



HERITAGE NEW ZEALAND
POUHERE TAONGA

21 November 2022

Waimakariri District Council
Private Bag 1005,
Rangiora 7440
By email: Developmentplanning@wmk.govt.nz

Tēnā koe,

**HERITAGE NEW ZEALAND POUHERE TAONGA FURTHER SUBMISSION ON THE PROPOSED
WAIMAKARIRI DISTRICT PLAN**

To: Waimakariri District Council
Name of submitter: Heritage New Zealand Pouhere Taonga (HNZPT)

Submitter details

1. This is a further submission on submissions made on the Proposed Waimakariri District Plan.
2. The Submitter has an interest in the proposal that is greater than the interest of the general public. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation and conservation of New Zealand's historic heritage.
3. If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.

Submission details

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

Submission at the Hearing

5. HNZPT wish to speak in support of our submission.

Ngā mihi,

**Dr Christine Whybrew
Acting Director Southern**

Heritage New Zealand Pouhere Taonga

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Appendix 1 - HNZPT further submission on submissions made on the Proposed Waimakariri District Plan

Submission #	Submitter	Relief sought by submitter	Reason for HNZPT further submission	Decision sought by HNZPT
230.4	Concept Services	Requests HH-O1 be amended to “Historic heritage and its overall contribution to the identity of the District is recognised, <u>and it is protected and maintained where practicable.</u> ”	HNZPT considers the addition of the words ‘where practicable’ would weaken this objective significantly and raises the question of how ‘where practicable’ is assessed.	HNZPT OPPOSES the relief sought and requests the objective be adopted as notified.
230.5	Concept Services	Requests HH-P5(3) be amended to “3. protects, <u>where practicable</u> , identified heritage values from inappropriate...”	HNZPT considers the addition of the words ‘where practicable’ would weaken this policy significantly and raises the question of how ‘where practicable’ is assessed.	HNZPT OPPOSES the relief sought and requests the objective be adopted as notified.
230.6	Concept Services	Requests HH-P8 be amended to “Avoid demolition of ‘ <u>Highly Significant</u> ’ historic heritage listed in HH-SCHED2 unless; <u>and manage demolition of ‘Significant’ historic heritage, where:...</u> ”	HNZPT considers this amendment would lessen the protection of some scheduled heritage items.	HNZPT OPPOSES the relief sought and requests the policy be adopted as notified.
408.15	Aurecon	Requests “Amend the Matters of Discretion in SUB-MCD13 to include: “ <u>8. whether the retention of the heritage features or form of the listed structure, place, or object causes significant additional costs, or reduction in its range of likely uses</u> ”	HNZPT does not consider the proposed wording to be necessary or appropriate. The wording is ambiguous and in particular the term ‘significant additional costs’ could be open to interpretation and difficult to assess. HNZPT consider the matters of discretion in the notified SUB-MCD13 to be well balanced in enabling subdivision whilst ensuring the district’s important heritage resources are protected.	HNZPT OPPOSES the relief sought and requests the matter of discretion be adopted as notified.