

11. Heritage

Submission No. and Point / Submitter Name	Plan Provision	Summary of Submission	Decision Requested
	General		
21.3 Susan and Alastair Stark	Omaui	The archaeological sites in Omaui need to be identified. Signage is important.	Not stated.
56.18 Jenny Campbell	General	The submitter considers that heritage is a very significant aspect of life in the city with a huge upsurge in interest and concern. The submitter refers to the submission of the Heritage South/Heritage Forum Steering Group of which she is a member.	Not stated.
56.20 Jenny Campbell	General	The submitter supports the Southland Coastal Heritage Inventory Project in light of climate change and sea level rise and being mindful of saving significant sites on the coast e.g. at Omaui.	Not stated
60.13 Heritage South/Heritage Forum Steering Group	General	Other than as discussed in submission points below, the submitter supports the sections of the Plan relating to the protection, management and enhancement of heritage values.	Retain those parts of the Plan relating to the protection, management and enhancement of heritage values.
78.3 Ministry of Education	General	Support. The submitter notes that there are two schools listed in Appendix II and support the management approach of adaptive reuse	Retain objectives, policies and rules that pertain to adaptive reuse and permitted activity status for repair and maintenance. (See 78.4)
106.2 Trevor Thayer	General	<p>The submitter supports the retention of the city's rich architecture and history and suggests that the Council identify examples and provide incentives to look after them.</p> <p>For those buildings in ill-repair the submitter states that the Plan provides incentives to go through the demolition process. The submitter also questions whether there will be District Plan rules in conjunction with the national policies on earthquake prone buildings.</p>	Not stated.
115.10 New Zealand Historic Places Trust	General – Earthquake strengthening	The submitter recommends that RMA policies and plans provide guidance and regulation to promote and improve heritage building	The submitter suggests the following rule frameworks for heritage building safety works: “Temporary Shoring – Permitted Activity

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		<p>safety. (Building safety aims to reduce the risk of hazards to people and the building. This may include the risk of earthquakes, fire, storms, and accidents and to improve physical access.)</p> <p>In particular, in particular the submitter believes that it is important that heritage rules should not be a barrier or disincentive to undertaking earthquake strengthening and should ensure the work is undertaken in a manner compatible with the heritage values of the building. Providing a tailored rule for building safety works would be supported by the NZHPT provided that adequate assessment criteria are drafted to support this.</p> <p>Alternatively, the submitter recommends that the benefits of earthquake strengthening be included as an assessment matter.</p>	<p>Definitions, standards and terms for repair and reconstruction should be included.</p> <p>Repairs and reconstruction to damaged buildings resulting from fire, earthquake or other hazard event – Permitted Activity</p> <p>Strengthening or replacement of high-risk elements (eg parapets, façade decoration, chimneys) with high quality light weight material – Controlled Activity</p> <p>Alterations for the purpose of improving building safety – earthquake strengthening, fire safety, access or other building code related work – Controlled Activity”</p> <p>NB: Demolition or partial demolition of an earthquake-prone building is recommended as a non-complying activity. It is noted that this is the case for NZHPT registered buildings under proposed rule 3.8.9.</p>
SECTION 2.8 ISSUES, OBJECTIVES AND POLICIES			
	General		
18.43 Environment Southland	Introduction	<p>The submitter believes that this section should include reference to the Government’s new Earthquake Prone Buildings policy. This policy and its ultimate implementation by the City Council is likely to have more impact on built heritage than any of the other factors mentioned in the Introduction. Given that Issue 5 in Section 2.8.1 relates to this matter, the matter should be addressed in the Intro</p>	<p>Add some introductory comment on the effect of the Government’s recently announced Earthquake prone building policy on built heritage.</p>
60.7 Heritage South/Heritage Forum Steering Group	Introduction	<p>The submitter supports the introduction to this section but considers that it is focussed on physical heritage values and there is no reference to associated beliefs, living cultural heritage traditions and practices, or the heritage community and groups which keep these alive.</p> <p>The submitter would like to see the introductory text revised to acknowledge the importance of living cultural heritage, traditions, practices and lifeways; the heritage community and heritage groups; living environment, significant trees, remnant native vegetation, dune</p>	<p>Amend the introductory text to acknowledge the importance of living cultural heritage, traditions, practices and lifeways; the heritage community and heritage groups; and to acknowledge the importance of the living environment, significant trees, remnant native vegetation, dune systems, estuaries and places of traditional maika kai, as living heritage</p>

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		systems, estuaries and places of traditional maika kai, and to recognise that these living aspects of heritage are vital to support the physical heritage values, and need to be fostered and cultivated.	
88.65 Federated Farmers	Introduction	<p>The submitter seeks a measured approach where adverse social and economic impacts of heritage provisions are carefully balanced against the social and cultural benefits of heritage preservation, and any mechanisms for heritage protection should encourage, rather than deter resource users in conserving heritage sites and other connections with the past.</p> <p>The submitter holds particular concern with the comment in paragraph 10 of the introduction that “<i>land use and subdivision activities could significantly and adversely affect heritage values</i>”. The submitter points out that the relevant provisions within Section 6 of the RMA refer to the impact of inappropriate activities and we consider it is inappropriate land use and subdivision that should be referenced here.</p>	<p>Federated Farmers seeks decisions on heritage provisions that are made in full consideration of the adverse economic, social and cultural effects, including adverse effects on ethics and aspirations of heritage conservation. We seek that Council amend paragraph 10’s final line to state:</p> <p>“... <u>Inappropriate</u> land use and subdivision activities could significantly and adversely affect heritage values”</p>
60.1 Heritage South/Heritage Forum Steering Group	General	The submitter generally supports the objectives, policies and methods but feel they could be strengthened and made more meaningful. In particular the submitter believes the Plan needs to be more proactive for promotion, collaboration and strategic planning for heritage, and take account of the collective heritage community wishes to develop a single regional heritage strategy and hold a biennial Heritage Forum alternating with a regional heritage event.	The District Plan should give effect to the Proposed Regional Policy Statement, in particular Policy HH1, policy HH6, Method HH4 and Method HH5
115.2 New Zealand Historic Places Trust	General	<p>The submitter supports the provisions with amendments.</p> <p>The submitter states that the introduction and the issues, objectives and policies provide a strong basis for managing the District’s heritage resources. However, suggest amendments to improve, clarify, qualify and strengthen the provisions.</p>	<p>Adopt the Issues, Objectives, and Policies section 2.8 as proposed subject to amendments:</p> <p>a. 2.8.1 (1): Inappropriate subdivision, use and development of heritage sites, structures, places and areas can lead to the degradation or deterioration, <u>loss or destruction</u> of heritage values.</p> <p>b. 2.8.1(7): Natural processes <u>and events such as</u></p>

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			<u>earthquakes</u> ; and climate change (i.e. coastal erosion, sea level rise and river flooding) can have adverse effects on heritage values.
	2.8.1 Issues		
88.66 Federated Farmers	Issues	Support.	Retain the issues as notified.
71.17 NZAS Ltd	Issue 1	Support. The submitter supports the recognition of heritage values, and particularly reference in the issue to “inappropriate subdivision, use and development” as in some case this subdivision, use and development may be appropriate	Retain Issue 1
77.19 Te Runaka o Waihopai and Te Runaka o Awarua	Issue 1	Support subject to amendment.	Amend Issue 1 as follows: “Inappropriate subdivision, use and development of heritage sites can also lead to the <u>loss</u> ... of values”
60.9 Heritage South/Heritage Forum Steering Group	New Issue	The submitter considers that a new issue is needed to highlight the bias in recording, listing and registration of heritage in favour of the inner city and Bluff, and the omission of representative places in the suburban areas of the city.	Add a new issue to highlight the bias in recording, listing and registration of heritage in favour of the inner city and Bluff, and the omission of representative places in the suburban areas of the city.
	2.8.2 Objectives		
18.44 Environment Southland	Objectives	Support	Retain objectives
88.67 Federated Farmers	Objectives	Support in part. The submitter has concerns with the open-ended reference to “are identified” within Objective 1 because of the lack of clarity as to intended procedure, and given the matter is more fully addressed within Policy 2, we do not consider it needs to be included here.	Amend Objective 1 as follows: “Heritage values are identified and protected from inappropriate subdivision, use and development”
64.24 Department of Conservation	Objective 1	Support. The submitter considers the objective recognises the significant heritage values in the Invercargill district and that protecting historic buildings, places and sites is necessary to ensure that these values are maintained. The submitter considers the objective is consistent with s6 of the RMA and Policy 17 of the NZCPS	Retain Objective 1
71.18 NZAS Ltd	Objective 1	Support. The submitter supports the recognition of heritage values, and	Retain Objective 1

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		particularly reference in the issue to “inappropriate subdivision, use and development” as in some case this subdivision, use and development may be appropriate	
60.2 Heritage South/Heritage Forum Steering Group	New Objective	The submitter considers that the Council should include specific text in the objectives, policies and methods relating to heritage, that provide for the Council to contribute to and be involved in the development of a single regional heritage strategy for southland in cooperation and collaboration with territorial authorities, tangata whenua, the NZ Historic Places Trust, Department of Conservation, Te Ao Marama Incorporated, the NZ Archaeological Association and other stakeholders, and especially Heritage South and other community heritage groups.	Add a new objective that: <u>“ICC works collaboratively with other territorial authorities and key stakeholders (i.e.tangata whenua, the New Zealand Historic Places Trust, Department of Conservation, Te Ao Marama Incorporated, the New Zealand Archaeological Association and other stakeholders, and especially community heritage groups) to promote heritage and develop an integrated strategic direction for heritage”.</u>
	2.8.3 Policies		
18.45 Environment Southland	General	Support	Retain policies
88.68 Federated Farmers	General	<p>Support in part.</p> <p>The submitter supports Policies 1, 2 3 and 4 and the promotion of active management, conservation and adaptive reuse of heritage buildings.</p> <p>The submitter considers that collaboration with key stakeholders is vital if there is to be success in this area and notes that Policy 8 makes reference to this but limits specified parties within the explanation to agencies and tangata whenua. The submitter considers it imperative that private landowners are involved throughout any process involving their land, and there must also be acknowledgement that preservation and management of heritage sites and buildings can be disproportionately costly, particularly in the area of earthquake strengthening.</p>	<ul style="list-style-type: none"> • That Council specifically provide reference to private landowners within Policy 8 or similarly provide a new policy alongside Policy 10 that refers to the importance of, and need to collaborate with private landowners throughout any heritage process. • Adopt other policies as proposed;
60.3 Heritage South/Heritage Forum Steering	Policy 1 – Promotion	The submitter considers that the Council should include specific text in the objectives, policies and methods relating to heritage, that provide for the Council, in collaboration with other TLAs, to support an annual	Add to the explanation for Policy 1 that this includes support for an annual Heritage Month and Biennial Heritage Forum in Southland.

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Group		Heritage Month and a biennial Heritage Forum for the Southland Region.	
60.8(a) Heritage South/Heritage Forum Steering Group	Policy 2 – Identification	The submitter is supportive of this section but considers it could be improved. The submitter considers that the Plan needs to include in the Issues, Policies and Methods the need for further heritage identification studies, in particular one to identify buildings in suburban areas.	Revise Policy 2 to acknowledge the need for and indicate action to identify heritage (through a similar study to those done for the inner city and Bluff) in the wider city suburban area including homes/dwellings and industrial buildings with heritage value.
65.19 ICC Environmental and Planning Services	Policy 2 Identification	Support in part. The submitter considers that the explanation should be amended because there is a possibility that there are some archaeological sites that are not currently shown on the Planning Maps and that further work may be undertaken to identify new archaeological sites.	Amend the first sentence of the second paragraph of the explanation to read: “ All known Archaeological sites are recorded on the Planning Maps and are listed in Appendix II.”
64.25 Department of Conservation	Policy 3 Effects on Heritage	Support. The submitter supports this policy as it seeks to avoid adverse effects on historic buildings, places and sites resulting from subdivision, use and development	Retain
77.20 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 3 Effects on Heritage	Support	Retain
60.10 Heritage South/Heritage Forum Steering Group	Policy 6 – Conservation and adaptive re-use	The submitter considers that Policy 6 should be revised to take account of the heritage values of verandas and beyond the facades of heritage buildings.	Revise Policy 6 to include reference to verandas as part of the heritage value of heritage buildings and streetscapes, and to state that heritage value may extend beyond the façade.
64.26 Department of Conservation	Policy 7 Archaeological and cultural sites	Support. The submitter considers protection of these sites is necessary to ensure the heritage values relating to them are retained.	Retain
77.21 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 7 Archaeological sites	Support	Retain
60.4 Heritage South/Heritage Forum Steering Group	Policy 8 – Collaboration	The submitter considers that the Council should include specific text in the objectives, policies and methods relating to heritage, that provide for the Council to contribute to and be involved in the development of a single regional heritage strategy for southland in cooperation and	Add the following to Policy 8: “To collaborate with key stakeholders in the management of heritage <u>and the development of a</u>

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		collaboration with territorial authorities, tangata whenua, the NZ Historic Places Trust, Department of Conservation, Te Ao Marama Incorporated, the NZ Archaeological Association and other stakeholders, and especially Heritage South and other community heritage groups.	<u>single Regional Heritage Strategy.</u> Add the following to the explanation for Policy 8: “The Invercargill City Council will also seek to work with the diverse range of heritage groups who are also aiming to work more collaboratively.”
77.22 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 8 – Collaboration	Support	Retain
60.11 Heritage South/Heritage Forum Steering Group	Policy 9 – Natural Processes	The submitter strongly supports Policy 9 but suggests the explanation should be amended to indicate its participation in the Southland Coastal Heritage Inventory Project as a key way of implement this policy in a collaborative way.	Amend the explanation for Policy 9 to include specific reference to the Southland Coastal Heritage Inventory Project.
77.23 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 9 Natural Processes	Support, the submitter specifically refers to the continuation of support o the Southland Coastal Heritage Inventory Partners Projects	Retain
117.8 Southern District Health Board	Policy 10 Tangata Whenua	The submitter acknowledges that heritage values can strengthen a sense of community and contribute to community connectedness. The submitter appreciates the introduction which identifies the heritage values of tangata whenua and European cultures and endorses Policy 10 – Tangata Whenua	Supports in general, in particular Policy 10
77.24 Te Runaka o Waihopai and Te Runaka o Awarua	Policy 10 Tangata Whenua	Support	Retain
	2.8.4 Methods of Implementation		
64.21 Department of Conservation	General	Support. The submitter refers specifically to the proposal to maintain and update a detailed list of heritage sites and to append it to the Plan, and the intention that this will involve consultation and collaboration with key stakeholders to keep the information as up-to-date as possible	Retain 2.8.4
77.25 Te Runaka o Waihopai and	General	Support all	Retain

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Te Runaka o Awarua			
88.69 Federated Farmers	General	<p>Support in part. The submitter reiterates the absolute need for full landowner involvement throughout any process involving private land, and that the process needs to be consistent, defined and transparent.</p> <p>The submitter considers that non-regulatory methods are the most effective way of managing and protecting heritage values.</p>	That Council adopt the methods as proposed but ensure full landowner involvement throughout any process involving private land. The submitter's preference is for non-regulatory methods to be the focus in this area.
60.8(b) Heritage South/Heritage Forum Steering Group	Method 1	The submitter is supportive of this method but considers it could be improved. The submitter considers that the Plan needs to include in the Issues, Policies and Methods the need for further heritage identification studies, in particular one to identify buildings in suburban areas.	Revise Method 1 to acknowledge the need for and indicate action to identify heritage (through a similar study to those done for the inner city and Bluff) in the wider city suburban area including homes/dwellings and industrial buildings with heritage value.
65.20 ICC Environmental and Planning Services	Methods 5 and 6	Support in part. The submitter considers that these methods are unnecessarily repetitive. It is considered that these two methods should be combined into one method.	Amend Method 5 to read: “Consulting with <u>Collaborating with key stakeholders in the management of heritage, including:...</u> AND Delete Method 6.
60.5 Heritage South/Heritage Forum Steering Group	Method 6	The submitter considers that the Council should include specific text in the objectives, policies and methods relating to heritage, that provide for the Council to contribute to and be involved in the development of a single regional heritage strategy for southland in cooperation and collaboration with territorial authorities, tangata whenua, the NZ Historic Places Trust, Department of Conservation, Te Ao Marama Incorporated, the NZ Archaeological Association and other stakeholders, and especially Heritage South and other community heritage groups.	Add the following to Method 6: <u>“Collaborating with key stakeholders and the wider heritage community in the management of heritage, including development of a single Regional Heritage Strategy.”</u>
60.6 Heritage South/Heritage Forum Steering Group	Method 8	The submitter considers that the Council should include specific text in the objectives, policies and methods relating to heritage, that provide for the Council, in collaboration with other TLAs, to support an annual Heritage Month and a biennial Heritage Forum for the Southland Region.	Amend Method 8 as follows: <u>“Promoting the protection of heritage values through education – guidelines, awards, brochures and leaflets, consultation, supporting an annual heritage month and</u>

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			biennial Heritage Forum, and facilitation.”
115.7 New Zealand Historic Places Trust	Method 10	The submitter supports this provision with amendments as it considered incentives as essential for achieving the preservation and re-use of heritage. The submitter states that as well as financial incentives, there are a number of heritage incentives that could be considered to encourage and support the protection of heritage values.	Amend 2.8.4 Method 10 as follows: “Using financial <u>a range of</u> incentives where protection is undertaken and as a method to encourage the protection of heritage values.”
60.12 Heritage South/Heritage Forum Steering Group	New Method	The submitter suggests the inclusion of a new method to acknowledge and empower the Council’s participation in the Southland Coastal Heritage Inventory Project as a priority means of responding to the adverse effects of natural processes and climate change.	Add a new method to identify the Councils support for the Southland Coastal Heritage Inventory Project as a priority means of responding to the adverse effects of natural processes and climate change.
SECTION 3.8 - RULES			
115.3 New Zealand Historic Places Trust	General framework	The submitter supports the rule framework in terms of the activity status of various activities affecting scheduled heritage items. They believe the rules are consistent with NZHPT’s best practice guidance for District Plans	Retain
115.11 New Zealand Historic Places Trust	General – settings / surrounds of heritage	The submitter advocates for the more attention to the protection of the settings and surroundings of historic heritage in the District Plan. The submitter supports the requirement for resource consent to subdivide a property containing a listed heritage item. However, it would also like to see the introduction of rules controlling new buildings within the curtilage of listed heritage buildings	Adopt provisions 3.18.1(a); 3.18.4(L) & 3.18.4(N) Introduce a new rule to section 3.8 Heritage as follows or similar: “ <u>The construction of a new building within a defined setting of a listed historic building is a restricted discretionary activity. The Council shall restrict its discretion to the following matters:</u> (a) <u>The extent to which the new building respects the historical surroundings of the scheduled building. Respect for surroundings may be achieved by, for example, ensuring that any new building is appropriately located so as not to detract from the appearance or prominence of the listed building and by ensuring that new adjacent buildings are compatible in terms of design, proportions, scale and materials.</u> ”

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			<p>Include definition of ‘Surroundings’ in Section 4 as follows or similar:</p> <p><u>“Surroundings (associated with historic heritage items): An area of land surrounding a place, site or area of heritage significance which is essential for retaining and interpreting its heritage significance. It can apply either to land which is integral to the heritage significance of items or an area which includes buildings, sites, trees, and place/area of significance to Maori.”</u></p>
77.4 Ministry of Education	3.8.2	Support in part. The submitter seeks to modify the rule as there may be times where it is not appropriate to replace materials with the same type of material (e.g. asbestos)	Amend 3.8.2 as follows: “... using the same type of material to that originally used, <u>where practicable and appropriate</u> , and must retain the original design, form and texture of the feature under repair.”
18.93 Environment Southland	3.8.6	Support	Retain
64.28 Department of Conservation	3.8.6	Support. The submitter supports the need for resource consent for any land disturbance within 100m of an identified archaeological site, and the requirements to consult with key stakeholders and the consideration of alternatives.	Retain
77.64 Te Runaka o Waihopai and Te Runaka o Awarua	3.8.6	Support	Retain
88.81 Federated Farmers	3.8.6	<p>Oppose in part. The submitter considers the rule has the potential to inadvertently capture farming activities as inappropriate where they occur on or near archaeological sites and it needs to be clear that minor everyday operations are not considered to be part of the land disturbance activities captured within this rule.</p> <p>The submitter believes the rule needs to include a consideration as to whether the activity can be reasonably expected to occur and also if it is</p>	<ul style="list-style-type: none"> • Ensure that normal farm practices are not unfairly captured by this rule; • Limit the rule to disturbance “within 400 metres of an identified archaeological site”

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		in character with the surrounding land uses.	
115.5 New Zealand Historic Places Trust	3.8.6	<p>The submitter partially supports the proposed approach to archaeological sites.</p> <p>The submitter supports the inclusion in the Plan of the archaeological sites recorded in the New Zealand Archaeological Association database. The submitter also supports the cross-referencing of these sites to the planning maps.</p> <p>However, the submitter does not believe it is necessary or practical to require resource consent for land disturbance in the vicinity of all recorded archaeological sites. The submitter states that in most cases these can be managed through the Historic Places Act 1993 but where the site is of sufficient significance it should be considered for protection by inclusion in the Heritage Record and subsequent heritage rules.</p> <p>The submitter suggests an approach similar to that used for earthworks activities by the Dunedin City Council. This would ensure that effects are able to be addressed were a resource consent is required for earthworks without imposing resource consent requirements where consent would not otherwise be needed.</p>	<p>Delete rule 3.8.6 and adopt an approach similar to that of the Dunedin City District Plan to manage the effects of land disturbance on recorded archaeological sites. See attached extract from the Dunedin City District Plan.</p> <p><u>or</u></p> <p>Assess the significance of the archaeological sites listed in Appendix II.6. Where archaeological sites are identified as being of sufficient significance to warrant protection through rule 3.8.6 then the rule should be applied to these sites rather than every recorded archaeological site. The NZHPT has offered to assist with this work in the past and this offer still stands.</p> <p>In addition to the above:</p> <ul style="list-style-type: none"> • Adopt Appendix II.6 and cross references to the planning maps <u>for information purposes.</u> • Include the following advice note in section 3.17: <p><u>All earthworks must comply with section 10 of the Historic Places Act 1993, which protects recorded, suspected and unrecorded archaeological sites from destruction, damage and modification.</u></p>
77.65 Te Runaka o Waihopai and Te Runaka o Awarua	3.8.10 (G)	Support	Retain
115.4 New Zealand Historic Places Trust	3.8.10	The submitter supports the matters that applications must address, as listed in 3.8.10.	Add additional assessment matters to provision 3.8.10 as follows or similar: <u>(J) The extent to which the proposed alterations,</u>

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		<p>The submitter particularly supports 3.8.10(H) as this clause is seen to provide for proper consideration of the rationale for a proposal. However the submitter believes that often the background information leading up to a proposal are not often well-documented leaving the Council, and the submitter, in a position of trying to make a judgement about whether a chosen course of action would be the most appropriate or reasonable outcome and whether the alternatives have been properly explored. They state that there would be benefit for informed decision making by in requiring the involvement of a heritage specialist in the process and requiring professional advice.</p>	<p><u>additions to or demolition of a scheduled heritage building have been informed by the advice of qualified professionals such as conservation architects, heritage consultants, engineers and quantity surveyors as appropriate. Such advice should include a thorough analysis of the alternative options available and the extent of professional advice obtained should be proportional to the scale and intensity of the effects of the works being undertaken."</u></p>