

Proposed Natural Resources Plan:

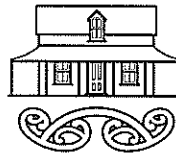
Submitter:

Heritage New Zealand

Submitter Number:

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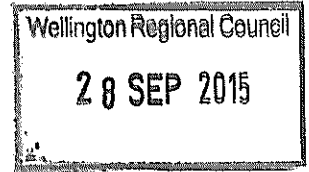
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HERITAGE NEW ZEALAND
POUHERE TAONGA

23 September 2015

File ref: 33002-014

Greater Wellington Regional Council
P O Box 11-646
Manners Street
WELLINGTON 6142



By email: regionalplan@gw.govt.nz

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA PROPOSED NATURAL
RESOURCES PLAN FOR THE WELLINGTON REGION**

1. This is a submission on the following proposed plan

Proposed Natural Resources Plan for the Wellington Region

2. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

The entire plan, in particular the provisions relating to historic and cultural heritage.

3. Heritage New Zealand's submission is:

See attached table

4. The reasons for Heritage New Zealand's position are as follows:

See attached table

5. Heritage New Zealand seeks the following decision from the local authority:

See attached table

6. Heritage New Zealand wishes to be heard in support of our submission.

Yours sincerely

Claire Craig
General Manager
Central Region
New Zealand Historic Places Trust Pouhere Taonga

Attachments:

1. Submission Table
2. Suggested expansion of the Clyde Quay Boat Harbour

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	Proposed Plan Provision	Support or Oppose	Reasons for Submission	Relief Sought
1.	1.5.2 Community views, scientific and technical information – identifying issues	Support	Heritage New Zealand supports the recognition of heritage protection as an issue to be addressed in the plan.	Retention of these provisions.
2.	Section 3 Objectives Section 3.7 Sites with significant values	Support	<p>Heritage New Zealand supports the grouping of objectives relating to the protection of historic heritage values with similar objectives under the heading 'Sites with Significant Values'. In particular, Heritage New Zealand supports the following heritage related objectives:</p> <p><i>Objective O33: Sites with significant mana whenua values are protected and restored.</i></p> <p><i>Objective O34: Significant historic heritage values are protected from inappropriate modification, use and development.</i></p>	Retention of these provisions.
3.	Section 4 Policies – all relating to historic and cultural heritage	Support	<p>Heritage New Zealand supports the provision for historic heritage (and mana whenua sites) in the various policies of the proposed regional plan.</p> <p>Heritage New Zealand notes that these policies (along with the objectives) have influenced how various activities are provided for in the rules and schedule sections. The policies will also provide appropriate guidance when assessing proposals that require a resource consent application under the rules of the regional plan, where effects on historic and cultural</p>	Retention of policies relating to historic and cultural heritage.

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		heritage are relevant. Heritage New Zealand notes and supports Policy P2 in that it requires consideration of any relevant provisions contained in any bordering territorial authorities' proposed and/or operative district plans when assessing a resource consent application. This would cover cross boundary situations where there is the potential for proposals in the Coastal Marine Area to have effects on historic heritage located above MHWS, such in Wellington Harbour.	
4.	All rules applying to Schedule C (mana whenua) and Schedule E4 (archaeological sites)	Support	Under various rules, the disturbance of Schedule C (mana whenua) and E4 (archaeological sites) in various situations requires a resource consent application in which case the objectives and policies of the plan require careful consideration of heritage effects. Heritage New Zealand supports these provisions. Retention of these provisions.
5.	Coastal Rules Applying to Structures Identified in Schedules E1(Heritage Structures), E2 (Wharves and Boatsheds) & E3 (Navigation Aids)	Support	Heritage New Zealand considers that the proposed Coastal Rules provide suitable provisions for the protection and conservation of historic heritage on Schedule E3: Sites with significant historic heritage values. In particular, the following aspects of these rules are noted: <ul style="list-style-type: none"> • Maintenance and repairs are provided for as a Permitted Activity for existing structures, with appropriate Permitted Activity Conditions. • Major additions and alterations to scheduled heritage structures require consent as at least a Restricted Discretionary Activity, with Retention of these provisions, but with appropriate cross referencing and the use of clearer rule headings and web navigation options.

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			<p>appropriate reference to the need to consider heritage effects (in addition to the policies discussed in submission point 3 above).</p> <ul style="list-style-type: none"> Removal, demolition or replacement of a scheduled heritage structures requires resource consent as a Discretionary Activity. Heritage New Zealand usually prefers the Non-Complying Activity status for this type of proposal. However, in this case this status is considered to be sufficient given that Policy P47 is very restrictive about when demolition is considered to be appropriate. <p>We have found the rules complicated and suggest the use of cross referencing to direct readers around this part of the plan. Clearer rule headings and the use of web navigation techniques for the online document would also help in this respect.</p>	
6.	Section 6 Other Methods 6.11. Historic Heritage	Support in part	<p>Heritage New Zealand supports the following method:</p> <p><i>Method 23: Archaeological Discovery Protocol</i> <i>Wellington Regional Council will require consent holders to have an archaeological discovery protocol in place, as a condition of resource consent, for ground disturbance activities. These protocols will ensure that appropriate actions take place should any archaeological material be uncovered unexpectedly.</i></p> <p>Such protocols are suitable for situations where it is unlikely for archaeological material to be discovered. However, in situations where ground disturbance is</p>	<p>Retention of Method 23, but the addition of a method regarding the use of Advice Notes on resource consents regarding the provisions of the Heritage New Zealand Pouhere Taonga Act 2014, such as:</p> <p><i>The Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) provides protection for all archaeological sites, whether recorded or not. It is unlawful to</i></p>

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		<p>taking place near recorded archaeological sites or in places known to have been associated with human activity that occurred before 1900, Heritage New Zealand prefers that the Council include an Advice Note on resources consents regarding the need for separate consents under the Heritage New Zealand Pouhere Taonga Act 2014 to modify or destroy and archaeological site.</p>	<p><i>modify or destroy an archaeological site without the prior authority of Heritage New Zealand.</i></p> <p><i>Section 2 of the HNZPTA defines an archaeological site as:</i></p> <p>a) <i>any place in New Zealand, including any building or structure (or part of a building or structure), that—</i></p> <p><i>(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and</i></p> <p><i>(ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand;</i></p> <p><i>By careful project design, it is frequently possible to avoid any such modification. However, where avoidance of an archaeological site is not possible, an Archaeological Authority will be required. An Authority is also required if there is</i></p>
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				<p><i>reasonable cause to suspect that an archaeological site may be modified or destroyed.</i></p> <p><i>Part 3 of the HNZPTA sets out the requirements for protecting archaeological sites and applying for authorities to modify or destroy such sites. All applications for Archaeological Authorities must be made to Heritage New Zealand.</i></p>
<p>7.</p>	<p>Schedule E: Sites with significant historic heritage values - inclusion of places on the New Zealand Heritage List/Rārangī Kōrero</p>	<p>Support in part</p>	<p>Heritage New Zealand supports the inclusion of sites on a schedule, which in the case of the proposed regional plan is the key to controlling heritage effects via the proposed rules. In this case, it is noted that the schedules include suitable statements regarding the heritage significance of each item.</p> <p>In preparing or reviewing a resource plan under the Resource Management Act, Councils are required under Section 66(2) (c)(iia) to have regard to relevant entries in the New Zealand Heritage List/Rārangī Kōrero, to the extent that they have a bearing on resource management issues of the area covered by the plan.</p> <p>Accordingly, Heritage New Zealand supports the inclusion within Schedule E of the following places that are either on or associated with the New Zealand Heritage List/Rārangī Kōrero. It is noted that some of these places are part of the Wellington Harbour Board Historic Area, which is still at the proposal stage:</p>	<p>Retention of these provisions but clarification of whether the Taranaki Street Wharf and Queens Wharf items on Schedule E2 (and the rules that apply to it) include the Customs Post building located on Taranaki Wharf and the heritage Wellington Harbour Board gates located in the vicinity of both wharves. If not, Heritage New Zealand seeks the specific addition of these items.</p> <p>Heritage New Zealand seeks that the Clyde Quay Boat Harbour item on Schedule E1: Historic heritage structures be extended to cover the foreshore at the northwest end of the pool building, as shown on Attachment 2 of this submission.</p>

		<p><u>Schedule E.1: Historic heritage structures</u></p> <ul style="list-style-type: none"> • Clyde Quay Boat Harbour – adjoins Freyberg Pool, Category 1 Historic Place (List No. 9440). Heritage New Zealand seeks that the area of this item be extended to cover the foreshore at the northwest end of the pool building, as shown on Attachment 2 of this submission to enable consideration of possible cross boundary heritage effects from any changes in this part of the coastal marine area. • Eastbourne Ferry Terminal Building, Tug Wharf, Waterloo Quay – Category 2 Historic Place (List No. 7807) and included within the Wellington Harbour Board Historic Area proposal (List No. 7036); • Evans Bay Patent Slip - Category 2 Historic Place (List No. 2895); • Shed 3 (Dockside Restaurant) – included in Wellington Harbour Board Historic Area proposal (List No. 7036); • Shed 5 (restaurant) – included in Wellington Harbour Board Historic Area proposal (List No. 7036); • Skerrett Boat Shed, Lowry Bay - Category 2 Historic Place (List No. 3582) • Tripod and level-luffing cranes, Queens Wharf - included in Wellington Harbour Board Historic Area proposal (List No. 7036). 	
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		<p><u>Schedule E2: Historic heritage wharves and boatsheds</u></p> <ul style="list-style-type: none"> • Days Bay Wharf - Category 2 Historic Place (List No. 3574); • Ferry Wharf - included in Wellington Harbour Board Historic Area proposal (List No. 7036); • Patent Slip Wharf – Category 2 Historic Place (list No. 2895); • Queens Wharf - included in Wellington Harbour Board Historic Area proposal (List No. 7036), although it is not clear whether this item includes the heritage Wellington Harbour Board gates in this vicinity; • Railway(inter-islander) Wharf included in Wellington Harbour Board Historic Area proposal (List No. 7036); • Rona Bay Wharf, Rimu Street, Eastbourne – Category 2 Historic Place (List No. 7474); • Taranaki Street Wharf - included in Wellington Harbour Board Historic Area proposal (List No. 7036), although it is not clear whether this item includes the Customs Post building on Taranaki Wharf and the heritage Wellington Harbour Board gates in this vicinity; • Waterloo Quay Wharf (Wool Jetty) - included in Wellington Harbour Board Historic Area proposal (List No. 7036); <p><u>Schedule E4: Archaeological sites</u></p> <ul style="list-style-type: none"> • Korohiwa Whaling Station, Porirua – Category 2 Historic Place (List 6162); • Mahanga Bay Wharf –associated with Fort 	
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		<p>Balance, Category 1 Historic Area (List No. 5074);</p> <ul style="list-style-type: none"> • Mana Island Whaling Station – associated with Te Mana o Kupe Wāhi Tapu (list No. 7674); • Te Kahuoterangi Whaling Station, Kapiti Island – Category 1 Historic Place (List No. 7662). <p><u>Schedule E5: Historic heritage freshwater sites</u></p> <ul style="list-style-type: none"> • Kourarau Hydroelectric Dam, Gladstone – Category 2 Historic Place (List No. 7814); • Ladle Bend Bridge, Rimutaka Incline – included in Rimutaka Incline Historic Area (List No. 7511); • Lower Karori Dam – Category 2 Historic Place (List No. 7750); • Ngatiawa Bridge, Reikorangi – Category 2 Historic Place (List No. 7189); • Pakuratahi Bridge, Rimutaka Incline – included in Rimutaka Incline Historic Area (List No. 7511); • Upper Karori Dam – Category 1 Historic Place (List No. 7740). 	
8.	Non-inclusion of heritage places within Schedule E: Sites with significant historic heritage values	Oppose	<p>Given that inclusion in Schedule E is the key mechanism for protection via the regional plan rules, Heritage New Zealand is concerned that two of the wharves within the proposed Wellington Harbour Board Historic Area are not included in Schedule E2: Historic Wharves and boatsheds:</p> <ul style="list-style-type: none"> • Kings Wharf • Glasgow Wharf <p>Heritage New Zealand understands that the reasons for not scheduling these wharves include:</p>
			<p>That the following structures be added to Schedule E2: Historic heritage wharves and boatsheds:</p> <ul style="list-style-type: none"> • Kings Wharf • Glasgow Wharf

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		<ul style="list-style-type: none"> • Their inclusion within the Commercial Port Area; • That the inclusion of other wharves within the proposed Wellington Harbour Board Historic Area provides sufficient representation of this type of wharf; • Only one side of Kings Wharf is exposed to the water as it is on the edge of the container reclamation. <p>However, Heritage New Zealand points out that the historic finger wharf configuration is an important characteristic of this part of Wellington Harbour, including when viewed from the many surrounding viewpoints that overlook the harbour. Accordingly, Heritage New Zealand would be concerned about any 'filling in' of the spaces between and around any of the finger wharves in this part of the harbour e.g. by reclamation or wharf extension.</p> <p>If Kings and Glasgow Wharves are not included on Schedule E2, Heritage New Zealand considers that the finger wharf character may be compromised by the 30 metre horizontal expansion permitted under Rule R173 for structures in the Commercial Port Area. Furthermore, for larger horizontal expansion or reclamations (i.e. requiring a resource consent), consideration of historic heritage effects does not appear to be provided for in either the rules or the policies of the proposed regional plan.</p> <p>Accordingly, Heritage New Zealand seeks the inclusion of Kings and Glasgow Wharves on Schedule E2: Historic wharves and boatsheds.</p>	
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Schedule C: Sites of significance to various Iwi - inclusion of places on the New Zealand Heritage List/ Rārangī Kōrero	Support	Retention of these provisions
9.	<p>Heritage New Zealand supports the inclusion of sites on a schedule, which is the key to controlling heritage effects via the proposed rules of the regional plan. It is noted that the schedules includes suitable statements regarding the heritage significance of each item.</p> <p>In preparing or reviewing a resource plan under the Resource Management Act, Councils are required under Section 66(2)(c)(iia) to have regard to relevant entries in the New Zealand Heritage List/Rārangī Kōrero, to the extent that they have a bearing on resource management issues of the area covered by the plan.</p> <p>Accordingly, Heritage New Zealand supports the inclusion within Schedule C of the following places that are either on or associated with the New Zealand Heritage List/Rārangī Kōrero:</p> <p><u>Schedule C3: Sites of significance to Ngāti Toa Rangatira</u></p> <ul style="list-style-type: none"> • Mana Island Shoreline – Te Mana o Kupe is a Wāhi Tapu (List No. 7674); • Ohariu – Wharehou Bay – archaeological site that is a Category 2 Historic Place (List No. 6143); • Tapu te Ranga – Owhiro-Haewai – Tapu te Ranga Island is a Wāhi Tapu (List No. 7654); • Te Ika a Maru, Ohau Bay – various archaeological sites that are Category 2 Historic Places (List No.s 6045, 6046, 6048, 6049, 6050, 6051, 6052, 6053); • Whitiareia – various archaeological sites that are Category 2 Historic Places (List No.s 6118-6121, 6123-6137, 6142, 6145- 6146, 6153-6157, 7259, 7260). 	

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			<p><u>Schedule C4: Sites of Significance to Taranaki Whanui ki te Upoko o te Ika a Maui</u></p> <ul style="list-style-type: none"> • Ohariu – Wharehou Bay – archaeological site that is a Category 2 Historic Place (List No. 6143); • Te Ika a Maru, Ohau Bay – various archaeological sites that are Category 2 Historic Places (List No.s 6045, 6046, 6048, 6049, 6050, 6051, 6052, 6053) • Tapu te Ranga – Owairo-Haewai – Tapu te Ranga Island is a Wāhi Tapu (List No. 7654). <p><u>Schedule C5: Sites of Significance to Ngāti Kahungunu ki Wairarapa and Rangitāne o Wairarapa</u></p> <ul style="list-style-type: none"> • Matakītiki coast, Palliser Bay – Matakītiki a Kupe Historic Area (List No. 7093); • Waikēkeno stream mouth, Glenburn Road, Waimoana – Waikēkeno Historic Area (List No. 7669). 	
10.	Non-inclusion of places on the New Zealand Heritage List/ Rārangī Kōrero within Schedule C: Sites of significance to iwi	Oppose	<p>In preparing or reviewing a resource plan under the Resource Management Act, Councils are required under Section 66(2)(c)(iia) to have regard to relevant entries in the New Zealand Heritage List/Rārangī Kōrero, to the extent that they have a bearing on resource management issues of the area covered by the plan.</p> <p>Heritage New Zealand notes that the following Wāhi Tapu Area on the New Zealand Heritage List/ Rārangī Kōrero has <u>not</u> been included within Schedule C:</p> <ul style="list-style-type: none"> • Rangitatau – Wāhi Tapu Area (List No. 9648). 	<p>That the following place be added to at least one of the lists within Schedule C:</p> <ul style="list-style-type: none"> • Rangitatau – Wāhi Tapu Area (List No. 9648).

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			<p>This site extends both above and below Mean High Water Springs, and it is noted that the landward side is provided for in the Wellington City District Plan. Accordingly, Heritage New Zealand seeks that complementary provisions are included in the Wellington Regional Natural Resources Plan. Consultation with regional iwi will be required.</p>	
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Appendix 2

Heritage New Zealand
submission

