particular sites have been included and recommends assessment be undertaken to justify their inclusion.
054	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	ARCH5 of SCHED1B identifies the New Zealand Heritage List number but does not identify the listing type. For clarity and consistency with SCHED1A, we request this be added.	<b>Amend:</b> HNZPT requests the Heritage New Zealand Listing Reference column for ARCH5 be amended: ‘HNZPT 7049 <b><u>Historic Place Category 1</u></b> ’
055	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	ARCH15 of SCHED1B identifies the New Zealand Heritage List number but does not identify the listing type. For clarity and consistency with SCHED1A, we request this be added.	<b>Amend:</b> HNZPT requests the Heritage New Zealand Listing Reference column for ARCH15 be amended: ‘HNZPT 7762 <b><u>Historic Place Category 1</u></b> ’
056	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	ARCH16 of SCHED1B identifies the incorrect New Zealand Heritage List number and does not identify the listing type. For clarity and consistency with SCHED1A, we request this be changed and added.	<b>Amend:</b> HNZPT requests the Heritage New Zealand Listing Reference column for ARCH16 be amended: ‘HNZPT 9285 <b><u>9835 Historic Place Category 1</u></b> ’

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057	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	ARCH27 of SCHED1B identifies the New Zealand Heritage List number but does not identify the listing type. For clarity and consistency with SCHED1A, we request this be added.	<b>Amend:</b> HNZPT requests the Heritage New Zealand Listing Reference column for ARCH27 be amended: <b><u>'HNZPT 7051 Historic Area'</u></b>
058	PART 4 – Appendices - Ngā Āpitianga / Schedule One: Schedule of Archaeological Sites -Te Rārangī Tuatahi: Ngā Rawa me ngā Whenua Tuku Iho / SCHED1B	Part Oppose	ARCH28 of SCHED1B identifies the incorrect New Zealand Heritage List number and does not identify the listing type. For clarity and consistency with SCHED1A, we request this be changed and added.	<b>Amend:</b> HNZPT requests the Heritage New Zealand Listing Reference column for ARCH28 be amended: <b><u>'HNZPT <del>7053</del> 7055 Historic Area'</u></b>
059	Part 4 – Appendices / Appendix Four: Accidental Discovery Protocols -Te Āpitianga Tuawhā: Ngā Tikanga o te Kite Pokerehū	Part Oppose	HNZPT supports the principle of inclusion of an Accidental Discovery Protocol (ADP) in Appendix four, but consider the wording provided does not cover all requirements. We therefore request the wording of the HNZPT ADP be used.	<b>Amend:</b> HNZPT requests the wording of the HNZPT ADP, attached in Appendix 3 of this submission, be used.

## **APPENDIX 2 – Suggested definitions for the criteria listed in Schedule One**

### **Historical and social significance value:**

Historical and social significance values that demonstrate or are associated with a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political, or other patterns.

### **Cultural and spiritual value:**

Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.

### **Architectural and aesthetic value:**

Architectural and aesthetic values that demonstrate or are associated with a particular style, period or designer, design values, form, scale, colour, texture, and material of the place.

### **Technological and craftsmanship value:**

Technological and craftsmanship values that demonstrate or are associated with the nature and use of materials, finishes, and/or technological or constructional methods which were innovative, or of notable quality for the period.

### **Contextual value:**

Contextual values that demonstrate or are associated with a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style, and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.

### **Archaeological and scientific significance value:**

Archaeological or scientific values that demonstrate or are associated with the potential to provide information through physical or scientific evidence and understanding about social, historical, cultural, spiritual, technological, or other values of past events, activities, structures, or people.



## Heritage New Zealand Pouhere Taonga Archaeological Discovery Protocol

In the event that an unidentified archaeological site is located during works, the following applies;

1. Work shall cease immediately at that place and within 20m around the site.
2. The contractor must shut down all machinery, secure the area, and advise the Site Manager.
3. The Site Manager shall secure the site and notify the Heritage New Zealand Archaeologist. Further assessment by an archaeologist may be required.
4. If the site is of Maori origin, the Site Manager shall notify the Heritage New Zealand Archaeologist and the appropriate iwi groups or kaitiaki representative of the discovery, and ensure site access to enable appropriate cultural procedures and tikanga to be undertaken, as long as all statutory requirements under legislation are met (*Heritage New Zealand Pouhere Taonga Act, Protected Objects Act*).
5. If human remains (koiwi) are uncovered, the Site Manager shall advise the Heritage New Zealand Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative and the above process under 4 shall apply. Remains are not to be moved until such time as iwi, NZ Police and Heritage New Zealand have responded.
6. Works affecting the archaeological site and any human remains (koiwi) shall not resume until Heritage New Zealand gives written approval for work to continue. Further assessment by an archaeologist may be required.
7. Where iwi so request, any information recorded as the result of the find such as a description of location and content, is to be provided for their records.
8. Heritage New Zealand will advise if an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* is required for works to continue.

It is an offence under S87 of the *Heritage New Zealand Pouhere Taonga Act 2014* to modify or destroy an archaeological site without an authority from Heritage New Zealand irrespective of whether the works are permitted, or a consent has been issued under the Resource Management Act.

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