



HERITAGE NEW ZEALAND
POUHERE TAONGA

23 August 2022

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

Tēnā koe,

**HERITAGE NEW ZEALAND POUHERE TAONGA SUBMISSION ON VARIATION 1 OF THE PROPOSED
WAIMAKARIRI DISTRICT PLAN – HOUSING INTENSIFICATION**

To: Waimakariri District Council
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 (HNZPTA) 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. The specific provisions of the proposal that HNZPT's submission relates to are:
Please refer to Appendix 1.
4. Our submission is:
Please refer to Appendix 1.
5. We have included 2 additional pages.
6. We seek the following decision from the Waimakariri District Council:
Please refer to Appendix 1.

Submission at the Hearing

7. We wish to speak in support of our submission.

HNZPT comments

8. We understand the purpose of Variation 1 is to amend the Proposed Waimakariri District Plan in response to the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021 which seeks to enable medium density residential standards for specific urban areas, of which a portion of Waimakariri is included, notably the townships of Rangiora, Kaiapoi, Woodend, Pegasus and Ravenswood.
9. The need for more housing is undisputed and HNZPT understands the direction that Central Government is taking with requiring district plans to be more facilitating of housing intensification. We agree that many areas are well suited to provide for that need but at the same time, we strongly advocate for robust provisions to be established to ensure that this will not be at the expense of historic heritage.
10. Waimakariri has a wealth of history which plays an important role in generating a feeling of identity and wellbeing, as well as encouraging intergenerational connection. HNZPT supports the general approach of this Variation which aims to enable a variety of housing types with a mix of densities and to simplify the process for such development. However, we submit that greater consideration is required to ensure that intensification does not adversely affect Waimakariri's most valued heritage.
11. The specific relief sought by HNZPT is set out in Attachment 1 of this submission. The relief sought is intended to strengthen the proposed provisions as they relate to the management and protection of historic heritage.
12. Thank you for the opportunity to submit on these proposed changes. HNZPT requests your consideration of the matters raised and would welcome further consultation.

Ngā mihi,



Dr Christine Whybrew
Acting Director Southern
Heritage New Zealand Pouhere Taonga

Address for service:

Arlene Baird
Heritage Advisor - Planning
Heritage New Zealand Pouhere Taonga
PO Box 4403
Christchurch 8140
Email: abaird@heritage.org.nz

APPENDIX 1 - SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON VARIATION 1 OF THE PROPOSED WAIMAKARIRI DISTRICT PLAN

HNZPT Ref #	Provision to which submission relates	Support or Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
001	Part 1 – Introduction and General Provisions/ Te whakamahi māhere - How the plan works / Relationships between spatial layers	Support	HNZPT supports the inclusion of properties identified as historic heritage items within the Medium Residential Zone of Rangiora, Kaiapoi and Woodend as a qualifying matter.	Retain as proposed.
002	Part 2 - District-wide matters Strategic directions / SD -Rautaki ahunga - Strategic directions	Support	HNZPT supports the promotion of well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, as a strategic direction.	Retain as proposed.
003	Part 2 – District-wide matters Subdivision / SUB - Wāwāhia whenua – Subdivision / SUB-R2	Oppose	<p>We note that there are no proposed matters of control for subdivision within the medium density zone. HNZPT is concerned that this lack of control has the potential to impact historic heritage and requests Council puts greater consideration into this matter.</p> <p>For example, a situation could arise where subdivision does not increase non-compliance with the built form standards of the zone and is therefore in accordance with 3a.i., but the changes may still have an adverse effect on the values of a heritage building.</p> <p>We acknowledge that rules within the Historic Heritage chapter provide protection for development within an identified setting, but the cumulative impact of intensification in the vicinity (or wider site) of a heritage item has the potential to be detrimental.</p>	<p>Amend HNZPT request SUB-R2 (Medium Density Zone) be amended as follows:</p> <p><u>Matters of control are restricted to:</u> <u>SUB-MCD8 – Archaeological sites</u> <u>SUB-MCD13 – Historic heritage</u></p>

HNZPT Ref #	Provision to which submission relates	Support or Oppose	Reasons for submission	Decision sought from Council (Retain / Amend / Delete)
			We therefore submit that it is important for the impact on historic heritage to be clearly identified and controlled at the subdivision consent stage for the Medium Residential zone in the same way as it is for other zones within SUB-R2.	
004	Part 3 – Area specific matters / Zones / RESZ – Whaitua Nohonoho - Residential Zones / MRZ – Medium Density Residential Zone / MRZ-BFS-1	Oppose	<p>HNZPT encourages greater thought as to the physical impact that intensified development may have on individual heritage items. The construction of a greater number, and potentially taller buildings close to a heritage structure could result in its heritage values being put at risk.</p> <p>MRZ-R2 identifies residential development in the Medium Density Zone as a permitted activity if it complies with built form standard MRZ-BFS1, which allows for up to 3 residential units per site within the medium density residential zone, up to 11m high and 1m from the site boundary (subject to recession planes).</p> <p>We acknowledge that rules within the Historic Heritage chapter provide protection for development within an identified setting, but the cumulative impact of intensification in the vicinity of a heritage item (e.g., its wider site beyond the identified setting) has the potential to be detrimental. We therefore submit that it is important for the impact on historic heritage to be clearly identified and assessed at the subdivision consent stage to ascertain whether up to 3 residential units is appropriate.</p>	<p>Amend HNZPT request Built Form Standard MRZ-BFS1 - Number of residential units per site, be amended as follows:</p> <p>1. There shall be no more than 3 residential units per site, except where:</p> <p>a. Within the qualifying matters - natural hazards area and qualifying matters - airport noise, there must be no more than 1 residential unit per site;</p> <p>b. <u>Within the qualifying matters – historic heritage area, a heritage impact assessment has been undertaken by a suitably qualified professional, to ascertain the number of residential units per site.</u></p>