

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / General HH	Andrew Haddleton	23.1	Oppose	Considers that in other cities, such as Auckland and Christchurch, councillors have pushed back to protect their heritage. WCC should do the same. Wellington is famous for its heritage housing and appearance. Allowing more concrete and glass buildings will ruin the tourist appeal of the city.	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Heritage New Zealand Pouhere Taonga	70.13	Support in part	[No reasons given other than decision]	Supports Historic Heritage Introduction with amendment.
Historical and Cultural Values / Historic Heritage / General HH	Heritage New Zealand Pouhere Taonga	70.14	Amend	Considers that as Appendix 1 (Historic Heritage Advice Notes) contains reference to the NZ Archaeological Association data base and the role of HNZPT with regards to archaeological sites, it would also be beneficial for plan users reading the Historic Heritage chapter to be reminded of the provisions which apply to both recorded and unrecorded archaeological sites.	Amend the introduction section of the Historic Heritage Chapter where it refers to APP1 - Historic Heritage Advice Notes as follows: ... APP1 - Historic Heritage Advice Notes 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> ...
Historical and Cultural Values / Historic Heritage / General HH	Lucy Telfar Barnard	72.1	Oppose	Opposes the inclusion of 134 Brougham Street within the Moir Street Heritage Area (Item 44 of SCHED3 - Heritage Areas). 134 Brougham Street (The property) is not a heritage example of Edwardian or character housing. Relevance to the Moir family home has been lost because of significant alterations to the property. Structure and weather proofing of the property is deteriorating and heritage area status makes repairs and development difficult. John Moir only lived in the property for <5 years. Most of the Heritage Assessment Criteria do not specifically or reasonably apply to the property. Heritage Area status will reduce ability to densify Mt Victoria and maximise the development potential of this particular site. [See original submission for further detail]	Seeks that 134 Brougham Street is excluded from the Moir Street Heritage Area (Item 44 of SCHED3 - Heritage Areas).
Historical and Cultural Values / Historic Heritage / General HH	Turi & Jane Park	73.2	Not specified	Considers that there was insufficient correspondence from the Council on the proposed inclusion of 134 Brougham Street within the Moir Street Heritage Area and that they have been let down by the Council	[Not specified]

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Historical and Cultural Values / Historic Heritage / General HH	Oliver Sangster	112.8	Amend	<p>Opposed to the inclusion of the Gordon Wilson Flats on SCHED1-Heritage buildings (# 299).</p> <p>Considers that the flats are an embarrassing and sorry sight in a time when there is a growing problem of homelessness and high rents in Wellington.</p> <p>Considers that the flats need to be demolished to make way for more housing near our city centre and Victoria University.</p> <p>Considers that because they already have Heritage New Zealand protection, further protection under the district plan is unnecessary.</p>	Seeks that the demolition or alteration of any kind of Item 299 (Gordon Wilson Flats) on SCHED1-Heritage Buildings be a permitted activity.
Historical and Cultural Values / Historic Heritage / General HH	Sophie Kahn	161.2	Not specified	[Refer to original submission for full reasons]	Seeks that only public owned structures should listed as heritage in the Proposed District Plan, unless privately owned property has the agreement of an owner.
Historical and Cultural Values / Historic Heritage / General HH	Sophie Kahn	161.3	Not specified	Considers that the Council should offer to purchase those homes it proposed to list when owners are not supportive of listing.	[None specified].
Historical and Cultural Values / Historic Heritage / General HH	Historic Places Wellington	182.8	Support in part	[No specific reason given beyond decision requested - refer to original submission]	Retain the HH - Historic Heritage chapter with amendment.
Historical and Cultural Values / Historic Heritage / General HH	Historic Places Wellington	182.9	Support	Supports continuing to promote seismic strengthening of heritage places.	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Historic Places Wellington	182.10	Oppose in part	Considers the chapter has become too permissive in its drafting and opposes it to this degree.	Seeks that the chapter takes a more mandatory, conservation and preservation focus.
Historical and Cultural Values / Historic Heritage / General HH	Historic Places Wellington	182.11	Amend	Opposes facadism as an outcome for heritage buildings.	Add a new policy or rule to the HH - Historic Heritage Chapter to make it clear that only in exceptional instances will facadism be appropriate, and only if consistent with ICOMOS guidelines.
Historical and Cultural Values / Historic Heritage / General HH	Mike Camden	226.2	Amend	Considers that HH rules are very "Enabling".	Seeks that the Historic Heritage chapter is amended to support more reuse, refurbishment and conservation.
Historical and Cultural Values / Historic Heritage / General HH	Mike Camden	226.3	Amend	[No specific reason given beyond decision requested - refer to original submission]	Seeks amendments to the Historic Heritage chapter for protection for stained and decorative heritage glass windows in Heritage Buildings.
Historical and Cultural Values / Historic Heritage / General HH	Lorraine and Richard Smith	230.11	Amend	Considers that historic elements in the Wellington Botanic Gardens (e.g. Talavera Cable Car Station) should be given heritage protection. [Refer to original submission for details]	Seeks that heritage protection is extended in the Botanic Gardens.
Historical and Cultural Values / Historic Heritage / General HH	Pukepuke Pari Residents Incorporated	237.3	Not specified	Considers that Hay Street has heritage values, as evidenced in the report titled 'Hay Street Heritage Area - Heritage Assessment' included with the submission.	Seeks that development in Hay Street is restricted due to the heritage values (as a qualifying matter).
Historical and Cultural Values / Historic Heritage / General HH	Cherie Jacobson	251.2	Not specified	<p>Considers that heritage is given inadequate weight in the PDP.</p> <p>The heritage policies have a focus on enabling works as opposed to enabling conservation.</p> <p>There is a lack of evidence indicating that the existing heritage and character provisions in the District Plan are affecting the housing market in Wellington.</p> <p>Heritage and character can make a significant contribution to Wellington's climate change goals by reducing emissions and waste through sustainable resource use.</p>	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Dean Knight and Alan Wendt	265.2	Amend	<p>Considers that when Salisbury Garden Court was listed as a heritage area, at the initiative of owners and residents, the key heritage feature sought to be protected was historic connectedness.</p> <p>The heritage controls imposed are, in practice, too heavy and go well beyond what is sought to be protected.</p> <p>[Refer to original submission for full reason]</p>	Seeks that Item 24 (Salisbury Garden Court) of SCHED3 - Heritage Areas) is exempt from all Heritage Zone Controls except HH-P14 (New buildings and structures within heritage areas), HH-R13 (New buildings and structures within heritage areas), HH-P16 (Total demolition of contributing buildings and structures) and HH-R1 (Total demolition of contributing buildings and structures).

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Historical and Cultural Values / Historic Heritage / General HH	Wellington City Council	266.71	Amend	Considers minor amendment necessary for consistency. In addition it is considered that this section makes no mention of the recognised heritage values of buildings.	Amend Historic Heritage Introduction as follows: (...) Sustainable long-term use One of the best ways to protect <u>the recognised heritage values of</u> built heritage is to ensure that it remains in a sustainable long-term long-term use.
Historical and Cultural Values / Historic Heritage / General HH	Property Council New Zealand	338.7	Support in part	Supports heritage as a qualifying matter. Retaining genuine heritage in Wellington is critical in maintaining a high quality, desirable and liveable building environment. It is however important that the Council ensures Wellington has sufficient development capacity when engaging with property owners on proposed new heritage listings.	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Parliamentary Service	375.1	Support in part	The Historical Heritage chapter introduction is generally supported, but wording in the Sustainable long-term use objective should be amended. The objective needs to more clearly recognise the need to ensure heritage buildings are able to continue to be used in a practicable way – “sustainable long-term use” does not adequately capture the concept of ensuring buildings are able to continue to be used in a practicable and functional way.	Retain the Historic Heritage Introduction with amendments.
Historical and Cultural Values / Historic Heritage / General HH	Parliamentary Service	375.2	Amend	Considers that the Sustainable long-term use objective needs to more clearly recognise the need to ensure heritage buildings are able to continue to be used in a practicable way – “sustainable long-term use” does not adequately capture the concept of ensuring buildings are able to continue to be used in a practicable and functional way.	Amend the Historic Heritage Chapter Introduction to acknowledge that it is important to ensure that built heritage can continue to be used in a practicable and functional way.
Historical and Cultural Values / Historic Heritage / General HH	Argosy Property No. 1 Limited	383.31	Support	Supports the Introduction to the extent that it recognises that ‘reuse’ (defined as “changing the use of a building or object from that which it was originally constructed for”) of a heritage building can be appropriate and facilitated by additions or alterations. This is important to balance the importance of retaining heritage values while enabling appropriate use of heritage buildings	Retain HH - Introduction as notified.
Historical and Cultural Values / Historic Heritage / General HH	Taranaki Whānui ki te Upoko o te Ika	389.64	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that within the 'Cross references to other relevant District Plan provisions' that it is amended to include Sites and Areas of Significance to Māori chapter.
Historical and Cultural Values / Historic Heritage / General HH	Taranaki Whānui ki te Upoko o te Ika	389.65	Amend	[No specific reason given beyond decision requested - refer to original submission].	Seeks that chapter includes appropriate rules to ensure protection of SASMs in or near identified Historic Heritage sites.
Historical and Cultural Values / Historic Heritage / General HH	Kāinga Ora Homes and Communities	391.163	Oppose in part	The Historic Heritage chapter is partially opposed as it is unclear which rules apply to a scheduled heritage building, a non-scheduled contributing building, and a non-scheduled non-contributing buildings.	Opposes the Historic Heritage chapter and seeks amendments.
Historical and Cultural Values / Historic Heritage / General HH	Kāinga Ora Homes and Communities	391.164	Amend	Considers that the Historic Heritage chapter should be amended to provide further clarification and should define contributing and non-contributing buildings, scheduled and non-scheduled building. It is not clear which rules apply to a scheduled heritage building, a non-scheduled contributing building, and a non-scheduled non-contributing buildings. Amendments are required throughout the chapter to provide clarity to when rules apply to respective buildings in Historic Heritage chapter.	Seeks amendments to the Historic Heritage chapter to provide clarity in provisions applying to: - Scheduled heritage buildings, - Non-scheduled heritage buildings considered to be contributing buildings; and - Non-scheduled heritage buildings that are non-contributing.
Historical and Cultural Values / Historic Heritage / General HH	Murray Pillar	393.10	Support in part	Supports the heritage rules but notes that they are very "enabling" i.e. permissive.	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Murray Pillar	393.11	Amend	Supports the heritage rules but notes that they are very "enabling" i.e. permissive.	Seeks that the heritage rules are drafted to support more conservation.

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Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.30	Oppose	<p>Considers that there is a lack of evidence to support the heritage content of the PDP, including for the following reasons:</p> <ul style="list-style-type: none"> - The provisions lack a reliable evidence base and a qualitative report on the effectiveness of the operative plan provisions in necessary. - There is little evidence to support claims that the provisions are working as intended - There is little evidence that the heritage and character provisions are affecting the housing market in wellington. <p>[Refer to original submission for full reason]</p>	Not specified
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.31	Not specified	<p>Considers that Wellington has struggled to retain its historic heritage and continues to lose listed and unlisted heritage of national significance.</p> <p>Considers that the city centre only retains a small pool of representative heritage from its past, and this is dominated by public buildings and clusters of commercial buildings. Many of Wellington's surviving historic buildings have been significantly altered, partially demolished or incorporated into larger buildings.</p>	Not specified
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.32	Oppose	<p>Considers that some of the heritage and plan content does not reflect best practice.</p> <p>Considers that the heritage policies have a focus on enabling works as opposed to enabling conservation, based on an assumption that heritage protection has prevented necessary development.</p> <p>Opposes more permissive rules for historic heritage and considers that finite environmental values like historic heritage need discretion through consent processes</p> <p>Considers that this is a fundamental misunderstanding of ICOMOS New Zealand charter and the principles of heritage conservation.</p>	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.33	Oppose	<p>Considers concern that if the plan as proposed is implemented, historic heritage and character which is of significance to current and future Wellingtonians, will be lost or altered.</p> <p>Considers concern that the proposed plan's more permissive rules for historic heritage, the inadequacy of the schedule in reflecting Wellington's heritage, and the reductive approach to character areas.</p> <p>[See original submission for full reasons]</p>	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.34	Oppose	<p>Considers that there is little reliable evidence that the current district plan has been effective at preventing or mitigating the loss of Wellington's historic heritage.</p> <p>Considers that the move in the PDP towards making more activities permitted is likely to result in adverse effects on historic heritage.</p> <p>Considers that finite environmental values like historic heritage need discretion through consent processes. As such, we are concerned that the more permissive rules in the proposed district plan for historic heritage will not adequately provide for the protection of historic heritage as a matter of national importance under section 6f of the RMA and will not achieve objective HH-02 Protecting Historic Heritage.</p>	Seeks that more historic heritage related activities need the activity status of discretionary. [Inferred decision requested].

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Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.35	Amend	Considers that it is not necessary to refer to partial demolition as a way of facilitating sustainable long term use as it is captured by 'alterations' and suggests partial demolition applications would be welcome, whereas they should be discouraged.	Amend the introduction to the Historic Heritage chapter as follows: ... Both ongoing use and reuse can be a sustainable long term use for built heritage and can be facilitated by compatible additions and alterations, and/or carefully done partial demolition.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.36	Amend	Considers that the reference to 'continuity of buildings and structures' as it relates to heritage areas is not clear. Some significant heritage areas are not 'continuous' and contain gaps where non-contributing buildings are located.	[inferred decision requested] clarify the meaning of 'continuity of buildings and structures' under the description of heritage areas.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.37	Amend	Considers that the 'sustainable long term use' section should explicitly allow for stabilisation and mothballing. This section is very focussed on 'use' as the be all and end all. However, if there isn't a reasonable use right now that doesn't mean the only other option is demolition.	Amend the section on sustainable long term use to explicitly allow for stabilisation and mothballing.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.38	Amend	Considers that the description of Heritage areas should be explicit (like the current District Plan) that it is 'because of their contribution to the value of the heritage area the contributor buildings warrant the same t1471reatment and control as listed heritage items'. Considers that the values of contributing buildings in heritage areas should be protected to the same degree as individual heritage buildings in heritage areas to ensure that the heritage values of the area as a whole are maintained. Considers that there is not reliable evidence in the s32 report to support this change.	Amend the introduction to the Historic Heritage chapter description of heritage areas to be explicit that it is 'because of their contribution to the value of the heritage area the contributor buildings warrant the same treatment and control as listed heritage items'.
Historical and Cultural Values / Historic Heritage / General HH	Wellington Heritage Professionals	412.39	Amend	Considers that In line with submission point on EW-S10reference to the application of the earthworks chapter should be removed for scheduled archaeological sites, as HH-P20, HH-R18 provide a more nuanced approach to assessing the effects of earthworks on scheduled archaeological sites	Amend the 'Cross references to other relevant district plan provisions' note so that scheduled archaeological sites are not referenced and accordingly not managed by the earthworks provisions.
Historical and Cultural Values / Historic Heritage / General HH	VicLabour	414.22	Support	Supportive of more flexible heritage building protections to allow for more sustainable changes to be made.	Not specified
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.4	Not specified	Considers that Council has misinterpreted their obligations to provide for the protection of heritage under the purpose of the RMA. Incentives for the Council to protect heritage are unbalanced and without proper diligence to the Section 32 evaluation may not actually be delivering a net benefit to society that is simply assumed. Council has interpreted Section 6(f) to mean that heritage is a fait accompli and trumps other societal value. However, a High Court ruling stated that "the consent authority must ensure its consideration is founded upon an assessment of whether or not destruction of historic heritage is a balanced response, and a fair, appropriate and reasonable outcome". Council has focused on regulatory solutions alone and has dismissed any consequences or costs of their regime as inconsequential. There is no confidence that there are net benefits to society from the heritage listing at 28 Robieson St, because Council did not fully identify the effects of their proposal or take quantitative assessment to a required level of detail that is proportional to the scale and significance of the regulatory intervention. [Refer to original submission for full reasons, including attachments]	Not specified.

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Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.5	Not specified	Considers that Heritage listings would have a direct impact of \$319 million. This indicates the order of magnitude of the scale and significance of the proposal and should not be diminished or dismissed. It requires that the Council apply a level detail and rigour that is proportional. It requires them to invest more effort. Council will cost hundreds of thousands of dollars to owners to meet quotas that have little merit of basis. [Refer to original submission for full reason, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.6	Not specified	Considers that heritage and building evaluation and classification from Council is weak. The evidence base for historic heritage section of the Section 32 evaluation is lacking in transparency and accountability. Futhermore, many modern buildings are not recorded as modern by the Council due to a lack of any robust classification system or process. [Refer to original submission for full reason, including attachments]	Seeks that Council use a more robust and transparent heritage assessment and classification system. [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.7	Not specified	Considers modern movement architects have a long history of contributing to public debate around affordable housing design, social housing, urban planning, and heritage. Many, including Bill Toomath and the Architecture Centre wrote or contributed to sustainable housing manifestos for architectural interest groups. [Refer to original submission for full reason, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.8	Not specified	Considers that the Council does not know how many of the existing scheduled heritage listings are private homes. The existing heritage inventory was analysed, and it is estimated that 224 private homes have individual heritage protection. In the District Plan, the Council has proposed the inclusion of 52 new heritage listings, of which half are homes (26 homes), and 11 new heritage areas which affects 350 homes. This is on top of the existing 224 individual homes listed and the 100 homes within the existing heritage areas. Character areas impact another 5000 homes in Wellington. Considers it is notable that Wellington has nearly three times the number of houses protected relative to the total housing stock in Auckland. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.9	Not specified	Considers that the council is proposing to expand homes with heritage protection from about 324 homes to about 700. This increase is an additional 376 homes and means under the proposal, almost 1% of all the homes in Wellington will be protected and have their development restricted, in the suburbs and within walking distance of the city centre and transport hubs. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.10	Not specified	Considers the council is naturally incentivised to over-provide Heritage protection, and interest groups have similar incentives to Council. Considers no non-regulatory mechanisms or options were considered in the Proposed District Plan which misses an opportunity to rethink and rebalance how incentives work to better deliver on the requirement in the RMA to treat the protection of heritage with importance. [Refer to original submission for full reasons, including attachments]	Not specified.

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Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.11	Not specified	<p>Considers that the Council is failing its responsibilities under the RMA . Their level of rigour, policies, approach to identification, evaluation frameworks, consideration of options, and level of performance assessment against heritage objectives are all lacking in the context of national importance prescribed within the Act. For instance, Section 6(f) of the RMA has been misinterpreted by Council.</p> <p>Furthermore, it is considered that there is an implicit expectation of access when closely interpreting the definition of historic heritage in the RMA. This would reasonably remove or reduce the heritage value of isolated private suburban homes compared to publicly accessible heritage buildings and landmarks. Considers that it seems likely that when the RMA was drafted in 1991 and heritage was defined, policy makers had not envisioned isolated homes from the 1960's, with no real stand out qualities form others on the street, no public access, and limited visibility, would be targeted for heritage protection.</p> <p>[Refer to original submission for full reason, including attachments]</p>	<p>Seeks that the Council better identify, evaluate, consider and assess heritage objectives in the context of national importance prescribed within the Act, particularly in regard to heritage listing specific properties.</p> <p>[Inferred decision requested]</p>
Historical and Cultural Values / Historic Heritage / General HH	Willis Bond and Company Limited	415.13	Not specified	<p>Considers that there is a significant power imbalance between the Council and isolated homeowners in regard to heritage listings. Considers the powers granted to consent authorities under the RMA to regulate are significant. Considers individuals and isolated homeowners have less voice, weight, time, or energy, to stand up for themselves. Considers the Council has both direct authority to regulate property owners, access to better information, and greater resources.</p> <p>[Refer to original submission for full reasons, including attachments]</p>	<p>Not specified.</p>
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.16	Amend	<p>Considers that the Council needs to be cognisant of the selection biases they have imbedded in their identification processes for historic heritage. by selecting 10 streets at random and checking every building on them for any historic significance. Such an approach might generate a fairer and more representative list of buildings for historic consideration, the same way randomisation is embedded in medical trials to prevent biases.</p> <p>[Refer to original submission for full reasons, including attachments]</p>	<p>Seeks that the Council amend its heritage identification process to include more randomisation, so as to prevent bias.</p> <p>[Inferred decision requested]</p>
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.17	Not specified	<p>Considers the evaluation of the effectiveness and performance of the current regulatory settings is extremely limited in regard to heritage protection. Considers that the heritage protection regime needs to find a balance heritage protection required by the RMA, the desire to identify historic heritage, the value of heritage to the wider community, the performance of an operative plan, and the cohesive integration with other policies.</p> <p>It is considered that the Council has dismissed the burden imposed on private property owners of proposed heritage listings, which is not aligned with the intent of the RMA. The heritage protection regime does not incentivise documentation, identification, nomination or preservation of historic heritage. It does not educate owners of heritage properties, and instead incentivises owners of unlisted properties to remove, destroy or significantly alter unknown heritage value to preserve monetary value, and even accelerate destruction prior to any proposed listing. Financial incentives are also considered inadequate. It is considered that there are significant issues with the current heritage protection regime. Considers that no evaluation of the effectiveness of the current regime against objectives and principles has taken place.</p> <p>[Refer to original submission for full reasons, including attachments]</p>	<p>Seeks that the current regime's effectiveness be evaluated against objectives and principles and this be used to inform a future regime, which should find a balance between the importance of heritage protection in the Resource Management Act, the desire to identify historic heritage, the value of heritage to the wider community and other factors such as teh burden imposed of private property owners of heritage listings.</p> <p>[Inferred decision requested, refer to original submission]</p>

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Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.18	Not specified	Considers that the council has only considered a narrow set of high-level options to protect heritage in their section 32 report. Considers that there is a singular focus on a regulatory approach, and costs relating to owners on newly listed properties has been dismissed. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.19	Not specified	Considers there are issues with the Heritage Issues and Options report including that it contains unsubstantiated claims, disputes findings within the paper e.g. that categorisation of buildings is not appropriate, and considers the state of some of the report content is very poor. Considers a heritage database of unlisted items as referred to in the report should be made public. [Refer to original submission for full reasons]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.20	Not specified	Considers that no non-regulatory incentive options for heritage protection have been considered. [Refer to original submission for full reasons]	Seeks that the council considers non-regulatory incentive options for heritage protection [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.21	Not specified	Considers that no options for a collaborative or regional approach to heritage protection have been considered [Refer to original submission for full reasons]	Seeks that the council considers options for a collaborative or regional approach to heritage protection [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.22	Not specified	Considers that digital heritage protection should be considered by Council. Having historic heritage digitally preserved provides many benefits over physical protection and may increase collective heritage value to society. Knowing a physical structure is already digitally preserved also changes the interpretation of what is an appropriate or inappropriate physical modification. A digital approach is less costly to society and would offer real value and convenience in the sustainable management of natural and physical resources, so people can interact, and experience natural and physical resources virtually, without any impact on the resources themselves. Good examples of digital heritage protection are provided by Google Street View Time Machine and CityViewAR. [Refer to original submission for full reasons]	Seeks that the Council considers digital heritage protection techniques.[Inferred decision requested]
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.23	Not specified	Considers that the digital innovation team at Wellington City Council should get in touch with the Heritage Team at the Council to collaborate on options regarding digital preservation and integration of heritage into the Wellington digital twin programme. [Refer to original submission for full reasons]	Seeks that digital heritage preservation be integrated into the Wellington digital twin programme.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.24	Not specified	Considers that the Council has failed to effectively consider cost and benefits of protection of heritage, which is required under Section 32 of the RMA. The responsibility in 'providing for' the protection of heritage does not require scheduling of buildings, it does not preclude incentive regimes, and it does not rule out the Council establishing a voluntary regime. Considers that section 32 evaluations must contain a level of detail that corresponds to the scale and significance of economic, social, and cultural effects that are anticipated from the implementation of the proposal. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.25	Not specified	Considers the Council has failed to identify the full range of effects and describe their scale and significance in regard to the heritage listing of 28 Robieson Street. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.26	Not specified	Considers the council has failed to quantify costs and benefits of their proposal (heritage listing of 28 Robieson Street), including largely ignoring the way society responds to their incentives, the cost to society of having more restrictive use of land and the costs that fall on owners. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.27	Not specified	Considers the Council has failed to include a level of information and certainty or properly identify risks in regard to the heritage listing of 28 Robieson Street. [Refer to original submission for full reasons, including attachments]	Not specified.

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Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.28	Not specified	The Section 32 evaluation is considered to be inadequate in regard to the heritage listing of 28 Robieson Street. A detailed list of objections is provided. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.29	Not specified	Considers that the heritage assessment of the Toomath House (28 Robieson Street) is weak and overstates the heritage value of the building, while ignoring costs. The Council's report makes un-substantiated claims, or errors. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Sarah Cutten and Matthew Keir	415.30	Not specified	Considers that while the heritage assessment provided by the Council attempts to assess the significance of heritage in the submitter's home (28 Robieson Street), it makes no attempt to consider or assess the heritage value. Considers that a framework that assesses "Use" and "non-use" values is appropriate. [Refer to original submission for full reasons, including attachments]	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Willis Bond and Company Limited	416.53	Support in part	Support Historic Heritage protection in part. [Refer to original submission for full reason].	Retain Historic Heritage provisions, with amendments [inferred decision requested].
Historical and Cultural Values / Historic Heritage / General HH	Willis Bond and Company Limited	416.54	Amend	Submitter seeking further certainty regarding Historic Heritage provisions. Submitter recognises the importance of Wellington's historic heritage. It is an important aspect of the City and must be protected. In the submitter's experience, however, the lines can become blurred at the boundaries between heritage areas and other areas of the City. Submitter considers that they need greater certainty in proximity controls so that all plan users understand where heritage protections do and do not apply.	Seeks greater certainty in the Historic Heritage proximity controls so that all plan users understand where heritage protections do and do not apply. [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / General HH	Penny Griffith	418.5	Amend	[No specific reason given beyond decision requested - see original submission for full reason]	Seeks that Wellington City Council formally recognises Historic Places Wellington as an organisation with specialist knowledge, who get consulted with on heritage policy issues.
Historical and Cultural Values / Historic Heritage / General HH	Paul Gregory Rutherford	424.12	Amend	[No specific reason beyond decision requested - refer to original submission]	Seeks that the Proposed District Plan add a new objective that reflects the positive contributions heritage, character and quality design, and the ability to read stories in the urban landscape, make to overall wellbeing.
Historical and Cultural Values / Historic Heritage / General HH	Paul Gregory Rutherford	424.13	Amend	Considers that Wellington's liveability, and its character and heritage, can be protected at the same time as new housing is added. Not every old building needs to be retained, but neither are people's sense of connection and place disposable commodities. Rather than wholesale deregulation and the widespread removal of protections, heritage and character can be considered as part of community dialogue, while new construction focuses first on under-utilised land.	Seeks that I submit that the draft District Plan needs to better recognise and provide for the protection of heritage from inappropriate development and better take into account the need to maintain and enhance amenity values.
Historical and Cultural Values / Historic Heritage / General HH	Peter Fordyce	431.3	Amend	Considers that Heritage Areas should be expanded. Wellington's built heritage comprises a vital part of the city, featuring a cityscape that is not only unique within New Zealand, but the world. This contributes to not only tourism, but fosters a sense of "place" for residents. While the rules as they currently exist provide some protection, this does not go far enough, and irreplaceable buildings and streetscapes are at risk of being lost.	Seeks that Heritage Areas be expanded.
Historical and Cultural Values / Historic Heritage / General HH	Kay Larsen	447.7	Amend	[No specific reason given beyond decision requested - see original submission]	Seeks that the history and character of the southern end of the terrace is protected.
Historical and Cultural Values / Historic Heritage / General HH	David Lee	454.2	Not specified	Considers there is the Climate change issue to consider. Demolishing wooden heritage housing (which the Plan will allow of right) will release carbon into the atmosphere. Considers that more carbon will be used in building replacements made of concrete, steel and glass. 'Old is greener than new'.	No specified.
Historical and Cultural Values / Historic Heritage / General HH	Marilyn Head	457.7	Oppose	Opposed to how the Proposed Plan protects Heritage Areas. [Refer to original submission for full reason]	Not specified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / General HH	Rachel Underwood	458.3	Amend	While supporting the heritage rules, considers they should be drafted to enable more conservation rather than permissive development. Considers there are many details that should be included such as stained and decorative heritage glass window in heritage listed buildings.	Seeks that the historic heritage provisions are amended to enable more conservation.
Historical and Cultural Values / Historic Heritage / General HH	Christina Mackay	478.6	Not specified	Considers that Neighbourhood clusters of houses set against the backdrop of the green town belt present Wellington's historical character and in the aggregate is of national significance under RMA s.6.	Not specified.
Historical and Cultural Values / Historic Heritage / General HH	Christina Mackay	478.7	Not specified	Considers that the maintenance, conservation and upgrading of 19th Century timber houses is not easy and VUW research found a shortage of heritage design and building craft skills and knowledge.	Seeks that WCC adopts policies to promote and encourage sustainable re-use and restoration and provide evidence-based design and technical based resources. [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / New HH	Paul Burnaby	44.3	Amend	Considers that a provision should be made for 'transferable development rights' from sites containing listed heritage buildings to adjoining sites that do not fall within an identified heritage area.	Seeks that 'transferable development rights' be created for sites adjoining Heritage areas.
Historical and Cultural Values / Historic Heritage / New HH	Tim Bright	75.4	Amend	Considers that a setback of more than 1m should be required to allow for more of a transition zone between Heritage Areas or Character Precincts.	Seeks that a setback of more than 1m is required from boundaries in or adjoining Heritage Areas in the Medium Density Residential Zone. [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / New HH	Historic Places Wellington	182.12	Amend	Considers that replacement of decorative and coloured glass be disallowed and discouraged.	Seeks that a new rule be added to the Historic Heritage Chapter that requires resource consent for the removal of heritage decorative or stained glass as a restricted discretionary activity.
Historical and Cultural Values / Historic Heritage / New HH	Historic Places Wellington	182.13	Amend	Considers that there is a gap in the current regulatory framework whereby property owners of heritage listed buildings can neglect to maintain or repair buildings so they are effectively "demolished by neglect". Demolition by neglect is addressed in the English National Planning Framework. Considers that adding a provision addressing demolition by neglect would address situations where an owner argues that the benefits of a newbuilding (which substantially demolishes a listed heritage building) outweighs its value as an intact or restored heritage building. Considers that such arguments should not be available to owners who have not undertaken maintenance or repair.	Add a new policy to the Historic Heritage Chapter along the lines of: <u>"Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision".</u>
Historical and Cultural Values / Historic Heritage / New HH	Historic Places Wellington	182.14	Amend	Considers that HPW specific bulk and shading controls should apply at and near to boundaries of sites which are near heritage listed sites to address the principles set out in various High Court decisions such as: Sydney Substation Ltd v WCC [2017] NZHC 2489.	Seeks that the Proposed District Plan is amended to include bulk and shading controls at, and near to, the boundaries of sites which are near to each heritage listed site where special height and design controls apply to protect context and curtilage setting of heritage listed buildings.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / New HH	Historic Places Wellington	182.15	Amend	<p>Considers that the Character Precincts together with the new “heritage areas” do not sufficiently protect heritage buildings from inappropriate development under RMA s.6. In particular, buildings with heritage value which are outside concentrations of buildings with similar values, or those in poor condition, will be at risk of inappropriate development.</p> <p>Considers that while “heritage is not the same as character”, it has been through character protections in the ODP that heritage has been acknowledged and protected in the existing planning regime (despite not being listed).</p> <p>Considers that Wellington’s unique heritage and character is represented in its native timber oldest inner city suburbs. The heritage values of those buildings are irreplaceable and unable to replicate.</p> <p>Considers that the proposal is consistent with the overlay proposed in the Councils Draft Spatial Plan.</p> <p>Considers that the proposal would protect the heritage of specific buildings where there is not a sufficient cluster of higher quality character streetscape sites, which would otherwise make available a level of protection under RMA s.7.</p> <p>Considers that without such a procedural overlay, the effects on the environment (specifically on heritage) of any ‘level of development’ would be incompatible and inappropriate, by not being considered at all.</p> <p>Considers that the demolition control overlay would see a negligible reduction in additional housing capacity. It would also provide an accumulative benefit from not demolishing NZ’s oldest native timber buildings which have low carbon emissions instead of constructing new buildings using materials (such as concrete and steel) with significant whole of life carbon emissions.</p> <p>[See original submission for full reasons]</p>	<p>Seeks that a 'heritage demolition control' be added for all areas identified by:</p> <ul style="list-style-type: none"> - The Pre-1930s character area review as 'Primary' 'Contributory' or 'omitted'; and - The Heritage New Zealand Pouhere Taonga's submission on the Draft Spatial Plan.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / New HH	Historic Places Wellington	182.16	Amend	<p>Considers that the Character Precincts together with the new “heritage areas” do not sufficiently protect heritage buildings from inappropriate development under RMA s.6. In particular, buildings with heritage value which are outside concentrations of buildings with similar values, or those in poor condition, will be at risk of inappropriate development.</p> <p>Considers that while “heritage is not the same as character”, it has been through character protections in the ODP that heritage has been acknowledged and protected in the existing planning regime (despite not being listed).</p> <p>Considers that Wellington’s unique heritage and character is represented in its native timber oldest inner city suburbs. The heritage values of those buildings are irreplaceable and unable to replicate.</p> <p>Considers that the proposal is consistent with the overlay proposed in the Councils Draft Spatial Plan.</p> <p>Considers that the proposal would protect the heritage of specific buildings where there is not a sufficient cluster of higher quality character streetscape sites, which would otherwise make available a level of protection under RMA s.7.</p> <p>Considers that without such a procedural overlay, the effects on the environment (specifically on heritage) of any ‘level of development’ would be incompatible and inappropriate, by not being considered at all.</p> <p>Considers that the demolition control overlay would see a negligible reduction in additional housing capacity. It would also provide an accumulative benefit from not demolishing NZ’s oldest native timber buildings which have low carbon emissions instead of constructing new buildings using materials (such as concrete and steel) with significant whole of life carbon emissions.</p> <p>[See original submission for full reasons]</p>	<p>Seeks that within the 'heritage demolition control' the following provisions apply:</p> <ul style="list-style-type: none"> - The demolition of any building or structure, excluding ancillary structures, built before 1930 be a restricted discretionary activity. - Intensification provisions would apply (being the level of development enabled under the MDRS and NPSUD policy 3).
Historical and Cultural Values / Historic Heritage / New HH	Wellington’s Character Charitable Trust	233.11	Amend	<p>Considers that there should be a specific process of heritage identification and assessment of all existing buildings in the inner city suburbs (noting that the Boffa Miskell 2019 report was not commissioned for the purpose of making a process to identify heritage and assessment of values, but rather identifying concentrations of "Character").</p>	<p>Seeks that a provision is added to make a process of specific heritage identification and assessment of heritage values for all building in the inner city suburbs.</p>
Historical and Cultural Values / Historic Heritage / New HH	Wellington’s Character Charitable Trust	233.12	Amend	<p>Supports evidence submitted by Historic Places Wellington.</p>	<p>Seeks a new rule so that the removal of decorative/coloured glass from heritage buildings requires resource consent as a restricted discretionary activity.</p>
Historical and Cultural Values / Historic Heritage / New HH	Argosy Property No. 1 Limited	383.32	Amend	<p>Considers there should be an additional rule clarifying that additions, alterations and demolition of non-listed heritage features of scheduled heritage buildings and heritage structures be permitted. This is consistent with the purpose of identifying features of heritage buildings that are not scheduled as not having heritage values, and is currently a gap in the Proposed Plan. For completeness, we note that it we do not consider it necessary for any of the existing standards in the Proposed Plan to apply to this rule.</p>	<p>Add a new rule HH-RX to the Historic Heritage chapter as follows:</p> <p><u>Additions, alterations and demolition of features that are excluded from the listing of scheduled heritage buildings and heritage</u></p> <p><u>1. Activity status: Permitted</u></p>
Historical and Cultural Values / Historic Heritage / New HH	Murray Pillar	393.12	Amend	<p>[No specific reason given beyond decision requested - refer to original submission].</p>	<p>Seeks that protection for stained and decorative heritage glass windows is provided for heritage listed buildings.</p>

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / New HH	Willis Bond and Company Limited	416.55	Amend	The submitter supports the general protection given to historic heritage in chapter HH. Considers that it must be clear where heritage protections apply to provide certainty for development. The submitter considers that Wellington must achieve a balance between heritage protection and enabling new development.	Add a new objective (or similar) within the HH chapter after HH-02 (Protecting historic heritage) as follows: <u>Clearly identify historic heritage and provide certainty on the extent of heritage protection.</u>
Historical and Cultural Values / Historic Heritage / New HH	Willis Bond and Company Limited	416.56	Amend	The submitter supports the general protection given to historic heritage in chapter HH. Considers that it must be clear where heritage protections apply to provide certainty for development. The submitter considers that Wellington must achieve a balance between heritage protection and enabling new development.	Add a new objective (or similar) within the HH chapter after HH-02 (Protecting historic heritage) as follows: <u>Recognise the importance of achieving a balance between heritage protection and enabling new development.</u>
Historical and Cultural Values / Historic Heritage / New HH	Peter Fordyce	431.4	Amend	Considers that the Heritage chapter should have a provision to protect original windows with stained and decorative glass on buildings within the character precincts, and heritage structures. As the chapter stands, provisions have little protection for the windows of heritage buildings, particularly stained and decorative glass, and there is a significant risk that this will be lost with the push for double glazing. Where possible, original window frames should be retained, and new or modified windows must contain the original decorative glass.	Add a new rule in the Historic Heritage chapter providing protection of original windows and stained and decorative window glass on heritage buildings and structures. [Inferred decision requested - note: relief sought refers to heritage structures and character precincts]
Historical and Cultural Values / Historic Heritage / New HH	Peter Fordyce	431.5	Amend	Considers that the Heritage chapter should have a provision to protect original windows with stained and decorative glass on buildings within the character precincts, and heritage structures. As the chapter stands, provisions have little protection for the windows of heritage buildings, particularly stained and decorative glass, and there is a significant risk that this will be lost with the push for double glazing. Where possible, original window frames should be retained, and new or modified windows must contain the original decorative glass.	Add a new Rule in the Historic Heritage chapter providing protection of original windows and stained and decorative window glass on buildings in Heritage Areas. [Inferred decision requested - note: relief sought refers to heritage structures and character precincts]
Historical and Cultural Values / Historic Heritage / New HH	Christina Mackay	478.8	Amend	Considers that in order to combat intentional neglect the submitter support a new policy to the PDP's Historic Heritage Chapter on Maintenance and Repair.	Add a new policy as follows: "Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision."
Historical and Cultural Values / Historic Heritage / HH-01	Cherie Jacobson	251.3	Not specified	Considers that the schedule does not represent what is distinctive about Wellington, the region and New Zealand. Objective HH-01 Recognising Historic Heritage will not be met if the schedule is not representative. This objective is that 'historic heritage [is] recognised for its contribution to an understanding and appreciation of the history, culture and sense of place of Wellington City, the Wellington region and New Zealand.' WCC has not adequately sought the views of the community on historic heritage in the development of the PDP.	Not specified.
Historical and Cultural Values / Historic Heritage / HH-01	WCC Environmental Reference Group	377.61	Support	This objective recognises the importance of heritage to Wellington's identity and sense of place.	Retain HH-01 (Recognising historic heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-01	Argosy Property No. 1 Limited	383.33	Support	Supports the objectives relating to historic heritage to the extent they recognise the benefits of enabling sustainable long-term use of heritage buildings.	Retain HH-01 (Recognising historic heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-01	Lucy Harper and Roger Pemberton	401.4	Support	Supports HH-01 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-01 (Recognising historic heritage) as notified.

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-01	Wellington Heritage Professionals	412.40	Amend	the objective is missing a word.	Amend HH-01 (Recognising historic heritage) as follows: Historic heritage <u>is</u> recognised for its contribution to an understanding and appreciation of the history, culture and sense of place of Wellington City, the Wellington region and New Zealand.
Historical and Cultural Values / Historic Heritage / HH-01	Willis Bond and Company Limited	416.57	Support in part	Supports HH-01 in part. The submitter supports the general protection given to historic heritage in chapter HH.	Retain HH-01 (Recognising historic heritage...) as notified.
Historical and Cultural Values / Historic Heritage / HH-02	WCC Environmental Reference Group	377.62	Support	This objective recognises the importance of heritage to Wellington's identity and sense of place.	Retain HH-02 (Protecting historic heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-02	Argosy Property No. 1 Limited	383.34	Support	Supports the objectives relating to historic heritage to the extent they recognise the benefits of enabling sustainable long-term use of heritage buildings.	Retain HH-02 (Protecting historic heritage) as notified
Historical and Cultural Values / Historic Heritage / HH-02	Lucy Harper and Roger Pemberton	401.5	Support	Supports HH-02 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-02 (Protecting historic heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-02	Willis Bond and Company Limited	416.58	Support in part	Supports HH-02 in part. The submitter supports the general protection given to historic heritage in chapter HH.	Retain HH-02 (Protecting historic heritage...), as notified.
Historical and Cultural Values / Historic Heritage / HH-03	Parliamentary Service	375.3	Support in part	Supports but submits that the objective needs to more clearly recognise the need to ensure heritage buildings are able to continue to be used in a practicable way – “sustainable long-term use” does not adequately capture the concept of ensuring buildings are able to continue to be used in a practicable and functional way.	Retain HH-03 (Healthy, safe and accessible living environments) with amendments.
Historical and Cultural Values / Historic Heritage / HH-03	Parliamentary Service	375.4	Amend	Supports but submits that the objective needs to more clearly recognise the need to ensure heritage buildings are able to continue to be used in a practicable way – “sustainable long-term use” does not adequately capture the concept of ensuring buildings are able to continue to be used in a practicable and functional way.	Amend HH-03 (Healthy, safe and accessible living environments) as follows: Sustainable long-term use One of the best ways to protect built heritage is to ensure that it remains in a sustainable <u>and practicable</u> long term use. ...
Historical and Cultural Values / Historic Heritage / HH-03	WCC Environmental Reference Group	377.63	Support	This objective recognises the importance of heritage to Wellington's identity and sense of place. It also recognises the importance of maintaining built heritage as part of sustainable use and waste reduction: construction waste is a major waste stream issue for Wellington - building re-use, as far as possible, needs to be incentivised.	Retain HH-03 (Sustainable long-term use) as notified.
Historical and Cultural Values / Historic Heritage / HH-03	Argosy Property No. 1 Limited	383.35	Support	Supports the objectives relating to historic heritage to the extent they recognise the benefits of enabling sustainable long-term use of heritage buildings.	Retain HH-03 (Sustainable long-term use) as notified.
Historical and Cultural Values / Historic Heritage / HH-03	Lucy Harper and Roger Pemberton	401.6	Support	Supports HH-03 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-03 (Sustainable long-term use) as notified.
Historical and Cultural Values / Historic Heritage / HH-03	Wellington Heritage Professionals	412.41	Amend	The objective of the chapter is best captured by HH-01 and HH-02. Concerned that HH-03 could lead to unnecessary demolition of built heritage where current circumstances do not allow for sustainable use. Considers that stabilisation and mothballing may also be an appropriate approach depending on the circumstances.	Amend HH-03 (Sustainable long term use) as follows: Built heritage is well-maintained, resilient. and kept in sustainable long term use.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-O3	Willis Bond and Company Limited	416.59	Support in part	Supports HH-O3 in part. The submitter supports the general protection given to historic heritage in chapter HH.	Retain HH-O3 (Sustainable long-term use ...), as notified.
Historical and Cultural Values / Historic Heritage / HH-O3	Anna Kemble Welch	434.6	Not specified	Not specified.	Not specified.
Historical and Cultural Values / Historic Heritage / HH-P1	WCC Environmental Reference Group	377.64	Amend	Generally supportive but considers more emphasis to Māori heritage is needed, to be in line with Section 6 of the RMA.	Amend HH-P1 (Identifying historic heritage) as follows: Identify buildings, structures, areas and archaeological sites with significant historic heritage values, or that contribute to an understanding and appreciation of Māori history, <u>relationship to their ancestral lands, water, sites, waahi tapu, other taonga and culture.</u>
Historical and Cultural Values / Historic Heritage / HH-P1	Taranaki Whānui ki te Upoko o te Ika	389.66	Amend	Considers appropriate to amend to include objectives, policies, rules and standards to minimise impact of earthworks or developments on cultural value to Taranaki Whānui. Requests focus on HH-P1.	Seeks that with the amendments to minimise impact of earthworks or developments on cultural value to Taranaki Whānui, that HH-P1 (Identifying historic heritage) is focused on.
Historical and Cultural Values / Historic Heritage / HH-P1	Lucy Harper and Roger Pemberton	401.7	Support	Supports HH-P1 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P1 (Identifying historic heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-P2	WCC Environmental Reference Group	377.65	Support	This policy is helpful in that it signals the need for adherence to conservation principles when maintaining or repairing built heritage.	Retain HH-P2 (Maintenance and repair) as notified.
Historical and Cultural Values / Historic Heritage / HH-P2	Argosy Property No. 1 Limited	383.36	Support in part	Supports the policies to the extent that they enable maintenance, repair and reasonable works to built heritage. It is important to enable works to built heritage to provide for long-term sustainable use to buildings, including where that long-term use is different to the use for which the built heritage was scheduled. Suggests amendments, consistent with the Introduction to this chapter, which clarify that enabling a sustainable long-term use of a building includes adaptive reuse. Subject to these amendments proposed, supports Policy HH-P2 to the extent that it encourages the maintenance and repair of built heritage where undertaken in accordance with recognised conservation principles and methods.	Retain HH-P2 (Maintenance and repair) as notified.
Historical and Cultural Values / Historic Heritage / HH-P2	Lucy Harper and Roger Pemberton	401.8	Support	Supports HH-P2 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P2 (Maintenance and repair) as notified.
Historical and Cultural Values / Historic Heritage / HH-P3	Fire and Emergency New Zealand	273.90	Support	Supports the policy as it allows internal alterations to heritage buildings unless it involves interior features that are specifically scheduled.	Retain HH-P3 (Internal works) as notified.
Historical and Cultural Values / Historic Heritage / HH-P3	WCC Environmental Reference Group	377.66	Support	This policy is helpful in that it helps make renovations easier - fostering re-use of built heritage.	Retain HH-P3 (Internal works) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P3	Argosy Property No. 1 Limited	383.37	Oppose	Opposes heritage controls on new floor levels where only the exterior of a heritage building is scheduled. These are unnecessary because the internal additions to buildings are unlikely to detract from the heritage values of the exterior of a heritage building. Instead, this policy imposes an unreasonable burden on internal works. We understand that the purpose of this policy is to prevent additional or mezzanine floors being constructed which are visible through tall windows and would have a material impact on the heritage value of the building. The drafting of the policy is not sufficiently clear to restrict its application to these circumstances. It does not address the effect on the heritage values but applies to any floor structure that is visible.	Delete HH-P3 (Internal works) in its entirety.
Historical and Cultural Values / Historic Heritage / HH-P3	Lucy Harper and Roger Pemberton	401.9	Support	Supports HH-P4 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P4 (Enabling approach to works) as notified.
Historical and Cultural Values / Historic Heritage / HH-P3	Wellington Heritage Professionals	412.42	Amend	Considers that the policy should be rewritten to focus on conservation as opposed to 'works' and reflect the ICOMOS New Zealand Charter approach to conservation.	Seeks that HH-P3 (Internal works) is rewritten with a focus on conservation as per the ICOMOS New Zealand Charter.
Historical and Cultural Values / Historic Heritage / HH-P3	Wellington Heritage Professionals	412.43	Amend	Considers that temporary works referred to in the Heritage Design Guide should be enabled as this is likely to prevent unnecessary demolition.	Amend HH-P3 (Internal works) so that temporary works are enabled as referred in the heritage design guide.
Historical and Cultural Values / Historic Heritage / HH-P3	Wellington Heritage Professionals	412.44	Amend	As per the current District Plan, structural strengthening which is visible from the exterior of the building should not be a permitted activity as this is likely to have an adverse effect on heritage values. There is little reliable evidence in the s32 report to support this change. See our commentary below on HH-S1.	Amend HH-P3 (Internal works) as follows: Enable works internal to built heritage, except where: 1. The works involve interiors or interior features which are specifically scheduled; or 2. New floor levels <u>and structural strengthening</u> that will be visible from the exterior of buildings.
Historical and Cultural Values / Historic Heritage / HH-P4	Precinct Properties New Zealand Limited	139.13	Support	Supports HH-P4 (Enabling approach to works) as it is enabling of works to built heritage and seeks that it is retained.	Retain HH-P4 (Enabling approach to works) as notified.
Historical and Cultural Values / Historic Heritage / HH-P4	Historic Places Wellington	182.17	Support	Supports the Council encouraging and supporting work on heritage places that increases their resilience and accessibility, contributes to sustainable long-term use and recovers or restores heritage values.	Retain HH-P4 as notified. [Inferred decision requested]
Historical and Cultural Values / Historic Heritage / HH-P4	Wellington City Council	266.72	Amend	Considers amendment necessary to enable works to built heritage that are undertaken in accordance with recognised conservation principles and methods.	Amend HH-P4 (Enabling approach to works) as follows: Enable works to built heritage that: 1. Increase resilience through seismic strengthening, either in isolation or as part of additions and alterations; 2. Support providing a sustainable long-term use; 3. <u>Are undertaken in accordance with recognised conservation principles and methods;</u> 4. <u>4.</u> Increase accessibility and support means of escape from fire; or 5. <u>5.</u> Provide the opportunity to promote, enhance, recover or reveal heritage values.
Historical and Cultural Values / Historic Heritage / HH-P4	Fire and Emergency New Zealand	273.91	Support	Supports this policy as it enables works to heritage buildings for the purposes of seismic resilience and/or supporting a sustainable long-term use.	Retain HH-P4 (Enabling approach to works) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P4	Parliamentary Service	375.5	Support in part	HH-P4 is supported as it is important to acknowledge that works will be required on heritage buildings to ensure they continue to be useable, as with any building. However, it is submitted that the concept of “sustainable long-term use” does not capture the need to ensure that buildings are retained in a state that ensures heritage buildings are able to continue to be used in a practicable way.	Retain HH-P4 (Enabling approach to works) with amendment.
Historical and Cultural Values / Historic Heritage / HH-P4	Parliamentary Service	375.6	Amend	Considers that the concept of “sustainable long-term use” does not capture the need to ensure that buildings are retained in a state that ensures heritage buildings are able to continue to be used in a practicable way.	Amend HH-P4 (Enabling approach to works) as follows: Enable works to built heritage that: 1. Increase resilience through seismic strengthening, either in isolation or as part of additions and alterations; 2. Support providing a sustainable <u>and practicable</u> long-term use; 3. Increase accessibility and support means of escape from fire; or 4. Provide the opportunity to promote, enhance, recover or reveal heritage values.
Historical and Cultural Values / Historic Heritage / HH-P4	WCC Environmental Reference Group	377.67	Support	This policy is helpful in that it helps achieve seismic strengthening - very necessary to many heritage structures - and helping remove regulatory impediments to this work	Retain HH-P4 (Enabling approach to works) as notified.
Historical and Cultural Values / Historic Heritage / HH-P4	Argosy Property No. 1 Limited	383.38	Amend	Supports the policies to the extent that they enable maintenance, repair and reasonable works to built heritage. It is important to enable works to built heritage to provide for long-term sustainable use to buildings, including where that long-term use is different to the use for which the built heritage was scheduled. Suggests amendments, consistent with the Introduction to this chapter, which clarify that enabling a sustainable long-term use of a building includes adaptive reuse. Subject to these amendments proposed, supports Policy HH-P4 as it recognises that works to built heritage will sometimes be required, and are appropriate where certain outcomes are achieved, including providing a sustainable long-term use.	Amend HH-P4 (Enabling approach to works): Enable works to built heritage that: ... 2. Support providing a sustainable long-term use (<u>including reuse</u>);
Historical and Cultural Values / Historic Heritage / HH-P4	Lucy Harper and Roger Pemberton	401.10	Support	Supports HH-P5 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P5 (Conservation Plans) as notified.
Historical and Cultural Values / Historic Heritage / HH-P5	Foster+Melville Architects Limited	141.1	Amend	Considers that HH-P5 should be clarified as the proposed wording is misleading (too open and would be mis-interpreted) and will result in confusion. The wording suggests even owners of properties of lesser significance will be required to provide a Conservation Plan. Conservation Plan costs are high and limited funding is much better directed towards building materials, which contribute positively to the ongoing viability of heritage buildings, rather than reports.	Amend HH-P5 (Conservation Plans) as follows: Encourage the preparation of conservation plans <u>for items of greatest significance</u> , and take them into account when considering the effects of development proposals on the identified heritage values of built heritage.
Historical and Cultural Values / Historic Heritage / HH-P5	WCC Environmental Reference Group	377.68	Support	This policy is helpful in that conservation plans can provide ongoing certainty and continuity in respect of maintaining and sustaining built heritage over time	Retain HH-P5 (Conservation Plans) as notified.
Historical and Cultural Values / Historic Heritage / HH-P5	Lucy Harper and Roger Pemberton	401.11	Support	Supports HH-P6 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P6 (Removal of unreinforced masonry chimneys) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P5	Wellington Heritage Professionals	412.45	Amend	Considers that this policy should come first in the Built heritage section as conservation planning comes after identification and before works are carried out.	Amend the numbering of HH-P5 (Conservation Plans) to HH-P1
Historical and Cultural Values / Historic Heritage / HH-P6	WCC Environmental Reference Group	377.69	Support	This policy is helpful in that it provides for mitigation the seismic risk of unreinforced masonry chimneys in a manner sensitive to the built heritage.	Retain HH-P6 (Removal of unreinforced masonry chimneys) as notified.
Historical and Cultural Values / Historic Heritage / HH-P6	Lucy Harper and Roger Pemberton	401.12	Support	Supports HH-P7 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P6	Wellington Heritage Professionals	412.46	Oppose	<p>Considers that chimneys are often important parts of heritage buildings and that very few of Wellington's buildings have heritage protection meaning the plan should be encouraging their conservation, not enabling demolition.</p> <p>Considers that the plan would more usefully provide a set of considerations in the heritage design guide to be used when deciding whether to allow removal of a chimney</p> <p>Disagrees with the intent as stated in the s32 report that the approach to chimneys aligns more closely with the way that Council manages removal of chimneys under the Building Act. Considers this is not appropriate as the BA is focussed on safety whereas the RMA is focussed on effects on the environment.</p>	Delete policy HH-P6 (Removal of unreinforced masonry chimneys)
Historical and Cultural Values / Historic Heritage / HH-P7	Precinct Properties New Zealand Limited	139.14	Support in part	Supports HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) to the extent that it is enabling of additions and alterations.	<p>Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) to the extent that it is enabling of additions ad alterations.</p> <p>[Inferred decision requested]</p>
Historical and Cultural Values / Historic Heritage / HH-P7	Foster+Melville Architects Limited	141.2	Amend	<p>Considers that HH-P7 should be amended to reflect that a successful alteration or addition is not achieved by whether or not the main determinants of the architectural style have been maintained. The wording is very limiting and would have made previous award winning architecture projects impossible.</p> <p>[Refer to original submission for award winning projects reference].</p>	<p>Amend HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as follows (Delete HH-P7.1.c.):</p> <p>...</p> <p>1.</p> <p>...</p> <p>e. Retains the main determinants of the architectural style or design of the heritage building or heritage structure;</p> <p>...</p>
Historical and Cultural Values / Historic Heritage / HH-P7	Wellington City Council	266.73	Amend	Considers amendments necessary to be consistent in wording between HH-P7 (Heritage buildings and structures), HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings...), HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) and HH-P14 (New buildings and structures within heritage areas).	<p>Amend HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as follows:</p> <p>1.</p> <p>(...)</p> <p>d. Is compatible with the scale, form, proportions, <u>design</u> and materials of the heritage building or heritage structure;</p>
Historical and Cultural Values / Historic Heritage / HH-P7	Fire and Emergency New Zealand	273.92	Support	Supports the policy as it allows additions, alterations and the partial demolition of heritage buildings and structures subject to considerations which seek to retain the heritage values of listed buildings.	Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P7	Parliamentary Service	375.7	Support in part	HH-P4 is supported as it is important to acknowledge that works will be required on heritage buildings to ensure they continue to be useable, as with any building. However, it is submitted that the concept of “sustainable long-term use” does not capture the need to ensure that buildings are retained in a state that ensures heritage buildings are able to continue to be used in a practicable way.	Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) with amendment.
Historical and Cultural Values / Historic Heritage / HH-P7	Parliamentary Service	375.8	Amend	Considers that the concept of “sustainable long-term use” does not capture the need to ensure that buildings are retained in a state that ensures heritage buildings are able to continue to be used in a practicable way.	Amend HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as follows: ... <u>2. The viability of the building or structure and the activities associated with it, with and/or without the work;</u> <u>3. For the Parliamentary Precinct, the extent to which the proposal supports the efficient, effective and safe functioning of Parliament and the Executive;</u> 4. <u>4. The visibility of the work from street frontages;</u> 5. <u>5. Whether the works would lead to cumulative adverse effects on identified heritage values;</u> 6. <u>6. Whether there has been any change in circumstances since scheduling in the District Plan, including damage from natural disaster;</u> 7. <u>7. Any advice that has been obtained from a suitably qualified heritage professional including Heritage New Zealand Pouhere Taonga; and</u> 8. <u>8. The identified heritage values of the heritage area, where located within a heritage area.</u>
Historical and Cultural Values / Historic Heritage / HH-P7	WCC Environmental Reference Group	377.70	Support	This policy is helpful in that it enables use change whilst signalling the need for this to occur in a manner sensitive to heritage values.	Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P7	Argosy Property No. 1 Limited	383.39	Amend	Supports the policies to the extent that they enable maintenance, repair and reasonable works to built heritage. It is important to enable works to built heritage to provide for long-term sustainable use to buildings, including where that long-term use is different to the use for which the built heritage was scheduled. Suggests amendments, consistent with the Introduction to this chapter, which clarify that enabling a sustainable long-term use of a building includes adaptive reuse. Subject to these amendments proposed, supports Policy HH-P7 to the extent that it enables additions and alterations to, and partial demolition of heritage buildings where it can be demonstrated that the work does not detract from the identified heritage values	Amend HH-P7 (Additions, alterations, and partial demolition of heritage buildings and structures): Provide for additions and alterations to, and partial demolition of heritage buildings and heritage structures where it can be demonstrated that the work does not detract from the identified heritage values, having regard to: 1. The extent to which the work: a. Supports the heritage building or heritage structure having a sustainable long term use (<u>including reuse</u>);
Historical and Cultural Values / Historic Heritage / HH-P7	Kāinga Ora Homes and Communities	391.165	Support in part	HH-P7 is generally supported as it provides for alterations and additions to heritage buildings and structures. However blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy (1(a) to (i) and 2-6) provides more than adequate guidance as to which specific matters need to be considered.	Retain HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) with amendment.

Sub-part / Chapter /Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P7	Kāinga Ora Homes and Communities	391.166	Amend	Considers that HH-P7 should be amended to focus on identified heritage values as outlined in the Wellington Heritage Inventory and balance the outcomes sought within the Zone the buildings and structures are located within. Blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy (1(a) to (i) and 2-6) provide more than adequate guidance as to which specific matters need to be considered. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value and should be utilised as a non-statutory document.	Amend HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures) and its title as follows: Additions, alterations and partial demolition of <u>scheduled</u> heritage buildings and structures Provide for additions and alterations to, and partial demolition of <u>scheduled</u> heritage buildings and heritage structures where it can be demonstrated that the work does not detract from the identified heritage values, having regard to: 1. The extent to which the work: ... j. Fulfils the intent of the Heritage Design Guide; 2. The visibility of the work from street frontages; ... 6. The identified heritage values of the heritage area, where located within a heritage area. - <u>Note - Please refer to the Heritage Design Guide for further guidance.</u>
Historical and Cultural Values / Historic Heritage / HH-P7	Lucy Harper and Roger Pemberton	401.13	Support	Supports HH-O3 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-O3 (Sustainable long-term use) as notified.
Historical and Cultural Values / Historic Heritage / HH-P7	Wellington Heritage Professionals	412.47	Amend	Considers the content in the policy should be reordered. [See original submission for full reasons]	Amend the order of order to: 1. The extent to which the work: a. Supports buildings and structures having a sustainable long term use; a. <u>Promotes, enhances, recovers or reveals heritage values;</u> b. Promotes, enhances, recovers or reveals heritage values; b. Respects the valued neighbourhood patterns of the heritage area including any predominant architectural style or design; c. Is compatible with the scale, form, proportion and materials that have been identified as part of the heritage values of the heritage area; d. Responds to the relationships between buildings and structures within the heritage area; e. Enables any adverse effects on heritage values to be reversed; f. Minimizes the loss of heritage fabric and craftsmanship; g. Is in accordance with any conservation plan that has been prepared by a suitably qualified heritage professional; <u>h. Supports buildings and structures having a sustainable long term use;</u> i. Increases structural stability, accessibility and means of escape from fire; and j. Fulfils the intent of the Heritage Design Guide;
Historical and Cultural Values / Historic Heritage / HH-P8	Precinct Properties New Zealand Limited	139.15	Support in part	Supports HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) to the extent that it provides for new buildings and modifications to non-scheduled buildings on the site of a heritage building.	Retain HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) as notified to the extent that it provides for new buildings and modifications to non-scheduled buildings on the site of a heritage building. [Inferred decision requested]

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P8	Wellington City Council	266.74	Amend	Considers amendments necessary to be consistent in wording between HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures), HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure), HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) and HH-P14 (New buildings and structures within heritage areas). Clarification is needed in HH-P8 to include reference to heritage values.	Amend HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) as follows: (...) 1. The extent to which the work: a. Is compatible with the scale, form, proportions, <u>design</u> , materials, and <u>heritage values</u> of the <u>heritage building or heritage structure</u> ;
Historical and Cultural Values / Historic Heritage / HH-P8	WCC Environmental Reference Group	377.71	Support	This policy is helpful in that it enables activities adjacent to heritage buildings, whilst maintaining sensitivity to heritage values.	Retain HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-P8	Kāinga Ora Homes and Communities	391.167	Support in part	HH-P8 is generally supported as it provides for new buildings and structures. However blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy provide adequate guidance as to which matters need to be considered.	Retain HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) with amendment.
Historical and Cultural Values / Historic Heritage / HH-P8	Kāinga Ora Homes and Communities	391.168	Amend	Considers that HH-P8 should be amended to focus on the identified heritage values outlined in the Wellington Heritage Inventory balanced with the outcomes sought within the Zone the buildings and structures are located within. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value.	Amend HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) as follows: Provide for new buildings and structures, and modifications to existing non-scheduled buildings and structures on the same site as <u>scheduled</u> heritage buildings or heritage structures where it can be demonstrated that the work does not detract from the identified heritage values, having regard to: 1. The extent to which the work: a. Is compatible with the scale, form, proportion and materials of the <u>scheduled</u> heritage building or heritage structure; b. Respects the identified relationship of the heritage building or heritage structure with its setting; and c. Fulfils the intent of the Heritage Design Guide. <u>Note - Please refer to the Heritage Design Guide for further guidance.</u>
Historical and Cultural Values / Historic Heritage / HH-P8	Lucy Harper and Roger Pemberton	401.14	Support	Supports HH-P8 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-P9	Heritage New Zealand Pouhere Taonga	70.15	Oppose in part	Considers that the HH-P9.3 states that 'relocation is considered ... to be a reasonable option' which can be taken to mean that relocation is one reasonable option among other options. Considers 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.	Opposes HH-P9 (Repositioning and relocation of a heritage building or structure) as notified and seeks amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P9	Heritage New Zealand Pouhere Taonga	70.16	Oppose in part	<p>Considers that the HH-P9.3 states that ‘relocation is considered ... to be a reasonable option’ which can be taken to mean that relocation is one reasonable option among other options.</p> <p>Considers 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 (Repositioning and relocation of a heritage building or structure) as follows:</p> <p>...</p> <p>3. 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>
Historical and Cultural Values / Historic Heritage / HH-P9	Wellington City Council	266.75	Amend	<p>Considers an additional point is required to only allow heritage buildings and heritage structures to be repositioned on the existing site or relocated to another site where it can be demonstrated that the repositioning or relocation work are undertaken in accordance with recognised conservation principles and methods.</p>	<p>Amend HH-P9 (Repositioning and relocation of a heritage building or structure) as follows:</p> <p>(...)</p> <p>4. <u>The work will be undertaken in accordance with recognised conservation principles and methods.</u></p>
Historical and Cultural Values / Historic Heritage / HH-P9	Waka Kotahi	370.166	Support in part	<p>Supports direction of policy.</p>	<p>Retain HH-P9 (Repositioning and relocation of a heritage building or structure), with amendment.</p>
Historical and Cultural Values / Historic Heritage / HH-P9	Waka Kotahi	370.167	Amend	<p>Considers that the wording should be amended to be less subjective – the policy requires an assessment of options and heritage values to be undertaken. Waka Kotahi agree that relocation should only be undertaken where other options are not available. The Council officer or decision maker will need to be satisfied that this has been demonstrated – it does therefore not need to be written into the condition.</p>	<p>Amend HH-P9 (Repositioning and relocation of a heritage building or structure) as follows:</p> <p>...</p> <p>3. In the case of relocation, there are no practical alternatives alternatives have been explored and relocation is considered by Council to be a reasonable option.</p>
Historical and Cultural Values / Historic Heritage / HH-P9	WCC Environmental Reference Group	377.72	Support	<p>This policy signals a preference for maintaining built heritage in situ.</p>	<p>Retain HH-P9 (Repositioning and relocation of a heritage building or structure) as notified.</p>
Historical and Cultural Values / Historic Heritage / HH-P9	Lucy Harper and Roger Pemberton	401.15	Support	<p>Supports HH-P9 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p>	<p>Retain HH-P9 (Repositioning and relocation of a heritage building or structure) as notified.</p>
Historical and Cultural Values / Historic Heritage / HH-P10	WCC Environmental Reference Group	377.73	Support	<p>Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of built heritage to Wellington’s identity and character.</p>	<p>Retain HH-P10 (Total demolition of heritage buildings and heritage structures) as notified.</p>
Historical and Cultural Values / Historic Heritage / HH-P10	Lucy Harper and Roger Pemberton	401.16	Support	<p>Supports HH-P10 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p>	<p>Retain HH-P10 (Total demolition of heritage buildings and heritage structures) as notified.</p>
Historical and Cultural Values / Historic Heritage / HH-P11	Wellington City Council	266.76	Amend	<p>Considers amendment of HH-P11 (Height of development in heritage areas) necessary for consistency within other policies in the chapter.</p>	<p>Amend title of HH-P11 (Height of development in heritage areas) as follows:</p> <p>Height of development <u>within heritage areas</u></p>
Historical and Cultural Values / Historic Heritage / HH-P11	WCC Environmental Reference Group	377.74	Support	<p>This policy is helpful as there are unfortunate examples in Wellington where heritage has been put at risk by over-height adjacent structures.</p>	<p>Retain HH-P11 (Height of development in heritage areas) as notified.</p>
Historical and Cultural Values / Historic Heritage / HH-P11	Argosy Property No. 1 Limited	383.40	Support	<p>Supports this policy to the extent that it recognises that the height of development in heritage areas in the City Centre zone should be considered in the context of the objectives and policies of that zone</p>	<p>Retain HH-P11 (Height of development in heritage areas) as notified.</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P11	Kāinga Ora Homes and Communities	391.169	Support in part	HH-P11 is generally supported as it manages the heights of development within heritage zones to recognise the scale of the heritage areas.	Retain HH-P11 (Height of development in heritage areas) with amendment.
Historical and Cultural Values / Historic Heritage / HH-P11	Kāinga Ora Homes and Communities	391.170	Amend	Considers that HH-P11 should be amended, as the form of development does not relate to the height of the building as this is covered by HH-P13 and HH-P14. In addition, the height of development should be cognisant of the heights that the Zone generally provides for and the existing height of buildings in the area.	Amend HH-P11 (Height of development in heritage areas) as follows: Manage the height of development to recognise and respect the unique setting of the form and scale of heritage areas in <u>conjunction with</u> the City Centre Zone, Centre Zones and the Waterfront Zone in which the development occurs.
Historical and Cultural Values / Historic Heritage / HH-P11	Lucy Harper and Roger Pemberton	401.17	Support	Supports HH-P11 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-P11 (Height of development in heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-P11	Willis Bond and Company Limited	416.60	Support in part	Supports HH-P11 in part. Supports HH-P11's direction to "manage" height in heritage areas, noting that in some instances greater height may be appropriate and consistent with heritage values.	Retain HH-P11 (Height of development in heritage areas), with amendments.
Historical and Cultural Values / Historic Heritage / HH-P11	Willis Bond and Company Limited	416.61	Amend	Considers that HH-P11 needs clarification that the policy only applies within heritage areas.	Amend HH-P11 (Height of development in heritage areas) as follows: Manage the height of development <u>within heritage areas</u> to recognise and respect the unique form and scale of heritage areas in the City Centre Zone, Centre Zones and the Waterfront Zone.
Historical and Cultural Values / Historic Heritage / HH-P11	Anna Kemble Welch	434.7	Amend	Considers that HH-P11 should allow heights of up to 6 storeys in the Newtown Shopping Centre Historic Area, providing the street frontages of the historic buildings are retained while providing for increased height of new structures set back from the street. The provision restricts the development of buildings in the Newtown shopping Centre, which hinders their sustainable long term use and commercial viability. There is a missed opportunity for housing intensification in the heart of the vibrant shopping precinct. These buildings are ideally situated along a main transport route very close to major community amenities including schools, library and hospital. The suburban centre zone and Newtown shopping centre are ideally situated for an increase in housing by allowing for increased height for apartments to be built, as well as set back on the sites to retain the sense of place of the old shops at street level.	Seeks that HH-P11 (Height of development in heritage areas) is amended to allow heights of up to six storeys in the Newtown Shopping Centre Historic Area, providing that the street frontages of historic buildings are retained while providing for increased height of new structures set back from the street.
Historical and Cultural Values / Historic Heritage / HH-P12	WCC Environmental Reference Group	377.75	Support	This policy will help enhance heritage areas previously compromised by poorly designed adjacent buildings.	Retain HH-P12 (Non-heritage buildings and structures) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P12	Lucy Harper and Roger Pemberton	401.18	Support	Supports HH-P12 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-P12 (Non-heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P13	Wellington City Council	266.77	Amend	Considers amendments necessary to be consistent in wording between HH-P7 (Additions, alterations and partial demolition of heritage buildings and structures), HH-P8 (New buildings and structures, and modifications to existing non-scheduled buildings on the site of a heritage building or structure), HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) and HH-P14.	Amend HH-P13 (Additions and alterations to and partial demolition of buildings and structures within heritage areas) as follows: 1. (...) d. Is compatible with the scale, form, proportions, <u>design</u> and materials that have been identified as part of the heritage values of the heritage area;
Historical and Cultural Values / Historic Heritage / HH-P13	WCC Environmental Reference Group	377.76	Support	This policy is helpful in that it signals the need for adherence to sensitive design when altering structures in heritage areas, recognising the importance of these areas to Wellington identity and character.	Retain HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-P13	Argosy Property No. 1 Limited	383.41	Amend	Notte Policy HH-P13 is very similar to Policy HH-P7 and replicates some of the matters that consent authorities should have regard to when providing for additions, alterations and partial demolition of heritage buildings and heritage structures. We propose a similar amendment to Policy HH-P13, for the reasons set out above in relation to Policy HH-P7.	Amend HH-P13 (Additions and alterations to and partial demolition of buildings and structures within heritage areas) as follows: Provide for additions and alterations to, and partial demolition of buildings and structures within heritage areas where it can be demonstrated that the work does not detract from the identified heritage values of the heritage area, having regard to: 1. The extent to which the work: a. Supports buildings and structures having a sustainable long term use (<u>including reuse</u>)
Historical and Cultural Values / Historic Heritage / HH-P13	Lucy Harper and Roger Pemberton	401.19	Support	Supports HH-P13 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P13	Wellington Heritage Professionals	412.48	Amend	Considers the content in the policy should be reordered. [See original submission for full reasons]	Amend the order of order to: 1. The extent to which the work: a. Supports buildings and structures having a sustainable long term use; a. Promotes, enhances, recovers or reveals heritage values; b. Promotes, enhances, recovers or reveals heritage values; b. Respects the valued neighbourhood patterns of the heritage area including any predominant architectural style or design; c. Is compatible with the scale, form, proportion and materials that have been identified as part of the heritage values of the heritage area; d. Responds to the relationships between buildings and structures within the heritage area; e. Enables any adverse effects on heritage values to be reversed; f. Minimizes the loss of heritage fabric and craftsmanship; g. Is in accordance with any conservation plan that has been prepared by a suitably qualified heritage professional; h. Supports buildings and structures having a sustainable long term use; i. Increases structural stability, accessibility and means of escape from fire; and j. Fulfils the intent of the Heritage Design Guide;
Historical and Cultural Values / Historic Heritage / HH-P13	Anna Kemble Welch	434.8	Amend	Considers that HH-P13 should be amended to allow for essential earthquake strengthening of buildings in the Newtown Shopping Centre Historic Area. The provision restricts the development of buildings in the Newtown shopping Centre, which hinders their sustainable long term use and commercial viability. There is a missed opportunity for housing intensification in the heart of the vibrant shopping precinct. Wssential earthquake strengthening of the old buildings should be allowed, as well as increasing housing intensification at the same time.	Seeks that HH-P13 (Additions and alterations to, and partial demolition of buildings and structures within heritage areas) be amended to allow for essential earthquake strengthening of buildings in the Newtown Shopping Centre historic Area.
Historical and Cultural Values / Historic Heritage / HH-P14	Dean Knight and Alan Wendt	265.3	Support in part	Considers that HH-P14 (New buildings and structures within heritage areas) is appropriate with respect to development in Salisbury Garden Court (Item 24 of SCHED3 Heritage Areas)	Retain HH-P14 (New buildings and structures within heritage areas) as notified, with respect to Salisbury Garden Court.
Historical and Cultural Values / Historic Heritage / HH-P14	WCC Environmental Reference Group	377.77	Support	This policy is helpful in that it enables new activities in heritage areas, whilst ensuring these are done in a way that recognises heritage values.	Retain HH-P14 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-P14	Kāinga Ora Homes and Communities	391.171	Support in part	HH-P14 is generally supported as it provides for new buildings and structures. However blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy provide adequate guidance as to which matters need to be considered.	Retain HH-P14 (New buildings and structures within heritage areas) with amendment.
Historical and Cultural Values / Historic Heritage / HH-P14	Kāinga Ora Homes and Communities	391.172	Amend	Considers that HH-P14 should be amended to focus on identified heritage values as outlined in the Wellington Heritage Inventory and balanced with the outcomes sought within the Zone the buildings and structures are located within. Blanket reference to the extent to which work fulfils the intent of the Heritage Design Guide is considered unnecessary when the other arms of the Policy provide more than adequate guidance as to which matters need to be considered. The Heritage Design Guide should only be used as a reference document as the detail in the guide is high level and of limited value.	Amend HH-P14 (New buildings and structures within heritage areas) as follows: Provide for new buildings and structures within heritage areas where it can be demonstrated that the works will not detract from the identified heritage values of the heritage area, having regard to: 1. The extent to which the work: a. Respects any valued neighbourhood patterns of the heritage area including any predominant architectural style or design; b. Is compatible with the scale, form, proportions, design and materials of the heritage area <u>and the role and function of the Zone; and</u> c. Is sited to maintain a consistent pattern of front façade alignment; and d. Fulfils the intent of the Heritage Design Guide. <u>Note - Please refer to the Heritage Design Guide for further guidance.</u>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P14	Lucy Harper and Roger Pemberton	401.20	Support	<p>Supports HH-P14 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p> <p>Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.</p>	Retain HH-P14 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-P14	Willis Bond and Company Limited	416.62	Support in part	Supports HH-P14 in part. Supports providing for new buildings and structures within heritage areas and the matters to have regard to, other than the Heritage Design Guide.	Retain HH-P14 (New buildings and structures within heritage areas), with amendments.
Historical and Cultural Values / Historic Heritage / HH-P14	Willis Bond and Company Limited	416.63	Amend	Submitter considers that HH-P14.1.d's reference to having regard to the Heritage Design Guide should be removed.	<p>Amend HH-P14 (New buildings and structures within heritage areas) as follows:</p> <p>Provide for new buildings and structures within heritage areas where it can be demonstrated that the works will not detract from the identified heritage values of the heritage area, having regard to:</p> <p>1. The extent to which the work: ... 4. Fulfill the intent of the Heritage Design Guide.</p>
Historical and Cultural Values / Historic Heritage / HH-P15	Heritage New Zealand Pouhere Taonga	70.17	Oppose in part	<p>Considers that the HH-P15.3 states that 'relocation is considered ... to be a reasonable option' which can be taken to mean that relocation is one reasonable option among other options.</p> <p>Considers 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>	Opposes HH-P15 (Repositioning and relocation of contributing buildings and structures) as notified and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-P15	Heritage New Zealand Pouhere Taonga	70.18	Amend	<p>Considers that the HH-P15.3 states that 'relocation is considered ... to be a reasonable option' which can be taken to mean that relocation is one reasonable option among other options.</p> <p>Considers 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-P15 (Repositioning and relocation of contributing buildings and structures) as follows:</p> <p>... 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>. ...</p>
Historical and Cultural Values / Historic Heritage / HH-P15	Wellington City Council	266.78	Amend	Considers clarification is needed in title of HH-P15 (Repositioning and relocation of contributing buildings and structures)	<p>Amend HH-P15 (Repositioning and relocation of contributing buildings and structures) title as follows:</p> <p><u>Repositioning and relocation of contributing buildings and structures within heritage areas</u></p>
Historical and Cultural Values / Historic Heritage / HH-P15	Waka Kotahi	370.168	Support in part	Supports the direction of policy.	Retain HH-P15 (Repositioning and relocation of contributing buildings and structures) with amendment.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P15	Waka Kotahi	370.169	Amend	Considers that the wording should be amended to be less subjective – the policy requires an assessment of options and heritage values to be undertaken. Waka Kotahi agree that relocation should only occur if there all alternatives have been explored. The Council officer or decision maker will need to be satisfied that this has been demonstrated – it does therefore not need to be written into the condition.	Amend HH-P15 (Relocation and relocation of contributing buildings and structures) as follows: ... and relocation is considered by Council to be a reasonable option.
Historical and Cultural Values / Historic Heritage / HH-P15	WCC Environmental Reference Group	377.78	Support	This policy signals a preference for maintaining contributing buildings or structures in heritage areas in situ.	Retain HH-P15 (Relocation and relocation of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P15	Lucy Harper and Roger Pemberton	401.21	Support	Supports HH-P15 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-P15 (Relocation and relocation of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P16	Heritage New Zealand Pouhere Taonga	70.19	Oppose in part	Considers that the HH-P16.2 states that 'total demolition is considered ... to be a reasonable option' which can be taken to mean that demolition is one reasonable option among other options. Considers 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.	Opposes HH-P16 (Total demolition of contributing buildings and structures) as notified and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-P16	Heritage New Zealand Pouhere Taonga	70.20	Amend	Considers that the HH-P16.2 states that 'total demolition is considered ... to be a reasonable option' which can be taken to mean that demolition is one reasonable option among other options. Considers 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 (Total demolition of contributing buildings and structures) as follows: ... 2. Alternatives to total demolition have been explored and <u>it has been demonstrated that there are no reasonable alternatives</u> to total demolition. is considered by Council to be a reasonable option.
Historical and Cultural Values / Historic Heritage / HH-P16	Dean Knight and Alan Wendt	265.4	Amend	Considers that HH-R16 (New buildings and structures within heritage areas) is appropriate with respect to demolition in Salisbury Garden Court (Item 24 of SCHED3 - Heritage Areas)	Retain HH-R16 (Total demolition of contributing buildings and structures) as notified, with respect to Salisbury Garden Court.
Historical and Cultural Values / Historic Heritage / HH-P16	Wellington City Council	266.79	Amend	Considers clarification is needed in title of HH-P16 (Total demolition of contributing buildings and structures)	Amend HH-P16 (Total demolition of contributing buildings and structures) as follows: Total demolition of contributing buildings and structures <u>within heritage areas</u>
Historical and Cultural Values / Historic Heritage / HH-P16	Waka Kotahi	370.170	Support in part	Supports the direction of policy.	Retain HH-P16 (Total demolition of contributing buildings and structures), subject to amendment.
Historical and Cultural Values / Historic Heritage / HH-P16	Waka Kotahi	370.171	Amend	Considers that the wording should be amended to be less subjective – the policy requires an assessment of options and heritage values to be undertaken. Waka Kotahi agree that relocation should only occur if there all alternatives have been explored. The Council officer or decision maker will need to be satisfied that this has been demonstrated – it does therefore not need to be written into the condition.	Amend HH-P16 (Total demolition of contributing buildings and structures) as follows: ... and relocation is considered by Council to be a reasonable option.

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-P16	WCC Environmental Reference Group	377.79	Support	Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of heritage areas to Wellington's identity and character.	Retain HH-P16 (Total demolition of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P16	Lucy Harper and Roger Pemberton	401.22	Support	Supports HH-P16 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-P16 (Total demolition of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-P17	WCC Environmental Reference Group	377.80	Support	This policy will help facilitate knowledge of archaeological sites: an important first step in ensuring their ongoing recognition and protection.	Retain HH-P17 (Information, advocacy and advice) as notified.
Historical and Cultural Values / Historic Heritage / HH-P20	WCC Environmental Reference Group	377.81	Support	This policy will enable activities that increase appreciation of sites whilst protecting them	Retain HH-P20 (Modification of scheduled archaeological sites and earthworks within their extent) as notified.
Historical and Cultural Values / Historic Heritage / HH-P21	Waka Kotahi	370.172	Support	Support policy as worded – demolition of scheduled sites should only occur if it can be demonstrated that there are no reasonable alternatives	Retain HH-P21 (Total demolition of scheduled archaeological sites) as notified.
Historical and Cultural Values / Historic Heritage / HH-P21	WCC Environmental Reference Group	377.82	Support	Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of archaeological sites to our history and identity	Retain HH-P21 (Total demolition of scheduled archaeological sites) as notified.
Historical and Cultural Values / Historic Heritage / HH-R1	Fire and Emergency New Zealand	273.93	Support	Supports the rule as it permits the maintenance and repair of scheduled heritage buildings.	Retain HH-R1 (Maintenance and repair of scheduled heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R1	WCC Environmental Reference Group	377.83	Support	HH-R1 is supported as it supports sustainable ongoing use of heritage buildings and structures	Retain HH-R1 (Maintenance and repair of scheduled heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R1	Argosy Property No. 1 Limited	383.42	Support	Supports maintenance and repair of scheduled heritage buildings and buildings in heritage areas being permitted.	Retain HH-R1 (Maintenance and repair of scheduled heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R1	Lucy Harper and Roger Pemberton	401.23	Support	Supports HH-R1 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R1 (Maintenance and repair of scheduled heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R1	Fabric Property Limited	425.20	Support	Supports maintenance and repair of scheduled heritage buildings being permitted activities.	Retain HH-R1 (Maintenance and repair of scheduled heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R2	Waka Kotahi	370.173	Support	Support rule as proposed, as it enables the demolition of non-scheduled buildings and structures.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R2	WCC Environmental Reference Group	377.84	Support	HH-R2 is supported as it facilitates enhancement of heritage.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures) as notified.

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R2	Argosy Property No. 1 Limited	383.43	Support	Supports demolition of non-scheduled buildings and structures on the site of heritage buildings being permitted.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures)
Historical and Cultural Values / Historic Heritage / HH-R2	Kāinga Ora Homes and Communities	391.173	Support	HH-R2 is supported as it permits the demolition of non-scheduled heritage buildings on a heritage site when the building has no heritage value.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures) as notified
Historical and Cultural Values / Historic Heritage / HH-R2	Lucy Harper and Roger Pemberton	401.24	Support	Supports HH-R2 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-R2	Fabric Property Limited	425.21	Support	Supports HH-R2 as notified.	Retain HH-R2 (Partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R3	Precinct Properties New Zealand Limited	139.16	Support	Supports the Restricted Discretionary activity status provided under HH-R3.2 (Additions, alterations and partial demolition of heritage buildings and structures) where compliance with the requirements of HH-R3.1 cannot be achieved.	Retain the Discretionary Restricted activity status at HH-R3.2 (Additions, alterations and partial demolition of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R3	Wellington City Council	266.80	Amend	Considers it necessary to add HH-P5 (Conservation plans) and HH-P6 (Removal of unreinforced masonry chimneys) to the list of matters of discretion.	Amend HH-R3 (Additions, alterations and partial demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures) as follows: 1. Activity status: Restricted Discretionary Where: a. Compliance with the requirements of HH-R3.1 cannot be achieved. Matters of discretion are restricted to: 1. The matters in HH-P4, <u>HH-P5</u> , <u>HH-P6</u> and HH-P7; 2. The extent of compliance with HH-S4.
Historical and Cultural Values / Historic Heritage / HH-R3	Fire and Emergency New Zealand	273.94	Support	Supports this rule as it makes provision for additions and alterations to heritage buildings.	Retain HH-R3 (Additions, alterations and partial demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R3	WCC Environmental Reference Group	377.85	Support	HH-R3 is supported as it facilitates changing use of heritage buildings whilst safeguarding heritage values.	Retain HH-R3 (Additions, alterations and partial demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R3	Argosy Property No. 1 Limited	383.44	Support	Supports additions, alterations and partial demolition of heritage buildings and buildings in heritage areas being permitted, subject to the comments made in relation to Standard HH-S1.1.b above. Argosy supports the default activity status being restricted discretionary. The provision, subject to the amendments sought to Standard HH-S1.1.b, provide appropriate restrictions on additions, alterations and partial demolition of heritage buildings.	Retain HH-R3 (Additions, alterations and partial demolition of heritage buildings and heritage structures) as notified, subject to amendments to HH-S1.1.b
Historical and Cultural Values / Historic Heritage / HH-R3	Lucy Harper and Roger Pemberton	401.25	Support	Supports HH-R3 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R3 (Additions, alterations and partial demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R3	Fabric Property Limited	425.22	Support	Supports Rule HH-R3 as notified. Fabric supports the default activity status being restricted discretionary.	Retain HH-R3 (Additions, alterations and partial demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R4	Precinct Properties New Zealand Limited	139.17	Support	Supports HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures)	Retain HH-R4 (New buildings and structures on the site of heritage buildings and heritage structure) as notified.

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Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R4	Fire and Emergency New Zealand	273.95	Support	Supports this rule as it makes provision for new buildings and structures on the site of heritage buildings.	Retain HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R4	WCC Environmental Reference Group	377.86	Support	HH-R4 is supported as it enables new activities in heritage areas, whilst ensuring these are done in a way that recognises heritage values.	Retain HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R4	Argosy Property No. 1 Limited	383.45	Support	Supports new buildings and structures on the site of heritage buildings and heritage structures and within heritage areas being permitted.	Retain HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R4	Kāinga Ora Homes and Communities	391.174	Oppose in part	HH-R4 is opposed as it restricts non-heritage buildings on heritage sites, which will hinder development potential in medium and high density areas where this will not affect built heritage values. HH-R2 permits partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures. By comparison, Rule HH-R4 permits new buildings and structures on the site of heritage buildings and heritage structures where HH-S2 is achieved. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m2. Given that the additional buildings are to the rear of, and accessory to, the primary residential building it is considered that the 10m2 limit should be removed as this will generally avoid the building being visible from the street and interfering with the heritage character. (Option A)	Opposes HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-R4	Kāinga Ora Homes and Communities	391.175	Amend	Considers that HH-R4 should be amended to remove compliance with HH-S2. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m2.	Amend HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) as follows: 1. Activity status: Permitted Where: a. Compliance with HH-S2 is achieved.
Historical and Cultural Values / Historic Heritage / HH-R4	Lucy Harper and Roger Pemberton	401.26	Support	Supports HH-R4 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R4 (New buildings and structures on the site of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R5	Precinct Properties New Zealand Limited	139.18	Support	Supports HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures)	Retain HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R5	WCC Environmental Reference Group	377.87	Support	HH-R5 is supported as it enables new activities in heritage areas, whilst ensuring these are done in a way that recognises heritage values.	Retain HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R5	Kāinga Ora Homes and Communities	391.176	Oppose in part	HH-R5 is opposed as it only allows additions to non-scheduled buildings and structures on the site of a heritage buildings where HH-S3 is achieved. HH-S3 limits modifications to less than 10% and where there are no additional storeys to the existing building. Additions to buildings are covered by other general rules and standards in the Heritage Overlay or underlying Zone so it is considered unnecessary to also control this matter here.	Opposes HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures) and seeks amendment.

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R5	Kāinga Ora Homes and Communities	391.177	Amend	Considers that HH-R5 should be amended to remove the reference to HH-S3. HH-S3 limits modifications to less than 10% and where there are no additional storeys to the existing building. Additions to buildings are covered by other general rules and standards in the Heritage Overlay or underlying Zone so it is considered unnecessary to also control this matter here.	Amend HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures) as follows: 1. Activity status: Permitted Where: a. Compliance with HH-S3 is achieved.
Historical and Cultural Values / Historic Heritage / HH-R5	Lucy Harper and Roger Pemberton	401.27	Support	Supports HH-R5 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R5 (Additions and alterations to non-scheduled buildings and structures on the site of heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R6	WCC Environmental Reference Group	377.88	Support	HH-R6 is supported as it supports maintaining buildings or structures in heritage areas in situ, recognising that place and position are a key part of heritage value	Retain HH-R6 (Repositioning of heritage buildings and heritage structures on their existing site) as notified.
Historical and Cultural Values / Historic Heritage / HH-R6	Argosy Property No. 1 Limited	383.46	Support	Supports the Proposed Plan enabling heritage buildings to be repositioned.	Retain HH-R6 (Repositioning of heritage buildings and heritage structures on their existing site) as notified.
Historical and Cultural Values / Historic Heritage / HH-R6	Lucy Harper and Roger Pemberton	401.28	Support	Supports HH-R6 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R6 (Repositioning of heritage buildings and heritage structures on their existing site) as notified.
Historical and Cultural Values / Historic Heritage / HH-R7	WCC Environmental Reference Group	377.89	Support	HH-R7 is supported as it will help decrease seismic risk whilst not making it overly difficult for building owners to do so.	Retain HH-R7 (Removal of unreinforced masonry chimneys from built heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-R7	Lucy Harper and Roger Pemberton	401.29	Support	Supports HH-R7 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R7 (Removal of unreinforced masonry chimneys from built heritage) as notified.
Historical and Cultural Values / Historic Heritage / HH-R7	Wellington Heritage Professionals	412.49	Support in part	Support removal of chimneys to be restricted discretionary but not reference to HH-P6	Retain rule HH-R7 (Removal of unreinforced masonry chimneys from built heritage) with amendments.
Historical and Cultural Values / Historic Heritage / HH-R7	Wellington Heritage Professionals	412.50	Amend	Do not support the matters of discretion at HH-P6.	Amend rule to remove matter of discretion as HH-P6 (Removal of unreinforced masonry chimneys)

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R8	Wellington City Council	266.81	Amend	Considers provision is blank and does not have any related points.	Amend HH-R8 (Relocation of heritage buildings and heritage structures beyond the existing site) as follows: 1. Activity status: Discretionary <u>Section 88 information requirements to accompany applications for the relocation of heritage buildings and structures beyond the existing site:</u> <u>An application under this rule for the relocation of heritage buildings and structures beyond the existing site must be accompanied by:</u> 2. <u>A Heritage Impact Assessment of the relocation of the building, notably assessing: a. The heritage values of the building in its current location; and</u> <u>b. The heritage values of the building resulting from its relocation;</u> 3. <u>An assessment of alternatives to relocation that have been considered by the applicant, including evidence demonstrating why none of these alternatives are reasonable;</u> 4. <u>A Heritage Construction Management Plan notably outlining the measures and methods that will be taken to protect the building before, during, and after the relocation; and</u> 5. <u>A Conservation Plan where one exists.</u>
Historical and Cultural Values / Historic Heritage / HH-R8	WCC Environmental Reference Group	377.90	Support	HH-R8 is supported as it supports maintaining buildings or structures in heritage areas in situ, recognising that place and position are a key part of heritage value.	Retain HH-R8 (Relocation of heritage buildings and heritage structures beyond the existing site) as notified.
Historical and Cultural Values / Historic Heritage / HH-R8	Argosy Property No. 1 Limited	383.47	Support	Supports the Proposed Plan enabling heritage buildings to be relocated.	Retain HH-R8 (Relocation of heritage buildings and heritage structures beyond the existing site) as notified.
Historical and Cultural Values / Historic Heritage / HH-R8	Lucy Harper and Roger Pemberton	401.30	Support	Supports HH-R8 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R8 (Relocation of heritage buildings and heritage structures beyond the existing site) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R9	Wellington City Council	266.82	Amend	Considers more information requirements are required to accompany applications for total demolition of heritage buildings and structures. This is based on the need for greater assessment from professionals, and the need to add options for seismic strengthening, adaptive reuse, or restoration.	Amend HH-R9 (Total demolition of heritage buildings and heritage structures) as follows: (...) <u>1. A Heritage Impact Assessment for the demolition of a building;</u> 2.4 A detailed seismic analysis (DSA) where the building is identified as earthquake prone, and a detailed description and methodology of the works required to increase seismic resilience, <u>provided by a suitably qualified structural engineer;</u> <u>3. Where the building is identified as being beyond repair, a condition survey report of the building, provided by a suitably qualified professional;</u> 4.2 Costings of the works required to increase seismic resilience provided by a suitably qualified quantity surveyor; 5.3 Estimates of contributions that are available, including funding, grants, consent fee reimbursement and rates relief; 6.4 An assessment of market demand and pricing for comparable buildings and floor space; 7.5 A valuation of the: a. Building following completion of works; and b. Financial return on investment expected upon completion of the works; i. Depending on the proposal this could be by way of lettable income on floorspace as well as forecast sales price; and 8.6 An assessment of alternatives to total demolition that have been considered by the applicant, including <u>options for seismic strengthening, reuse, or restoration where applicable, and evidence demonstrating why none of these options are reasonable; and</u> <u>9. A Conservation Plan where one exists.</u>
Historical and Cultural Values / Historic Heritage / HH-R9	Wellington City Council	266.83	Amend	Considers clarification is needed on who will undertake the peer review referred to in the final sentence in HH-R9 (Total demolition of heritage buildings and heritage structures)	Amend HH-R9 (Total demolition of heritage buildings and heritage structures) as follows: (...) The Council will obtain a peer review <u>by a suitably qualified professional</u> of the information provided by the applicant.
Historical and Cultural Values / Historic Heritage / HH-R9	Waka Kotahi	370.174	Support	Support discretionary activity status for demolition of heritage buildings.	Retain HH-R9 (Total demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R9	WCC Environmental Reference Group	377.91	Support	Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of heritage areas to Wellington's identity and character.	Retain HH-R9 (Total demolition of heritage buildings and heritage structures) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R9	Argosy Property No. 1 Limited	383.48	Oppose in part	Supports a consenting pathway for heritage buildings to be demolished as a discretionary activity. While Argosy is not currently intending to demolish any of the scheduled heritage buildings it owns, it opposes Rule HH-R9 in part as set out below. It is unnecessary for HH-R9 to specify a notification status for resource consent applications made under this rule. where it may be appropriate for a resource consent application to be publicly notified, s 95A of the Resource Management Act 1991 (RMA) provides sufficient guidance for the consent authority to use its discretion to decide if public notification is appropriate. We also note that the information requirements under this Rule are potentially onerous and inappropriate. The mandatory considerations under HH-R9 which relate to costs of works, market demand and financial returns do not relate to the protection of historic heritage from inappropriate subdivision, use and development (as required under s 6 of the RMA) and should not be mandatory application requirements.	Amend HH-R9 (Total demolition of heritage buildings and heritage structures) as follows: 1. Activity status: Discretionary Notification status: An application for a resource consent made in respect of HH-R9 must be publicly notified. Section 88 information requirements to accompany applications for total demolition of heritage buildings and structures: An application under this rule for the total demolition of heritage buildings and structures must be accompanied by: 1. A detailed seismic analysis (DSA) where the building is identified as earthquake prone, and a detailed description and methodology of the works required to increase seismic resilience; 2. Costings of the works required to increase seismic resilience provided by a suitably qualified quantity surveyor; 3. Estimates of contributions that are available, including funding, grants, consent fee-reimbursement and rates relief; 4. An assessment of market demand and pricing for comparable buildings and floor space; 5. A valuation of the: a. Building following completion of works; and b. Financial return on investment expected upon completion of the works; i. Depending on the proposal this could be by way of lettable income on floorspace as well as forecast sales price; and ...
Historical and Cultural Values / Historic Heritage / HH-R9	Lucy Harper and Roger Pemberton	401.31	Support	Supports HH-R9 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-R9 (Total demolition of heritage buildings and heritage structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R9	Fabric Property Limited	425.23	Oppose in part	Supports a consenting pathway for heritage buildings to be demolished as a discretionary activity. Considers that the information requirements under this Rule are potentially onerous and inappropriate. These requirements do not relate to the protection of historic heritage from inappropriate subdivision, use and development (as required under s 6 of the RMA) and should not be mandatory application requirements. Considers that it is unnecessary for HH-R9 to specify a notification status for resource consent applications made under this rule. Where it may be appropriate for a resource consent application to be publicly notified, s 95A of the Resource Management Act 1991 (RMA) provides sufficient guidance for the consent authority to use its discretion to decide if public notification is appropriate.	Opposes HH-R9 (Total demolition of structures) in part and seeks amendments.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R9	Fabric Property Limited	425.24	Amend	Supports a consenting pathway for heritage buildings to be demolished as a discretionary activity. Considers that it is unnecessary for HH-R9 to specify a notification status for resource consent applications made under this rule. Where it may be appropriate for a resource consent application to be publicly notified, s 95A of the Resource Management Act 1991 (RMA) provides sufficient guidance for the consent authority to use its discretion to decide if public notification is appropriate.	Delete the notification clause under HH-R9 (Total demolition of structures) as follows: 1. Activity status: Discretionary Notification status: An application for a resource consent made in respect of HH-R9 must be publicly notified.
Historical and Cultural Values / Historic Heritage / HH-R9	Fabric Property Limited	425.25	Amend	Supports a consenting pathway for heritage buildings to be demolished as a discretionary activity. Considers that it is unnecessary for HH-R9 to specify a notification status for resource consent applications made under this rule. Where it may be appropriate for a resource consent application to be publicly notified, s 95A of the Resource Management Act 1991 (RMA) provides sufficient guidance for the consent authority to use its discretion to decide if public notification is appropriate.	Delete the notification clause under HH-R9 (Total demolition of structures) as follows: 1. Activity status: Discretionary Notification status: An application for a resource consent made in respect of HH-R9 must be publicly notified.
Historical and Cultural Values / Historic Heritage / HH-R10	WCC Environmental Reference Group	377.92	Support	HH-R10 is supported as it supports sustainable ongoing use of heritage areas.	Retain HH-R10 (Maintenance and repair of buildings and structures, including non-heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R10	Argosy Property No. 1 Limited	383.49	Support	Supports maintenance and repair of scheduled heritage buildings and buildings in heritage areas being permitted.	Retain HH-R10 (Maintenance and repair of buildings and structures including non-heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R10	Lucy Harper and Roger Pemberton	401.32	Support	Supports HH-R10 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-R10 (Maintenance and repair of buildings and structures, including non-heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R10	Fabric Property Limited	425.26	Support	Supports maintenance and repair of scheduled heritage buildings being permitted activities.	Retain HH-R10 (Maintenance and repair of buildings and structures, including non-heritage buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R10	Fabric Property Limited	425.27	Support	Supports HH-R10 as notified and seeks that it is retained.	Retain HH-R10 (Maintenance and repair of buildings) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R11	Wellington City Council	266.84	Amend	Considers matters of discretion in HH-R11.2 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) should include HH-P11 (Height of development in heritage areas). Matters of discretion should have an additional point referring to HH-P6 (Removal of unreinforced masonry chimneys) for buildings and structures within a heritage area, except non-heritage buildings and structures.	Amend HH-R11.2 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) as follows: Activity status: Restricted Discretionary (...) Matters of discretion are: 1. The matters in HH-P4, <u>HH-P11</u> and HH-P13; <u>and</u> 2. <u>The matters in HH-P6 for buildings and structures within a heritage area, except non-heritage buildings and structures.</u>
Historical and Cultural Values / Historic Heritage / HH-R11	Wellington City Council	266.85	Amend	Considers HH-P4 (Enabling approach to works) needs to be included in matters of discretion.	Amend HH-R11.3 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) as follows: Activity status: Restricted Discretionary (...) Matters of discretion are: 1. The matters in <u>HH-P4</u> , HH-P11 and HH-P13; <u>and</u> 2. <u>The extent of compliance with HH-S4.</u>
Historical and Cultural Values / Historic Heritage / HH-R11	Argosy Property No. 1 Limited	383.50	Support	Supports additions, alterations and partial demolition of heritage buildings and buildings in heritage areas being permitted, subject to the comments made in relation to Standard HH-S1.1.b above. Argosy supports the default activity status being restricted discretionary. The provision, subject to the amendments sought to Standard HH-S1.1.b, provide appropriate restrictions on additions, alterations and partial demolition of heritage buildings.	Retain HH-R11 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) as notified, subject to amendments to HH-S1.1.b.
Historical and Cultural Values / Historic Heritage / HH-R11	Kāinga Ora Homes and Communities	391.178	Oppose in part	HH-R11 is opposed in part and should be clarified.	Opposes HH-R11 in part (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-R11	Kāinga Ora Homes and Communities	391.179	Amend	Considers that HH-R11 should be amended. HH-S1 only allows minor Internal alterations and states that this Standard does not apply to non heritage buildings. The rule should reflect this to be clear. Accordingly, Kāinga Ora seeks changes to the rule to improve clarity. Consequential changes to restricted discretionary activities should be made to reflect that changes to non-heritage buildings are permitted.	Amend HH-R11 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) as follows: 1. Activity status: Permitted Where: <u>a. Non-heritage buildings and structures are affected; or</u> <u>b. For heritage buildings and structures - Compliance with HH-S1 is achieved.</u>
Historical and Cultural Values / Historic Heritage / HH-R11	Lucy Harper and Roger Pemberton	401.33	Support	Supports HH-R11 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-R11 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) as notified.

Historical and Cultural Values / Historic Heritage

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R11	Wellington Heritage Professionals	412.51	Amend	<p>Considers that there is no rationale given for having different considerations in these zones for additions and alterations.</p> <p>Considers the approach should be based on the heritage values of the place not what zone the place is in.</p>	Amend HH-R11 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) so that there are not different considerations depending on the zone.
Historical and Cultural Values / Historic Heritage / HH-R11	Fabric Property Limited	425.28	Support	Supports HH-R11 as notified and seeks that it is retained.	Retain HH-R11 (Additions, alterations and partial demolition of buildings) as notified.
Historical and Cultural Values / Historic Heritage / HH-R11	Peter Fordyce	431.6	Amend	Considers that Historic Heritage rules governing demolition of pre-1930s buildings should have their coverage increased to more widely cover demolition prevention of pre-1930s dwellings in areas under protection.	<p>Seeks that HH-R11 (Additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures) have increased demolition protection coverage for pre-1930s dwellings in Heritage Areas.</p> <p>[Decision requested - submission refers to Historic Heritage provisions]</p>
Historical and Cultural Values / Historic Heritage / HH-R12	Waka Kotahi	370.175	Support	Support permitted activity status for total demolition repositioning, or removal of identified non-heritage building or structure in heritage area.	Retain HH-R12 (Total demolition, repositioning and relocation of an identified non-heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-R12	WCC Environmental Reference Group	377.93	Support	HH-R12 is supported as it facilitates enhancement of heritage areas.	Retain HH-R12 (Total demolition, repositioning and relocation of an identified non-heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-R12	Lucy Harper and Roger Pemberton	401.34	Support	<p>Supports HH-R12 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p> <p>Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.</p>	Retain HH-R12 (Total demolition, repositioning and relocation of an identified non-heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-R12	Fabric Property Limited	425.29	Support	Supports HH-R12 as notified and seeks that it is retained.	Retain HH-R12 (Total demolition, repositioning and relocation of an identified non-heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-R13	Dean Knight and Alan Wendt	265.5	Amend	Considers that HH-R14 (New buildings and structures within heritage areas) is appropriate with respect to development in Salisbury Garden Court (Item 24 of SCHED3 Heritage Areas)	Retain HH-R13 (New buildings and structures within heritage areas) as notified, with respect to Salisbury Garden Court.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R13	Wellington City Council	266.86	Amend	Considers a minimum size to allow for small structures in heritage areas (e.g. bollards, kerbing) necessary. Without this provision any structure, no matter how small, will require resource consent.	<p>Add new permitted activity rule for 'All zones' being HH.13.1 (Heritage Areas - New buildings and structures within heritage areas) as follows:</p> <p><u>1. Activity status: Permitted</u></p> <p><u>Where:</u></p> <p><u>1. The works involve the construction of a structure associated with the operation, use and maintenance of the legal road; or</u></p> <p><u>2. The height of the structure does not exceed 1.0 metres; or</u></p> <p><u>3. The structure is a lamppost.</u></p> <p>2. <u>2. Activity status: Permitted</u></p> <p>Where:</p> <p>a. Compliance with the following standards is achieved:</p> <p>i. HRZ-S1;</p> <p>ii. HRZ-S3;</p> <p>iii. HRZ-S4 only in relation to the rear yard boundary setback;</p> <p>iv. HRZ-S5;</p> <p>v. HRZ-S6;</p> <p>vi. HRZ-S7;</p> <p>vii. HRZ-S8;</p> <p>viii. HRZ-S9; and</p> <p>ix. HRZ-S10.</p> <p>2,3. <u>3. Activity status: Restricted Discretionary (...)</u></p>
Historical and Cultural Values / Historic Heritage / HH-R13	WCC Environmental Reference Group	377.94	Support	HH-R13 is supported as it facilitates changing use of heritage areas whilst safeguarding heritage values	Retain HH-R13 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-R13	Argosy Property No. 1 Limited	383.51	Support	Supports new buildings and structures on the site of heritage buildings and heritage structures and within heritage areas being permitted.	Retain HH-R13 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-R13	Kāinga Ora Homes and Communities	391.180	Oppose in part	HH-R13 is opposed as it restricts new buildings and structures that are at the rear of the primary residential building as this will hinder development potential in high medium and high density areas where this will not affect heritage area values.	Opposes HH-R13 in part (New buildings and structures within heritage areas) and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-R13	Kāinga Ora Homes and Communities	391.181	Amend	Considers that HH-R13.1 should be amended to remove the reference to HH-S2. Rule HH-R13 permits new buildings and structures within heritage areas where HH-S2 is achieved. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m2. (Option A)	<p>Amend HH-R13.1 (New buildings and structures within heritage areas) as follows:</p> <p>Activity status: Permitted</p> <p>Where:</p> <p>a. Compliance with HH-S2 is achieved</p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R13	Lucy Harper and Roger Pemberton	401.35	Support	<p>Supports HH-R13 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p> <p>Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.</p>	Retain HH-R13 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-R13	Wellington Heritage Professionals	412.52	Amend	<p>Considers that there is no rationale given for having different considerations in these zones for additions and alterations.</p> <p>Considers the approach should be based on the heritage values of the place not what zone the place is in.</p>	Amend HH-R13 (New buildings and structures within heritage areas) so that there are not different considerations depending on the zone.
Historical and Cultural Values / Historic Heritage / HH-R13	Willis Bond and Company Limited	416.64	Support in part	Supports HH-R13.2 in part. Supports the restricted discretionary status in HHR13.2.	Retain HH-R13.2 (New buildings and structures within heritage areas), with amendments.
Historical and Cultural Values / Historic Heritage / HH-R13	Willis Bond and Company Limited	416.65	Amend	Considers that public notification should be precluded from HH-R13.2. Submitter considers that non-notification which is adopted by the Operative District Plan, is proven and efficient, and should be maintained.	Amend HH-R13.2 (New buildings and structures within heritage areas) as follows: ... <u>Notification status: An application for resource consent made in respect of rule HH-R13.2a is precluded from being publicly notified.</u>
Historical and Cultural Values / Historic Heritage / HH-R13	Willis Bond and Company Limited	416.66	Support in part	Supports HH-R13.3 in part. Supports the restricted discretionary status in HHR13.2.	Retain HH-R13.3 (New buildings and structures within heritage areas), with amendments.
Historical and Cultural Values / Historic Heritage / HH-R13	Willis Bond and Company Limited	416.67	Amend	Considers that public notification should be precluded from HH-R13.3. Submitter considers that non-notification which is adopted by the Operative District Plan, is proven and efficient, and should be maintained.	Amend HH-R13.3 (New buildings and structures within heritage areas) as follows: ... <u>Notification status: An application for resource consent made in respect of rule HH-R13.3 is precluded from being publicly notified.</u>
Historical and Cultural Values / Historic Heritage / HH-R13	Fabric Property Limited	425.30	Support	Supports HH-R13 as notified and seeks that it is retained.	Retain HH-R13 (New buildings and structures within heritage areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-R14	WCC Environmental Reference Group	377.95	Support	HH-R14 is supported as it supports maintaining buildings or structures in heritage areas in situ, recognising that place and position are a key part of heritage value.	Retain HH-R14 (Repositioning of contributing buildings and structures within a heritage area) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R14	Lucy Harper and Roger Pemberton	401.36	Support	<p>Supports HH-R14 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p> <p>Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.</p>	Retain HH-R14 (Repositioning of contributing buildings and structures within a heritage area) as notified.
Historical and Cultural Values / Historic Heritage / HH-R15	Wellington City Council	266.87	Amend	<p>Considers the provision is blank and does not have any related points as to what should be included as part of an application for resource consent under this rule. Considers further guidance on accompanying information requirements is appropriate to include for this rule.</p>	<p>Amend HH-R15 (Relocation of contributing buildings and structures to a location outside of a heritage area) as follows:</p> <p>1. Activity status: Discretionary</p> <p><u>Section 88 information requirements to accompany applications for the relocation of heritage buildings and structures beyond the existing site:</u></p> <p><u>An application under this rule for the relocation of heritage buildings and structures beyond the existing site must be accompanied by:</u></p> <p><u>1. A Heritage Impact Assessment of the relocation of the building, notably assessing: a. The heritage values of the heritage area and the contribution of the building in its current location; and b. The heritage values of the heritage area resulting from the relocation of the building;</u> <u>2. An assessment of alternatives to relocation that have been considered by the applicant, including evidence demonstrating why none of these alternatives are reasonable;</u> <u>3. A Heritage Construction Management Plan notably outlining the measures and methods that will be taken to protect the building before, during, and after the relocation.</u></p>
Historical and Cultural Values / Historic Heritage / HH-R15	WCC Environmental Reference Group	377.96	Support	<p>HH-R15 is supported as it supports maintaining contributing buildings or structures in heritage areas in situ, recognising that place and position are a key part of heritage value.</p>	Retain HH-R15 (Relocation of contributing buildings and structures to a location outside of a heritage area) as notified.

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R15	Lucy Harper and Roger Pemberton	401.37	Support	<p>Supports HH-R15 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.</p> <p>Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.</p>	Retain HH-R15 (Relocation of contributing buildings and structures to a location outside of a heritage area) as notified.
Historical and Cultural Values / Historic Heritage / HH-R16	Dean Knight and Alan Wendt	265.6	Amend	Considers that HH-P16 (New buildings and structures within heritage areas) is appropriate with respect to demolition in Salisbury Garden Court (Item 24 of SCHED3 - Heritage Areas)	Retain HH-P16 (Total demolition of contributing buildings and structures) as notified, with respect to Salisbury Garden Court.
Historical and Cultural Values / Historic Heritage / HH-R16	Wellington City Council	266.88	Amend	Considers this provision is blank and does not have any related points as to what should be included as part of an application for resource consent under this rule. Considers further guidance on accompanying information requirements is appropriate to include for this rule.	<p>Amend HH-R16 (Total demolition of contributing buildings and structures) as follows:</p> <p>1. Activity status: Discretionary</p> <p><u>Section 88 information requirements to accompany applications for the total demolition of contributing buildings and structures:</u> <u>An application under this rule for the total demolition of heritage buildings and structures must be accompanied by:</u></p> <ol style="list-style-type: none"> <u>1. A Heritage Impact Assessment of the demolition of the building;</u> <u>2. A detailed seismic analysis (DSA) where the building is identified as earthquake prone, and a detailed description and methodology of the works required to increase seismic resilience, provided by a suitably qualified structural engineer;</u> <u>3. Where the building is identified as being beyond repair, a condition survey report of the building, provided by a suitably qualified professional;</u> <u>4. Costings of the works required to increase seismic resilience provided by a suitably qualified quantity surveyor;</u> <u>5. Estimates of contributions that are available, including funding, grants, consent fee reimbursement and rates relief;</u> <u>6. An assessment of market demand and pricing for comparable buildings and floor space;</u> <u>7. A valuation of the:</u> <ol style="list-style-type: none"> <u>a. Building following completion of works; and</u> <u>b. Financial return on investment expected upon completion of the works;</u> <ol style="list-style-type: none"> <u>i. Depending on the proposal this could be by way of lettable income on floorspace as well as forecast sales price; and</u> <u>8. An assessment of alternatives to total demolition that have been considered by the applicant, including options for seismic strengthening, adaptive reuse, or restoration where applicable, and evidence demonstrating why none of these options are reasonable.</u> <p><u>The Council will obtain a peer review by a suitably qualified professional of the information provided by the applicant.</u></p>

Sub-part / Chapter / Provision	Submitter Name	Sub No / Point No	Position	Summary of Submission	Decisions Requested
Historical and Cultural Values / Historic Heritage / HH-R16	WCC Environmental Reference Group	377.97	Support	Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of heritage areas to Wellington's identity and character.	Retain HH-R16 (Total demolition of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R16	Lucy Harper and Roger Pemberton	401.38	Support	Supports HH-R16 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention. Supports the Doctors Common Heritage area. The submitter considers that the Doctors Common Heritage area is a visible and memorable part of the cityscape because of its buildings, streets (including steps) layout and position on Mt Victoria. The submitter considers that it still has a strong relationship to the early/historical layout of Wellington. The submitters are landowners in the area and support the recognition in the Plan of this area's significance to the city and the provisions that will retain that significance.	Retain HH-R16 (Total demolition of contributing buildings and structures) as notified.
Historical and Cultural Values / Historic Heritage / HH-R16	Peter Fordyce	431.7	Amend	Considers that Historic Heritage rules governing demolition of pre-1930s buildings should have their coverage increased to more widely cover demolition prevention of pre-1930s dwellings in areas under protection.	Seeks that HH-R16 (Total demolition of contributing buildings and structures) have increased demolition protection coverage for pre-1930s dwellings in Heritage Areas. [Decision requested - submission refers to Historic Heritage provisions]
Historical and Cultural Values / Historic Heritage / HH-R18	WCC Environmental Reference Group	377.98	Support	HH-R18 is supported as it will enable activities that increase appreciation of sites whilst protecting them.	Retain HH-R18 (Modification of a scheduled archaeological site, including earthworks within the mapped extent) as notified.
Historical and Cultural Values / Historic Heritage / HH-R19	WCC Environmental Reference Group	377.99	Support	Avoiding demolition unless specific conditions are met provides certainty and reflects the importance of archaeological sites to our history and identity.	Retain HH-R19 (Total demolition of scheduled archaeological sites) as notified.
Historical and Cultural Values / Historic Heritage / HH-R20	Wellington Heritage Professionals	412.53	Oppose	Opposes the rule enabling alterations to enable building access at ground floor level of 32 the Terrace 'The Braemar building' being permitted as they may have an adverse effect on heritage.	Delete rule HH-R20 (Alterations to enable building access at ground floor level of 32 the Terrace 'The Braemar building')
Historical and Cultural Values / Historic Heritage / HH-S1	Argosy Property No. 1 Limited	383.52	Oppose	Considers standard HH-S1.1.b would restrict internal additions and alterations of heritage buildings and heritage structures which would otherwise be permitted. It is important to encourage and enable the adaptive reuse of heritage buildings to ensure that they are occupied and maintained, this includes the ability to change internal floor layout and height for modern uses	Delete HH-S1.1.b (Permitted additions, alterations, and partial demolition) in its entirety.
Historical and Cultural Values / Historic Heritage / HH-S1	Lucy Harper and Roger Pemberton	401.39	Support	Supports HH-S1 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S1 (Permitted additions, alterations and partial demolition) as notified.
Historical and Cultural Values / Historic Heritage / HH-S1	Wellington Heritage Professionals	412.54	Amend	Considers that as per the current District Plan, structural strengthening which is visible from the exterior of the building should not be a permitted activity as this is likely to have an adverse effect on heritage values.	Amend HH-S1 (Permitted additions, alterations and partial demolition) as follows 1. The works must be internal to built heritage and not: a. Involve buildings where the whole interior, or individual interior elements have been specifically scheduled (and the work affects the scheduled interior or elements); or b. Result in new internal walls, floor levels or internal structural strengthening visible from the exterior of the building

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Historical and Cultural Values / Historic Heritage / HH-S1	Wellington Heritage Professionals	412.55	Amend	Considers that HH-S1 should apply to non-heritage buildings in heritage areas also as visible strengthening is likely to have an adverse effect on the area.	Seeks that HH-S1 (Permitted additions, alterations and partial demolition) apply to non-heritage buildings in heritage areas.
Historical and Cultural Values / Historic Heritage / HH-S1	Fabric Property Limited	425.31	Support	Supports HH-S1 as notified as it recognises that the standard does not apply to non-heritage buildings in heritage areas.	Retain HH-S1 (Permitted additions, alterations and partial demolition) as notified.
Historical and Cultural Values / Historic Heritage / HH-S2	Wharenui Apartments Ltd	358.1	Oppose in part	HH-S2 is opposed on the grounds that it will prevent development rights to be exercised at the rear of 274 Oriental Parade. The potential heritage listing of the building will not allow the development of the area of approximately 800 square metres. The rear of the site has a pedestrian right from Wilkinson St. The Submitter considers that the heritage listing will make the realisation of the development potential far more difficult to achieve.	Opposes HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) as notified and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-S2	Wharenui Apartments Ltd	358.2	Amend	Considers that wording in HH-S2 should be amended to allow the development of new buildings on sites of heritage buildings.	Amend HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) to allow the development of new buildings on heritage building sites.
Historical and Cultural Values / Historic Heritage / HH-S2	Kāinga Ora Homes and Communities	391.182	Oppose in part	HH-S2 is opposed and an amendment is sought.	Opposes HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) and seeks amendment.
Historical and Cultural Values / Historic Heritage / HH-S2	Kāinga Ora Homes and Communities	391.183	Amend	Considers that HH-S2 should be amended to remove the size and height limits for accessory buildings in order to not restrict development on heritage sites. The Standard restricts non-heritage buildings on heritage sites, which will hinder development potential in high medium and high density areas where this will not affect built heritage values. HH-R2 permits partial and total demolition of non-scheduled buildings and structures on the site of heritage buildings and heritage structures. By comparison, Rule HH-R4 permits new buildings and structures on the site of heritage buildings and heritage structures where HH-S2 is achieved. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m2. Given that the additional buildings are to the rear of, and accessory to, the primary residential building it is considered that the 10m2 limit should be removed as this will generally avoid the building being visible from the street and interfering with the heritage character. (Option B)	Amend HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) as follows: Medium Density Residential Zone and High Density Residential Zone: 1. Any new building or structure must be: a. Accessory to the primary residential building; and b. Located to the rear of the primary residential building; and c. Smaller than 10m2. 2. Any new structure (excluding buildings provided for in HH-S2.1) must have a maximum height of 4.5m
Historical and Cultural Values / Historic Heritage / HH-S2	Kāinga Ora Homes and Communities	391.184	Amend	Considers that HH-S2 should be amended to remove the size and height limits for accessory buildings in order to not restrict development on heritage sites. HH-S2 only applies to the MDRZ and HDRZ and only allows buildings and structures that are accessory to the primary residential building, located to the rear and less than 10m2. Given that the additional buildings are to the rear of, and accessory to, the primary residential building it is considered that the 10m2 limit should be removed as this will generally avoid the building being visible from the street and interfering with heritage character. (Option B)	Amend HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) as follows: Medium Density Residential Zone and High Density Residential Zone: 3. Any new building or structure must be: a. Accessory to the primary residential building; and b. Located to the rear of the primary residential building; and c. Smaller than 10m2. 4. Any new structure (excluding buildings provided for in HH-S2.1) must have a maximum height of 4.5m
Historical and Cultural Values / Historic Heritage / HH-S2	Lucy Harper and Roger Pemberton	401.40	Support	Supports HH-S2 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S2 (New buildings and structures on the site of heritage buildings or structures and on sites within heritage areas) as notified.

Historical and Cultural Values / Historic Heritage

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Historical and Cultural Values / Historic Heritage / HH-S3	Lucy Harper and Roger Pemberton	401.41	Support	Supports HH-S3 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S3 (Modifications to non-scheduled buildings and structures on the site of a heritage building or structure) as notified.
Historical and Cultural Values / Historic Heritage / HH-S4	Parliamentary Service	375.9	Support in part	HH-S4 is supported due to the differentiation of maximum heights across the Parliament Precinct. However the wording used in this Standard is ambiguous, and does not appear to align with the height controls set out on the Council's interactive maps.	Retain HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) with amendment.
Historical and Cultural Values / Historic Heritage / HH-S4	Parliamentary Service	375.10	Amend	Considers that the wording in HH-S4 should be amended to avoid any ambiguity about maximum heights allowed at the site. The wording used in this Standard is ambiguous, and does not appear to align with the height controls set out on the Council's interactive maps. The submitter requests that the wording is amended to avoid any ambiguity about maximum heights allowed at the site.	Amend HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) as follows: Location ... Between Parliament buildings and Museum Street From the front (eastern edge) of Parliament buildings westward to Museum Street
Historical and Cultural Values / Historic Heritage / HH-S4	Argosy Property No. 1 Limited	383.53	Support	Note the maximum height above ground level for the part of the Stout Street Precinct heritage area that includes 15 Stout Street and 143-149 Lambton Quay is 50m. This is appropriate in light of the building heights on the site and in the surrounding area and Argosy supports this height limit. The maximum height above ground level for the sites at 360-366 Lambton Quay is 95m in the airspace above 360-366 Lambton Quay and 8 Wills Street. This is also appropriate in light of the existing building heights and Argosy supports this height limit	Retain HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) as notified.
Historical and Cultural Values / Historic Heritage / HH-S4	Kāinga Ora Homes and Communities	391.185	Oppose in part	HH-S4 is opposed and amendments are sought.	Opposes HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) and seeks amendments.
Historical and Cultural Values / Historic Heritage / HH-S4	Kāinga Ora Homes and Communities	391.186	Amend	Considers that HH-S4 should be amended to align with other relief relating to Zone provisions as the heights of buildings should be comparable with the underlying zone rather than the heritage provisions particularly at the interface with the underlying zone.	Amend HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) to: - Align height limits with amended Historic Heritage Standards, - Amend underlying zoning according to Appendix 4, - Amend Residential and Centre Zones heights and Heights in relation to boundary standards. [Refer to original submission, including Appendix 4]
Historical and Cultural Values / Historic Heritage / HH-S4	Lucy Harper and Roger Pemberton	401.42	Support	Supports HH-S4 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S4 (Minimum and maximum heights for heritage areas in the City Centre Zone, Centre Zones and Waterfront Zone) as notified.
Historical and Cultural Values / Historic Heritage / HH-S5	Lucy Harper and Roger Pemberton	401.43	Support	Supports HH-S5 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S5 (Grazing of stock) as notified.

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Historical and Cultural Values / Historic Heritage / HH-S6	Lucy Harper and Roger Pemberton	401.44	Support	Supports HH-S6 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S6 (Earthworks for the maintenance and repair of existing roads, walking and access tracks, and operation of existing cultivation areas) as notified.
Historical and Cultural Values / Historic Heritage / HH-S7	Lucy Harper and Roger Pemberton	401.45	Support	Supports HH-S7 as it is consistent with the direction of Part 2 of the Act and the direction of the RPS for the Wellington Region to maintain the historic heritage values of the city, while providing for upkeep and maintenance. The policy direction of avoiding demolition of heritage buildings and structures and buildings in heritage areas strongly discourages demolition and the rule structure supports this intention.	Retain HH-S7 (Mowing of lawns, trimming and pruning of trees and vegetation within the extent of a scheduled archaeological site) as notified.