

Arlene Baird, Heritage New Zealand Pouhere Taonga

Brief of evidence

Heritage New Zealand was consulted early in the Plan review process and provided the planning team with considerable guidance in terms of heritage issues and information on items included on the New Zealand Heritage list. We understand that not all of our guidance was actioned within the proposed plan – some because of Council pressures, others because with a change of planning staff during the review, I believe some of the information may have slipped between the gaps. Regardless of that, the Heritage New Zealand submission was broadly supportive of the Proposed Plan and it acknowledged the efforts that have been made to strengthen the identification and protection of historic heritage within the district. The small number of opposing points related to areas of the Plan where stronger provisions would result in either a better understanding of heritage or better outcomes in its management and protection.

I had the opportunity to be part of a pre-hearing meeting where a number of the Heritage New Zealand submission points were satisfactorily addressed and this is reflected in the s42A report. I referred to that in my evidence, as you will have seen, and I accept the 42A recommendation for those.

4 main issues remain:

- 1. The relocation and repositioning of a heritage item** The Proposed Plan has a controlled activity status for relocation or repositioning of a heritage item. Following the pre-hearing meeting the s42A report acknowledged that that does not afford sufficient protection and could lead to poor decisions. It has recommended that be amended so that under HH-R4 it is a restricted discretionary activity and under HH-R7 (where compliance with H4 is not achieved) it is a discretionary activity. I have two issues with that. Firstly, repositioning (within the site) and relocation (beyond the site) are quite different activities with varying levels of potential impact on heritage values. As such I believe they should not be grouped together, but rather should have separate rules.

Secondly the activity status is not protective enough. In the pre-hearing meeting Dr. McEwan expressed the opinion that the activity status should be descending based upon degree of potential impact, with demolition being a non-complying activity, relocation being discretionary, and repositioning being restricted discretionary. Although I accept that this is not quite as protective as Heritage New Zealand's submission point, I do agree that this would provide an appropriate balance between protection and enabling. However the s42A report has not followed Dr McEwans recommendations - I therefore disagree with the S42A recommendation on this occasion and agree with Dr. McEwan's recommendation.

- 2. Heritage Schedule** The New Zealand Heritage List is for identification purposes and does not provide protection. Therefore the Heritage schedule within a district plan is one of the most significant tools for protection of heritage items. Heritage New Zealand actively advocates for these schedules to be both comprehensive and defensible. For that to be the case requires the preparation of assessments to identify each items significance and to justify its inclusion in the schedule. This is both for the benefit of the owner to understand why their property is scheduled and what important features must be retained, and also for the benefit of the processing planner to understand more clearly how proposals must mitigate

adverse impacts on the item's heritage values. This is particularly important for Councils such as those on the West Coast who do not have any internal heritage expertise.

I understand that Council has acknowledged the need for these assessments and that Dr McEwan has been commissioned to undertake them over a number of years – this is good but not entirely satisfactory because in the meantime items on the schedule are not assessed and it will then be incredibly difficult to adequately analyse the impact of development proposals. However I do at the same time understand the financial pressures on the Coast. So the additional proposed Method does provide some confidence that these assessments will happen. But this is definitely a compromise and I would urge the Council to ensure finances are made available for these assessments to be undertaken at the earliest timeframe possible.

3. **Ensuring accuracy when discussing archaeological sites**. Archaeology can be a confusing topic and many people do not fully understand what an archaeological site is or what responsibilities they may have. So I consider that having clear and accurate definitions, explanations and advice notes within the Plan regarding archaeology is essential in assisting owners to better understand their obligations. Heritage New Zealand made a number of submission points on this topic and it was discussed at the pre-hearing meeting. I am really pleased to see that this has followed through in the s42A report so I would like to take the opportunity to strongly support those recommendations for clear definitions and advisory notes regarding archaeology.
4. **Demolition of a heritage item** 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. Heritage New Zealand has strongly advocated for demolition to be included as a non-complying activity throughout the whole plan review process – I realise that this has received push-back from Councillors but I consider this to be the only solid method to adequately protect the tangible remains of the West Coast's rich and unique history. Following the pre-hearing meeting, the S42A report does now address this issue and concludes that the proposed discretionary activity status is insufficiently protective. It therefore recommends a non-complying status. I want to take this opportunity to strongly support that proposal. It will better implement the policy framework within the Plan and will bring the West Coast up to the same standard of active heritage protection afforded in other areas of the country.