

Pre-Hearing Meeting in Relation to Heritage New Zealand Pouhere Taonga Submissions and Further Submissions to the TTPP (Te Tai o Poutini Plan)

25 September 2023

Chair:

Fiona Thomson (WCRC)

In Attendance

Ben Douglas (WCRC), Lois Easton (Kereru Consultant), Christine Whybrew (HNZPT), Arlene Baird (HNZPT), Robyn Burgess (HNZPT), Ann McEwan (Independent Heritage Advisor for the TTPP)

Apologies

No apologies

Agenda

- Clarification and understanding of HNZPT submission
- Discussion of specific issues where the reporting officer is still determining a response to the submission

Minutes

1. Introductions
2. *HNZPT submission on policy HH-P9*

WCRC: In consultation with Poutini Ngāi Tahu, TTPP has an appendix containing all archaeological sites of Māori origin. The sites haven't been accurately mapped or assessed, but a commitment was made to do so within the next 10 years.

HNZPT: have sought the commitment be extended to all sites rather than just those of Māori origin

WCRC: cannot make that commitment due to resources required

HNZPT: understand limitations of resources, would still like to see wording of policy expanded to provide for sites not of Māori origin to be assessed as well

No Agreement

3. *HNZPT submission on rule HH-R1: Date Stamping of New Materials*

WCRC: Standards on Permitted Activities are of limited use, given permitted activities aren't monitored by compliance staff.

HNZPT: Date stamping not an onerous process- can be as simple as pencil on wood. Understand it is difficult to monitor, but aiming to increase use of date stamping rather than rigidly enforce it per se. It is best practice and adds a lot of value at a later date when the repairs are uncovered due to renovations etc.

WCRC: Poses difficulties for compliance officers.

HNZPT: Could be more appropriate as a requirement of resource consents

No Agreement

Agreement that policy should refer to 'scheduled archaeological sites' as opposed to NZAA as the two are not 'merged', unless included as a NZAA layer and linked to data feed is

WCRC: NZAA layer not included in TTPP due to accuracy concerns

4. *HNZPT Submissions on Rule HH-R1: Repairs and Maintenance to Interiors*

WCRC: Policy is clear but the schedule and rule is not. Would like to have been more clear which items have significant interior elements. Refers only to 'fittings and fixtures'. Would be good to change to 'the interior of this building is included in the extent'. Intent was to align with inclusion of interiors in HNZPT listings.

HNZPT: Don't generally use the term 'fixtures and fittings' anymore.

ANN: Interiors are very difficult to schedule accurately and practicably. Is there a way for scheduled items to be inclusive of interiors as a matter of course?

ANN: The fact that TTPP only provides for effects on interiors to be considered in consent applications in regard to the 8 items where interiors are specifically mentioned, whereas HNZPT will consider the effects on interiors for all of the items scheduled with them provides uncertainty for owners and other consent applicants.

WCRC: Were thinking of including entire interiors explicitly in those scheduled items where 'fixtures and fittings' are included in the extent and linking them to HH-R1, but could also add advice note that where items are listed with HNZPT, that interiors are included in the extents, and that the TTPP will require consideration of the effect on interiors where consent is triggered also, in order to be consistent.

ANN: Not good if owners have a heritage assessment carried out of impacts on exterior of item, do everything as they should and are required by the TTPP, then when applying for approval via HNZPT are told they will need to go back and have the interior impacts assessed. Advice note would be a good way to deal with the issue.

HNZPT: Agree. Logical way to get information to the public.

WCRC: Will draft accordingly

Agreement: That an advice note should be included in the Plan that where items are scheduled with HNZPT that interiors are included in the extents and that the TTPP will require consideration of the effect on interiors where consent is triggered also.

5. *Rules HH – R4 and HH – R7 Relocation and Repositioning of Historic Heritage Items*

WCRC: Understand that extents are key aspect of heritage items why HNZPT seeking to make rules more restrictive. WC communities would generally rather see an item moved or repositioned rather than lost completely.

HNZPT: Would be happy for R4 to be restricted discretionary, based on it going back to previous location or being in immediate danger. Controlled status raises too many red flags.

In terms of R7, relocation and repositioning are distinguished but have the same activity status. Have sought discretionary for repositioning and non-complying for relocation. Relocation can be a solution in some cases, but want to send the message that it is the last resort.

ANN: Thinks definition of repositioning could be better, currently it's 'moving an item within it's site', but more appropriate to refer to extent. More appropriate for Very rare to have prohibited status for demolition. Agrees with repositioning being restricted discretionary, thinks discretionary appropriate for relocation and non-complying for demolition.

HNZPT: Agree that relocation and repositioning need to be differentiated.

Agreement: Restricted Discretionary Activity for Repositioning.

6. Rule HH – R9 Demolition and Destruction of Historic Building

WCRC: Currently a discretionary activity. Clear on HNZPT position and reasons as arising in discussion on previous (relocation and repositioning) rule.

7. Submission on Schedule 1A

WCRC: Would have liked to have carried out heritage assessments of all sites, but do not have the budget. Have prioritised.

ANN: Has had a record for each item in schedule formatted. Level of completion varies according to priority. All Buller District completed. Every report contains URL. Would be ideal to finish populating as funding becomes available or as assessments are required to be completed for consent applications.

Lots of issues around mapped extents. Sometimes only building footprints mapped, sometime too large an extent mapped. Difficult to assess applications for relocation or repositioning. More user friendly to use the ePlan than read the extents in the Schedule.

Has also completed assessment of all items nominated for scheduling. Has recommended 6 for scheduling. Has not recommended Seddon House site in Schedule 1A (Historic Heritage items) but suggests could be appropriate for 1B (archaeological sites).

HNZPT: Can assessment of all scheduled items be included in the Plan as a commitment over time?

WCRC: Could do. Intent is to justify scheduling but also to assist planning officers in their assessments in consent applications.

HNZPT: Agree. A practical tool for planners to use on the ground. Particularly as few or no qualified heritage experts on the Coast. Would like a commitment that it is carried out over time.

WCRC: Understand importance, particularly at consenting end. Believes Greymouth is the priority currently as where most development and impacts on heritage sites are happening. Secondly, private land as public agencies more likely to protect heritage values. Does HNZPT have any suggestions in terms of priorities?

HNZPT: Areas likely to impacted by climate change, eg Granity and Westport and other coastal settlements.

WCRC: Could add that detail to the Plan.

HNZPT: Believe that commitment would be a good compromise.

Agreement: That a Method will be included in the Plan outlining that the assessment process for all heritage items will be progressively completed over time.

HNZPT have tried to assist with assessment information, though the HNZPT and WCRC assessments do need to be separate. Lots of information was sent through over a period of many years, including updated assessments of items scheduled with HNZPT and also assessments of items to consider for scheduling.

WCRC: Have the assessments, but for some reason they weren't included in the Plan. Not sure how they dropped out of the process.

ANN: Some of the items could potentially be added to the schedule in a future Plan change.

WCRC: There won't a plan change in the near future as all resources are tied up in preparing for hearings.

HNZPT: Many on private land and no engagement with owners taken. Still some time away from recommending for scheduling. If either organisation wants to pursue, a future plan change gives time for targeted engagement where considered appropriate.

ANN: Some double-ups, eg Jack's Mill School and Bungalow listed separately.

8. Submission on Schedule 1B

WCRC: All 1B sites are on public land so treating as lower priority, propose to develop assessments over time as per method for 1A items.

HNZPT: Concern is that given only a small number of the total known are recorded, it could be interpreted that they are the most important. Had not realised 1B would take this form and do not understand scheduling of these sites above and beyond other sites.

ANN: No good reason to include items in multiple schedules , eg Ross Historic Area included in 1A and 1B.

Has spoken with someone from Christchurch City Council who has received legal advice that heritage reports can be appended to schedules, without having to go through a statutory process to update them or add further ones, due to them being included by reference only rather than as part of the Plan itself.

WCRC: Hadn't intended to include reports as part of Plan but rather to be held by district councils as resources for use in assessments.

HNZPT: Strongly recommend reports are linked from the Schedule so everything is easily available in one place. Could become a rolling project.

Believe all are on same page.

Agreement: That the Method agreed for Schedule 1A will also apply to Schedule 1B.

WCRC: Thanked HNZPT for the great feedback.

HNZPT: Useful to talk through for them as well.

Meeting closed