



HERITAGE NEW ZEALAND  
POUHERE TAONGA

Tairangahia a tua whakarere;  
Tatakihia nga reanga o amuri ake nei  
Honouring the past; Inspiring the future

File ref: 33002-177

6 September 2022

District Plan Team  
Wellington City Council  
PO Box 2199  
**Wellington 6140**

[pdpsubmissions@wcc.govt.nz](mailto:pdpsubmissions@wcc.govt.nz)

Dear Sir or Madam

#### **SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED DISTRICT PLAN**

Heritage New Zealand Pouhere Taonga (HNZPT) 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 historical and cultural heritage.

- 1. This is a submission on the Proposed District Plan for Wellington City.**
- 2. Heritage New Zealand Pouhere Taonga could not gain an advantage in trade competition through this submission.**
- 3. The specific provisions of the proposed plan that the HNZPT submission relates to are detailed in the attached table (Attachment 1).**
- 4. The reasons for the HNZPT submission are detailed in Attachment 1.**
- 5. HNZPT seeks the decisions as described in the table in Attachment 1.**

6. HNZPT wishes to be heard in support of its submission.

7. If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.

Yours sincerely



Jamie Jacobs  
Kaiwhakahaere Matua / Director Takiwā o Te Pūtahi a Māui /Central Region  
Heritage New Zealand Pouhere Taonga

Attachment:

1. Heritage New Zealand Pouhere Taonga Submission Table on Wellington Proposed District Plan.

Address for service

Heritage New Zealand Pouhere Taonga  
Takiwā o Te Pūtahi a Māui  
PO Box 2629  
Wellington 6140  
Ph: 04 494 8325  
Contact person: Dean Raymond, Kaiwhakamāhare  
Email: [draymond@heritage.org.nz](mailto:draymond@heritage.org.nz)

Attachment 1 Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan				
Chapter	Specific Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
Part 1 - Definitions				
Definitions	Maintenance and repair	Support (partial)	<p>HNZPT is supportive of this definition, with a minor amendment which appears to be a drafting error.</p> <p>Point (f) needs to have words added to improve the meaning.</p>	<p>Amend definition:</p> <p>f. The affixing of scaffolding to <u>a heritage building</u> unless the work is reasonably required for health and safety.</p>
Definitions	New definition: Setting	Oppose	<p>The word ‘overlay’ is used in a number of parts of the PDP, including Infrastructure and Subdivision.</p> <p>A definition would improve the meaning of these clauses for the convenience of plan users.</p> <p>The Porirua PDP includes a definition of overlay which can be adapted for use in the Wellington District Plan.</p>	<p>New definition:</p> <p><u>Overlay means the spatially identified sites, items, features, or areas with distinctive values, risks or other factors within the City which require management in a different manner from underlying zone provisions, as set out in Schedules 1-8 and 10-12.</u></p>
Glossary	Glossary: Wāhi Tapu	Oppose (partial)	The PDP includes an interpretation of the term Wāhi tapu in the glossary. It may be better and consistent with other regulations and usage to adopt the meaning of wāhi tapu from the Heritage New Zealand Pouhere Taonga Act 2014.	<p>Amend entry of wāhi tapu: means <del>sacred or spiritual places e.g., battle sites, urupā, burial sites, caves, ritual sites including burial of pito / whenua (placenta)</del></p>

**Attachment 1****Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan**

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				has the same meaning as in section 6 of the HNZPTA 2014 (as set out below): <u>means a place sacred to Māori in the traditional, spiritual, religious, ritual, or mythological sense</u>
Glossary	Glossary: Wāhi Tīpuna	Oppose (partial)	The PDP includes an interpretation of the term Wāhi Tīpuna in the glossary. HNZPT suggests that using the definition of Wāhi Tīpuna from the Heritage New Zealand Pouhere Taonga Act 2014 would be appropriate and more consistent.	Amend entry of Wāhi Tīpuna:  Wāhi Tīpuna means <del>places with special cultural, scenic or amenity values e.g., mountains, rivers and other waterways, including the sea and coastal areas, important landmarks, boundary markers.</del> <u>a place important to Māori for its ancestral significance and associated cultural and traditional values</u>
Glossary	Glossary: Wāhi Tūpuna	Oppose (partial)	The PDP includes an interpretation of the term Wāhi Tūpuna in the glossary - <i>Means a place associated with traditional uses</i>  In the HNZPT Act 2014 Wāhi Tipuna/Tīpuna has the same meaning as Wāhi Tupuna/Tūpuna. This should be reflected in the PDP.	Delete this definition and include a statement in the Wāhi Tīpuna glossary entry that the term also refers to Wāhi Tūpuna.

<b>Attachment 1</b> <b>Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan</b>				
Chapter	Specific Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
<b>Part 2 – Historic Heritage</b>				
Historic Heritage	Historic Heritage Introduction	Support (partial)	<p>Wellington contains many archaeological sites, both recorded and unrecorded, which are protected under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014.</p> <p>Appendix 1 contains reference to NZ Archaeological Association data base and the role of HNZPT with regards to Archaeological sites. It would be beneficial for plan users reading the Historic Heritage chapter to be reminded in of the provisions which apply to both recorded and unrecorded archaeological sites.</p>	<p>Add the following (or equivalent) to the introduction section of the HH Chapter:</p> <p><u>APP1 – Historic Heritage Advice Notes</u> contains useful information on assessing effects on heritage values and the different ways in which historic heritage is addressed by regulation and advocacy. <u>APP1 also contains reference to the provisions of the Heritage New Zealand Pouhere Taonga Act 2014 which protect all archaeological sites.</u></p>
Historic Heritage	HH-P9	Oppose (partial)	<p>The third clause of this policy states that ‘relocation is considered to be a reasonable option’.</p> <p>This can be taken to mean that relocation is one reasonable option among other options. HNZPT submits that stronger wording is needed to protect heritage values from inappropriate relocation. Relocation should be seen as a ‘last resort’ to save a building from demolition.</p>	<p>Amend HH-P9:</p> <p>In the case of relocation, alternatives have been explored and relocation is considered by Council to be a reasonable option <u>to avoid total demolition.</u></p>

**Attachment 1**  
**Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan**

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Historic Heritage	HH-P15	Oppose (partial)	The third clause of this policy states that 'relocation is considered to be a reasonable option'. This can be taken to mean that relocation is one reasonable option among other options. HNZPT submits that stronger wording is needed to protect heritage values from inappropriate relocation. Relocation should be seen as a 'last resort' to save a building from demolition.	Amend HH-P15: 3. For relocation outside of the heritage area, alternatives to relocation have been explored and relocation is considered by Council to be a reasonable option <u>to avoid demolition</u> .
Historic Heritage	HH-P16	Oppose (partial)	The second clause of this policy states that 'total demolition is considered to be a reasonable option'. This can be taken to mean that demolition is one reasonable option among other options. HNZPT submits that stronger wording is needed to protect heritage values from inappropriate demolition. The wording of this policy for contributing buildings should align with the policy for demolition of scheduled buildings.	Amend HH-P16 (2): Alternatives to total demolition have been explored and <u>it has been demonstrated that there are no reasonable alternatives to total demolition</u> . <del>is considered by Council to be a reasonable option.</del>
<b>Part 2 – Earthworks</b>				
General District Wide	EW-O1	Support (partial)	HNZPT is largely supportive of this objective. However the potential adverse effects referenced in the second clause of the objective are too narrow, being restricted to 'adverse effects on visual amenity values' The objective should be amended to allow for consideration of a broader range of adverse effects, and not limited to only visual amenity.	Amend EW-O1: 2. minimises adverse effects <u>on the environment, including effects on visual amenity values and,</u> including changes to natural landforms.

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Chapter	Specific Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
General District Wide	EW-P7	Support (partial)	<p>EW-P7 refers to heritage buildings, structures and heritage areas. For improved consistency it should also cover scheduled archaeological sites and Sites of Significance to Māori.</p> <p>Alternatively, additional policies could be added to the earthworks chapter to address archaeological sites and SASM.</p>	<p>Amend EW-P7:</p> <p>Earthworks on the site of heritage buildings, <del>and</del> heritage structures, <del>and</del> within heritage areas, <u>within the extent of scheduled archaeological sites and within Sites and Areas of Significance to Māori.</u></p> <p>Manage earthworks within sites occupied by heritage buildings and heritage structures, <del>and</del> within heritage areas, <u>within the extent of scheduled archaeological sites and within Sites and Areas of Significance to Māori,</u> having regard to:</p> <ol style="list-style-type: none"><li>1. The identified <del>heritage</del> values of the scheduled <del>item or heritage building,</del> <u>heritage structure or heritage area;</u></li><li>2. The extent to which the earthworks would detract from those identified values and setting; and</li></ol>

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				3. Whether the earthworks can be achieved without altering the significance of the <u>item</u> or <del>heritage</del> area.
General District Wide	EW-R8	Support (partial)	In line with the submission point on EW-P7 the scope of EW-R8 should be broadened to include scheduled archaeological sites.	EW-R8  Earthworks on the site of scheduled heritage buildings and structures, <del>and</del> within heritage areas, <u>and within scheduled archaeological sites.</u>
General District Wide	EW-S10	Support (partial)	In line with the submission point on EW-P7 the scope of EW-S10 should be broadened to include scheduled archaeological sites.	EW-S10 Earthworks on the site of heritage building, heritage structures or on a site within a heritage area, <u>or within a scheduled archaeological site</u>
<b>Part 2 - SIGNS</b>				
General District Wide	SIGN-S12	Support (partial)	HNZPT supports this standard for signs on heritage buildings and structures. However SIGN-S12 should align with SIGN-R6 by including reference to heritage areas.	SIGN-S12 Signs on a heritage building or heritage structure <u>or within a heritage area</u>



<b>Attachment 1</b> <b>Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan</b>				
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<b>Part 3 – Medium Density Residential Zone</b>				
Residential Zones	MRZ-PREC01 - Introduction	Support (partial)	<p>HNZPT acknowledges the differentiation between historic heritage and character precincts, even though there is some overlap with some character precincts also being identified as heritage areas, or containing heritage buildings.</p> <p>Wellington's character housing areas are a significant and valued resource, which form a tangible connection with our history, and confer a sense of place and identity.</p> <p>HNZPT is supportive of character precincts being included in the PDP. However in the submission of HNZPT, the character precincts should be extended to include further areas, based on the findings of the <i>Pre-1930 Character Area Review (Boffa Miskell 2019)</i>.</p> <p>Examples of streets which may meet the threshold for being included in Character Precincts are Myrtle Crescent in Mt Cook, Harper Street in Newtown, and Royal Street in Berhampore.</p>	Consider increasing the Character Precincts to include more of the areas identified as primary and contributory in the Boffa Miskell Character Area Review.

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Residential Zones	MRZ-PREC01-R3	Support (partial)	This rule provides for the demolition or removal of buildings and structures as a permitted activity. This is in contrast to the following rule, which addresses the demolition of pre-1930 buildings. To avoid ambiguity Rule 3 should be amended to refer to post-1930 buildings.	Amend MRZ-PREC01-R3: Demolition or removal of buildings and structures, <u>except those buildings addressed in MRZ-PREC01-R4</u>
<b>Part 3 – City Centre Zone</b>				
City Centre Zone	CCZ-PREC01 Te Ngākau Civic Square Precinct (introduction)	Support	<p>HNZPT supports the provisions relating to this precinct (objectives, policies, and rules), including the references to the heritage values of the area.</p> <p>It is noted that Te Ngākau Civic Square has not been included in the PDP as a Heritage Area. In the view of HNZPT the precinct provisions adequately address the unique range of factors, including heritage, which need to be considered in any (re)development of this area.</p>	Retain as notified
<b>Part 4 – Appendices</b>				
Appendices	Appendix 1 – Historic Heritage Notes	Support (partial)	HNZPT is supportive of these advice notes, which are a useful source of advice and further information for various aspects of heritage.	Add to the end of the Accidental Discovery Protocol section: <u>Where the discovery is of Māori origin the</u>

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			The final section refers to accidental discovery protocols. It is common practice (and is a requirement for archaeological authorities under the HNZPT Act) that tangata whenua are notified in the event of any discovery which may be of Māori origin.	<u>relevant iwi representatives will need to be notified.</u>
<b>Part 4 – Schedule 1</b>				
Schedules	Additional item on Schedule 1: Wellington Central Library (Te Matapihi)	Oppose	The Wellington Central Library (Te Matapihi) has been entered on the NZ Heritage List / Rārangī Kōrero as a Category 1 Historic Place. This place should be included in Schedule 1. We understand that the proposed strengthening and refurbishing work on this building is likely to have an impact on its heritage values, however at this stage its heritage values merit being included in Schedule 1.	Add Wellington Central Library (List number 9761) to Schedule 1
Schedules	Additional item on Schedule 1: McLean Flats	Oppose	HNZPT notes that Gordon Wilson Flats is included in Schedule 1. However the NZ Heritage List/ Rārangī Kōrero for this place (List number 9783) also includes the adjacent McLean Flats. As both these buildings have been identified as a Category 1 Historic Place, they should both be included in the District Plan schedule. McLean Flats could be added to the Gordon Wilson schedule entry, or alternatively could be included as its own entry in Schedule 1.	Include McLean Flats in Schedule 1, either as its own entry, or as part of entry 299 (Gordon Wilson Flats).

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Schedules	Additional item on Schedule 1: Hurston, Island Bay	Oppose	This building has recently been added to the NZ Heritage List / Rārangī Kōrero as a Category 2 Historic Place. This place should be included in Schedule 1.	Include Hurston (List number 9954) in Schedule 1
Schedules	Schedule 1 entries – multiple minor errors and corrections	Oppose (partial)	<p>A number of entries in Schedule 1 have incorrect New Zealand Heritage List/Rārangī Kōrero references, and incorrect addresses.</p> <p>We have also noted several instances where legal descriptions appear to be incorrect. HNZPT requests that all entries are checked for accuracy in terms of address and legal descriptions.</p> <p>Notes on particular entries:</p> <p># 179 – 55 Lambton Quay is the official address HNZPT uses for this place.</p> <p># 187 – this entry incorporates two entries in the NZ Heritage List - # 212 and # 1336</p> <p># 220 – 94 Hamilton Rd is the address of the vicarage; the church is at 90 Hamilton Road.</p> <p># 227 – The NZ heritage List entry and the WCC inventory refers to the Church, not the hall. The correct</p>	<p># 164.2 <del>1362</del> <u>1400</u></p> <p># 165 <u>Historic Place Category 2, 1362</u></p> <p># 179 Government Buildings (address) <del>45</del> <u>55</u> Lambton Quay</p> <p># 187 (Old BNZ Building 2) <u>Historic Place Category 2, 1336</u></p> <p># 220 <del>94-90</del> Hamilton Road</p> <p># 227 St Annes Church <del>and Hall</del> (Former) <del>Lot 2 DP 82032 – subj to electricity easement</del> <u>Lot 1 DP 90016</u></p> <p># 234 3654 <u>3645</u></p> <p># 274 <del>3411</del> <u>3611</u></p> <p># 350 St John's <u>Presbyterian</u> Church</p>

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			<p>legal description for the church should be provided (the incorrect one refers to the parcel of land where the hall is situated)</p> <p># 350 – name should be changed to be consistent with Schedule 3 item 12)</p> <p># 429 – It is noted that entry # 82.2 refers to 145-149 Cuba St</p>	# 429 <del>149</del> <u>151</u> Cuba Street
<b>Part 4 – Schedule 2 – Heritage Structures</b>				
Schedules	Schedule 2 entries – minor corrections	Oppose (partial)	A number of entries in Schedule 2 have incorrect New Zealand Heritage List/Rārangī Kōrero references. Corrections are provided here.	# 4 Seatoun Tunnel <u>Historic Place Category 2, 3650</u>  # 28 Queen Victoria Statue Historic Place Category 2, <del>28</del> <u>3663</u>
<b>Part 4 – Schedule 3 - Heritage Areas</b>				
Schedules	Additional item in Schedule 3 – Truby King heritage area	Oppose (partial)	<p>The Truby King historic area is included in the NZ Heritage List / Rārangī Kōrero as an Historic area (List number 7040).</p> <p>HNZPT acknowledges that several individual buildings within this historic area have been included in schedule</p>	Include Truby King Heritage Area (List number 7040) in Schedule 3.

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			1. However Truby King historic area as a whole, including the gardens, landscaping, and settings of the buildings, has significant heritage values and merits inclusion in schedule 3 as a heritage area.	
Schedules	Schedule 3 – minor corrections	Oppose (partial)	<p>A number of entries in Schedule 3 have incorrect or missing New Zealand Heritage List/Rārangī Kōrero references.</p> <p>Corrections are provided here.</p> <p>Notes on particular entries:</p> <p># 5 (Botanic Gardens) - It is noted that this Heritage Area incorporates the ‘Dominion Observatory Historic Area’ as well as the Botanic Gardens Historic Area</p> <p># 27 Cuba Street Heritage Area includes both the Cuba Street Historic Area and the Footscray Avenue Historic Area.</p> <p># 28 Government Centre Historic Area (List number 7035) incorporates both Parliamentary Precinct and Stout Street Precinct – although noting that the boundaries do not correspond exactly in all aspects.</p>	<p># 5 Wellington Botanic Gardens Historic Area, 7573 and <u>Dominion Observatory Historic Area, 7033</u></p> <p># 14 Parliamentary Precinct <u>Government Centre Historic Area, 7035</u></p> <p># 19 <u>Wrights Hill Fortress Historic Place Category 1, 7543</u></p> <p># 21 <u>Old Coach Road Historic Place Category 1, 7396</u></p> <p># 22 <u>Evans Bay Patent Slip Historic Place Category 2, 2895</u></p> <p># 27 <u>Cuba Street Historic Area, 7209 and Footscray Avenue Historic Area, 7209</u></p> <p># 28 <u>Government Centre Historic</u></p>

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				<u>Area, 7035</u>  # 39 Red Rocks Baches <u>Historic Area</u> , 7509  # 40 Albion Gold Mining Company Battery and Remains, <u>Historic Place Category 2</u> , 9032
<b>Part 4 – Schedule 4 – Scheduled Archaeological Sites</b>				
Schedules	Schedule 4 – item 3	Oppose (partial)	Some of the entries in Schedule 4 have incorrect or inconsistent information.  Corrections are provided here.  Karori Goldmining and Dam (item 3) – this item relates particularly to the gold mining remains, not the Karori Dam; the name should be amended to reflect this.	Item # 1 Kau Point Battery <del>Category 1</del> Historic Place <u>Category 1</u> , No. 7542  Item # 3 Karori Goldmining and <del>Dam</del> <u>Remains</u>
<b>Part 4 – Schedule 5 Viewshafts</b>				
Schedules	Additional item Schedule 5 -	Oppose	The Operative District Plan includes Viewshaft 21, from the former National Art Gallery and Museum (Central Area Appendix 11). This viewshaft, which is important in	Include viewshaft 21 in schedule 5 of the PDP.

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			maintaining the integrity of views to and from the museum/war memorial site, and the wider Pukeahu area, is missing from the PDP.	
<b>Part 4 – Schedule 7 - Sites and Areas of Significance to Māori</b>				
Schedules	Schedule 7 items – cross references and details	Support (partial)	<p>HNZPT is fully supportive of the significant sites and areas being included in Schedule 7.</p> <p>However it may be beneficial for plan users that the places entered in Schedule 7 are cross-referenced (where applicable) with recorded New Zealand Archaeological Association (NZAA) Sites and/or List numbers from the New Zealand Heritage List / Rārangī Kōrero.</p> <p>An example from a different District Plan where this approach has been applied is the Porirua Proposed District Plan – Schedule 6.</p> <p>It is acknowledged that more site-specific work is needed, in consultation with Tangata Whenua, to correlate the places entered in Schedule 7 with NZAA sites and/or NZ Heritage List numbers.</p> <p>One example of additional information and cross-</p>	<p>Add an additional column to Schedule 7, headed <u>HNZPT List number and/or NZAA site record number</u></p> <p>DP Reference 14 – Ōhaua Kāinga 2 – <u>HNZPT List # 6143, NZAA reference R27/1</u></p>



<b>Attachment 1</b> <b>Submission of Heritage New Zealand Pouhere Taonga on Wellington City Proposed District Plan</b>				
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			referencing is provided here - Makara Pā / Ōhaua Kāinga. It appears that schedule 7 entry #14 (Ōhaua Kāinga 2) corresponds with Makara Pā (NZ Heritage List # 6143, NZAA site record # R27/1)	