



Te Tai o Poutini PLAN

A combined district plan for the West Coast

Prepared for: Hearing Commissioners - Te Tai o Poutini Plan
Prepared by: Lois Easton, Principal Planner
Date: 12 January 2023
Subject: **s42A Author Right of Reply Historic Heritage**

Purpose of Report

1. The purpose of this report is to respond to the questions raised by the Hearings Commissioner during Hearing 6: Historic Heritage, and for the Officer to propose any further amendments to the notified version of the Proposed District Plan above those recommended in the Officers s42a evidence report.

Hearing Panel's Questions to the s42a Reporting Officer and their Response

2. The following questions were received from the Hearing Commissioner for the Historic Heritage topic which sat on 7 December 2023.

[1] Based on the evidence presented by Frida Inta and Laura Mills are there further heritage items that should be included?

3. Four additional heritage items were proposed by Frida Inta and Laura Mills with further evidence presented at the hearing about these. I have sought the advice of Dr Ann McEwan Heritage Consultant and TJ O'Connell, Archaeologist on whether there is merit in scheduling these items. Their reports are attached to this Right of Reply. Dr McEwan advises that she would not recommend the scheduling of the Mōkihinui midden or the Mōkihinui-Seddonville (Chasm Creek) railway line, or the Mt Griffin serpentine quarry remnants as heritage items. However Dr McEwan does recommend that the Hannan and Seddon Building at Werita Street Greymouth is significant and meets the threshold for inclusion as a heritage item.
4. On that basis I recommend the inclusion of the Hannan and Seddon building in the heritage schedule, with the exterior only of the building being included. Dr McEwan is preparing a full heritage report for the item and this would form the basis of the information (extent and values) to be included in the schedule.

[2] What is the role of the Department of Conservation in relation to the management of historic heritage?

5. The Department of Conservation (DOC) has a considerable role in the management of historic heritage.
6. The Conservation Act 1987 defines conservation as "*the preservation and protection of natural **and historic** resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.*"
7. DOC manages the largest heritage portfolio in the country. The management of historic resources on public conservation land is guided by general policy, conservation management strategies and conservation plans.

[3] HNZPT referred to additional heritage assessments undertaken of some 90 potential heritage items on the West Coast – what is the status of these? Are there any statutory provisions that HNZPT have in relation to these sites?

8. As part of supporting the development of TTPP, HNZPT undertook an assessment of the 90 sites that people had sought to be included on the HNZPT Register. This resulted in the registration of the Waiuta Historic Area (which is also scheduled in TTPP). This information is available to support any future assessment of the other sites for inclusion in the TTPP schedule. .
9. Other than the general pre-1900 archaeological site provisions, there are no statutory provisions that HNZPT have in relation to these sites.

[4] What are the planned or intended steps to prepare any Variation in relation to the historic heritage schedule? What is the timing?

10. Over the next two years it is planned to produce detailed site records for each of the items in the historic heritage schedule. This would include reviewing the extent of these items. Once this work is complete a Variation will be able to be prepared to update the scheduled listings. The timing of this might see a Variation in 2026.
11. In relation to assessing the Appendix 10 sites, this is proposed to be undertaken over the life of the Plan – ie a 10 year timeframe. Realistically this is likely to be with a view for such an assessment to support the next Plan review.
12. In relation to assessing additional sites (including the 90 where HNZPT did some assessment) there is no budget or planned work to do this.

[5] Method 2 does not address prioritisation. Is there a need for a specific method?

13. The S42A report recommends a new method HH – M2 as follows:

HH – M2 - The TTPP Committee will consider the merits of inclusion of additional heritage items in the Plan as part of their regular monitoring of Plan implementation. People seeking additional items to be scheduled will need to provide an assessment by a suitably qualified heritage professional that identifies the merits of the item proposed to be scheduled against the criteria in Policy HH – P2. The owner of the item should also be willing for it to be scheduled in the Plan. Where such an assessment and confirmation of agreement to scheduling is provided to the TTPP Committee, the Committee will assess whether there is sufficient justification for scheduling, and if so schedule the item via a Committee - initiated Plan Change.

14. As outlined above under [4] the resources available to support further identification of heritage items in the region are very limited. There are no staff in any of the four Councils with heritage expertise and no locally (West Coast based) heritage consultants. The proposed future work programme for heritage is outlined in 4 above. Unfortunately I do not consider that there is capacity within the Councils to prioritise resources for identification of further items for the schedule. That is why the proposed method makes it clear that any additions will need to be initiated externally, with sufficient evidence also developed externally.
15. I do not consider that for this method prioritisation is necessary, however I note that the new recommended Method HH – M4 there is a priority set for developing the site records. If the Commissioners consider that priorities should be included in HH – M2 then I would recommend the same as follows:
 - Those items and areas which are on private land or are privately owned,
 - Items and areas on Crown land outside of the public conservation estate,
 - Items and areas on district or regional council lands
 - Items and areas on public conservation land

[6] What are the resources available for heritage assessments? What are the priorities in relation to Appendix 10?

16. The resources are very limited. As agreed in the pre-hearing mediation, and now outlined in Method HH – M4, it is intended to prepare detailed site records for each of the heritage items in the Schedule over the next 2 years. This will use all the resources available for historic

heritage during that time. Following that, work will be able to commence to review the items in Appendix 10.

[7] Is there a link to historic heritage with the Tourism strategic objective? Has there been any assessment of economic value of this to the West Coast? Does Development West Coast support heritage tourism?

17. Yes I consider there is a link - but this is not clearly made in the Plan and it would be useful to address that, perhaps in the Overview section. The individual district councils have cultural heritage tourism projects aimed at growing this sector (e.g. Westland Cultural Heritage Tourism Project) – and locations such as Ross, Shanty Town, Reefton and Denniston Plateau form important parts of the heritage tourism itinerary. The most notable cultural heritage tourism project is the Pounamu Pathway project, which is supported by Development West Coast and the Councils.
18. At this stage my understanding is that the total contribution of historic heritage tourism on the West Coast is small, but this is identified as a priority area to support, particularly in that it is based around the settlements, rather than the natural heritage tourism that focuses on the public conservation land.

[8] Method 4. Can this reference what's done with the documentation?

19. Proposed Method HH – M4 is:

Detailed documentation of the historic heritage and/or archaeological values of the Schedule 1A and Schedule 1B historic heritage items will be undertaken by the end of 2026. This will be prioritised for development as follows:

1. *Those items and areas which are on private land or are privately owned,*
 2. *Items and areas on Crown land outside of the public conservation estate,*
 3. *Items and areas on district or regional council lands*
 4. *Items and areas on public conservation land.*
20. I agree it should be clear that the site records should be publicly available on the TTPP website so that they can be accessed to support Plan implementation. They could also be linked directly from the TTPP schedule as this is a relatively simple action to achieve.
 21. I therefore recommend that the method be amended as follows:

Detailed documentation of the historic heritage and/or archaeological values of the Schedule 1A and Schedule 1B historic heritage items will be undertaken by the end of 2026. These site records will be placed on the Tai o Poutini Plan website and directly linked to from Schedule 1.....

[9] Should Historic Areas and Archaeological Sites be treated differently in relation to utilities? Is there scope to address this?

22. I think that historic areas could be treated differently as they include the wider setting (including roads and infrastructure within these). The Archaeological Sites, like the Heritage Items are more discrete in their location.
23. In terms of scope there are no submissions seeking that historic areas be treated differently. However I consider that the submissions of Westpower – e.g. S547.179 that seeks Permitted Activity status for installing overhead energy lines and S547.185 that seek a Restricted Discretionary Activity status for new energy activities, Chorus NZ Ltd, Spark NZ Trading Ltd, Vodafone NZ Ltd (S663.036) seeking a Permitted Activity status for installing new underground customer connections and Manawa Energy e.g. S438.069 that seeks that installing new customer connections be a Controlled Activity may provide scope for the Commissioners to address these in part by having different provisions for utilities in historic areas, compared with other historic sites and items.

[10] HH - P5. Does the evidence of Manawa Energy change your view? Should upgrading of energy supplies in relation to this policy be qualified to just supplies to the building?

24. Yes. I support the proposed amendment included in the Manawa Energy evidence which suggests the following addition:

Or c. The alterations are necessary to enable the continued adaptive reuse of the heritage item while maintaining heritage values to the fullest extent possible.

25. In terms of upgrading of energy supplies in relation to this policy, I agree that this should be qualified as energy supplies to the historic site or item, not upgrading of the wider network.

26. Based on these two matters I recommend an amended HH -P5 as follows:

HH – P5.

When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered:

- a) Any external alteration will not significantly detract from an item of historic heritage value; or
- b) The alterations are for the primary purpose of improving structural performance, fire safety, upgrading energy supply or physical access to the heritage item; or
- c) The alterations are necessary to enable the continued adaptive reuse of the heritage item while maintaining heritage values to the fullest extent possible.

[11] HH – P6 Can this be reworded to be more plain English and clear – ie refer to leased land in Greymouth? Is there scope for such a change?

27. While I have not exhaustively searched the submissions, I do not consider there is any submission that specifically relates to this matter. However there are numerous submissions on the plan asking that the Plan be put into “plain English” and on that basis I consider there is scope to reword this part of the policy. I propose the following:

When considering proposals for relocation or repositioning of historic heritage items identified in Schedule One....

~~g. The historic heritage item is located on leased land with different ownership and there is no practical option for the item to remain in its current location, and land it is sited on are in different ownership and following investigation and assessment into practical options for the retention of the historic item in its current location, it is unreasonable for the item to remain.~~

[12] Is the word “practicable” more appropriate than “viable”? [submission of Manawa Energy]

28. Yes. I support the proposed use of the term that Manawa put forward. I therefore recommend an amended HH – P7 as follows:

....a. the extent of the work required to retain the heritage items is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised; b. the item poses a significant risk to public safety and there is no practicable alternative to make the item safe; c. The costs to retain or repair the heritage item would be unreasonable; d. All other....

[13] HH – P7 (b) – how would “unreasonable” be assessed in terms of cost? Could this be included in an Advice Note? Is there scope?

29. As an Advice Note has no legal effect I consider that there is scope to include this information in an advice note.

30. However I am not sure how this would be assessed as it would need to be done on a case by case basis. Section 85 (6) of the RMA outlines what is “reasonable use” of land but provides no clarification on what is an “unfair or unreasonable” burden. I have had a brief investigation of case law and guidance on this, and have not found anything more useful to assist the panel.

[14] HH – P7 (b) Is there an available mechanism in the RMA to make people maintain heritage sites?

31. No. However s131 of the Building Act has a specific requirement for Councils to have a policy around dangerous and insanitary buildings, and how this policy applies to heritage buildings.

[15] HH- P7 (d) Do there need to be criteria for assessing practicable alternatives?

32. Again I consider that this is something which would need to be assessed on a case by case basis and the development of applicable criteria is difficult.

33. What is practicable might differ based on a large number of factors, eg. the degree of deterioration of the building, it's location in terms of potential alternative uses, whether there are particular characteristics of the building which make it more or less suitable for adaptive reuse. Depending on the item, there are likely to be other factors I have not listed here.

[16] Is there room in HH – P9 to provide priority for NZAA assessment?

34. This could be a useful addition. Priority could follow a similar approach to Method 4 ie:

- *Those items and areas which are on private land or are privately owned,*
- *Items and areas on Crown land outside of the public conservation estate,*
- *Items and areas on district or regional council lands*
- *Items and areas on public conservation land.*

[17] Is there a need for P10 to include a consideration of alternatives?

35. This would be a useful addition. I recommend an updated HH – P10 as follows:

Only allow new infrastructure on or within heritage items, heritage settings and historic heritage sites, identified in Schedule One where it can be demonstrated that:

- a.) There is an operational need or functional need that means the infrastructure's location cannot be avoided; and
- b) The new infrastructure will protect and maintain the particular heritage and/or cultural values of that building, site, area, item and/or feature; and
- c) There is no practicable alternative to the location of the infrastructure.

[18] HH – R1 – What is the legal status of Advice Notes?

36. Advice notes do not have legal effect. They are information and guidance only.

[19] HH -R10 Proposed New Restricted Discretionary Activity. Should there be some scale attached to this rule beyond which it becomes full Discretionary?

37. Yes. I suggest this is consistent with the Energy Infrastructure and Transport provisions and that Permitted Activities within this rule set be provided for in the Rule. I propose therefore there would be a new Restricted Discretionary Rule HH – RXXX and that Discretionary Rule HH – R10 would remain. I recommend the new rule as follows:

Rule HH -RXXX Energy Activities and Infrastructure Activities and associated Earthworks within a Historic Heritage Site or Area identified in Schedule One not meeting Permitted or Controlled Activity Standards

Activity Status Restricted Discretionary

Where:

1. These are Permitted Energy Activities provided for in Rules ENG – R1 – ENG – R5; or

2. These are Permitted Infrastructure Activities provided for in Rules INF – R1 – INF – R12; or
3. These are Permitted Transport Activities provided for in Rules TRN – R1 – TRN – R6.

Matters of Discretion

- a. The location of the energy or infrastructure activity within the heritage site or area;
- b. The impacts on the historic heritage values of the site or area;
- c. Any alternative locations or designs;
- d. Impacts on amenity, identity and character;
- e. Compliance with a conservation plan or report that has been proposed by a suitably qualified heritage professional;
- f. Relationship with adjoining sites of historic heritage value;
- g. How effects will be minimised through construction and maintenance; and
- h. Implementation of any advice received from the relevant Poutini Ngāi Tahu Rūnanga on ways to manage the effects of the activity on cultural values.

Advice Note: Where work is proposed that could modify an archaeological site (regardless of whether the site is scheduled as an archaeological site in Te Tai o Poutini Plan or not) obtaining archaeological authority from Heritage New Zealand Pouhere Taonga (HNZPT) is required before any work starts.

38. I also recommend that HH – R10 is amended for clarification as a consequential amendment as follows:

~~New~~ Energy Activities and ~~New~~ Infrastructure Activities within a Historic Heritage Site or Area identified in Schedule One not provided for in another rule

[20] Please provide a S32AA for the change of status for Demolition and Destruction to a Non-Complying Activity.

Effectiveness and Efficiency

39. Making demolition and destruction of historic heritage items a non-complying activity better meets the direction in Section 6 of the RMA that the protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance.
40. The increased restriction will be more effective at implementing the objectives of the Plan and in particular Objective HH – O4 which states " Protect historic heritage by restricting relocation, repositioning, internal and external alterations and additions to heritage items and not allowing demolition and destruction."
41. Making demolition and destruction of a heritage item or area a non-complying activity is also more effective in implementing the WCRPS Chapter 4 Policy 5 which states "Promote the sustainable management of historic heritage through....b) ensuring that subdivision, use and development does not detract from the significant values of historic heritage.."
42. Overall I consider that this change is more effective at implementing the direction provided by the RMA, WCRPS and the Objectives of the Plan.

Costs/Benefits

43. The proposed change of rule status clearly identifies that a very high bar for demolition and destruction approvals is in place. This will avoid speculative attempts to demolish heritage buildings and provide a clear understanding to the community that the heritage items are protected.
44. The proposed change of rule status will provide benefits to the community in that they can be confident that the historic, cultural and sense of place values provided by valued historic heritage is more likely to be retained in the community.

45. The increase in restriction so that the activity is non-complying is likely to have increased costs where a heritage item owner seeks demolition, however in both the Buller and Westland Operative District Plans it is already a non-complying status, so these costs will be most likely seen in the Grey District.

46. Overall I consider that the potential costs of these proposals are outweighed by the benefits.

Risk of Acting/Not Acting.

47. I consider that there is certain and sufficient information about the effect of this change, as a non-complying rule has been in place in both Buller and Westland Districts since the Operative Plans came into effect in the early 2000s. The effect of a Discretionary Activity is also known, as this is the Grey Operative District Plan approach. It is notable that of the few scheduled historic heritage items that have been demolished over the life of the Operative Plans, almost all have been in the Grey District.

48. In most Plans nationally demolition and destruction of historic heritage items is a non-complying activity and I consider that there is a low risk of acting in the manner proposed.

Conclusion about the most appropriate option

49. I consider this recommended amendment is more appropriate in achieving the purpose of the RMA than the notified version of TTPP.

[21] Please address the errors identified in the Westpower submission and provide updated recommendations.

50. I have the following corrections to make: S547.148 re HH – R3 – add an “or” at the end of 1.a. I support this submission as it corrects an error. I recommend the following amendment to the rule:

HH – R3

These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with:

An activity permitted under Rule HH - R1 or Rule HH - R2;or

...

51. Amendments to Accept/Reject Table

Submission Point	Submitter (S) / Further Submitter (FS)	Provision	Position	Summary of Decision Requested	Officer recommendation
S547.148	Westpower Limited	HH – R3	Amend	Amend item 1.a. An activity ... Rule HH-R2; <u>or</u> ...	Accept

[22] Demolished Items. Should the Plan require records and photographic recording/more detailed recording of these?

52. This would be a useful requirement, however I note that as a non-complying activity, there would be ample scope to require this as a consent condition. I am not aware of any submissions about this matter, so I do not think that there is scope for a policy or rule change. However should the Commissioners want to address this then an Advice Note could be added to the Plan stating that where demolition or destruction is approved, detailed photographic and records of the demolished/destroyed item should be made.

[23] Please confirm if the Bathurst Building is covered by the Denniston Historic Area.

53. Yes. The extent of the Denniston Historic Area is defined in the schedule as

"The area's boundary runs from the base of the incline to the centre of activities at the brakehead and then continues along the route to major mining areas at Burnett's Face and Coalbrookdale. It includes features which are representative of the unique history of this

mining locale....The social history of Denniston has been well recorded and many places and items remain to tell its story. Elements of the various townships remain at 'The Camp', Denniston, Marshallvale, Burnett's Face and Coalbrookdale. Apart from remains of dwellings, the sites of commercial or public buildings or recreational activities can be identified to gain a picture of the life settlers evolved for themselves....

*Extent includes all remnants relating to Denniston. The key components are: the self-activating rail incline; Neighbours Brickwork Site; the former Bridle Path (now walking track); the brakehead and stone retaining walls; the Banbury Arch, mine mouth and rail link; the roperoad; the lower aerial tower; the bath houses and former power house chimney base; **the settlements**; and the Coalbrookdale Mine site and Fanhouse.*

[24] Which of the Buller District Council sites are included in Appendix 10 and which are included in Schedule 1. What is not included and why?

The following items from the Buller District Plan have been included in Schedule 1:

Buller DC REF NO.	ITEM	TTPP Schedule Ref
250	Banbury Arch	HH 5 - Not separately listed. Part of Denniston Historic Area
251	Blackwater School	HH 44
252	Buller County Chambers	HH 8
253	Buller Field Station (former)	HH 10
254	Cape Foulwind Lighthouse	HH 26
255	Church of Saint John the Evangelist	HH1 1
256	Clerk of the Court and Survey Office House	HH 40
259	Courthouse Westport	HH 12
260	Furnace Birchfields Foundry	HH 6
261	Gates of Remembrance Westport	HH 13
262	Granity Public Library	HH 1
264	House 32 Henley Street Westport	HH 14
265	House 51 Queen Street Westport	HH 15
266	House 55 Queen Street Westport	HH 16
267	House 75 Queen Street Westport	HH 9
273	Martin's Mitre 10 Homecentre (Verandah)	HH 17
274	Masonic Lodge Hall Reefton	HH 38
275	Masonic Lodge Hall Westport	HH 18
276	Mines Survey Office Granity	HH 4
277	Municipal Chambers Westport	HH 25
279	O'Conor House	HH 19
280	Oddfellows Hall	HH 30
281	Pennington House & Horse Trough	HH 28
282	Post Office Westport	HH 7
283	Racecourse Stand Reefton	HH 31
284	Railway Workshop Westport	HH 20
285	Reefton Courthouse (former)	HH 32
286	Powerhouse Foundations Reefton	HH 33
287	School of Mines	HH 34
288	Sacred Heart Church (Catholic)	HH 35
289	St Stephen's Church (Anglican)	HH 36
290	State Mine Store	HH 2

291	Stone Retaining Wall	HH 5 - Not separately listed. Part of Denniston Historic Area
292	Tramway Hotel (Former)	HH 5 - Not separately listed. Part of Denniston Historic Area
293	Trippins Guest House	HH 24
294	War Memorial	HH 3
295	War Memorial Obelisk	HH37
296	Westpac Building (Former Bank NSW)	HH 22
297	Westport Carnegie Free Library	HH 21
65	Historic Cemetery	Arch 17
76	Grave	Arch 18
77	Grave	Arch 19
114	Cemetery	Arch 20
121	Cemetery	Arch 21

The following sites in the Buller District are not included in either Schedule 1 or Appendix 10.

BDC Ref No.	Description	Reason Not included
5	Village	NZAA Site with no obvious Māori origin, no accurate information on location.
6	Tunnel	
16	Hut	
29	Ferry Site	
32	Gold Workings	
36	Gold Workings	
37	Gold Workings	
38	Vacant	
39	Water Race	
46	Shipwreck	
48	Gold Workings	
49	Gold Workings	
50	Railway Formation	
52	Flax Mill	
54	Source Site	
55	Cave	
56	Rock Shelter	
57	Sea Caves	
58	Sea Caves	
59	Sea Caves	
60	Sea Caves	
61	Flint Source	
62	Gold Workings	
63	Gold Workings	
64	Gold Workings	
66	Gold Tailings	
67	Battery Site	
68	Gold Sluicing	
69	Water race/dam	
70	Gold Workings	
72	Miners Hut	

73	Goldmining		
74	Goldmining		
75	Midden	Included in a SASM	
78	Goldmining	NZAA Site with no obvious Māori origin, no accurate information on location.	
79	Sawmill		
80	Goldmine		
86	Occupation Layer		
95	Railway		
96	Track		
97	Tramway		NZAA Site with no obvious Māori origin, no accurate information on location
98	Coal Mine		
99	Coal Mine		
100	Building Remains		
101	Dam		
102	Dam		
103	Coal Mine/Tramway		
104	Coal Tramway		
105	Tramway		
106	Mining Settlement		
107	Coke Oven		
108	Tramway		
109	Coal Tramway		
110	Rock Shelter		
111	Mining Battery		
112	Quartz Battery		
113	Mining Town		
114	Cemetery		
115	Boundary Marker		
116	Hotel and Township		
117	Ferry Site/Artefact Find		
118	Hotel & Township		
119			
120	Hunting Camp		
122	Coalmine/Incline		
123	Goldmine/Track		
124	Miner's Track		
125	Foundry		
126	Mining Settlement		
127	Goldmining		
128	Hotel Site		
129	Bricked-up Coal Mine Drive		
130	Quartz Battery		
131	Slab Hut Creek Claim		
132	Surprise Coalmine		
133	Powerhouse Site		
134	Brick Works		
135	Quartz Mine		

136	Goldmining		
137	Track		
138	Track		
139	Sawmill		
140	Water Race/Coal Mine		
141	Miner's Track		
142	Track		
143	Mine/Battery		
144	Battery/Water Race		
145	Miner's Track		NZAA Site with no obvious Māori origin, no accurate information on location
146	Goldmine		
147			
148	Miner's Track		
149			
150	Battery		
151	Miner's Track		
152	Coal Mines		
153	Goldmine		
154	Goldmine		
155	Miner's Track		
156	Goldmining		
157	Goldmining		
158	Goldmining		
159	Mining Town		
160	Goldmine		
161	Goldmining		
162	Goldmine		
163	Miner's Track		
164	Coal Tramway/Coal Mine		
165	Coal Tramway		
166	Miner's Track		
167	Miner's Road		
168	Tramway		
169	Coal Tramway		
170	Water Race		
171	Water Race		
172	Goldmines		
173	Goldmine		
174	Goldmines		
175	Goldmine		
176	Goldmines		
177	Goldmines		
178	Goldmine		
179	Goldmine		
180	Goldmining		
181	Town Site		
182	Coal Mine		

183	Coal Mine		
184	Coal Mine		
185			
186	Coal Mines		
187	Coal Mine		
188	Mining Town		
189	Goldmine/Battery		
190	Town Site		
192	Artificial Cave		
193	Quartz Mine		NZAA Site with no obvious Māori origin, no accurate information on location
194	Quartz Mining		
195	Saw Mill		
196	Coal Mine/Tram		
197	Mining Dam		
201	Occupation		
202	Gold Mining		
203	Hotel Site		
204	Gold Workings		
205	Pack Track		
206	Gold Workings		
207	Miners Hut Site		
208	Gold Workings		
209	Gold Workings		
210	Gold Workings		
211	Gold Workings		
212	Miners Hut Site		
213	Gold Workings		
214	Water Race		
215	Goldmine		
216	Miners' Track		
217	Goldmine/Battery		
218	Goldmine/Battery		
219	Goldmine/Battery		
220	Track		
221	Water Race		
222	Miners' Track		
223	Water Race		
224	Goldmine		
225	Track		
226	Power House/Water Race		
227	Goldmine/Cableway/Pipeline /Tramway		
228	Goldmine		
229	Goldmine		
230			
231	Tramway		
232	Goldmine		
233			

234			
235			
236	Ore Processing		
237			
238			
239	Goldmine		
240	Goldmine/Battery		
241	Goldmine		
242	Water Race		
243	Goldmining		
244	Goldmine		
245	Goldmine		
246	Miners' Track	NZAA Site with no obvious Māori origin, no accurate information on location	
249	Goldfield		
257	Vacant		Not a historic site. Did not meet criteria
258	Vacant		Not a historic site. Did not meet criteria
263	Vacant		Not a historic site. Did not meet criteria
268	Postie Fashions Warehouse (former school) 7 Lyndhurst Street	Not a historic site. Did not meet criteria	
269	House 30 Wakefield St	Not a historic site. Did not meet criteria	
270	House 32 Wakefield St	Demolished	
271	House 34 Wakefield St	Insufficient information to justify inclusion	
272	Manager's House Blacks Point	Insufficient information to justify inclusion	
278	Vacant	Insufficient information to justify inclusion	
298	Brunner Plaque	Insufficient information to justify inclusion	
299	Karamea Special Settlement Plaque	Not a historic site. Did not meet criteria	
300	Cannibal Gorge Plaque	Not a historic site. Did not meet criteria	
301	Reefton Hydro Electric Plaque	Not a historic site. Did not meet criteria	
302	Bard of Inangahua Plaque	Not a historic site. Did not meet criteria	
303	Electricity Centennial Plaque	Not a historic site. Did not meet criteria	
304	Buller Bridge Plaque	Not a historic site. Did not meet criteria	
305	Abel Tasman Plaque	Not a historic site. Did not meet criteria	
306	Denniston Incline Plaque	Not a historic site. Did not meet criteria	
307	Replica Streetlight Standards	Not a historic site. Did not meet criteria	
308	Replica Streetlight Standards	Not a historic site. Did not meet criteria	
309	Replica Streetlight Standards	Not a historic site. Did not meet criteria	
310	Newmans Lookout	Not a historic site. Did not meet criteria	

[25] Is there a benefit in including an Appendix 10A for the remaining archaeological sites? What costs would be associated with this?

54. I can see if a benefit of including these as an "information only" appendix. Provided this did not include mapping the sites, there would be low costs in doing this. In the order of \$1000.

55. If there was a need to map the sites, then the digital information from NZAA would need to be purchased, and a layer built in TTPP. It could then be shown as a non-statutory "indicative" layer. I estimate the cost to do this would be in the order of \$10-15,000. However I consider, this would be a lower priority piece of expenditure compared to many others facing TTPP and I do not recommend the mapping of these sites.

[26] Westpower seeks a controlled activity. Can you outline what rules would be triggered if a power pole needed to be replaced. Does this change your recommendations?

56. Based on the recommendations I have made in my s42A report and as amended in this right of reply, if a power pole was replaced in the same location this would be a Permitted Activity under HH – R3. If this involved the digging of a new pole, then this would be a Restricted Discretionary Activity under new Rule HH -XX.
57. I have considered how this issue is dealt with in other districts (eg Porirua City Council, Central Hawkes Bay District, Selwyn District, Waikamiriri and Timaru -Restricted Discretionary in all cases) and that it is my understanding that temporary diversion of powerlines is possible, I consider a Restricted Discretionary Activity is appropriate.

[27] HH – R4 – Is the provision around natural hazards necessary or could this be addressed using the emergency powers under the RMA?

58. I consider that this rule is necessary because the emergency powers under s330 of the RMA only apply to certain authorised persons. While this includes local authorities, the heritage item may not be owned by the local authority and it may not wish or consider it appropriate, to use its emergency powers to relocate a historic heritage item owned by another organisation, or private entity.

Recommended Amendments to the Plan

1. Amend the Schedule 1: Historic Heritage to include the Hannan and Seddon Building, Werita Street, Greymouth in the schedule.
2. Include Method HH - M4 as follows:

HH – M4 Detailed documentation of the historic heritage and/or archaeological values of the Schedule 1A and Schedule 1B historic heritage items will be undertaken by the end of 2026. These site records will be placed on the Tai o Poutini Plan website and directly linked to from Schedule 1. This will be prioritised for development as follows:

1. Those items and areas which are on private land or are privately owned,
 2. Items and areas on Crown land outside of the public conservation estate,
 3. Items and areas on district or regional council lands
 4. Items and areas on public conservation land.
3. Amend HH – P5 as follows:
When considering proposals for external alteration of historic heritage items identified in Schedule One, the following matters shall be considered:
 - a) Any external alteration will not significantly detract from an item of historic heritage value;
or
 - b) The alterations are for the primary purpose of improving structural performance, fire safety, upgrading energy supply or physical access; to the heritage item; or
 - c. The alterations are necessary to enable the continued adaptive reuse of the heritage item while maintaining heritage values to the fullest extent possible,

4. Amend HH – P6 as follows:

When considering proposals for relocation or repositioning of historic heritage items identified in Schedule One....

g. The historic heritage item is located on leased land with different ownership and there is no practical option for the item to remain in its current location, and land it is sited on are in different ownership and following investigation and assessment into practical options for the retention of the historic item in its current location, it is unreasonable for the item to remain.

5. Amend HH – P7 as follows:

Demolition and destruction of historic heritage items identified in Schedule One will not be allowed unless it can be demonstrated, through investigation and assessment by a suitably qualified heritage professional that:

- a. the extent of the work required to retain the heritage items is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised;
 - b. the item poses a significant risk to public safety and there is no practicable alternative to make the item safe;
 - c. The costs to retain or repair the heritage item would be unreasonable;
 - d. d. All other....
6. Include HH -P10

Only allow new infrastructure on or within heritage items, heritage settings and historic heritage sites, identified in Schedule One where it can be demonstrated that:

- a.) There is an operational need or functional need that means the infrastructure's location cannot be avoided; and
- b) The new infrastructure will protect and maintain the particular heritage and/or cultural values of that building, site, area, item and/or feature; and
- c) There is no practicable alternative to the location of the infrastructure.

7. Include Rule HH – RXX

Rule HH -RXXX Energy Activities and Infrastructure Activities and associated Earthworks within a Historic Heritage Site or Area identified in Schedule One not meeting Permitted or Controlled Activity Standards

Activity Status Restricted Discretionary

Where:

1. These are Permitted Energy Activities provided for in Rules ENG – R1 – ENG – R5; or
2. These are Permitted Infrastructure Activities provided for in Rules INF – R1 – INF – R12;
or
3. These are Permitted Transport Activities provided for in Rules TRN – R1 – TRN – R6.

Matters of Discretion

- a. The location of the energy or infrastructure activity within the heritage site or area;
- b. The impacts on the historic heritage values of the site or area;
- c. Any alternative locations or designs;
- d. Impacts on amenity, identity and character;
- e. Compliance with a conservation plan or report that has been proposed by a suitably qualified heritage professional;
- f. Relationship with adjoining sites of historic heritage value;
- g. How effects will be minimised through construction and maintenance; and
- h. Implementation of any advice received from the relevant Poutini Ngāi Tahu Rūnanga on ways to manage the effects of the activity on cultural values.

Advice Note: Where work is proposed that could modify an archaeological site (regardless of whether the site is scheduled as an archaeological site in Te Tai o Poutini Plan or not) obtaining archaeological authority from Heritage New Zealand Pouhere Taonga (HNZPT) is required before any work starts.

8. Retain HH – R10 as a Discretionary Activity and amend the rule as follows:

HH - R10 ~~New~~-Energy Activities and ~~New~~-Infrastructure Activities within a Historic Heritage Site or Area identified in Schedule One not provided for in another rule
Activity Status: Discretionary

9. Amend Rule HH – R3 as follows:

HH – R3

These are earthworks that will not result in damage, demolition or destruction of heritage items and are associated with:

An activity permitted under Rule HH - R1 or Rule HH - R2;or

...

Appendix One: Report from Dr Ann McEwan

Te Tai o Poutini Plan [Proposed]

Schedule 1A: Historic Heritage Items and Areas

Response to Hearing Presentations re Potential Additional Items

Frida Inta / Buller Conservation Group

- Mōkihinui midden [find site]

This find site is recorded as NZAA Site Number L28/1. The site record form states that the location of the site, having first been recorded in 1987, was not found. It appears that the site was erroneously recorded as a midden, despite the fact that the original NZAA record form refers only to the site being associated with the discovery of one or more stone adzes.

Recommendation: Based on the information provided and the memo prepared by South Island Archaeology [Attachment 1] there is no basis upon which to schedule a site, whose precise location has not been determined. The NZAA site record, such as it is, appears to be sufficient to identify the general location in which the adze find[s] took place. A site at which an event took place does not generally meet the criteria for heritage scheduling but, assuming it can be identified, could be marked by historic interpretation signage.

- Chasm Creek Walkway / former Chasm Stream Railway Line [section], Seddonville

This place, which is the site of a privately-built railway line laid in 1885 to service a coal mine, is recorded as NZAA Site Number L28/36. An archaeological assessment of the former railway line was presented at the hearing. The report was prepared by Rosie Geary Nichol and Katharine Watson of Underground Overground Archaeology in November 2013. The NZAA site record form includes the historical narrative provided in the archaeological assessment.

The site is Crown land under the management of Land Information NZ. The two bridges on the walkway were closed in the early 2010s due to safety concerns. Surviving structures comprise two bridges and a tunnel; the path of the railway line is also evident. According to the archaeological assessment one or both bridges may have been upgraded in the early 1900s; the report notes 20th century components in both bridges dating to the 1900s and 1960s/1970s and concludes that little pre-1900 fabric can be confidently identified in both structures. The rails and sleepers of the railway line were removed at some date after c.1981.

An assessment of archaeological values according to the HNZPT criteria on p. 33 of the archaeological report confirms a 'moderate' value for the railway, formation, tunnel and two bridges.

Recommendation: The place is demonstrably an archaeological site and is therefore protected under the Heritage NZ Pouhere Taonga Act. As the memo from South Island Archaeology [Attachment 2] makes clear, without a new site visit and survey it is not possible to assess the current condition of the component parts of the nominated item. The extent of setting that would need to be identified if the place was recommended for scheduling cannot be determined at this time either. Scheduling will not, in and of itself, address any maintenance or upgrade matters that would be required in order to reopen the two rail bridges to foot traffic. The most that can be said at this time is that the Chasm Creek Walkway has potential heritage value and, subject to a site visit, could meet the criteria for scheduling on the TTPP.

Laura Mills

- Hannan and Seddon building, Werita Street – *no information supplied with submission; additional information now presented to the hearing*

Initial assessment re the submission:

This site appears to have been associated with various iterations of what became the law firm of Hannan & Seddon since the late 1860s. The building looks like it pre-dates 1900 but without corroborating evidence as to its age, designer and, potentially, authenticity, it is not possible to recommend scheduling at this time.

Review of further information following hearing:

The submitter helpfully supplied additional information that provided a date of 1872-73 for the masonry building and identified the architect, builder and first owner/occupier, the Tasmanian-born solicitor William Perkins. The building is now recommended for scheduling on the basis of the information supplied; a heritage record form will be supplied in due course.

- Mt Griffin serpentine quarry remnants – *checking with DoC re conservation status of item; awaiting reply*

Initial assessment re the submission:

Gazetted as state forest in 1919, now subject to Conservation Act for recreation purposes; remnant machinery and evidence of quarrying. Site in use 1913-15, operations then apparently moving to Tuhua until c.1918. A historic site but location within conservation park may provide sufficient recognition and protection.

Review of further information following hearing:

Photographs supplied by the submitter provided additional visual information about the nature and location of relics that remain on Mt Griffin. There remains insufficient information available to identify the nature of the 'relics' and assess the site as a potential scheduled heritage item. Historic interpretation of the site and its remnant machinery is desirable. It could also be recorded by the NZAA as a post-1900 archaeological site.

Dr Ann McEwan
11 January 2024

Attachments [2]: Memos from TJ O'Connell, South Island Archaeology, re Mōkihinui midden & former Chasm Stream Railway, dated 20 December 2023.