

Section 32 Evaluation Report

Part 2: Heritage and Cultural Values

Historic Heritage

Sites and Areas of Significance to Māori

Notable Trees

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Table of acronyms

Abbreviation	Full term
C	Controlled
CAB	Civic Administration Building
CBD	Central Business District
DOC	Department of Conservation
DP	District Plan
EPB	Earthquake Prone Building
FDS	Future Development Strategy
GIS	Geographic Information Systems
GWRC	Greater Wellington Regional Council
HH	Historic Heritage
HNZPTA	Heritage New Zealand Pouhere Taonga Act 2014
LGA	Local Government Act 2002
MDRS	Medium Density Residential Standards
MOB	Municipal Office Building
NPS	National Policy Statements
NPS-UD	National Policy Statement on Urban Development
NZAA	New Zealand Archaeological Association
NZHPT	New Zealand Historic Places Trust
ODP	Operative District Plan
PNRP	Proposed Natural Resources Plan
RD	Restricted Discretionary
RMA	Resource Management Act
RPS	Regional Policy Statement for the Wellington Region 2013
SASM	Sites and Areas of Significance to Māori
SNAs	Significant Natural Areas
STEM	Standard Tree Evaluation Method
TREE	Notable Trees
WCC	Wellington City Council

1.0 Overview and Purpose

1.1 Introduction to the resource management issue/s

This section 32 evaluation report is focussed on the following Part 2: District Wide Matters:

1. **Historic heritage**, including heritage buildings and structures, heritage areas and scheduled archaeological sites;
2. **Notable trees**; and
3. **Sites and areas of significance to Māori.**

Given that the integrated nature of historic heritage, sites and areas of significance to Māori and notable trees, this section 32 evaluation report includes a combined analysis of these matters.

Historic Heritage

The proposed Historic Heritage chapter reflects the obligations for the Council stated at section 6(f) of the RMA, where those responsible for the management of use, development, and protection of natural and physical resources shall recognise and provide for “*the protection of historic heritage from inappropriate subdivision, use, and development*”.

The Historic Heritage chapter promotes the contribution that heritage makes to Wellington City’s identity and includes provisions to support earthquake strengthening and support promote sustainable long-term use and connections to peoples’ individual and collective histories. The chapter covers the following:

- **Heritage buildings and heritage structures** – being individual buildings or structures that have been assessed as having significant heritage values.
- **Heritage areas** – being areas that contain a collection and continuity of buildings and structures with similar heritage values.
- **Scheduled archaeological sites** – being any place (including buildings, structures or shipwrecks) that was associated with pre-1900 human activity, where there is evidence relating to the history of New Zealand that can be investigated using archaeological methods. Only archaeological sites which have been assessed as ‘significant’ are included as scheduled archaeological sites.
- **Heritage orders** – being sites that are subject to a Heritage Order applies in accordance with section 189 of the RMA.

The Historic Heritage chapter is accompanied by Appendix 1: Historic Heritage Advice Notes And the Heritage Design Guide.

The chapter applies to the items in the following schedules:

- Schedule 1: Heritage Buildings
- Schedule 2: Heritage Structures
- Schedule 3: Heritage Areas
- Schedule 4: Scheduled Archaeological Sites

The existing heritage lists have been reviewed and carried into the schedules. In addition, 52 new buildings and four new structures have been added to Schedule 1, and 10 residential heritage areas have been added to Schedule 2. At Schedule 3, archaeological sites have been added to the District Plan for the first time. The three sites within the schedule are: Kau Point Battery, Miramar Tunnels, and the Karori Goldmining and Dam within Zealandia.

Seventeen items will have their heritage listing status removed.

Notable Trees

Notable trees are individual trees, or groups of trees, that are identified and protected for their significant historic heritage, ecological or amenity values. These trees may be notable as prominent natural features and landmarks, contributors to local identity, spectacular or rare specimens, or for their association with special sites, events or people. It is important that these trees are identified, protected and cared for so that they can be enjoyed by future generations.

The proposed Notable Trees chapter reflects the Council's obligations with respect to section 6(f) of the RMA, along with the requirements at sections 7(c), (d) and (g) as set out above.

The Notable Trees chapter applies to the items in Schedule 6: Notable Trees.

Sites and Areas of Significance to Māori

Wellington City Council, Te Atiawa, Taranaki Whānui ki te Upoko o te Ika and Te Runanga o Toa Rangatira have signed a partnership agreement called Takai Here to promote collaboration, communication, and unity. Sites and Areas of Significance to Māori fall under the definition of historic heritage (b)(iii). The proposed Sites and Areas of Significance to Māori chapter reflects the obligations of the District Plan in relation to sections 6(e) and 6(f) of the RMA, along with the section 7(a) requirement to have particular regard to kaitiakitanga and the 8 requirements to take into account the principles of the Treaty of Waitangi.

The Council recognises that there is a gap within the representation of Wellington's heritage, particularly the visibility of sites and areas of significance to Māori. This proposed chapter aims to help elevate the visibility of these taonga. The chapter reinvents how Wellington's operative District Plan has previously managed the City's Māori heritage, where currently there are few rules to protect these taonga.

Schedule 7 provides a revised list of sites and areas of significance, with a categorised system that appoints a level of protection. Engagement and consultation with Taranaki Whānui ki te Upoko o te Ika ('Taranaki Whānui) and Ngāti Toa Rangatira has determined how each site should be protected and represented within the Sites and Areas of Significance to Māori chapter.

The categorisation of the sites and areas of significance provides the opportunity for iwi to vocalise which types of sites should be elevated and given priority within the resource consent process. This system provides three main categories, with subcategories which describe and give context to the site or area.

The three main categories can be described as:

- Category A – sites which have been determined as high to medium significance,
- Category B – sites which have been determined as medium to low significance,
- Category C – specific to marae.

These categories determine within the chapter how activities will trigger actions within the resource consent process.

This Sites and Areas of Significance to Māori section of this report also includes assessment of the Tangata Whenua chapter, as it overlaps with the Sites and Areas of Significance to Māori chapter.

2.0 Reference to other evaluation reports

This report should also be read in conjunction with the other section 32 evaluation reports.

The following section 32 evaluation reports contain provisions that specifically address the topics of this report:

Report	Relationship to this topic
<i>Infrastructure - other overlays</i>	Contains provisions managing the effects of infrastructure with Historic Heritage, Notable Trees, and Sites and Areas of Significance to Māori chapters.
<i>Subdivision</i>	Manages the effects of subdivision on Historic Heritage, Notable Trees, and Sites and Areas of Significance to Māori chapters.
<i>Earthworks</i>	Manages the effects of subdivision on Historic Heritage, Notable Trees, and Sites and Areas of Significance to Māori chapters.
<i>Signs</i>	Manages the scale, number, illumination, motion and placement of signs on heritage buildings, within archaeological sites and heritage areas, and on/within sites and areas of significance to Māori.
<i>Hospital Zone</i>	Has provisions that require consultation with mana whenua in some circumstances and overlaps with the Sites and Areas of Significance to Māori chapter.
<i>Tertiary Education Zone</i>	Has provisions that require consultation with mana whenua in some circumstances and overlaps with the Sites and Areas of Significance to Māori chapter.
<i>Temporary Activities</i>	Provides direction to manage temporary activities which are located near or on scheduled Māori sites of significance and statutory acknowledgement areas by actively engaging with mana whenua to preserve the mouri/mauri of these sites.
<i>Noise</i>	Provides direction to consider heritage values when modifying buildings to meet noise insulation requirements.

3.0 Strategic Direction

The Strategic Direction provisions at Part 2 set the strategic objectives for the Proposed District Plan for managing growth, land use and development in Wellington City and identify historic heritage as a key contributor to the City's vibrancy and sense of place, as well as a factor that can make a significant contribution to the City's economy.

The following objectives in the Strategic Direction section of the Proposed District Plan are relevant to the topics of historic heritage, notable trees and sites and areas of significance to māori:

AW-01	<i>Anga whakamua – Moving into the future</i>
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Resource management processes include mana whenua as active participants in a way that recognises Te Tiriti o Waitangi and its principles.

AW-02 **Anga whakamua – Moving into the future**

The relationship of Tangata Whenua with their Lands and Traditions is recognised and provided for, including:

- 1. The use, development and expansion of Treaty Settlement land and any land that is subject to Deed of Settlement provisions relating to right of first refusal land, in a manner that recognises its commercial redress purposes; and*
- 2. The use and development of all other land to provide for the social, economic, commercial, and cultural aspirations of Tangata Whenua.*

AW-03 **Anga whakamua – Moving into the future**

Mana whenua can exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori.

AW-04 **Anga whakamua – Moving into the future**

The development and design of the City reflects mana whenua and the contribution of their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes, and other taonga of significance to the district's identity and sense of belonging.

CC-02 **Capital City**

Wellington City is a well-functioning Capital City where:

- 1. A wide range of activities that have local, regional, and national significance are able to establish.*
- 2. Current and future residents can meet their social, cultural, economic, and environmental wellbeing.*
- 3. Mana whenua values and aspirations are visible, celebrated and an integral part of the City's identity.*
- 4. Urban intensification is delivered in appropriate locations and in a manner that supports future generations to meet their needs.*
- 5. Innovation and technology advances that support the social, cultural, economic, and environmental wellbeing of existing and future residents are promoted.*
- 6. Values and characteristics that are an important part of the City's identity and sense of place are identified and protected.*

CC-03 **Capital City**

Development is consistent with and supports the achievement of the following strategic City goals:

- 1. Compact: Wellington builds on its existing urban form with quality development in the right locations.*
- 2. Resilient: Wellington's natural and built environments are healthy and robust, and we build physical and social resilience through good design.*
- 3. Vibrant and Prosperous: Wellington builds on its reputation as an economic hub and creative centre of excellence by welcoming and supporting innovation and investing strategically to maintain our thriving economy.*

	<p>4. <i>Inclusive and Connected: Wellington recognises and fosters its identity by supporting social cohesion and cultural diversity, and has world-class movement systems with attractive and accessible public spaces and streets.</i></p> <p>5. <i>Greener: Wellington is sustainable, and its natural environment is protected, enhanced and integrated into the urban environment.</i></p> <p>6. <i>Partnership with mana whenua: Wellington recognises the unique role of mana whenua within the city and advances a relationship based on active partnership.</i></p>
CEKP-05	City Economy, Knowledge and Prosperity
<i>Strategically important assets including those that support Māori culture, tourism, trade, education, research, and health are provided for appropriate locations.</i>	
HHSASM-01	Historic Heritage and Sites and Areas of Significance to Māori
<i>Significant buildings, sites, areas, places, and objects that exemplify Wellington's historical and cultural values are identified, recognised and protected.</i>	
HHSASM-02	Historic Heritage and Sites and Areas of Significance to Māori
<i>Built heritage is resilient and has sustainable long term use while ensuring their heritage and cultural values are recognised and maintained.</i>	
HHSASM-03	Historic Heritage and Sites and Areas of Significance to Māori
<i>The cultural, spiritual and/or historical values associated with sites and areas of significance to Māori are protected.</i>	
HHSASM-04	Historic Heritage and Sites and Areas of Significance to Māori
<i>Sites of significance to Māori are identified and mana whenua's relationships, interests and associations with their culture, traditions, ancestral lands, waterbodies, sites, areas, and landscapes, and other taonga of significance are recognised and provided for.</i>	
HHSASM-05	Historic Heritage and Sites and Areas of Significance to Māori
<i>Recognise that only mana whenua can identify impacts on their relationship with their culture, traditions, ancestral lands, waterbodies, sites, areas and landscapes and other taonga/sites of significance to Māori.</i>	
NE-01	Natural Environment
<i>The natural character, landscapes and features, and ecosystems that contribute to the City's identity and have significance for mana whenua as kaitiaki are identified, recognised, protected, and, where possible, enhanced.</i>	
NE-02	Natural Environment
<i>Future subdivision and development is designed to limit further degradation of the City's water bodies, and recognises mana whenua and their relationship to water (Te Mana o Te Wai).</i>	
NE-03	Natural Environment
<p><i>The City retains an extensive open space network that:</i></p> <ol style="list-style-type: none"> 1. <i>Is easily accessible;</i> 2. <i>Connects the urban and natural environment;</i> 3. <i>Supports ecological, cultural and landscape values; and</i> 4. <i>Meets the needs of anticipated future growth.</i> 	

NE-O4	Natural Environment
<i>Mana whenua are able to exercise their customary responsibilities as mana whenua and kaitiaki with their own mātauranga Māori in the protection and management of the natural environment.</i>	
SRCC-O2	Sustainability, Resilience and Climate Change
<i>Natural hazard risks are identified, planned for, mitigated and, where necessary, avoided.</i>	

An evaluation of these objectives is contained in the companion Section 32 Evaluation Overview Report.

4.0 Regulatory and policy direction

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose and principles contained in Part 2 of the RMA.

Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management 'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

- (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment'.*

In achieving this purpose, all persons exercising functions and powers under the RMA also need to:

- Recognise and provide for the matters of national importance identified in section 6
- Have particular regard to the range of other matters referred to in section 7
- Take into account the principles of the Treaty of Waitangi/Te Tiriti o Waitangi in section 8.

4.1 Section 6

The section 6 matters relevant to this topic are:

Section	Relevant Matter
Section 6(e)	<p><i>'To recognise and provide for the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga',</i></p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> Section 6(e) is given effect to by this chapter as it has opened opportunities for the Council's iwi partners to identify their taonga and collaborate on the decision of how they should be protected. As a result, the Council has significantly increased number of sites and areas of significance to Māori.</p> <p>Having the extensive list of sites and areas of significance from both Taranaki Whānui and Ngāti Toa Rangatira reflects the commitments of the Council to its treaty partners.</p>

Section 6(f)	<p><i>'To recognise and provide for the protection of historic heritage from inappropriate subdivision, use, and development'</i>,</p> <p><u>Chapter - Historic Heritage:</u> The purpose of this chapter is to protect historic heritage by clearly defining works that can occur without resource consent and setting higher activity statuses for more invasive works. As such, the District Plan identifies works that are appropriate, such as maintenance and repair. Works that are not for maintenance and repair, such as additions and alterations, will need to be shown to not detract from heritage values.</p> <p>Likewise, the subdivision, use and development of scheduled archaeological sites will now require resource consent, where they previously did not. This provides the Council with an opportunity to assess and influence development of these sites.</p> <p><u>Chapter - Notable Trees:</u> Notable trees provide visual representation of the City's history and cultural values, along with amenity and a sense of place. This chapter includes provisions that encourage the retention of these trees, manages their trimming and pruning and guides development in their vicinity, thereby protecting their historic heritage and amenity values.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> This chapter sets how certain land use activities will be managed within these sites and areas. The proposed new chapter sets out new objectives, policies and rules in relation to development of these sites, with clarification as to when consultation is required with mana whenua. Under the new provisions it is intended that the Council will not accept a resource consent application without evidence of consultation with iwi. With more iwi involvement at the early stages of a development, mana whenua will be able to identify and influence situations where there may be inappropriate use and development.</p>
Section 6(g)	<p><i>'To recognise and provide for the protection of protected customary rights'</i></p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> This chapter acknowledges the customary activities undertaken by mana whenua and provides for this through rules.</p>

4.2 Section 7

The section 7 matters that are relevant to this topic are:

Section	Relevant Matter
Section 7(a)	<p><i>kaitiakitanga</i></p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> The chapter strives to assist in the kaitiakitanga of iwi over their sites and areas of significance. Through the process of formulating the chapter (site selection and rule testing) and the provisions, further opportunities for iwi to practice kaitiakitanga are created.</p>
Section 7(b)	<p><i>The efficient use and development of natural and physical resources</i></p>

	<p><u>Chapter - Historic Heritage:</u> Heritage buildings and structures and contributing buildings within heritage areas are an established physical resource and the Proposed District Plan seeks to ensure the retention and ongoing use of these buildings by provisions that enable maintenance, repair and earthquake strengthening works, promote reuse and discourage demolition. This can be more efficient and environmentally sustainable option than demolition and redevelopment of these sites.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> This chapter seeks to ensure the retention and ongoing use of sites and areas of significance to Māori, in a way that protects their underlying culturally significant values.</p>
Section 7(c)	<p><i>The maintenance and enhancement of amenity values</i></p> <p><u>Chapter - Historic Heritage:</u> Historic heritage is recognised as an aspect of amenity that provides a sense of connection to the past and contributes to the City's 'sense of place'.</p> <p><u>Chapter - Notable Trees:</u> Along with having ecological values, notable trees contribute to a sense of place and amenity of a localised area. The District Plan seeks to maintain these values by requiring the retention of these trees.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> Sites and areas of significance to Māori provide a tangible connection to whenua and significant historical events and are an important element of historic heritage that contributes to the City's sense of place. As such, these sites and areas contribute to the amenity values for the localised area. The District Plan provisions will act to maintain, and where possible enhance, these sites and areas.</p>
Section 7(d)	<p><i>Intrinsic values of ecosystems</i></p> <p><u>Chapter - Notable Trees:</u> In seeking to protect established trees of significant size and age the chapter inherently protects the values of the ecosystems associated with these trees. This has particular relevance where a group of trees is protected.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> Sites and areas of significance to Māori provide a tangible connection to whenua that recognises the intrinsic value and whakapapa of ecosystems. The District Plan provisions will act to maintain, and where possible enhance, these sites and areas.</p>
Section 7(f)	<p><i>Maintenance and enhancement of the quality of the environment</i></p> <p><u>Chapter - Historic Heritage:</u> The retention, maintenance and enhancement of historic heritage contributes to a sense of place, history, identify and culture and contribute to the well-being of the City's residents. The District Plan will enable works that improve</p>

	<p>both the seismic strength and visual quality of heritage buildings, structures, and areas, which in turn will help improve the quality of the environment.</p> <p><u>Chapter - Notable Trees:</u> Notable trees enhance the quality of localised environments, and the District Plan provisions with respect to these trees will ensure this outcome is maintained.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> Sites and areas of significance to Māori also contribute to a sense of place, history, identity and culture and contribute to the well-being of the City's residents. The District Plan provisions seek to protect these sites and enable works that improve their quality and, as such, the quality of the environments in which they are located.</p>
Section 7(g)	<p><i>Any finite characteristics of natural and physical resources</i></p> <p><u>Chapter - Historic Heritage:</u> Heritage buildings, structures and areas are a finite resource that, once lost, cannot be replaced. Therefore, the District Plan provisions enable works that provide for their retention, including through adaptive reuse, and set a high bar for demolition.</p> <p><u>Chapter - Notable Trees:</u> The District Plan seeks to prevent works that damage or destroy notable trees so they can be appreciated into the future.</p> <p><u>Chapter - Sites and Areas of Significance to Māori:</u> Sites and areas of significance to Māori are also a finite resource. The District Plan provisions seek to protect these sites and prevent works that impact this resource. The District Plan will require developers to work with mana whenua to ensure that outcomes for these sites and areas are appropriate.</p>

4.3 Section 8

The Sites and Areas of Significance to Māori chapter aim to reflect the principles of the Treaty of Waitangi.

Taranaki Whānui and Ngāti Toa Rangatira were actively consulted and created the basis for how the chapter would be set out to protect these taonga. This provided the opportunity for iwi members to be able to share the narrative of their sites, as well formulating how sites should be categorised.

The objectives, policies and rules in the Sites and Areas of Significance to Māori chapter increase the protection of sites and areas of significance by outlining which activities should have greater restrictions to avoid negative cultural outcomes. Consultation with iwi is now required as a part of the resource consent application process, which assists to further kaitiakitanga of the sites by the Council's mana whenua iwi partners.

4.4 National Direction

4.4.1 National Policy Statements

There are five National Policy Statements (NPS) currently in force:

- NPS on Urban Development 2020
- NPS for Freshwater Management 2020
- NPS for Renewable Electricity Generation 2011
- New Zealand Coastal Policy Statement 2010
- NPS for Electricity Transmission 2008

The instruments and associated provisions relevant to this topic are:

NPS	Relevant Objectives / Policies
<p><i>NPS on Urban Development 2020</i></p>	<ul style="list-style-type: none"> • Objective 1: <ul style="list-style-type: none"> ○ <i>New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.</i> • Objective 4: <ul style="list-style-type: none"> ○ <i>New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.</i> • Objective 5: <ul style="list-style-type: none"> ○ <i>Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).</i> • Objective 6: <ul style="list-style-type: none"> ○ <i>Local authority decisions on urban development that affect urban environments are:</i> <i>(c) responsive, particularly in relation to proposals that would supply significant development capacity.</i> • Policy 1; <ul style="list-style-type: none"> ○ <i>Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</i> <i>(a) have or enable a variety of homes that:</i> <i>(ii) enable Māori to express their cultural traditions and norms;</i> • Policy 4: <ul style="list-style-type: none"> ○ <i>Regional policy statements and district plans applying to tier 1 urban developments modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.</i> • Policy 9; <ul style="list-style-type: none"> ○ <i>(a) Involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful, and, as far as practicable, in accordance with tikanga Māori; and</i> ○ <i>(b) When preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and</i> ○ <i>(c) Provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and</i> ○ <i>(d) Operate in a way that is consistent with iwi participation legislation.</i>
<p><i>NPS</i></p>	<ul style="list-style-type: none"> • Policy 1: <ul style="list-style-type: none"> ○ <i>Freshwater is managed in a way that gives effect to Te Mana o te Wai.</i>

<p>for Freshwater Management 2020</p>	
<p>New Zealand Coastal Policy Statement 2010</p>	<ul style="list-style-type: none"> • Objective 3: <ul style="list-style-type: none"> ○ <i>To take account of the principles of the Treaty of Waitangi, recognise the role of tangata whenua as kaitiaki and provide for tangata whenua involvement in management of the coastal environment by:</i> <ul style="list-style-type: none"> ○ <i>recognising the ongoing and enduring relationship of tangata whenua over their lands, rohe and resources;</i> ○ <i>promoting meaningful relationships and interactions between tangata whenua and persons exercising functions and powers under the RMA;</i> ○ <i>incorporating mātauranga Māori into sustainable management practices; and</i> ○ <i>recognising and protecting characteristics of the coastal environment that are of special value to tangata whenua.</i> • Objective 6; <ul style="list-style-type: none"> ○ <i>To enable people and communities to provide for their social, economic and cultural wellbeing and their health and safety, through subdivision, use and development, recognising that:</i> <ul style="list-style-type: none"> ○ <i>historic heritage in the coastal environment is extensive but not fully known, and vulnerable to loss or damage from inappropriate subdivision, use and development.</i> • Policy 2; <ul style="list-style-type: none"> ○ <i>(c) involve iwi authorities or hapū on behalf of tangata whenua in the preparation of regional policy statements, and plans, by undertaking effective consultation with tangata whenua; with such consultation to be early, meaningful, and as far as practicable in accordance with tikanga Māori;</i> ○ <i>(d) Provide opportunities in appropriate circumstances for Māori involvement in decision making, for example when a consent application or notice of requirement is dealing with cultural localities or issues of cultural significance, and Māori experts, including pūkenga, may have knowledge not otherwise available.</i> ○ <i>(g) In consultation and collaboration with tangata whenua, working as far as practicable in accordance with tikanga Māori, and recognising that tangata whenua have the right to choose not to identify places or values of historic, cultural, or spiritual significance or special value:</i> <ul style="list-style-type: none"> ○ <i>(i) recognise the importance of Māori cultural and heritage values through such methods as historic heritage, landscape, and cultural impact assessments; and</i> ○ <i>(ii) provide for the identification, assessment, protection and management of areas or sites of significance or special value to Māori, including by historic analysis and archaeological survey and the development of methods such as alert layers and predictive methodologies for identifying areas of high potential for undiscovered Māori heritage, for example coastal pā or fishing villages.</i> • Policy 6;

	<ul style="list-style-type: none"> ○ (1)(j) <i>Where appropriate, buffer areas and sites of significant indigenous biological diversity, or historic heritage value.</i> ● Policy 10; <ul style="list-style-type: none"> ○ (2) <i>Where a reclamation is considered to be a suitable use of the coastal marine area, in considering its form and design have particular regard to:</i> <ul style="list-style-type: none"> ○ <i>(f) whether the proposed activity will affect cultural landscapes and sites of significance to tangata whenua;</i> ● Policy 17; <ul style="list-style-type: none"> ○ <i>Protect historic heritage in the coastal environment from inappropriate subdivision, use, and development by:</i> <ul style="list-style-type: none"> ○ <i>identification, assessment and recording of historic heritage, including archaeological sites;</i> ○ <i>providing for the integrated management of such sites in collaboration with relevant councils, heritage agencies, iwi authorities and kaitiaki;</i> ○ <i>initiating assessment and management of historic heritage in the context of historic landscapes;</i> ○ <i>recognising that heritage to be protected may need conservation;</i> ○ <i>facilitating and integrating management of historic heritage that spans the line of mean high water springs;</i> ○ <i>including policies, rules and other methods relating to (a) to (e) above in regional policy statements, and plans;</i> ○ <i>imposing or reviewing conditions on resource consents and designations, including for the continuation of activities;</i> ○ <i>requiring, where practicable, conservation conditions; and</i> ○ <i>considering provision for methods that would enhance owners' opportunities for conservation of listed heritage structures, such as relief grants or rates relief.</i> ● Policy 19; <ul style="list-style-type: none"> ○ (2) <i>Maintain and enhance public walking access to, along and adjacent to the coastal marine area, including by:</i> ○ (c) <i>identifying opportunities to enhance or restore public walking access, for example where:</i> <ul style="list-style-type: none"> ○ <i>(v) access to areas or sites of historic or cultural significance is important;</i> ● Policy 20; <ul style="list-style-type: none"> ○ (1) <i>Control use of vehicles, apart from emergency vehicles, on beaches, foreshore, seabed and adjacent public land where:</i> <ul style="list-style-type: none"> ○ <i>(e) damage to historic heritage; or</i> ○ <i>(g) damage to sites of significance to tangata whenua;</i> ● Policy 21: <ul style="list-style-type: none"> ○ <i>Where the quality of water in the coastal environment has deteriorated so that it is having a significant adverse effect on ecosystems, natural habitats, or water-based recreational activities, or is restricting existing uses, such as aquaculture, shellfish gathering, and cultural activities, give priority to improving that quality by:</i> <ul style="list-style-type: none"> ○ <i>(e) engaging with tangata whenua to identify areas of coastal waters where they have particular interest, for example in cultural</i>
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	<p>sites, wāhi tapu, other taonga, and values such as mauri, and remedying, or, where remediation is not practicable, mitigating adverse effects on these areas and values.</p> <ul style="list-style-type: none"> • Policy 26; <ul style="list-style-type: none"> ○ (1) Provide where appropriate for the protection, restoration or enhancement of natural defences that protect coastal land uses, or sites of significant biodiversity, cultural or historic heritage or geological value, from coastal hazards.
<p>NPS for Electricity Transmission 2008</p>	<ul style="list-style-type: none"> • Policy 7; <ul style="list-style-type: none"> ○ Planning and development of the transmission system should minimise adverse effects on urban amenity and avoid adverse effects on town centres and areas of high recreational value or amenity of existing sensitive activities. • Policy 8; <ul style="list-style-type: none"> ○ In rural environments, planning and development of the transmission system should seek to avoid adverse effects on outstanding natural landscapes, areas of high natural character and areas of high recreation value and amenity and existing sensitive activities.

4.4.2 Proposed National Policy Statements

In addition to the five NPS currently in force there are also two proposed NPSs under development, noting that these are yet to be issued and have no legal effect:

- Proposed NPS for Highly Productive Land
- Proposed NPS for Indigenous Biodiversity

4.4.3 National Environmental Standards

There are no National Environmental Standards of direct relevance to this topic.

4.4.4 National Planning Standards

The National Planning Standards require that where the following matters are addressed, they must be included in the Part 2 – District-Wide Matters of the District Plan:

- Historical Heritage
- Notable Trees
- Sites and Areas of Significance to Māori

The National Planning Standards require each of these matters must be included in a separate, standalone chapter.

Historic Heritage:

If the following matters are addressed, they must be located in the Historic Heritage chapter:

- identification of historic heritage
- provisions to protect and manage historic heritage
- heritage orders
- schedule(s) of identified historic heritage and heritage orders. This may cross-reference an appendix.

Notable Trees:

If the following matters are addressed, they must be located in the Notable Trees chapter:

- identification of individual trees or groups of trees
- provisions to manage trees or groups of trees
- a schedule(s) of individual trees and groups of trees. This schedule must include a description of the tree(s) including the species of the tree(s). This may cross-reference an appendix.

Sites and Areas of Significance to Māori:

If the following matters are addressed, they must be located in the Sites and Areas of Significance to Māori chapter:

- descriptions of the sites and areas (eg, wāhi tapu, wāhi tūpuna, statutory acknowledgement, customary rights, historic site, cultural landscapes, taonga and other culturally important sites and areas) when there is agreement by Māori to include this information
- provisions to manage sites and areas of significance to Māori
- a description of agreed process of identification of sites and areas including an explanation of how tangata whenua or mana whenua are engaged
- a schedule(s) that lists the specific or general location of sites and areas of significance to Māori when this information is provided. This may cross-reference an appendix
- a description of any regulatory processes for identification.

4.5 National Guidance Documents

Heritage New Zealand Pouhere Taonga provides national guidance with respect to the three historic heritage topics. This is available at the following links:

<https://www.heritage.org.nz/>

<https://www.heritage.org.nz/resources/sustainable-management-guides>

Regional Policy Statement for the Wellington Region 2013 (RPS)

The table below identifies the relevant provisions and resource management topics for historic heritage, notable trees and sites and areas of significance to Māori contained in the RPS.

3.5 Historic Heritage	
Section	Relevant matters
Objective 15	<i>Historic heritage is identified and protected from inappropriate modification, use and development.</i>
Policy 21	<i>Identifying places, sites, and areas with significant historic heritage values—district and regional plans.</i>
Policy 22	<i>Protecting historic heritage values – district and regional plans.</i>
Policy 46	<i>Managing effects on historic heritage values – consideration.</i>
3.10 Resource management with tangata whenua	

Section	Relevant matters
Objective 23	<i>The region's iwi authorities and local authorities work together under Treaty partner principles for the sustainable management of the region's environment for the benefit and wellbeing of the regional community, both now and in the future.</i>
Policy 66	<i>Enhancing involvement of tangata whenua in resource management decision-making – non-regulatory.</i>
Objective 24	<i>The principles of the Treaty of Waitangi are taken into account in a systematic way when resource management decisions are made.</i>
Policy 48	<i>Principles of the Treaty of Waitangi – consideration.</i>
Objective 25	<i>The concept of kaitiakitanga is integrated into the sustainable management of the Wellington region's natural and physical resources.</i>
Policy 49	<i>Recognising and providing for matters of significance to tangata whenua – consideration.</i>
Objective 26	<i>Mauri is sustained, particularly in relation to coastal and fresh waters.</i>
Objective 27	<i>Mahinga kai and natural resources used for customary purposes, are maintained, and enhanced, and these resources are healthy and accessible to tangata whenua.</i>
Objective 28	<i>The cultural relationship of Māori with their ancestral lands, water, sites, wāhi tapu and other taonga is maintained.</i>

Regional Plans

In addition to the Regional Coastal Policy Statement 2000, there are currently five operative regional plans and one proposed regional plan for the Wellington region:

- Proposed Natural Resources Plan, appeals version 2021
- Regional Freshwater Plan for the Wellington Region, 1999
- Regional Plan for Discharges to the Land, 1999
- Regional Coastal Plan for the Wellington Region, 2000
- Regional Air Quality Management Plan for the Wellington Region, 2000
- Regional Soil Plan for the Wellington Region, 2000

The Proposed Natural Resources Plan (PNRP) replaces the five operative regional plans, with provisions in this plan now largely operative, with the exception of those that are subject to appeal.

The table below identifies the relevant provisions within the abovementioned plans that relate to historic heritage, notable trees and sites and areas of significance to Māori.

Regional Coastal Policy Statement 2000	
Section	Relevant matters

Policy 4.2.17	<p><i>To recognise that there are circumstances when public access along the coastal marine area is not appropriate; and other circumstances where it is not practicable because of the nature of the coastline.”</i></p> <p><i>In the explanation it is noted “Public access may not be appropriate where it is necessary to protect any Area of Significant Conservation Value, Area of Important Conservation Value, sites of significance to tangata whenua, public health or for safety, animal health, security, defence purposes, or quarantine facilities.</i></p>
Policy 4.2.25	<p><i>Where a resource consent application is for an activity in or immediately adjacent to a site of significance to tangata whenua, to require the applicant to notify and consult directly with the tangata whenua group in order to ascertain:</i></p> <ul style="list-style-type: none"> • <i>whether the granting of the resource consent would have any adverse effects on the values that cause the site to be significant to the tangata whenua; and</i> • <i>how any actual or potential adverse effects which might result from the activity could, from the tangata whenua viewpoint, be avoided, remedied or mitigated.</i>
Policy 4.2.27	<p><i>To not allow use and development which would restrict the access of tangata whenua to sites of cultural significance on land of the Crown, unless that access can specifically be provided for, or the loss can be adequately remedied.</i></p>
Objective 7.2.1	<p><i>To allow activities involving damage or disturbance to any foreshore or seabed, where the adverse effects are short term, reversible, or minor; and to allow other activities where adverse effects can be satisfactorily avoided, remedied or mitigated. As a guide, the following criteria will need to be met for the activity to be deemed to have minor adverse effects:</i></p> <p>....</p> <ul style="list-style-type: none"> • <i>the activity will not have any adverse effects on mahinga maataitai, waahi tapu or any other sites of significance to iwi.</i>
Proposed Natural Resources Plan, appeals version 2021	
Section	Relevant matters
Objective 3	<p><i>The importance and contribution of air, land, water and ecosystems to the social, economic, and cultural well-being and health of people and the community are recognised in the management of those resources.</i></p>
Objective 14	<p><i>The relationships of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga are recognised and provided for, including:</i></p> <ul style="list-style-type: none"> ○ <i>(a) maintaining and improving opportunities for Māori customary use of the coastal marine area, rivers, lakes and their margins and natural wetlands, and</i> ○ <i>(b) maintaining and improving the availability of mahinga kai species, in terms of quantity, quality and diversity, to support Māori customary harvest, and</i>

	<ul style="list-style-type: none"> ○ (c) providing for the relationship of mana whenua with Ngā Taonga Nui a Kiwa, including by maintaining or improving Ngā Taonga Nui a Kiwa so that the huanga identified in Schedule B are provided for, and ○ (d) protecting sites with significant mana whenua values from use and development that will adversely affect their values and restoring those sites to a state where their characteristics and qualities sustain the identified values.
Objective 15	<i>Kaitiakitanga is recognised and mana whenua actively participate in planning and decision-making in relation to the use, development, and protection of natural and physical resources.</i>
Objective 24	<p><i>Rivers, lakes, natural wetlands, and coastal water are suitable for contact recreation and Māori customary use, including by:</i></p> <ul style="list-style-type: none"> ○ (a) maintaining water quality, or ○ (b) improving water quality in: <ul style="list-style-type: none"> (i) significant contact recreation freshwater bodies and sites with significant mana whenua values and Ngā Taonga Nui a Kiwa to meet, as a minimum, the primary contact recreation objectives in Table 3.1, and (ii) coastal water and sites with significant mana whenua values and Ngā Taonga Nui a Kiwa to meet, as a minimum, the primary contact recreation objectives in Table 3.3.
Objective 34	<i>Significant historic heritage and its values are protected from inappropriate modification, use and development.</i>
Objective 44	<i>The adverse effects on soil and water from land use activities are minimised.</i>
Schedule C	Sites with significant mana whenua values
Schedule D	Statutory acknowledgements
Schedule E	Sites with significant historic heritage values
Regional Freshwater Plan for the Wellington Region 1999	
Section	Relevant matters
Policy 4.2.1	<i>To manage sites of special value to the tangata whenua in water bodies and river and lake beds so that the cultural values of those sites are not adversely affected.</i>
Policy 4.2.2	<p><i>To encourage applicants to consult directly with affected tangata whenua when making an application for a resource consent which is for an activity within, upstream, or immediately downstream of any identified site of special value to the tangata whenua. As part of this consultation the applicant should determine:</i></p> <ol style="list-style-type: none"> 1. <i>Whether granting the resource consent could have any adverse effects on the special values of the site.</i> 2. <i>How any potential adverse effects that might result from the activity could be avoided or remedied.</i>

Policy 4.2.33	<i>To provide for those activities which have no more than minor adverse effects on the environment. As a guide, the adverse effects of activities are likely to be no more than minor if the following criteria are met:</i> ... <i>6. there are no adverse effects on mahinga kai, waahi tapu, or any other sites of special value to tangata whenua; and...</i>
Method 8.1.1	<i>Investigate, with tangata whenua, methods of identifying, recording, and protecting sites of special value to the tangata whenua to give effect to Policy 4.2.1. Where appropriate, the Council will:</i> <ul style="list-style-type: none"> • <i>help establish appropriate protocols for managing such information, including the use of silent files, the development of a waahi tapu inventory, and iwi planning documents; and</i> • <i>consider the inclusion of a table of sites of special value to the tangata whenua in this Plan by way of a Plan change.</i>
Regional Coastal Plan for the Wellington Region, 2000	
Section	Relevant matters
Policy 4.2.45	<i>In the Lambton Harbour Development Area to:</i> <ul style="list-style-type: none"> • <i>recognise the heritage character, development, and associations of the area;</i>
Appendix 4	Features and Buildings of Historic Merit
Regional Soil Plan for the Wellington Region, 2000	
Section	Relevant matters
Policy 4.2.13	<i>To encourage resource consent applicants to notify and consult directly with any affected tangata whenua group where a resource consent application is for an activity in, or immediately adjacent to, a site of significance to tangata whenua. As part of this consultation the applicant should determine:</i> <ul style="list-style-type: none"> • <i>whether the granting of the resource consent would have any effects on the values that cause the site to be significant to tangata whenua; and</i> • <i>how any actual or potential adverse effects which might result from the activity could be avoided, remedied, or mitigated (in that order of preference).</i>

4.6 Iwi Management Plan(s)

There are no existing Iwi Management Plans relevant to this topic.

4.7 Relevant plans or strategies

The following plans and strategies are relevant to the topics of historic heritage, notable trees and sites and areas of significance to Māori:

- *Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021*
- *Te Atakura - First to Zero*
- *Wellington Resilience Strategy 2017*

- *Wellington Towards 2040: Smart Capital*
- *Te Ngākau Civic Precinct Draft Framework 2021*
- *Wellington Heritage Policy 2010*
- *Backyard Tāonga*
- *Our Natural Capital: Wellington's biodiversity strategy and action plan 2015*
- *Reserve Management Plans*

Details of the plans / strategies listed above and aspects of these that relate to the topics of historic heritage, notable trees and sites and areas of significance to Māori are provided in the table below.

Plan / Strategy	Organisation	Relevant Provisions
Our City Tomorrow – He Mahere Mokowā mō Pōneke - A Spatial Plan for Wellington City 2021	Wellington City Council	The Spatial Plan is a strategic document for the City that puts a high-level plan in place for how and where the City will grow. It also provides key policy direction that has influenced the review of the District Plan. This includes policy direction in relation to historic heritage, notable trees, and sites and areas of significance to Māori.
Wellington Regional Growth Framework 2021	Central Government, Councils from the Wellington region and mana whenua	The Wellington Regional Growth Framework is a spatial plan that describes a long-term vision for how the region will grow, change, and respond to key urban development and environmental challenges and opportunities in a way that gets the best outcomes and maximises the benefits across the region.
Te Atakura - First to Zero	Wellington City Council	<p>This is a strategy that seeks to make Wellington City a zero carbon capital (net zero emissions) by 2050. It outlines key activities that can help reduce our emissions in four target areas.</p> <p>The following outcomes reflect the outcomes sought by Te Atakura – First to Zero:</p> <ul style="list-style-type: none"> ○ The retention and ongoing use of heritage buildings is a sustainable option. ○ Existing mature trees assist to capture carbon from the atmosphere.
Wellington Resilience Strategy 2017	Wellington City Council	<p>This is a strategy that seeks to enable Wellingtonian City and its residents to better prepare for, respond to, and recover from disruptions resulting from natural disasters including earthquakes and sea level rise. An aspect of this strategy is making sure our natural and built environments are healthy and robust.</p> <p>The following strategies in this plan relate to the historic heritage:</p> <ul style="list-style-type: none"> ○ Building on matauranga Māori.

		<ul style="list-style-type: none"> ○ Developing Disaster Risk management plans for heritage areas, involving the identification of the most key heritage areas and investment in their resilience.
Wellington Towards 2040: Smart Capital	Wellington City Council	<p>Wellington Towards 2040: Smart Capital is a document that focuses on the future development of Wellington over the next 30 years.</p> <p>This document seeks to promote the following that are reflected in the Historic Heritage and Sites and Areas of Significance to Māori chapters:</p> <ul style="list-style-type: none"> ○ Wellington's 'story' told through built form and natural heritage. ○ The role of mana whenua celebrated and recognised by the visibility of Māori culture and history in the city.
Te Ngākau Civic Precinct Draft Framework 2021	Wellington City Council	<p>This is a draft framework seeks to guide the redevelopment of Te Ngākau Civic Square, which is listed in the Operative District Plan as a 'heritage area'.</p> <p>The draft framework recognises that Te Ngākau is entering a phase of transition, given that many buildings are currently closed due to due to earthquake damage or as a precaution due to seismic risk (including the Wellington City Library, the Civic Administration Building (CAB), the Municipal Office Building (MOB), Wellington iSite, car parks and Capital E).</p> <p>The purpose of the framework is to establish a strategic approach for reinstating Te Ngākau as the vibrant heart of the City (with Te Ngākau translating to 'the heart), while recognising:</p> <ul style="list-style-type: none"> ● Heritage values; ● Hazards, including current flooding/ inundation issues and the threat of sea level rise; ● Spatial issues, with respect to how the space is laid out and how activities will be provided for; ● The need for open space in the Central City; ● Affordability and public expectations; and ● Future development potential. <p>The District Plan reflects the strategic approach to Te Ngākau by:</p>

		<ul style="list-style-type: none"> • Removing the 'heritage area' listing and making this a 'Precinct' with specific planning provisions to ensure the recognition of civic and other unique values moved to the Central City Zone chapter. • Continuing to protect heritage buildings by listing specific buildings and objects within the heritage schedules. The provisions within the Historic Heritage chapter will enable works to improve the resilience of these items. • Partnering with mana whenua to ensure future development of (and within) Te Ngākau reflects Wellington's unique culture and identity, specifically with respect to mana whenua and Te Ao Māori.
Wellington Heritage Policy 2010	Wellington City Council	<p>This is a Council policy document that recognises Wellington's historic heritage buildings, sites and trees are a precious and finite resource and sets out objectives and actions for continued protection of this resource.</p> <p>The policy is based on the RMA requirements with respect to the determination and management of historic heritage and identifies that the District Plan is one of the methods that will achieve the objectives above. As such it has informed the Spatial Plan and District Plan review and applies to the Historic Heritage, Notable Trees and Sites and Areas of Significance to Māori chapters.</p> <p>Review of this policy is underway.</p>
Our Natural Capital – Wellington's Biodiversity Strategy and Action Plan 2015	Wellington City Council	<p>This is the Council's vision for the city's indigenous biodiversity, and outlines the vision, goals and objectives in this respect. It include goals and objectives that are relevant to the Notable Trees and Sites and Areas of Significance to Māori chapters:</p>
Botanic Gardens of Wellington Management Plan 2014	Wellington City Council	<p>This plan relates to the management of the City's four Botanic Gardens which contains Heritage buildings, heritage structures, heritage areas, notable trees and sites and areas of significance to Māor</p>
Orouaiti Reserve Management Plan 2011	Wellington City Council	<p>This co-management plan sets a framework for the Council and The Port Nicholson Block Settlement Trust for making decisions and managing the Orouaiti Reserve for the period 2011-2021. Section</p>

		1.2 of the plan sets out the historical significance of this reserve.
Wellington Town Belt Management Plan 2018	Wellington City Council	This plan, prepared under the Reserves Act 1977, provides a policy framework for management and decision-making related to the Wellington Town Belt. There are heritage buildings and structures, notable trees and sites and areas of significance to Māori throughout the town belt.

4.8 Other relevant legislation or regulations

The following additional legislative / regulatory requirements are also relevant to the topics of historic heritage, notable trees and sites and areas of significance to Māori:

Legislation / Regulation	Relevant Provisions	
Port Nicholson Block (Taranaki Whānui ki te Upoko o te Ika) Claims Settlement Act 2009	The purpose of this Act is to give effect to certain provisions of the deed of settlement, which is a deed that settles the historical claims of Taranaki Whānui ki Te Upoko o Te Ika.	
	Schedule 1 of this Act provides for Statutory Areas in both Wellington City and the Hutt valley including:	
	Kaiwharawhara Stream	As shown on SO 408069
	Coastal marine area	As shown on SO 408070
	Hutt River	As shown on SO 408071
	Waiwhetu Stream	As shown on SO 408072
	Wellington Harbour	As shown on SO 408073
	Riverside Drive marginal strip	As shown on SO 408074
	Seaview marginal strip	As shown on SO 408075
	Government Buildings Historic Reserve	As shown on SO 408076
Turnbull House Historic Reserve	As shown on SO 408077	
Rimutaka Forest Park	As shown on SO 408079	

	Wainuiomata Scenic Reserve		As shown on SO 408080																																
	Turakirae Head Scientific Reserve		As shown on SO 408081																																
	Kelburn Local Purposes (Community and Administrative Buildings) Reserve																																		
Ngati Toa Rangatira Claims Settlement Act 2014	<p>The purpose of this Act is to give effect to certain provisions of the deed of settlement that settles the historical claims of Ngati Toa Rangatira.</p> <p>Schedule 1 of this Act provides for Statutory Areas including:</p> <p>Statutory Area</p> <table border="1"> <tr> <td>Balance of Mana Island</td> <td>As shown on OTS-068-28</td> </tr> <tr> <td>Red Rocks Scientific Reserve</td> <td>As shown on OTS-068-29</td> </tr> <tr> <td>Pukerua Bay Scientific Reserve</td> <td>As shown on OTS-068-30</td> </tr> <tr> <td>Oteranga Bay Marginal Strip</td> <td>As shown on OTS-068-23</td> </tr> <tr> <td>Queen Elizabeth Park</td> <td>As shown on OTS-068-24</td> </tr> <tr> <td>Whareroa Farm</td> <td>As shown on OTS-068-25</td> </tr> <tr> <td>Te Onepoto Bay</td> <td>As shown on OTS-068-26</td> </tr> <tr> <td>Pauatahanui Wildlife Reserve</td> <td>As shown on OTS-068-31</td> </tr> <tr> <td>Horokiri Wildlife Management Reserve</td> <td>As shown on OTS-068-32</td> </tr> <tr> <td>Battle Hill Farm Forest Park</td> <td>As shown on OTS-068-27</td> </tr> <tr> <td>Lake Rotoiti, Nelson Lakes National Park</td> <td>As shown on OTS-068-33</td> </tr> <tr> <td>Lake Rotoroa, Nelson Lakes National Park</td> <td>As shown on OTS-068-34</td> </tr> <tr> <td>Wairau Pa</td> <td>As shown on OTS-068-35</td> </tr> <tr> <td>Chetwode Islands</td> <td>As shown on OTS-068-36</td> </tr> <tr> <td>Malcolm's Bay Scenic Reserve, Arapaoa Island</td> <td>As shown on OTS-068-37</td> </tr> <tr> <td>Hutt River and its tributaries</td> <td>As shown on OTS-068-45</td> </tr> </table>			Balance of Mana Island	As shown on OTS-068-28	Red Rocks Scientific Reserve	As shown on OTS-068-29	Pukerua Bay Scientific Reserve	As shown on OTS-068-30	Oteranga Bay Marginal Strip	As shown on OTS-068-23	Queen Elizabeth Park	As shown on OTS-068-24	Whareroa Farm	As shown on OTS-068-25	Te Onepoto Bay	As shown on OTS-068-26	Pauatahanui Wildlife Reserve	As shown on OTS-068-31	Horokiri Wildlife Management Reserve	As shown on OTS-068-32	Battle Hill Farm Forest Park	As shown on OTS-068-27	Lake Rotoiti, Nelson Lakes National Park	As shown on OTS-068-33	Lake Rotoroa, Nelson Lakes National Park	As shown on OTS-068-34	Wairau Pa	As shown on OTS-068-35	Chetwode Islands	As shown on OTS-068-36	Malcolm's Bay Scenic Reserve, Arapaoa Island	As shown on OTS-068-37	Hutt River and its tributaries	As shown on OTS-068-45
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Horokiri Wildlife Management Reserve	As shown on OTS-068-32																																		
Battle Hill Farm Forest Park	As shown on OTS-068-27																																		
Lake Rotoiti, Nelson Lakes National Park	As shown on OTS-068-33																																		
Lake Rotoroa, Nelson Lakes National Park	As shown on OTS-068-34																																		
Wairau Pa	As shown on OTS-068-35																																		
Chetwode Islands	As shown on OTS-068-36																																		
Malcolm's Bay Scenic Reserve, Arapaoa Island	As shown on OTS-068-37																																		
Hutt River and its tributaries	As shown on OTS-068-45																																		

	Maitai River and its tributaries	As shown on OTS-068-46
	Wairau River, Omaka River, Ōpaoa River, and Kaituna River and their tributaries	As shown on OTS-068-47
	Te Hoiere / Pelorus River and its tributaries	As shown on OTS-068-48
	Tuamarina River and its tributaries	As shown on OTS-068-49
	Buller River and its tributaries (northern portion)	As shown on OTS-068-50
	Waimea River and its tributaries	As shown on OTS-068-58
	Motueka River and its tributaries	As shown on OTS-068-59
	Coastal statutory areas	
	Statutory area	Location
	Cook Strait	As shown on OTS-068-38
	Te Awarua-o-Porirua Harbour	As shown on OTS-068-39
	Wellington Harbour (Port Nicholson)	As shown on OTS-068-40
	Thoms Rock / Tokahaere	As shown on OTS-068-41
	Kapukapuariki Rocks	As shown on OTS-068-42
	Toka-a-Papa Reef	As shown on OTS-068-43
	Tawhitikurī / Goat Point	As shown on OTS-068-44
	Te Tau Ihu coastal marine area	As shown on OTS-068-70
Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA)	The HNZPTA provides direction for the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand. This includes the matters of sites and areas of significance to Māori	

5.0 Resource Management Issues Analysis

5.1 Background

This section sets out the background to each of the topics addressed in this report, considering the background reports that have been prepared with respect to each topic, which summarise the existing legislative and strategic context, assess the effectiveness of the Operative District Plan provisions based on monitoring work, and provide the rationale for the proposed changes.

5.2 Evidence Base - Research, Consultation, Information and Analysis undertaken

Historic Heritage:

Title	Author	Brief synopsis and actions
Heritage Background Report	Wellington City Council	This report discusses the regulatory framework through which Council must manage historic heritage resources.
Heritage Resource Quantitative Analysis	Wellington City Council	This report contains a quantitative analysis of resource and building consents issued for works on historic heritage between 2006 and 2019. The report shows that there were 393 resource consent applications and 1306 building consent applications for activities on sites with a heritage listed item.
Heritage Background Report	Wellington City Council	This primarily discusses the importance of historic heritage and the strategic context, including the legislative framework in which the Proposed District Plan is being written. It also details recent work the Council has undertaken with respect to heritage, which includes a review of the Heritage Inventory and a resilience review undertaken by the building consents team.
Historic Heritage Issues and Options Paper	Wellington City Council	<p>The Heritage Issues and Options Paper considers whether the Operative District Plan provisions meet the following:</p> <ul style="list-style-type: none"> - The Council's obligations with respect to section 6(f) of the RMA. - The outcomes indicated in the Spatial Plan. - The outcomes sought in the Wellington Heritage Policy 2010. - Best practice with respect to historic heritage. - The views and values of the City's residents. <p>This paper highlights that the District Plan review is an opportunity to ensure that the District Plan does reflect the above outcomes and aspirations and addresses any deficits in the existing Plan.</p>

		<p>Notably, the report identifies that the current District Plan heritage list underrepresents some <u>types</u> of heritage, including:</p> <ul style="list-style-type: none"> - Archaeological sites - Surroundings - Interiors - Modernist buildings - Suburban heritage <p>The report recommends better representation of these in the Proposed District Plan.</p>
Options Analysis – Archaeological Sites	Wellington City Council	This report assesses different options available to the Council to protect significant archaeological sites within Wellington City. It includes evaluation of the status quo (no protection other than NZAA), through to including every archaeological site recorded. It recommends scheduling a small number of significant sites.
Historical Heritage Technical Review Panel Officer Report	Wellington City Council	This report presents officers preferred provisions to a panel of senior resource management professionals for critical evaluation.
Evaluation of local authorities' approaches to archaeological sites in district plans	Wellington City Council	Evaluates local authority approaches to archaeological sites in district plans. Concludes there are a number of different approaches from reflecting NZAA sites in plans, through to more nuanced assessments.
Review of operative district plan heritage list against 2013 Thematic Review of Wellington's heritage	Wellington City Council	<p>Our approach to assessing possible new heritage listings has been based on analysis of the current heritage schedule against the Thematic Heritage Study of Wellington's 2013. This has given us a picture of which themes are represented well through current heritage listings, and which are not.</p> <p>From our database of over 600 items, we have prioritised shortlisting and assessment of items that:</p> <ol style="list-style-type: none"> 1. Are identified by Heritage New Zealand Pouhere Taonga as important places. 2. Represent themes of Wellington's history and heritage that are not well represented on the current schedule; and 3. the Council holds good information on. This is generally because a place has been previously identified as having significant heritage values. <p>Each of the places and objects that we have prioritised for this process has had a detailed assessment of its heritage values completed and shared with owners before the notification of the Proposed District Plan.</p>

		<p>As a result of this exercise the following items are being proposed for listing</p> <ol style="list-style-type: none"> 1. 10 new heritage areas 2. 52 new heritage buildings 3. 4 new heritage structures 4. 3 new archaeological sites 																																				
<p>Evaluation of operative district plan heritage list against criteria for listing</p>	<p>Wellington City Council</p>	<p>All items on the operative district plan heritage list have had a high-level assessment to confirm that they meet the criteria for listing or that heritage listing is the best method of managing their values.</p> <p>As a result of this assessment the following items are being removed from the heritage list:</p> <table border="1" data-bbox="719 719 1410 1912"> <thead> <tr> <th data-bbox="719 719 919 808">DP reference</th> <th data-bbox="919 719 1410 808">Building, structure or area</th> </tr> </thead> <tbody> <tr> <td data-bbox="719 808 919 864">2.2</td> <td data-bbox="919 808 1410 864">68 Abel Smith Street</td> </tr> <tr> <td data-bbox="719 864 919 920">386</td> <td data-bbox="919 864 1410 920">4 Imlay Crescent</td> </tr> <tr> <td data-bbox="719 920 919 976">4</td> <td data-bbox="919 920 1410 976">128 Abel Smith Street</td> </tr> <tr> <td data-bbox="719 976 919 1032">19</td> <td data-bbox="919 976 1410 1032">62 Austin Street</td> </tr> <tr> <td data-bbox="719 1032 919 1133">184</td> <td data-bbox="919 1032 1410 1133">199-201 Lambton Quay – Hamilton Chambers</td> </tr> <tr> <td data-bbox="719 1133 919 1234">425</td> <td data-bbox="919 1133 1410 1234">211 Taranaki Street/Buckle Street – Olphert</td> </tr> <tr> <td data-bbox="719 1234 919 1290">21.1</td> <td data-bbox="919 1234 1410 1290">Erskine College Main Building</td> </tr> <tr> <td data-bbox="719 1290 919 1346">206</td> <td data-bbox="919 1290 1410 1346">61 Majoribanks Street</td> </tr> <tr> <td data-bbox="719 1346 919 1402">363.6</td> <td data-bbox="919 1346 1410 1402">57 Wright Street</td> </tr> <tr> <td data-bbox="719 1402 919 1458">363.7</td> <td data-bbox="919 1402 1410 1458">58 Wright Street</td> </tr> <tr> <td data-bbox="719 1458 919 1514">363.8</td> <td data-bbox="919 1458 1410 1514">59 Wright Street</td> </tr> <tr> <td data-bbox="719 1514 919 1570">363.9</td> <td data-bbox="919 1514 1410 1570">61 Wright Street</td> </tr> <tr> <td data-bbox="719 1570 919 1671">77/2</td> <td data-bbox="919 1570 1410 1671">104 Cuba St (façade) now a heritage area contributor</td> </tr> <tr> <td data-bbox="719 1671 919 1727">153.1</td> <td data-bbox="919 1671 1410 1727">121 Holloway Road</td> </tr> <tr> <td data-bbox="719 1727 919 1783">419</td> <td data-bbox="919 1727 1410 1783">Shed 35, 1915</td> </tr> <tr> <td data-bbox="719 1783 919 1839">13</td> <td data-bbox="919 1783 1410 1839">Masfield way gardens heritage area</td> </tr> <tr> <td data-bbox="719 1839 919 1912">29</td> <td data-bbox="919 1839 1410 1912">Civic Centre heritage area</td> </tr> </tbody> </table>	DP reference	Building, structure or area	2.2	68 Abel Smith Street	386	4 Imlay Crescent	4	128 Abel Smith Street	19	62 Austin Street	184	199-201 Lambton Quay – Hamilton Chambers	425	211 Taranaki Street/Buckle Street – Olphert	21.1	Erskine College Main Building	206	61 Majoribanks Street	363.6	57 Wright Street	363.7	58 Wright Street	363.8	59 Wright Street	363.9	61 Wright Street	77/2	104 Cuba St (façade) now a heritage area contributor	153.1	121 Holloway Road	419	Shed 35, 1915	13	Masfield way gardens heritage area	29	Civic Centre heritage area
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Notable trees:

Title	Author	Brief synopsis
Summary Report – Listed Heritage Trees Resource Consents'	Wellington City Council	<p>This report provides background and insight to how the operative District Plan's provisions have worked in relation to listed heritage trees. Within 2005 and 2020 there were 16 resource consent applications under Rule 21C.2.1, of which 13 were for works within the dripline of the tree, four were for trimming and two were for the removal of a listed tree. It is assumed that of the 16, some applications involved both trimming and works within the dripline. Most applications related to pohutukawa or Norfolk pines.</p> <p>The Standard Tree Evaluation Method (STEM) sets the threshold for scheduling a tree as notable within the District Plan and the Council has followed this methodology.</p>
Review of local authority STEM listing thresholds	Wellington City Council	Reviewed STEM listing thresholds across a number of Councils in New Zealand. Concluded that 110 threshold is appropriate for the Wellington Region.
STEM assessments of notable trees	Paper Street Tree Company	<p>This work assessed all notable trees currently on the Heritage Tree list against the Standard Tree Evaluation Method (STEM). It also assessed new nominations. It recommended:</p> <ul style="list-style-type: none"> • Removing 7 trees which scored below 110; • Removing 12 trees that have been removed or are dead/ in a state of terminal decline; and • Adding 32 trees that meet the criteria for listing. <p>The Council has STEM assessments of every tree on the list.</p>

Sites and Areas of Significance to Māori:

Title	Author	Brief synopsis
Monitoring Report	Wellington City Council	<p>Provides insight to how the operative District Plan's provisions have worked.</p> <p>Concludes that Rule 21E.1.1 does not seem to be effective in managing effects on Māori sites of significance given it was only applied six times over 15 years. However, there does appear to be a general understanding of the importance of these sites and consultation with iwi in relation to them.</p>
Māori Sites of Significance – Wellington District 2021	Raukura Consultants	Helped formulate the basis for the sites and areas of significance scope for Taranaki Whānui hapū.

	- Morrie Love	
District Plan Māori Sites of Significance 2013	Ailsa Cain	Helped formulate the basis for the sites and areas of significance scope. Also provided context for the treaty settlements involved.
Review of Māori Sites of Significance Wellington City District Plan - Makara and South Coast Area Review of Archaeological Information - 2021	Capital Heritage Limited	Provided archaeological update on the findings seen in Wellington's South Coast. This was then analysed by planning officer, which compared the archaeological information with the information which was already available to WCC.
Mana whenua advice	Mana whenua	Anecdotal evidence gathered through conversations with iwi, used to confirm the extent of the sites and areas of significance.

In addition to the material listed in the table above, the Council has also used the following sources of information and advice in relation to the topic of sites and areas of significance to Māori:

- Morrie Love XML GIS Layers – Eastern Ward and CBD.
- New Zealand Archaeological Association Sites and Areas (ArcSite).
- Capital Heritage provided Pā archaeological reports and maps (Victoria Grouden).
- Wellington Water stormwater locations (Stormwater Open Channel, Stormwater Pipe).
- A subsoil survey of Wellington City. Bastings L. 1936. New Zealand Institute of Architects Journal. 15(5):75-78.
- NZ Cadastral Survey Plan Maps. Accessed using Cadastral Index, Institute of Cadastral Surveying Inc.
- WCC Draft District Plan Overlays (Stream Corridor Overlay, Significant Natural Areas, Hilltops and Ridgelines).
- Taranaki Whānui ki Te Upoko o Te Ika Deed of Settlement documents.
- The Great Harbour of Tara, 1959. G. Leslie Adkin.
- Map of Wellington and Environs, 1915. With notes from Elsdon Best.
- Wellington Country District Shewing (sic) Native Names, 1916.
- “Mana Whenua Inventory of Precinct and Sites of Significance”. 2021. Compiling all data Council had on the current list of sites and areas of significance.
- “Summarising the 'WCC DP South coast Sites Report'.” 2021. Reflection on a report which was provided.
- “Nga Waahi Taonga O Te Whanganui a Tara – Māori Sites Inventory”
- “Proposed Natural Resources Plan”.
- “Initial list of significant places to Ngāti Toa Rangatira in the Wellington District.”
- Wellington City Council. (1995). “Nga Waahi Taonga O Te Whanganui a Tara: Māori Sites Inventory”.
- Raukura Consultants. (2018). “Significant Natural Areas (SNA), Outstanding Natural Landscapes and Features and Special Amenity Landscapes – Wellington City – Māori Sites, And Statutory Acknowledgment Areas and Māori Features Within the Landscapes.”

- James Barnes & Associates. (1990). Māori Historical Information Base for the Wellington City Council Area, Part One – History, Bibliography and Site Mapping Information.
- Ngati Toa Rangatira Deed of Settlement. (2012).
- Port Nicholson Block (Taranaki Whanui Ki Te Upoko O Te Ika) Deed of Settlement. (2007). 2: *Statement of Association: Kelburn Local Purposes (Community and Administrative buildings) Reserve.*

5.3 Operative District Plan provisions of relevance

The provisions of the Operative District Plan of relevance to the topics of this report are summarised below.

Topic	Summary of relevant provisions
Chapter 20: Heritage	<p>This chapter sets out the two objectives and 17 supporting policies in relation to historic heritage, which are as follows:</p> <p><i>Objective 20.2.1 To recognise the City’s historic heritage and protect it from inappropriate subdivision use and development</i></p> <p><i>Policy 20.2.1.1 Identify, record, and list the city’s significant historic heritage.</i></p> <p><i>Policy 20.2.1.2 To discourage demolition, partial demolition and relocation of listed buildings and objects while:</i></p> <ul style="list-style-type: none"> • <i>acknowledging that the demolition or relocation of some parts of buildings and objects may be appropriate to provide for modifications that will result in no more than an insignificant loss of heritage values; and</i> • <i>giving consideration to total demolition or relocation only where the Council is convinced that there is no reasonable alternative to total demolition or relocation.</i> <p><i>Policy 20.2.1.5 Identify heritage areas to cover groups of buildings, structures, spaces, and other features, which collectively have significant historic heritage value.</i></p> <p><i>Policy 20.2.1.6 Protect buildings, structures, spaces, and other features integral to the significance of a heritage area and allow demolition, destruction, or relocation, where there are no significant effects on heritage values.</i></p> <p><i>Policy 20.2.1.7 Ensure additions and alterations to existing buildings, any new buildings or subdivision within a heritage area avoid, remedy, or mitigate the adverse effects on the heritage values of the heritage area.</i></p> <p><i>Policy 20.2.1.8 Maintain and enhance the heritage values, qualities, and character of listed heritage areas.</i></p> <p><i>Policy 20.2.1.9 Ensure that signs on listed heritage buildings or objects (or sites on which they are located) or within heritage areas do not adversely affect heritage values and</i></p>

Topic	Summary of relevant provisions
	<p><i>qualities and avoid unnecessary or inappropriate signage.</i></p> <p><i>Policy 20.2.1.10 Protect listed trees from destruction and loss, and control the effects of trimming and changes to ground levels or other activities within the dripline of trees, to only allow these activities where they maintain or enhance the heritage values recognised in the listing of trees in section 20.1.3.</i></p> <p><i>Policy 20.2.1.11 Avoid, remedy, or mitigate the adverse effects of development on the archaeological values of any site.</i></p> <p><i>Objective 20.2.2 To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington’s tangata whenua and other Māori.</i></p> <p><i>Policy 20.2.1.1 Identify, record, and list the city’s significant historic heritage.</i></p> <p><i>Policy 20.2.1.2 To discourage demolition, partial demolition and relocation of listed buildings and objects while:</i></p> <ul style="list-style-type: none"> <i>• acknowledging that the demolition or relocation of some parts of buildings and objects may be appropriate to provide for modifications that will result in no more than an insignificant loss of heritage values; and</i> <i>• giving consideration to total demolition or relocation only where the Council is convinced that there is no reasonable alternative to total demolition or relocation.</i> <p><i>Policy 20.2.1.3 Promote the conservation and sustainable use of listed buildings and objects while ensuring that any modification avoids, remedies, or mitigates, effects on heritage values of the listed buildings or objects and where relevant:</i></p> <ul style="list-style-type: none"> <i>• ensures that modifications to the main elevations are minimised, or if possible are unaltered;</i> <i>• any modifications respect the scale of the building or object; and</i> <i>• any modifications maintain the relationship of the building or object with its setting.</i>
21A: Buildings and Objects	<p>Objective 20.2.1 and policies 20.2.1.1 and 20.2.1.2 relate to heritage buildings and objects.</p> <p>Rule 21A.1 provides for repairs, maintenance, and internal works to occur as a Permitted Activity (where the interior of a building is not listed). There is a definition of ‘Repairs and Maintenance’ within chapter 3 that clearly specifies which works this rule applies to.</p> <p>All other works involving listed buildings or objects require resource consent. Construction works, including building modifications and demolition, are two categories:</p> <ol style="list-style-type: none"> 1. Rule 21A.2.1 - Modifications to listed buildings/objects

Topic	Summary of relevant provisions
	<p>2. Rule 21A.2.2 - Modifications to buildings/objects that involve works to buildings/objects that are not listed, where there is a listed building/object on the site.</p> <p>In both instances, the works are a Discretionary (Restricted) Activity, with discretion restricted to:</p> <ul style="list-style-type: none"> • historic heritage; and • the height, coverage, bulk, and massing of buildings (to the extent that these affect historic heritage). <p>Rule 21A.2.1 relates to listed buildings and objects and is subject to 19 assessment criteria. These are:</p> <p>21A.2.1.4 <i>The extent to which proposals meet the provisions of any relevant Design Guide addressing additions or alterations to buildings of heritage significance</i></p> <p>21A.2.1.5 <i>The nature, form and extent of the proposed work and the extent to which the work:</i></p> <ul style="list-style-type: none"> • <i>Retains the main determinants of the style and character of the building or object and in respect of buildings, particularly the street elevation. The Council seeks to ensure that modifications to street elevations are kept to a minimum, and if possible, not altered at all. If necessary, preference shall be given to altering rear or secondary elevations.</i> • <i>Respects the scale of the original building or object. The Council seeks to ensure new work is not usually dominant, particularly where rooftop additions are proposed.</i> • <i>Is sympathetic in form, proportions, materials, colours, and the patina of materials of the existing building or object.</i> • <i>Avoids the loss of historic fabric and the destruction of significant materials and craftsmanship.</i> • <i>Maintains the relationship of the building or object with its setting.</i> <p>21A.2.1.5 <i>Respects the historic or other values for which the building was listed.</i></p> <p>21A.2.1.6 <i>Whether the restoration of former architectural design elements maintains a high level of authenticity. The Council will require evidence of the design of missing elements.</i></p> <p>21A.2.1.7 <i>Whether the removal of existing unsympathetic additions to a building or object can be achieved without altering the significance of the building or object.</i></p> <p>21A.2.1.8 <i>The extent to which the work is necessary to ensure structural stability, accessibility, and means of escape from fire and the extent of the impact of the work on the heritage values of the building. The Council will seek to ensure that</i></p>

Topic	Summary of relevant provisions
	<p><i>in any case every reasonable alternative solution has been considered to minimise the effect on heritage values.</i></p> <p>21A2.1.9 <i>Whether in respect of work involving listed interiors or listed interior items, the original plan form of the building, the primary spaces and their sequential layout, and any significant architectural features and significant finishes are respected or conserved.</i></p> <p>21A2.1.10 <i>The extent to which the work is necessary to enable the continued use of the building.</i></p> <p>21A2.1.11 <i>Whether professional heritage or conservation advice has been obtained from the NZHPT or any other professionally recognised expert in heritage conservation.</i></p> <p>21A.2.1.12 <i>Whether work is in accordance with a conservation plan prepared for the building or object and peer reviewed by the Council.</i></p> <p>21A.2.1.13 <i>Whether the site has or is likely to have significant archaeological values, and whether the effects on those values by the proposal can be adequately avoided, remedied, or mitigated.</i></p> <p>21A.2.1.14 <i>Whether there is any change in circumstances that has resulted in a reduction of the building's heritage significance since the building was identified in the plan</i></p> <p>21A.2.1.15 <i>The extent to which the building or object has been damaged by fire or other human generated disaster or any natural disaster.</i></p> <p>21A.2.1.16 <i>Whether it is necessary to save the building or object from damage or destruction arising from ground subsidence, landslip, flooding or other natural disaster.</i></p> <p>21A.2.1.17 <i>Where relocation is proposed to enhance the development potential of land, whether this should override the heritage value of retaining the building or object in its original location.</i></p> <p>21A.2.1.18 <i>Whether the relocated building will remain in the immediate vicinity or neighbourhood.</i></p> <p>21A.2.1.19 <i>Whether the proposed site for the relocated building or object is appropriate and will assist in mitigating the loss of heritage values arising from the relocation.</i></p> <p>21A.2.1.20 <i>Whether a heritage building, or object is to be relocated</i></p>

Topic	Summary of relevant provisions
	<p><i>to its original location or site and the appropriateness of the original location or site to accommodate the building or object.</i></p> <p>21A.2.1.21 <i>Whether adaptive reuse of a listed building or object will enable the owners, occupiers, or users of it to make reasonable and economic use of it.</i></p> <p>21A.2.1.22 <i>The public interest in enhancing the heritage qualities of the City and in promoting a high quality, safe urban environment.</i></p> <p>Rule 21.2.2 relates to works on sites containing a heritage building and is subject to the following assessment criteria:</p> <p>21A.2.2.3 <i>The extent to which the proposal detracts from the values for which the building or object was listed.</i></p> <p>21A.2.2.4 <i>The relationship of the surroundings of the site to the listed heritage building or object.</i></p> <p>21A.2.2.5 <i>Whether the site has or is likely to have significant archaeological values, and whether the effects on those values by the proposal can be adequately avoided, remedied or mitigated.</i></p> <p>In some instances, both of the above rules and sets of assessment criteria apply.</p> <p>Rule 21A.3.1 applies to the subdivision of a site containing a listed building or object, which is a Discretionary (Unrestricted) activity.</p>
21B: Heritage Areas	<p>Objective 20.2.1 and policies 20.2.1.1 and 20.2.1.5 to 20.2.1.8 relate to heritage areas.</p> <p>Rule 21B.1 provides for repairs, maintenance and internal works involving buildings in a heritage area to occur as a Permitted Activity, as also applies to this rule.</p> <p>It is noted that this section distinguishes between buildings that contribute to the heritage values of the heritage area, and non-heritage buildings.</p> <p>The Discretionary (Restricted) Activities below relate to contributing buildings. The heritage area rules are also split into two categories, but separate modifications from demolition:</p> <ul style="list-style-type: none"> • Rule 21B.2.1 - Modifications to buildings • Rule 21B.2.2 - Demolition of buildings <p>As with rule 21A, the matters of discretion are restricted to:</p> <ul style="list-style-type: none"> • historic heritage; and • the height, coverage, bulk, and massing of buildings (to the extent that these affect historic heritage). <p>Rule 21B.2.1 is subject to the following assessment criteria:</p>

Topic	Summary of relevant provisions
	<p>21B.2.1.3 <i>The extent to which the form, mass, proportion and materials of the new building or structure is compatible with the original architectural style predominant in the heritage area.</i></p> <p>21B.2.1.4 <i>The extent to which the new building or structure is positioned or sited to maintain continuity of front façade alignment of buildings in the vicinity.</i></p> <p>21B.2.1.5 <i>The extent to which proposals meet the provisions of any relevant Design Guide and particularly in respect of the Heritage Areas within the Central Area, the provisions of the Central Area Urban Design Guide.</i></p> <p>21B.2.1.6 <i>For modifications, alterations, and additions the Council will have regard to relevant assessment criteria under Rule 21A.2.1.</i></p> <p>21B.2.1.7 <i>Whether professional heritage or conservation advice has been obtained from the NZHPT or any other professionally recognised expert in heritage conservation.</i></p> <p>21B.2.1.9 <i>Whether the site has or is likely to have significant archaeological values, and whether the effects on those values by the proposal can be adequately avoided, remedied, or mitigated.</i></p> <p>Rule 21B.2.2 is subject to the following assessment criteria:</p> <p>21B.2.2.3 <i>Whether there is any change in circumstances that has resulted in a reduction of the area's heritage significance since the area was identified in the Plan.</i></p> <p>21B.2.2.4 <i>The extent to which buildings, structures or other features comprising a heritage area have been damaged by fire or other human generated disaster or any natural disaster.</i></p> <p>21B.2.2.5 <i>Whether relocation is necessary to save a building, structure or other feature comprising a heritage area from ground subsidence, landslip, flooding or other natural disaster.</i></p> <p>21B.2.2.6 <i>Whether it can be demonstrated irrefutably that no sustainable continued use of buildings within a heritage area is possible.</i></p> <p>21B.2.2.7 <i>Whether it can be demonstrated that a building proposed for demolition or relocation has no intrinsic heritage value and does not contribute to the significance of the heritage area.</i></p> <p>21B.2.2.8 <i>Where the demolition or relocation of a building that contributes to the significance of the heritage area is</i></p>

Topic	Summary of relevant provisions
	<p><i>proposed to enhance the development potential of land, whether this should override the heritage value of retaining the building in its existing location.</i></p> <p>21B.2.2.9 <i>The extent to which proposed replacement buildings are compatible with the original architectural style predominant in the heritage area and maintain the continuity of front façade alignment of buildings in the vicinity.</i></p> <p>21B.2.2.10 <i>Whether the site has or is likely to have significant archaeological values, and whether the effects on those values by the proposal can be adequately avoided, remedied, or mitigated.</i></p> <p>There are instances where both Rule 21B.2.1 and 21B.2.2 apply, and/or these provisions apply in conjunction with the rules at section 21A.</p> <p>Rule 21B.2.3 applies to earthworks in a heritage area, with consent required as a Discretionary (Restricted) activity and discretion restricted to “effects on historic heritage”. The following assessment criteria are listed under this rule:</p> <p>21B.2.3.2 <i>Whether the earthworks will result in the loss of heritage values for which the area was listed. The extent to which earthworks will enhance the use or appreciation of a listed heritage area.</i></p> <p>21B.2.3.3 <i>The extent to which earthworks are necessary to</i></p> <p>21B.2.3.4 <i>provide for the protection or conservation of buildings, structures or features constituting a heritage area. Whether the site has or is likely to have significant</i></p> <p>21B.2.3.5 <i>archaeological values, and whether the effects on those values by the proposal can be adequately avoided, remedied or mitigated.</i></p> <p>Rule 21B.3.1 applies to the subdivision of a site within a heritage area, which is a Discretionary (Unrestricted) activity.</p>
21C: Trees	<p>Objective 20.2.1 and policy 20.2.1.10 relate to heritage trees.</p> <p>Rule 21C.1.1 provides for minor trimming and some limited works within the dripline of a listed tree to occur as a Permitted Activity.</p> <p>All other works require resource consent for a Discretionary (Unrestricted) Activity under Rule 21C.2.1 and are subject to the assessment criteria below:</p> <p>21C.2.1.1 <i>In respect of any listed tree:</i></p> <ul style="list-style-type: none"> • <i>the necessity for carrying out the work</i> • <i>whether the tree has a potentially fatal disease or has been damaged beyond recovery.</i>

Topic	Summary of relevant provisions
	<ul style="list-style-type: none"> • <i>the need for compliance with any statutory or legal obligation under other legislation.</i> • <i>whether the tree can be, or needs to be, relocate</i> • <i>whether the proposal can be altered to achieve greater protection or preservation of the tree while still meeting the objectives of the applicant.</i> <p>21C.2.1.2 <i>In respect of any activity carried out within the dripline of any listed tree:</i></p> <ul style="list-style-type: none"> • <i>whether the proposed activity within the dripline is likely to damage the tree or endanger its health</i> • <i>the necessity for carrying out the works.</i>
21E: Māori Sites	<p>Objective 20.2.2 and policies 20.2.2.1 to 20.2.2.3 relate to Māori sites.</p> <p>Within the Operative District Plan there is a singular rule regarding Māori sites, being 21E.1.1:</p> <p><i>The total or partial demolition, destruction, or removal of any listed site of significance to tangata whenua or other Māori, is a Discretionary Activity (Unrestricted).</i></p> <p>This is accompanied by the following assessment criteria, which require an assessment of the following:</p> <p>21E.1.1.1 <i>The degree to which the activity detracts from the heritage significance of the site.</i></p> <p>21E.1.1.2 <i>Where the site is within a Māori Precinct, the effect of the activity on the significance and objectives of the Precinct.</i></p> <p>21E.1.1.3 <i>The outcome of consultation with tangata whenua and other Māori.</i></p>
Archaeological sites	<p>At present, there are no rules or assessment criteria within Chapter 20 for the use or development of archaeological sites.</p> <p>The following two policies do reference these sites:</p> <ul style="list-style-type: none"> • Policy 20.2.1.11 (set out above). <p>And, in chapter 29 – Earthworks:</p> <ul style="list-style-type: none"> • <i>Policy 29.2.1.12 Protect koiwi (human remains), taonga, Māori and Non-Māori material and archaeological sites dated from before 1900, by advising applicants of their obligations under legislation and using enforcement powers where necessary.</i>
Heritage Orders	<ol style="list-style-type: none"> 1. Plimmer House, 99 Boulcott Street. (New Zealand Historic Places Trust) 2. St. James Theatre, 77-81 Courtenay Place. (New Zealand Historic Places Trust) 3. BNZ Buildings 1, 239-243 Lambton Quay and 3, 98-102 Customhouse Quay. (New Zealand Historic Places Trust) 4. The Public Trust Building, 131-135 Lambton Quay. (New Zealand Historic Places Trust)

Topic	Summary of relevant provisions
	5. Prime Ministers Residence, 260 Tinakori Road. (New Zealand Historic Places Trust) 6. State Insurance Building, 143-149 Lambton Quay. (New Zealand Historic Places Trust) 7. Erskine College, 21-35 Avon Street, (Save Erskine College Trust)

5.4 Analysis of Operative District Plan provisions relevant to these topics

Historic Heritage

The Operative District Plan provisions for heritage building, structures and areas are within the Heritage chapters, with the objectives and policies at chapter 20 and the rules at chapter 21.

Heritage Buildings and Heritage Structures

Feedback from Council's Resource Consents Team on the effectiveness of the Operative District Plan provisions is as follows:

- The number of assessment criteria (in particular), means that extensive heritage assessments are required. These can exceed 50 pages in length. This creates costs and delays for developers.
- Some assessment criteria are given excessive weight compared to others, meaning the intent of the policy can be applied differently by different people.
- There is overlap between the assessment criteria for buildings/objects and heritage areas.
- There is enough in the objectives, policies and matters of discretion to assess all of the above without needing a separate assessment of each criterion.
- Heritage is commonly singled out as the factor delaying a proposal from being granted resource consent.
- There are typically heritage experts with conflicting views which means that resource consent planners are left in a position of having to choose one heritage expert over another.
- Archaeological values have one assessment criterion but no specific rule. They are therefore not protected in the district plan.
- The activity status for modifications to heritage buildings and demolition is the same, whereas total demolition could be subject to a higher test. This would have the benefit of reducing time on applications for small scale modifications and allowing more comprehensive assessment of applications for demolition.
- The above provisions apply in conjunction with area-based heritage provisions (for example, objectives policies for the Central Area in Chapter 12), as well as provisions in the Central Area Urban Design Guide. This results in additional complexity.
- Where a heritage rule is not triggered, the area based and design guide provisions do, however, provide the planner with scope to consider heritage. This method, which has been contested by developers, is often the only recourse for considering effects on significant heritage buildings/objects/areas. Examples include the developments of 1 Tasman Street (next to the National War Memorial) and 61 Molesworth Street (next to

the Wellington Cathedral of St Paul and Parliament). Without these provisions, no consideration of heritage would have been possible.

Heritage Areas

Feedback from Council's Resource Consents Team on the effectiveness of the Operative District Plan provisions is as follows:

- The assessment criteria have been used to provide buildings within these areas the same status as heritage buildings. This has added complexity and confusion to resource consents.
- Where buildings are listed buildings/objects and within heritage areas, and the provisions of section 21A have prevalence, the provisions of section 21B have also been assessed by the Council's heritage experts, adding complexity, time delays and costs.
- The assessment of applications under these rules has often conflated the importance of non-contributing features, such as the rear elevations and yards; thereby preventing proposals that would have an overall benefit to the heritage area – for example, strengthening works that would update the appearance of both the building and the area and allow for its ongoing use, where a rear addition would make these works financially viable. This leads to a risk of 'demolition by neglect', which is a poor outcome for the heritage area.
- The area-based and design guide provisions that relate to heritage apply in conjunction to these rules.

Archaeological Sites

There are no provisions explicitly managing archaeological sites other than a general policy to avoid remedy or mitigate effects on archaeological values. This is acknowledged as a gap in the operative district plan.

Heritage Orders

Where a heritage order is included in the District Plan any work on the site will require prior written consent of the relevant heritage protection authority named in the District Plan. There are seven heritage orders in the Operative District Plan. These have been included in the Proposed District Plan with the only change being to the name of Heritage New Zealand Pouhere Taonga (formerly shown as Heritage New Zealand). The Erskine College Heritage Order was requested to be rolled over as is by the Save Erskine College Trust.

Notable Trees

Feedback from Council's Resource Consents Team on the effectiveness of the Operative District Plan provisions is as follows:

- There is not a consistent methodology for evaluating trees in the Operative District Plan. Useful information, such as the age of the tree, is not always available in the listing and is therefore not taken into account in decision-making.

Sites and Areas of significance to Māori

During the course of reviewing the operative provisions several issues were identified.

- The general rule covers a broad range of activities and does not consider the sites and areas which have already been destroyed or damaged. This does not assist with elevating the importance of these taonga.
- This same rule does not provide for appropriate management of effects on sites that are underground and known to be there but have not yet been discovered. In these cases, works that lead to the discovery of these sites can partially or fully destroy them. This has led to protracted and convoluted resource consent outcomes.
- There is an assessment criterion in relation to ‘Māori Precincts’ which are identified on the planning maps but have no associated rule. This creates difficulty and inconsistencies with the purpose and intent of these precincts.
- The monitoring report has indicated that triggering of consent did not always lead to consultation with mana whenua.
- There is concern that the existing heritage objectives and policies have provided minimal (if any) opportunities for Māori to “*exercise tino rangatiratanga and kaitiakitanga*”, and that Operative District Plan fails to adequately address section 6(e) of the RMA.

5.4.1 Analysis of other District Plan provisions relevant to this topic

Historic heritage

Heritage New Zealand Pouhere Taonga routinely carry out assessments of provisions in District Plans against their own desired standards for rule status and policy direction. The latest version of the ‘National Assessment RMA Plans and Policies – Heritage Provisions’ was carried out in 2021. A copy of the document can be found here: <https://www.heritage.org.nz/protecting-heritage/~link.aspx?id=FB9D1973F7D84550A63C78981CF2B6A8&z=z>

The 2021 document found in summary that:

- The overall percentage of List entries scheduled and protected in plans has increased slightly from 88% to 90% since the 2018 Assessment.
- There is typically a lower standard of regulation nationwide for Māori heritage than for scheduled built heritage and there has been no improvement.
- Ninety-six percent of plans protect built heritage with at least a discretionary rule, although in four plans demolition is a permitted activity for a third tier of scheduled heritage, subject to notification.
- Most of the recent plans have permitted activity rules for repair and maintenance, but some rely on definitions rather than performance standards.
- Fifty-seven percent of plans still do not make specific provisions to facilitate safety improvements to heritage structures, including one recently proposed plan.
- Some recent plans have a hierarchy based on heritage significance and degree of intrusiveness of strengthening work, and one provides for access and fire safety upgrades as well as seismic strengthening.
- Thirty-six percent of plans have a restricted discretionary rule for additions and alterations, and 25% a discretionary rule for higher-ranked items

Heritage New Zealand Pouhere Taonga’s desired standards for activity statuses and policy direction were considered in the development of the preferred package of provisions. The

Council’s view is that the preferred provisions are generally consistent with the expectations of HNZPT (as was expressed in their submission) with differences (particularly with the activity status for total demolition) not unreasonable or of significant concern.

HNZPT requested a non-complying activity status for demolition. This option was considered but not supported as it would prevent the consideration of any demolition proposal. This is because the section 104D ‘Gateway Test’ of the RMA requires that either the effects of a proposal are no more than minor, or the proposal is not contrary to the objectives and policies of the District Plan. If the Gateway Test is not met, the Council must not consider an application. There was a concern that the Gateway Test would not be met by any demolition applications, even when there may be a valid reason for demolition.

The review of the heritage schedules in the Proposed District Plan has had particular regard to the relevant entries on the New Zealand Heritage List/Rārangi Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014 as per s74 of the RMA. Accordingly, the Council has included new entries into the heritage schedule of the district plan as was practicable including Granny Cooper’s cottage and Freyberg Pool.

Notable trees

Plan	Description of approach
Porirua City Council Proposed District Plan	<ul style="list-style-type: none"> • Uses STEM score of 120 for listing. • One objective covering both identification and protection of notable trees. • Combined policy for both works within the root protection area and trimming and pruning. • Criteria specifying when removal of a notable tree as a permitted activity would be an acceptable outcome. • Specific standards for trimming and pruning and works within the root protection area, including definitions for ‘works’ and ‘technician’ arborist.
Dunedin City Council Proposed District Plan Appeals version	<ul style="list-style-type: none"> • Uses STEM score of 145 for listing. • No permitted activities - all work on scheduled trees requires resource consent. Very restrictive approach. • Standards that manage of activities in the dripline including buildings, structures, earthworks and new roads are included. • Removal or any work on a scheduled tree that could lead to death or terminal decline is a non-complying activity. • Documentation required from a suitably qualified arborist for the removal or modification of a scheduled tree. • Plan includes a Definition of ‘Suitably qualified arborist’.
New Plymouth District Council (proposed plan 2019)	<ul style="list-style-type: none"> • Uses a different scoring system that is not STEM. • Compliant with the National Planning Standards Structure. • Specific policies for specific activities. • Uses permitted activity status subject to standards for trimming and pruning, works with the root protection area. This is similar to Porirua.

	<ul style="list-style-type: none"> • Most rules cascade to Restricted Discretionary, though removal is non-complying. Very strict on removal.
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These plans were selected because:

- They have been subject to recent review.
- Are of a similar scale to Wellington city or have potential for cross boundary similarity in the case of Porirua.

The exercise shows:

- Apart from Dunedin City Council, there is a common approach to permit low impact/low risk activities within the root protection area or trimming and pruning subject to standards. Restricted discretionary thereafter.
- Recent plans have an increased number of policies, specific to different activities.
- Removal tends to have a non-complying activity status.
- A variety of STEM scores are applied (on in the case of New Plymouth District Council its own system is used). This varies by geographic location, diversity of species and climatic conditions.

Further work was undertaken to examine STEM scores across different District Plans before landing on the threshold of 110 for Wellington City, as shown below. This accounts for the City's climatic conditions, slower growth rates and relatively limited diversity of species.

Local Authority STEM listing thresholds

Thames-Coromandel District Council	170
Hastings District Council	160
Palmerston North City Council	160
Horowhenua District Council	150
Kaipara District Council	150
Marlborough District Council	150
Dunedin City Council	145
Kapiti District Council	140
Matamata-Piako District Council	140
South Taranaki District Council	130
Tauranga City Council	130 (for native species) 150 (for exotic species)
Hutt City Council	120
Queenstown Lakes District Council	120
Whakatane District Council	108
Upper Hutt City Council	100

Sites and Areas of Significance to Māori

Plan	Description of approach
Proposed New Plymouth District Plan	<ul style="list-style-type: none"> • Use of language such as 'having regard to' reflects the RMA • Uses a 50m buffer as trigger to certain rules.

Operative District Plan	<ul style="list-style-type: none"> • Policies have some indication of involvement with local iwi. • Use of language such as 'having regard to' reflects the RMA.
Far North District Council District Plan	<ul style="list-style-type: none"> • Has a focus on the involvement of iwi within the curation of their chapter as well as through managing resource consents. • Acknowledges landowners who will be affected, and measures provided to them to navigate provisions. • Prefer stronger language than 'promote' and 'regard'. Needing stronger ties to action. • Any activity which is not permitted, restricted discretionary, non-complying is then discretionary. Leaves gaps within types of activities. • Blanket approach to sites.
Central Hawke's Bay Proposed District Plan	<ul style="list-style-type: none"> • Policies focus on education and elevation of sites of significances, whilst also placing measures which would lead to active engagement with iwi. • Addition of assessment measures creates depth. • General trigger of involving iwi is present, but unclear within rules whether alerting iwi is up to the discretion of the consenting planners. • Does provide a buffer. • Blanket approach to sites.
Rotorua District Plan	<ul style="list-style-type: none"> • Acknowledges role as partner with local iwi as well as the importance of iwi management plans. • Provides provisions to enable maraes and the development of them. This includes a dedicated layer. • Detailed rules and assessment matters into how marae should be designed and how buildings within the marae protection layer should be managed.
Operative District Plan 2021	<ul style="list-style-type: none"> • Acknowledges role as partner with local iwi. • Splits up SASMs into five categories, with associated levels of protections. • Categorisation includes whether a site has been modified or not, which impacts on the level of protection which has been allocated. Interested in how this manages intangible sites. • Triggers for consultation with iwi unclear.

A summary of the key findings follows:

- Strong language must be used to ensure the intent of the provisions is achieved. Avoidance of language such as 'have regard to' will contribute to desired outcomes and good planning.
- A few of the examples, did not decide to categorise their sites and areas of significance.
- Reviewing where trigger points for consultation placed within different Council's chapters also was a point of interest.

5.4.2 Advice received from Taranaki Whānui and Ngāti Toa Rangatira

Under Clause 4A of Schedule 1 of the RMA local authorities are required to:

- Provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- Allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- Have particular regard to any advice received before notifying the plan.

As an extension of this s32(4A) requires evaluation reports prepared in relation to a proposed plan to include a summary of:

- All advice received from iwi authorities concerning the proposal; and
- The response to that advice, including any proposed provisions intended to give effect to the advice.

The District Plan Review has included significant engagement with our mana whenua partners - Taranaki Whānui ki te Upoko o te Ika and Ngāti Toa Rangatira. This has included over 100 hui and wānanga attended by Council officers over the last 12 months. This has provided a much greater understanding of mana whenua values and aspirations as they relate to the PDP. Additionally this has continued to build strong relationships with both iwi.

The PDP elevates the consideration of mana whenua values in resource management processes, including:

- A new Tangata Whenua chapter which provides context and clarity about who mana whenua are and what environmental outcomes they are seeking.
- A new Sites and Areas of Significance to Māori chapter that provides greater protection for sites and areas of significance than the current District Plan.
- Integrating mana whenua values across the remainder of the plan where relevant.

This is consistent with both the City goal of 'Partnership with mana whenua' in the Spatial Plan; and the recently signed Tākai Here (2022), which is the new partnership agreement between the Council and our mana whenua partners, Rūnanga o Toa Rangatira, Taranaki Whānui ki Te Upoko o Te Ika and Te Rūnanganui o Te Āti Awa.

A full copy of the advice received is attached as an addendum to the complete suite of Section 32 reports as Addendum A – Advice received from Taranaki Whānui and Ngāti Toa Rangatira.

Historic Heritage

The following questions were posed of the Historic Heritage Chapter:

- Are there any other section 6 considerations that can be made in terms of promoting visibility of mana whenua? Or do we reserve them for tangata whenua chapter?
- HH-P1 policy – is there a way that this Plan can promote future practice of identifying significant historic heritage values for Tangata whenua?
- If we do nothing now, the practice and interpretation of tangata whenua values (or lack thereof continues). What can be done?

This advice has been given partial effect to through the amendment/addition of the following provisions:

- The Sites and Areas of Significance to Māori chapter requires consultation with mana whenua for new buildings on sites of significance, or additions to the footprint of existing ones, which presents an opportunity to increase the visibility of mana whenua values through built design.
- HH-P1 was amended to
 - 'Identify buildings, structures, areas and archaeological sites with significant historic heritage values, *or that contribute to an understanding and appreciation of Māori history and culture*'.

Notable trees

The following questions were posed of the Historic Heritage Chapter:

- Pukeahu has a number of significant trees. These were shifted and planted outside Te Papa along the waterfront edge. What is the process to protect these?
- Can we introduce holding provisions in order to take time to capture the narratives relating to trees of significance to tangata whenua?

This advice has been given partial effect to through the amendment/addition of the following provisions:

- HH-O1 was amended to:
 - Notable trees are recognised for their contribution to the city's amenity, history, ecology and sense of place *and cultural value to mana whenua*.

Sites and Areas of Significance to Māori

Within the nature of this chapter, the advice received from Council's iwi partners has been incremental in regard to the treatment of sites. Both iwi gave details on the inventory of sites and provided detail on why changes should be made or how these sites should be categorised.

No submissions were directly received by our iwi partners on the Draft District Plan.

The following is a summary of the advice received from mana whenua specific to the proposed provisions evaluated within this report:

Topic	Advice Received	Response
Site analysis, narrative and location affirmation	<ul style="list-style-type: none"> • Preference for adopting te reo Māori naming for sites and areas of significance, • Noting some sites are in the incorrect location. • Noting where sites should be added or removed. 	<ul style="list-style-type: none"> • Glossary has been produced to aid in the adoption of te reo Māori naming for sites and areas of significance. • Listening to Iwi representatives about where they believe the sites and areas are located, or whether a site should be removed or added.
Mapping – representation of site or area	<ul style="list-style-type: none"> • Provide flexibility in how sites and areas are represented, given that mapping does not always 	<ul style="list-style-type: none"> • Providing options of how sites are represented as well as treated. This includes using polygons

	accurately represent the entirety of a site.	(areas) and lines to represent the nature of the sites. <ul style="list-style-type: none"> The use of buffers around sites to better represent the extent of the sites and areas. This acknowledges the limitations of the operative district plan representation of SASMs as points.
Categorisation	<ul style="list-style-type: none"> Iwi representatives provided context and descriptions. Iwi representatives reviewed and provided direction to how sites and areas should be categorised. 	<ul style="list-style-type: none"> Context and descriptions were adopted in the sub-categories of the sites and areas of significance. Suggested significance and categorising of the sites and areas of significance were adopted.

5.4.3 Consultation undertaken to date

A summary of specific feedback on these topics received during consultation on the Draft District Plan is contained in Appendix 1 and 2 to this report, including how it has been responded to in the Proposed District Plan. Additional detail concerning the wider consultation undertaken in preparing the Proposed District Plan is contained in the companion Section 32 Evaluation Overview Report.

The following is a summary of the primary consultation undertaken in respect of this topic:

Historic Heritage

Who	What	When	Relevant Issues Raised
Landowners of proposed new listings	<p>Letters containing summary reports of heritage values with an invitation to discuss listing process and implications. Sent to approx. 390 people relating to</p> <ul style="list-style-type: none"> 58 individual buildings 10 new heritage areas 2 existing heritage areas – the addition of new contributing 	<p>November 2020.</p> <p>Triggered ongoing conversations with interested owners.</p>	<ul style="list-style-type: none"> Private property rights Earthquake prone buildings regulation Incentives and council assistance

	objects and buildings <ul style="list-style-type: none"> • 2 existing heritage buildings – the addition of features • 4 heritage objects 		
Landowners of proposed new listings	Final heritage reports provided	June 2022	<ul style="list-style-type: none"> • Private property rights • Earthquake prone buildings regulation • Incentives and council assistance • Information on process
Environmental Reference Group	Overview of proposals in the draft district plan	Mid 2021	<ul style="list-style-type: none"> • Value of heritage • Owner engagement
Heritage New Zealand Pouhere Taonga	Seeking feedback on proposals in the draft district plan	September 2021	<ul style="list-style-type: none"> • Value of heritage • Specifics of rules and standards
Thorndon Heritage interest group	Overview of proposals in the draft district plan	May 2021	<ul style="list-style-type: none"> • Value of heritage • Advocacy for new listings
Mount Victoria heritage interest group	Overview of proposals in the draft district plan	February 2020	<ul style="list-style-type: none"> • Value of heritage • Advocacy for new listings

In summary, the key findings arising from the consultation undertaken on this topic are:

- Impact on private property rights of listing in the district plan.
- Balance of regulation and incentives.
- Questions of process.

Notable trees

Who	What	When	Relevant Issues Raised
Landowners of proposed new listings	Communication regarding effect and timing of new listings	2020 onwards	<ul style="list-style-type: none"> • Private property rights
Environmental Reference Group	Overview of proposals in the draft district plan	Mid 2021	<ul style="list-style-type: none"> • Value of trees • Owner engagement

Sites and Areas of Significance to Māori

Please see Appendix 2 of this report for detail on specific engagement that has occurred.

5.5 Summary of Relevant Resource Management Issues

Historic Heritage

Issue	Operative district plan approach	Proposed District Plan approach	Summary of reasons why
<p>Chapter contents and structure are not consistent with the national planning standards</p>	<p>Contains five sections in the Heritage chapter:</p> <ol style="list-style-type: none"> 1. Heritage Buildings/objects 2. Heritage Areas 3. Heritage Trees 4. Signs 5. Māori sites. <p>Introductions, objectives, policies and rules are contained within those sections.</p>	<p>Contains four sections in the Historical Heritage chapter under the 'Historic and Cultural values' heading:</p> <ol style="list-style-type: none"> 1. Heritage Buildings/Objects 2. Heritage Areas 3. Scheduled archaeological sites 4. Heritage orders <p>Notable tree and Sites of Significance to Māori provisions are contained in their own chapter under the same heading.</p> <p>Signs, subdivision and earthworks provisions are moved and contained in their own chapter under the 'General District Wide Matters' heading.</p>	<p>Must implement with the National Planning Standards chapter layout which assigns chapter headings and locations for provisions.</p> <p>The Council is introducing Scheduled Archaeological Sites in the proposed district plan.</p> <p>This approach to heritage listing is not included in the existing plan, but must be placed in this chapter as per the planning standards.</p>

<p>Drafting style is unclear and uncertain</p>	<p>Short policies for groupings of activities are included, accompanied by lengthy explanations to provide certainty of policy intent.</p> <p>Different activities are grouped together in a single rule because they share a common activity status. Over 20 different assessment criteria are included as part of the rule</p> <p>Rules are grouped by activity status, rather than 'cascading' through activity status for the activity.</p>	<p>Each activity has a detailed policy. This approach and the drafting language used provides greater clarity to plan users and resource consent planners on the range of matters that are to be considered in a resource consent.</p> <p>Rules are grouped by activity and, then status. Where an activity has different statuses if non-compliance with a standard occurs, this 'cascade' occurs within the same rule.</p>	<p>Current drafting style creates uncertainty about what will be assessed in a resource consent.</p> <p>Many of the 20+ assessment criteria overlap and are not always relevant to an activity requiring consent under the rule.</p> <p>The new drafting approach provides more certainty</p> <p>An enabling policy has been included that notes Council will look upon an activity favourably if it is undertaken in the manner envisaged by the policy.</p> <p>While the policy intent is the same for the majority of activities in the new provisions, this drafting style communicates that Council is proactively looking for reasons to grant consent.</p> <p>This communicates there is an upfront expectation for applicants to demonstrate efforts to achieve good heritage outcomes.</p> <p>The existing assessment criteria contained in the plan have been simplified and adapted where relevant and included within the policies. This means rules are much shorter and is consistent with the wider drafting approach of the new district plan.</p>
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			Changes to rule structure is as per the planning standards.
Operative district plan objectives do not reflect current context	<p>Only one objective is included for historic heritage.</p> <p><i>‘To recognise the City’s historic heritage and protect it from inappropriate subdivision use and development’</i></p>	<p>Three more detailed objectives are included:</p> <ol style="list-style-type: none"> 1. <i>Historic heritage 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.</i> 2. <i>Historic heritage is retained and protected from inappropriate use, subdivision, and development.</i> 3. <i>Built heritage is well-maintained, resilient and kept in sustainable long-term use.</i> 	<p>The Council’s only objective is not to only ensure that historic heritage is recognised and protected, but also that it:</p> <ul style="list-style-type: none"> • is maintained; • supports city resilience and wellbeing, public safety and is resilient during seismic events • is kept in a sustainable use, whether this be the same as it was built for, or a new use. <p>This approach better communicates the Council’s desired outcomes for historic heritage and gives effect to the breadth of strategic direction.</p>
Adaptive reuse and ongoing use is not obviously enabled	<p>The policy explanation in the operative district plan identifies that the continued use of a heritage building is essential to its survival, but it should not be at the loss of its historic and architectural integrity. It also recognises that to ensure the ongoing use</p>	<p>No change to intent, but greater clarity:</p> <p>The introduction to the chapter is explicit that having a sustainable long term use for a building, whether it be ongoing use (the use a building was built for) or reuse (a different use) is important to ensure its protection.</p>	<p>The proposed approach makes it clear that both ongoing use and re-use can be a sustainable option when they ensure the retention of heritage-fabric and other heritage values</p> <p>The sustainable ongoing use of a heritage building,</p>

	<p>modifications can be necessary.</p> <p>Two assessment criteria identify ongoing and adaptive reuse:</p> <p><i>21A2.1.10 The extent to which the work is necessary to enable the continued use of the building.</i></p> <p><i>21A2.1.21 Whether adaptive reuse of a listed building or object will enable the owners, occupiers, or users of it to make reasonable and economic use of it.</i></p>	<p>The range of uses that are appropriate for a given place is managed by zone provisions and is not managed by historic heritage provisions.</p> <p>Reuse and ongoing use are treated equally through the policy framework. When modifications are proposed, they must not detract from heritage values, regardless of where they are for an ongoing or adaptive reuse.</p>	<p>either through the continuation of its original use or by reuse may be facilitated by additions or alterations.</p> <p>Where a resource consent is required for additions and alterations those works must not detract from heritage values.</p>
Resilience needs to be expedited	<p>Internal modifications and seismic strengthening works are permitted where undertaken within the interior of a building and not visible from the exterior.</p> <p>This is the case provided the interior is not also scheduled. Approximately 9 buildings have some internal features identified in the current schedules, and 3 interiors are listed in their entirety.</p> <p>Earthquake strengthening visible from the exterior is considered a modification and requires resource consent.</p>	<p>Internal earthquake strengthening is permitted provided the interior is not also scheduled.</p> <p>Internal modifications, including earthquake strengthening, do not typically affect heritage values to an extent that makes requiring a resource consent efficient or effective when balanced with the city's seismic vulnerability and need to reduce risk from earthquake.</p> <p>Earthquake strengthening visible from the exterior still requires resource consent.</p> <p>Policy direction clarifies that a higher level of effect on heritage values resulting from external strengthening works is acceptable, provided that these effects are</p>	<p>Strengthening works internal to buildings can have effects on heritage values (e.g. K Braces) but do not outweigh the need to respond to resilience outcomes and reduce the number of buildings (including heritage listed) that are identified as EPB.</p> <p>Providing policy direction that a higher level of effects is appropriate for strengthening works pragmatically aligns with the council's objectives to ensure resilient buildings. This is in the current provisions but is not clearly articulated.</p> <p>The bespoke policy and rule relating to the removal of unreinforced masonry chimneys provides a balanced and pragmatic approach to</p>

		<p>minimised as far as is practicable.</p> <p>A bespoke approach for the removal of unreinforced masonry chimneys has been introduced. This provides policy direction and a specific rule that enables the removal of unreinforced masonry chimneys in certain situations.</p>	<p>the removal of features that do present a level of safety risk in seismic events.</p> <p>EPB do not include single unit residential dwellings, but there are a lot of houses on the heritage lists and homeowners are keen to ensure that their houses are resilient. This also aligns more closely with the way that Council manages removal of chimneys under the Building Act.</p>
Repairs need to be incentivised and clear	<p>Repairs and maintenance have a complicated definition that bundles together a suite of different activities including restoration. The definition also contains standards which detail the extent of repairs and maintenance.</p> <p>These standards are not very detailed and result in interpretation difficulties and uncertainties for plan users.</p> <p>It is a permitted activity.</p>	<p>The definition will be split in separate definitions:</p> <ol style="list-style-type: none"> 1. repairs and maintenance; and 2. restoration. <p>Repairs and maintenance are permitted.</p> <p>Installation of clear double glazed windows is now a permitted activity.</p> <p>Restoration will be a restricted discretionary activity.</p> <p>More specific standards will be included which will clarify common interpretation issues.</p> <p>E.g., painting previously unpainted surfaces, or replacing timber windows with aluminium ones is not within the scope of repairs and maintenance and requires resource consent assessment.</p>	<p>The change in approach increases clarity and certainty of interpretation but does not change intent.</p> <p>There is a policy change with respect to double glazing which on balance has minor effects on heritage values.</p>

Restoration needs to be incentivised, but managed	Restoration of a building to its appearance as of 1994 is considered 'repairs and maintenance' and is permitted.	Restoration is unbundled from repairs and maintenance and is a separate activity which requires resource consent.	Restoration of a building to its appearance as of 1994 does not necessarily mean that heritage values will be protected and maintained or enhanced; The form as of 1994 may have less value than the current appearance. It is uncommon to restore a building without any other works. Council would have no control over this potentially significant change in heritage value if permitted and as such it is appropriate to consider the activity through the resource consent process. This activity would likely be supported by the Cultural Heritage team and be eligible for resource consent fee reimbursement. Owners may also apply for HRF and HNZPT grant funding.
There are gaps with earthworks provisions	Earthworks rules only apply to heritage areas and not to scheduled heritage buildings. The purpose of such controls is to manage changes in landform which could affect the values or appreciation of heritage areas. Rules for heritage are included in the Earthworks chapter, and	Earthworks rules have been extended to also apply to the sites of scheduled heritage buildings and objects.	Earthworks (which are currently permitted) can have adverse effects of heritage values. The threshold for permitted earthworks has been set at 10m ³ . This allows a level of earthworks to occur for a reasonable level of use but ensures more significant earthworks

	these address archaeology		would require resource consent. Managing earthworks is consistent with other recent district plans. This provision is in the EW chapter.
There are gaps with structures provisions	New structures on the site of a heritage building/object or within a heritage area are a permitted activity.	Small scale structures in residential zones are permitted in order to enable a level of reasonable use (e.g. letterboxes, fences and garden sheds) New structures in other zones (e.g. centres) are a restricted discretionary activity.	Currently zone based rules for new structures apply on the site of heritage buildings and within heritage areas. This means that structures between 7.5m to 10m in a residential zone and 21m in a centres zone could be constructed as permitted with no consideration of heritage values. This could lead to significant adverse effects on heritage values. Managing new structures on the site of heritage buildings and within heritage areas is consistent with other recent district plans.
Repositioning and relocation are not treated as different activities	Moving a building within or off its current site is known jointly as 'relocation'. It is addressed through the same policy and rule framework as total demolition. It is a restricted discretionary activity with 'historic heritage' effects being a matter of discretion.	Relocation is split into two different activities with separate policies and rules: 1. Repositioning on an existing site (Still restricted discretionary) 2. Relocation to another site (Changed to discretionary)	Under the current settings, there is a confused policy distinction between: 1. Repositioning on an existing site; 2. Relocation to another site; and 3. Total demolition. These activities are part of a continuum with different levels and types of effects on heritage values and

			<p>should be treated as such.</p> <p>The policies for repositioning and relocation identify the activity may be an acceptable outcome where it ensures the retention of the building.</p> <p>Moving a building (particularly offsite) carries significant risk of damage or destruction and can lead to weathertightness or structural issues.</p> <p>The policy framework creates a distinction between onsite and offsite movement whereby the overall goal of both of these activities must be to consider alternatives.</p> <p>Discretionary status for relocation allows consideration of factors such as relocation for urban development or infrastructure.</p> <p>In either case moving a building to save it from damage or destruction from natural hazards is a reasonable outcome.</p>
Demolition needs to clearly be a last resort	<p>Demolition of heritage buildings in part or whole is a restricted discretionary activity.</p> <p>The policy explanation details that where total demolition is proposed, the Council will need to be convinced that there is no reasonable alternative to demolition. This is the same policy</p>	<p>The activity of demolition is split into two:</p> <ol style="list-style-type: none"> 1. Partial demolition (a modification which is RD activity); 2. Total demolition Discretionary activity 	<p>Total demolition of a heritage building, or object should be considered the last resort after all other options to retain it (including with modifications) have been ruled out.</p> <p>There are exceptional circumstances, and applicants need to</p>

	<p>approach to off-site relocation.</p>	<p>Separate policies apply to these activities recognising there is difference in the potential heritage effects of these activities.</p>	<p>demonstrate that there are no reasonable alternatives to total demolition</p> <p>This approach aligns with application of the current rule where council needs to be convinced that there is no reasonable alternative to demolition.</p> <p>The expiry of Earthquake Prone Building notices will peak in 2027. At this time, it is expected that increasing pressure will come to allow the demolition of heritage buildings to satisfy the requirements of the notice.</p> <p>There are approximately. 600 EPB in Wellington, approx. 150 EPB heritage, approx. 50 strengthening is underway, approx. 50 at some stage of design works from feasibility to detailed seismic design, remaining 50 there is no data.</p> <p>This approach gives a clear indication to owners delaying works so their EPB notice expires that demolition is not a foregone conclusion.</p>
<p>Scheduled archaeological sites are not managed in the operative district plan</p>	<p>No scheduled archaeological sites are identified in the District Plan.</p>	<p>Three scheduled archaeological sites on public land have been included and provisions drafted to manage them.</p>	<p>Archaeological sites are historic heritage under the RMA. The Council has a responsibility to identify and manage these</p>

	<p>There is general policy direction to avoid, remedy or mitigate adverse effects on archaeological values.</p> <p>There is commentary to note the intention to identify and schedule archaeological sites within a future District Plan.</p>	<p>The likely extent of identified scheduled archaeological sites have been identified.</p> <p>Provisions focus on activities most likely to affect archaeological values within this extent.</p> <p>The activities managed include grass mowing, vegetation removal, earthworks, modification, and demolition.</p> <p>Similar to heritage buildings and areas provisions a hierarchy of activities is established from maintenance of land through to demolition.</p> <p>The provisions enable ongoing maintenance and repair of roads and tracks, as well as farming within the extent of scheduled archaeological sites.</p>	<p>sites under the RMA, as well as direction in the Regional Policy Statement.</p> <p>The sites identified are a small number on Council or public land for consultation and engagement to visualise application of the draft provisions.</p> <p>The HNZPT Act is not always effective in protecting entire archaeological sites from modification and destruction.</p> <p>Whilst the purpose of the HNZPT Act is to provide overarching protection for archaeological sites and that these should not be modified or destroyed, it does not prevent the partial or total destruction of sites. Instead, the HNZPT Act manages their documentation and investigation through the archaeological authority process.</p> <p>The current district plan largely defers to the archaeological authority process under the HNZPT Act.</p> <p>For the reasons identified above this does not fulfil the Council's responsibilities under the RMA.</p> <p>These provisions have been workshopped with HNZPT who are supportive of the approach and intent.</p>
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Notable Trees

Issue	Comment	Response
Operative District plan provisions are not pragmatic when considering removal of trees that pose a risk to safety	The Operative District Plan provisions for notable trees require a resource consent to remove trees which have died or in a terminal condition.	The proposed provisions enable the removal of trees that pose an imminent threat to safety or that are dead or in terminal decline.
Uncertainties exist over skills and experience of experts	The Operative District Plan provisions for notable trees require work to be undertaken 'by a person with an appropriate level of expertise'. This is not defined.	The proposed provisions include new definitions of 'works' and 'technician' arborists with clear qualifications

Sites and Areas of Significance to Māori

Issue	Comment	Response
Mana whenua relationships with SASM, landscape and history of Wellington City is not well considered in the operative plan	The relationship of Māori and their cultural and traditions with their ancestral lands, water, sites, waahi tapu and other taonga are matters of national importance under section 6(e) of the RMA. Historic heritage is a matter of national importance under section 6(f) of the RMA. This importance is reflected in the RPS which requires identification of significant historic heritage under certain criteria. The protection of protected customary rights is a matter of national importance under section 6(g) of the RMA.	Introduction of standalone chapter for Sites and Areas of Significance to Māori. An updated SCHED7 to reflect significance of sites with the introduction of two categories for protection. These categories determine within the chapter how activities (such as additions and alterations to a building) will trigger actions within the resource consent process.

	<p>Sites and areas of significance to Māori have generally been captured by dots on maps and GIS systems that do not accurately reflect the extent of sites and areas. They also do not reflect the significance of each site.</p> <p>The Plan needs to reflect accurate and updated information including from Treaty Settlement legislation.</p>	
<p>Sites and Areas of Significance to Māori are not sufficiently protected and their different values recognised in the operative district plan.</p>	<p>Sites and areas of significance to Māori are retained and protected from inappropriate use, subdivision, and development in the plainest sense.</p> <p>The different values that different sites have are not adequately reflected in the plan.</p>	<p>Three categories of SASM were developed with mana whenua and include:</p> <p>Category A sites include Wāhi Tapu, Wāhi Tīpuna, Wāhi Kainga, Wāhi Mahinga Kai sites and areas that have high level of significance.</p> <p>Category B sites include Wāhi Taonga, Wāhi Tawhito, Nga Ara Tawhito, Nga Ara Pakanga sites and areas that are significant for Mana Whenua, however they may not match the level of significance to the sites and areas listed in Category A.</p> <p>Category C sites are active marae</p> <p>Objectives, policies and rules are included that seek to protect degradation of the values if sites, while allowing for reasonable use, and opportunities to increase representation of mana whenua values.</p> <p>Include policies to identify sites and areas of significance to Māori, to enable maintenance and repair activities on sites and areas of significance to Māori where the spiritual and</p>

		cultural values of the site or area are protected.
The ability of mana whenua to express Kaitiakitanga is not overt	There is little recognition in the operative district plan enabling Mana whenua to exercise kaitiakitanga in relation to sites and areas of significance.	An objective regarding kaitiakitanga is included.

6.0 Evaluation of the Proposal

This section of the report evaluates the objectives of the proposal to determine whether they are the most appropriate means to achieve the purpose of the RMA, as well as the associated policies, rules, and standards relative to these objectives. It also assesses the level of detail required for the purposes of this evaluation, including the nature and extent to which the benefits and costs of the proposal have been quantified.

6.1 Scale and Significance

Section 32(1)(c) of the RMA requires that this report contain a level of detail that corresponds with the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

The level of detail undertaken for this evaluation has been determined by assessing the scale and significance of the environmental, economic, social, and cultural effects anticipated through introducing and implementing the proposed provisions (the objectives, policies and rules) relative to a series of key criteria.

Based on this the scale and significance of anticipated effects associated with this proposal in relation to the topics of historic heritage, notable trees and sites and areas of significance to Māori is provided below.

Historic Heritage

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change		✓		<ul style="list-style-type: none"> There is no new national direction on how to manage historic heritage to inform this review. The Council is still operating on the basis that heritage is a matter of national importance under the RMA. There is increased awareness and knowledge of Wellingtons seismic vulnerabilities and defined requirements for the resolution of EPB notices. Although the current provisions are generally working as intended, further adjustments have been

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				introduced to comply with the National Planning Standards and to improve their effectiveness relative to issues identified.
Addresses a resource management issue		✓		<ul style="list-style-type: none"> Historic heritage is a matter of national importance under s6(f) of the RMA.
Degree of shift from the status quo	✓			<p>The proposals represent a low change from the status quo.</p> <ul style="list-style-type: none"> The majority of policy in the chapter remains relatively unchanged. The removal of masonry chimneys and permitted internal seismic strengthening are moderate shifts from current policy. The introduction of scheduled archaeological sites is a high change. A new heritage design guide is introduced to provide advice on how the provisions of the chapter should be interpreted and implemented.
Who and how many will be affected/ geographical scale of effect/s	✓			<ul style="list-style-type: none"> The number of owners of properties subject to the heritage provisions numbers approximately 1000, which in the scheme of all properties in the city is small. Historic heritage has a city-wide benefit enabling appreciation of cultures and history for all Wellingtonians, as well as New Zealanders more widely.
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> Feedback and interest from mana whenua on this topic has been limited. The Sites and Areas of Significance to Māori chapter provides opportunity for the history and culture of mana whenua partners to be increased in prominence.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> The impact of the proposal will be immediate from notification of the Proposed District Plan. The effect of the chapter is to seek retention of historic heritage for the benefit of future generations.

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Type of effect/s	✓			<ul style="list-style-type: none"> The proposal is primarily centred around managing effects relating to the use and development of a moderate number of heritage resources
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> The proposals are to a large extent a 'roll over' of relevant provisions in the ODP for heritage buildings and structures, with refinements to increase clarity and address seismic resilience outcomes. Proposals to include scheduled archaeological sites are new and carry a greater level of risk than the heritage buildings and structures provisions, but only apply at present to a small number of sites. In part this decision was to enable refinement and testing of the approach.

Overall, the scale and significance of the proposed provisions are low for the following reasons:

- Most proposals are not a significant change from the operative plan. It is recognised there are some changes to policy approach, including permitting internal seismic strengthening and removal of chimneys.
- New buildings, structures and areas are being added to the heritage schedules, which has impact on a small number of affected owners.

Consequently, a high level evaluation of these provisions has been identified as appropriate for the purposes of this report.

Notable Trees

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change	✓			<ul style="list-style-type: none"> There is no new national direction how to manage notable trees. The Council is still operating on the basis that heritage is a matter of national importance under s6 the RMA and as a matter of amenity under s7. The current provisions are generally working as intended, and there are limited numbers of resource consents for notable trees. There are not a significant number of notable trees scheduled. Further adjustments have been introduced to comply with the National

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				Planning Standards and to improve their effectiveness relative to issues identified.
Addresses a resource management issue	✓			<ul style="list-style-type: none"> Some trees have historic heritage values while others have amenity value.
Degree of shift from the status quo	✓			<ul style="list-style-type: none"> The proposals represent a low change from the status quo in terms of intent. The proposals increase clarity of the current approach to implementation.
Who and how many will be affected/ geographical scale of effect/s	✓			<ul style="list-style-type: none"> The number of owners of properties subject to the notable trees is small ~200. Only 32 new trees are proposed to be added to the schedule and were nominated by owners. The notable trees listed are appreciated by the people of wellington city.
Degree of impact on or interest from iwi/ Māori	✓			<ul style="list-style-type: none"> Feedback and interest from mana whenua on this topic has been limited. The Sites and Areas of Significance to Māori chapter provides opportunity for the history and culture of mana whenua partners to be increased in prominence.
Timing and duration of effect/s	✓			<ul style="list-style-type: none"> The effect of the chapter is to seek retention and manage the health of notable trees for the benefit of present and future generations.
Type of effect/s	✓			<ul style="list-style-type: none"> The proposal is primarily centred around managing the health of a small number of notable trees.
Degree of risk and uncertainty	✓			<ul style="list-style-type: none"> The proposals are to a large extent a 'roll over' of relevant provisions in the ODP with refinements to increase clarity and implementation.

Overall, the scale and significance of the proposed provisions are low for the following reasons:

- The provisions are very similar in intent to the ODP with minor amendments to increase clarity and certainty of application.

Consequently, a high level evaluation of these provisions has been identified as appropriate for the purposes of this report.

SASMs

Criteria	Scale/Significance			Comment
	Low	Medium	High	
Basis for change			✓	<ul style="list-style-type: none"> The chapter reinvents how Wellington's operative District Plan has previously managed the City's Māori heritage, where currently there are few rules to protect these taonga. Mana whenua have actively engaged and informed the development of this chapter including the identification of sites.
Addresses a resource management issue		✓		<p>The SASM provisions address resource management issues:</p> <ul style="list-style-type: none"> Section 6 – Matters of national importance Section 7 – kaitiakitanga Section 8 to take into account the principles of the Treaty of Waitangi.
Degree of shift from the status quo		✓		<ul style="list-style-type: none"> The proposals represent a high degree of change from the status quo in terms of intent, quality of information and input from mana whenua. The proposals provide greater clarity of the current approach to implementation including to evidence mana whenua consultation.
Who and how many will be affected/ geographical scale of effect/s	✓			<ul style="list-style-type: none"> The number of owners of properties subject to SASM provisions is expected to be low and, in the hundreds, which in the scheme of all properties in the city is small.
Degree of impact on or interest from iwi/ Māori			✓	<ul style="list-style-type: none"> Feedback and interest from mana whenua on this topic has been significant with over a year of dedicated and regular engagement. Provisions provide opportunity for the history and culture of mana whenua partners to be increased in prominence.
Timing and duration of effect/s		✓		<ul style="list-style-type: none"> The impact of the proposal will be immediate from notification of the Proposed District Plan. The effect of the chapter is to protect and maintain sites and areas of significance

Criteria	Scale/Significance			Comment
	Low	Medium	High	
				to Māori in way that acknowledges the past and builds a cultural narrative and prominence of these sites into future.
Type of effect/s		✓		<ul style="list-style-type: none"> The proposal is primarily centred around the protection and maintenance of sites and engagement with mana whenua too.
Degree of risk and uncertainty		✓		<ul style="list-style-type: none"> Provisions provide opportunity for the history and culture of mana whenua partners to be increased in prominence. The effect of the chapter is to protect and maintain sites and areas of significance to Māori in way that acknowledges the past and builds a cultural narrative and prominence of these sites into future.

Overall, the scale and significance of the proposed provisions are medium because the proposals provide increased prominence of sites and areas of significance to mana whenua and are a significant change from the operative plan.

Consequently, a detailed evaluation of these provisions has been identified as appropriate for the purposes of this report.

6.2 Quantification of Benefits and Costs

Section 32(2)(b) requires that, where practicable, the benefits and costs of a proposal are to be quantified.

Historic Heritage, notable trees and Sites and Areas of significance to Māori

Specific quantification of the benefits and costs beyond the information and evidence outlined in section 5.2 of this report is neither practicable nor readily available. However, a qualitative assessment of identifiable costs and benefits associated with this proposal is provided below and, where relevant, in the assessment of policies, rules and other methods contained in section 10 of this report

7.0 Overview of Proposals

Key elements of the applicant heritage chapters are provided below, with the full chapters available at the following ePlan link: <https://eplan.wellington.govt.nz/proposed/>

Historic Heritage

In summary, the proposed provisions include:

- Definitions
 - A set of relevant definitions, including:
 - Built heritage
 - Archaeological site
 - Additions

- Alterations
 - Partial demolition
 - Total demolition
 - Ongoing use
 - Reuse
 - Heritage building
 - Heritage structure
 - Heritage area
 - Contributing building
 - Non-heritage building
 - Maintenance and repair
 - Fabric
- Three objectives that address:
 - Recognising the value of historic heritage
 - Protecting historic heritage from loss and inappropriate subdivision use and development.
 - Keeping built heritage maintained, resilient in the face of seismic risks and in long term use.
- Twenty one policies that:
 - Identify heritage buildings, structures, areas, and archaeological sites with significant historic heritage values
 - Enable works that do not have significant effects on heritage values
 - Direct a flexible approach to works that support resilience, support long term uses, accessibility or can enhance heritage values.
 - Encourage conservation plans to be prepared.
 - Manage the removal or replacement of chimneys that could pose risk to life or property.
 - Manage the modification of heritage buildings, heritage structures, heritage areas and scheduled archaeological sites.
 - Manage new buildings on the site of heritage buildings, heritage structures, heritage areas and within scheduled archaeological sites.
 - Manage the relocation or repositioning of heritage buildings, heritage structures and contributing buildings within heritage areas.
 - Seeks to avoid the permanent loss of scheduled historic heritage.
- A rule framework that manages land use and building and structure activities as follows:
 - Permits repair and maintenance of buildings and land within scheduled archaeological sites, as well as the removal of buildings that do not contribute to heritage values in heritage areas.
 - Manages the modification, demolition, repositioning or relocation of buildings and structures, and new buildings.
- A complementary set of effects standards that address:
 - Maximum height, grazing of stock, extent of modifications.
- Schedules
 - SCHED1 – Heritage Buildings
 - SCHED2 - Heritage Structures
 - SCHED3 – Heritage Areas
 - SCHED4 – Scheduled Archaeological Sites
- Non-regulatory methods

- Historic heritage advice note

The addition of the following to the relevant heritage schedules:

Heritage Buildings:

- 30 Ascot Street, Thorndon
- 20 Austin Street, Mt Victoria
- 89 Austin Street, Mt Victoria
- 140 Austin Street, Mt Victoria
- 20, 17 and 21, 94 Ballance, Whitmore and Featherston Streets, Wellington Central
- 390 Broadway, Miramar
- 64 Brougham Street, Mt Victoria
- 70 Brougham Street, Mt Victoria
- 71 Brougham Street, Mt Victoria
- 87 Brougham Street, Mt Victoria
- 89 Brougham Street, Mt Victoria
- 91 Brougham Street, Mt Victoria
- 111 Brougham Street, Mt Victoria
- 23 Brougham Street, Mt Victoria (AKA Pat Lawlor Close)
- 117 Campbell Street, Karori
- 2 Courtenay Place / 12 Cambridge Terrace Hannah Playhouse Trust, Te Aro
- 173 Clyde Street, Island Bay
- 24 Donald McLean Street, Newtown
- 69 Donald Street, Karori
- 139 Featherston Street, Wellington Central
- 7 Fortification Road, Karaka Bays
- 11 Ganges Road, Khandallah
- 60-62 Homewood Crescent, Karori
- 21 Kelburn Parade, Kelburn
- 120 Lambton Quay, Wellington Central
- 294 Main Road, Tawa
- 64 Majoribanks Street, Mt Victoria
- 17 Makara Road, Karori
- 271 Mansfield Street, Newtown
- 1 Milne Terrace, Island Bay
- 26 Murphy Street, Thorndon
- 205 Ohiro Road, Brooklyn (façade only)
- 110 Oriental Parade, Oriental Bay
- 214 Oriental Parade, Oriental Bay
- 274 Oriental Parade, Oriental Bay
- 280 Oriental Parade, Oriental Bay
- 139 Park Road, Miramar
- 56 Pirie Street, Mt Victoria
- 1 Queen Street, Lyall Bay
- 28 Robieson Street, Roseneath
- 30 Salamanca Road, Kelburn
- 29 South Makara Road / 399 Makara Road, Makara Schoolhouse
- 3-5 Stanley Street, Berhampore
- 210 Sutherland Road, Lyall Bay
- 75 Taranaki Street, Te Aro
- 79A Todman Street, Brooklyn

- 18 Vera Street, Karori
- 154 Victoria Street, Te Aro
- 49 Waiapu Road, Kelburn
- 134 Willis Street, Te Aro
- 233 Willis Street, Te Aro (façade only)

The building at 355 the Parade, Island Bay, had been proposed for listing as part of the Draft District Plan process but was subsequently removed from the Proposed District Plan by way of Planning and Environment Committee decision on 23 June 2022.

Heritage Areas:

- Basin Reserve Heritage Area
- Mestanes Bay Baches Heritage Area
- Red Rocks Baches Heritage Area
- Albion Gold Mining Company Battery and Mine Remains Heritage Area
- Armour Avenue Heritage Area
- Doctors' Common Heritage Area
- Elizabeth Street Heritage Area
- Moir Street Heritage Area
- Porritt Avenue Heritage Area
- Ascot Street Heritage Area
- BNZ Head Office Heritage Area – addition
- Our Lady Star of the Sea Heritage Area - addition

Heritage Structures:

- Lower Karori Dam
- Upper Karori Dam
- Motorway Overbridge
- Centennial Memorial

Archaeological Sites:

- Proposed Kau Point Battery, Motu Kairangi / Miramar Peninsula
- Miramar Tunnels
- Karori Goldmining and Dam

Notable Trees

In summary, the proposed provisions include:

- Definitions
 - A set of relevant definitions, including:
 - Notable tree
 - Trimming and pruning
 - Root protection area
 - Works arborist
 - Technician arborist
- Three objectives that address:
 - Recognising the value of notable trees.

- Protecting notable trees from loss and inappropriate subdivision use and development.
- The maintenance of trees and their health.
- Seven policies that:
 - Identify notable trees
 - Enable trimming and pruning that does not have significant effects on tree health.
 - Manages any other trimming and pruning and development within the root protection area.
 - Provides limited situations in which removal or relocation may be acceptable.
- A rule framework that manages land use activities as follows:
 - Permits trimming to reduce interference with property, ensure electrical safety or risk to safety.
 - Permits small scale works within the root protection area of trees.
 - Manages more significant trimming and pruning, or development within the root protection area.
 - Provides a framework for the removal or relocation of notable trees.
- A complementary set of effects standards that address:
 - The qualifications that arborists must hold to undertake works on or under trees.
 - Technical standards for infrastructure related works.
- Schedules
 - SCHED6 – Notable trees

Sites and Areas of Significance to Māori:

- Definitions
 - A set of relevant glossary terms, including:
 - Wāhi Tapu, Wāhi Tīpuna, Kāinga, Mahinga Kai, Takiwā, Wāhi Taonga, Wāhi Tawhito, Marae, tikanga
- Three objectives that address:
 - The purpose of the chapter, noting the relationship between mana whenua and their taonga,
 - The protection of sites from inappropriate use, subdivision and development.
 - Enabling ongoing use and development of marae
- Six policies that:
 - Identify the sites and areas of significance with iwi partners,
 - Allow maintenance and repair of sites where the spiritual and cultural values of the site or area are protected,
 - Manage the construction of new buildings and structures within sites and areas of significance.
 - Provide triggers for mana whenua influence when there are modifications and alterations to sites and areas of significance,

- Avoid destruction or demolition of sites and areas of significance,
- Enable the ongoing activities at and within Marae.
- A rule framework that manages land use and building and structure activities that
 - permits the maintenance and repair of sites and areas of significance, and cultural rituals, practices, and tikanga Māori
 - manages the modification of sites and areas of significance, new buildings and structures and the destruction of sites.
- Schedules
 - SCHED7 – Sites and Areas of Significance to Māori
- A tangata whenua chapter which:
 - Outlines who represents Tangata Whenua; and
 - Articulates relevant matters that are significant to Tangata Whenua.

8.0 Qualifying Matters

Historic Heritage, Sites and Areas of Significance to Māori and Notable Trees

Urban residential zones

For the purposes of preparing this evaluation report for the Council is required, under section 77G of the RMA, to satisfy the following in relation to applying a less permissive approach to medium density development in an area to accommodate any qualifying matter:

- (a) To demonstrate why –
 - (i) it considers that the area is subject to a qualifying matter; and
 - (ii) the qualifying matter is incompatible with the level of development permitted by the Medium Density Residential Standards (MDRS) for that area; and
- (b) Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- (c) Assess the costs and broader impacts of imposing those limits; and
- (d) Include –
 - (i) a description of how the provisions of the district plan are consistent with the specified development outcomes;
 - (ii) a description of how modifications to the MDRS as applied to the relevant residential zones are limited to only those modifications necessary to accommodate qualifying matters, and in particular how they apply to any spatial layers relating to overlays, precincts, specific controls, and development areas, including—
 - (A) any operative district plan spatial layers; and
 - (B) any new spatial layers proposed for the district plan.

Urban non-residential zones

For the purposes of preparing this evaluation report Council is required, under section 77N of the RMA, to satisfy the following in relation to applying a less permissive approach than that required under Policies 3(a)-(c) of the NPS-UD in an area to accommodate any of the qualifying matters:

- (a) To demonstrate why –
 - (i) it considers that any area proposed is subject to a qualifying matter; and
 - (ii) the qualifying matter is incompatible with the level of development provided for in the other intensification policies; and
- (b) Assess the impact that limiting development capacity, building height, or density (as relevant) will have on the provision of development capacity; and
- (c) Assess the costs and broader impacts of imposing those limits.

Application of 77K and 77Q

Under section 77K and 77Q of the RMA, the Council may undertake a descriptive approach to the justification of qualifying matters where those qualifying matters are included in the operative district plan 'an existing qualifying matter'.

The Council's operative district plan contains heritage buildings, heritage structures, heritage areas, notable trees and sites and areas of significance to Māori and are subject to section 77Q. Scheduled archaeological sites included in the proposed district plan are in the General Rural and Open Space zones and not subject to the NPS-UD.

The following commentary is required by section 77K and 77Q:

(a) identify by location (for example, by mapping) where an existing qualifying matter applies:

- Within the spatial extent of the area covered by this topic areas of the city have listed qualifying matters under the NPS-UD, have qualifying matters that require amendments to the building height or density requirements, and/or application of the MDRS.
- The following areas have been identified as subject to these qualifying matters and are subject to policy 3 of the NPS-UD or the MDRS:
 - Medium Density Residential zone
 - High Density Residential zone
 - Neighbourhood Centre zone
 - Local Centre zone
 - Mixed use zone
 - General industrial zone
 - Metropolitan centre zone
 - City Centre Zone

All qualifying matters are identified on the planning maps.

(b) specify the alternative density standards proposed for those areas identified under paragraph (a):

- Maximum building heights within heritage areas are identified in Standard HH-S4.
- Alternative density standards are not proposed on sites with a heritage building or structure, rather effects on heritage values are considered in the resource consent process which means achieving maximum heights otherwise

required by the NPS-UD or MDRS may not be possible. This is also true of Sites and Areas of Significance to Māori.

- The notable tree provisions restrict development within the root protection area, which means that 3 residential units may not be a permitted activity on every residential site should the notable tree provisions be triggered. This is also true of Sites and Areas of Significance to Māori.

(c) identify in the report prepared under section 32 why the territorial authority considers that 1 or more existing qualifying matters apply to those areas identified under paragraph (a):

- Because they are listed in the NPS-UD as qualifying matters.

(d) describe in general terms for a typical site in those areas identified under paragraph (a) the level of development that would be prevented by accommodating the qualifying matter, in comparison with the level of development that would have been permitted by the MDRS and policy 3:

- On a residentially zoned site within a heritage area, on a site with a heritage building or structure, or Sites and Areas of Significance to Māori any new building requires resource consent. This means 3 units are not permitted.
- In centres zoned heritage areas, the effect of the heritage area provisions is to limit 3 storeys of development capacity that otherwise would be provided for in absence of the qualifying matter.
- On sites with a heritage building or structure, heritage values are considered in the resource consent process which means achieving maximum heights otherwise required by the NPS-UD or MDRS may not be possible. This is also true of Sites and Areas of Significance to Māori.

NOTE: At date of publication the Council is awaiting a detailed assessment that meets and goes beyond the requirements of 77K and 77Q of the RMA to demonstrate the net effect of each qualifying matter on the provision of development capacity, including those new scheduled items that are not currently scheduled in the operative district plan.

This report will be published approximately August 2022 and made publicly available to support this section 32 report.

9.0 Evaluation of Proposed Objective/s

9.1 Introduction

Section 32(1)(a) of the RMA requires that the evaluation report examine the extent to which the objectives of the proposal are the most appropriate way to promote the sustainable management of natural and physical resources.

An examination of the proposed objectives along with reasonable alternatives is included below, with the relative extent of their appropriateness based on an assessment against the following criteria:

1. Relevance (i.e. Is the objective related to addressing resource management issues and will it achieve one or more aspects of the purpose and principles of the RMA?)
2. Usefulness (i.e. Will the objective guide decision-making? Does it meet sound principles for writing objectives (i.e. does it clearly state the anticipated outcome?)
3. Reasonableness (i.e. What is the extent of the regulatory impact imposed on individuals, businesses or the wider community? Is it consistent with identified tangata whenua and community outcomes?)
4. Achievability (i.e. Can the objective be achieved with tools and resources available, or likely to be available, to the Council?)

9.2 Evaluation of Sites and Areas of Significance to Māori Objectives

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo

<p>SASM-O1 Purpose Sites and areas of significance to Māori are identified for their cultural significance and their contribution to an understanding and appreciation of the relationship mana whenua have with the landscape and the history of Wellington City.</p> <p>SASM-O2 Protecting Sites and Areas of Significance to Māori Sites and areas of significance to Māori are retained and protected from inappropriate use, subdivision and development.</p> <p>SASM-O3 Kaitiakitanga Mana whenua are enabled to exercise kaitiakitanga in relation to sites and areas of significance.</p>		
<p>General intent: The three objectives outline the responsibility of Council to provide the opportunity to Iwi to be the kaitiaki of their taonga. In part of embodying and exercising kaitiakitanga, Iwi and Council must identify, safeguard and elevate sites and areas of significance to Māori.</p>		
<p>Other potential objectives</p>		
<p>Status quo: 20.2.2. “To facilitate and enable the exercise of tino rangatiratanga and kaitiakitanga by Wellington’s tangata whenua and other Maori.”</p>		
	<p>Preferred objective</p>	<p>Status quo</p>
<p>Relevance:</p>		
<p>Addresses a relevant resource management issue</p>	<p>Yes -</p> <ul style="list-style-type: none"> • Outlines the specific direction of how kaitiakitanga will be achieved through the identification of sites and active meaningful engagement. • Acknowledges how local Mana Whenua have a connection to these sites. • Widening of the inventory of the sites and areas of significance to represent the taonga of both of Wellington’s iwi. 	<p>Partly-</p> <ul style="list-style-type: none"> • Has a level of awareness of the relationship between mana whenua and these taonga, but this is not clearly spelt out. •

	<ul style="list-style-type: none"> Aligning Council's direction with the responsibilities of upholding te Tiriti o Waitangi as well as the details of the treaty settlements. 	
Assists the Council to undertake its functions under s31 RMA	<p>Yes -</p> <ul style="list-style-type: none"> Proposed objectives and associated policies and rules aim to assist the Council undertaking their functions through integrating their responsibilities under the Treaty Settlement Acts through undertaking an in-depth inventory of the sites and areas of significance, and opening more opportunities for iwi to contribute to the resource consenting process. Consistent with s31(1)(a), the management of the effects of use, development or protection of land 	<p>Partly -</p> <ul style="list-style-type: none"> Generally consistent with s31(1)(a), the management of the effects of use, development or protection of land, though non-specific how this will be achieved.
Gives effect to higher level documents	<p>Yes -</p> <ul style="list-style-type: none"> Consistent with the requirements of section 6 and 8 of the RMA Acknowledges the Treaty Settlements; Taranaki Whānui ki Te Upoko o Te Ika Settlement and Ngāti Toa Rangatira. 	<p>Partly-</p> <ul style="list-style-type: none"> Generally consistent with the direction of the RMA. Implies the need to engage and seek direction from mana whenua, but resulting provisions do not sufficiently action this.
Usefulness:		
Guides decision-making	<p>Yes -</p> <ul style="list-style-type: none"> The three objectives frame how the policies and rules should be implemented in more detail than the operative provisions and set the framework for more mana 	<p>No -</p> <ul style="list-style-type: none"> The objective does not specifically note the purpose. No mention of sites and areas of significance or what outcomes are sought.

	whenua to have a more meaningful role in development on and around sites and significance.	
Meets best practice for objectives	<p>Yes -</p> <ul style="list-style-type: none"> States the intent in plain English. 	<p>No -</p> <ul style="list-style-type: none"> Too vague to be useful to ensure consistent implementation of proposed policies and rules. This drafting approach is typical of many first generation plans.
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	<p>Yes -</p> <ul style="list-style-type: none"> There will be some increased cost for some landowners which may not otherwise be required to obtain a resource consent for works under the provisions. This is particularly relevant given the improved accuracy of mapping the sites and areas will mean that more properties will trigger resource consents. It is noted that resource consent will already be required for many activities in the CCZ, where several SASMS are located. This topic is a matter of national significance, and mana whenua have made these aspirations known, this cost is considered reasonable. 	<p>Partly -</p> <ul style="list-style-type: none"> The current approach has broad triggers for sites and areas of significance which leaves resource consent planners having to decide the level of reasonability in which sites and areas are affected. This creates time delays and uncertainty for applicants.
Acceptable level of uncertainty and risk	<p>Yes -</p> <ul style="list-style-type: none"> There are risks adopting provisions that are more aspirational and meaningful than those of the operative plan, but 	<p>Yes -</p> <ul style="list-style-type: none"> Property owners are aware of the sites and areas of significance which are situated on their property.

	<p>this risk and uncertainty is considered reasonable in light of the Council's responsibilities under the RMA and aspirations of mana whenua.</p>	
<p>Achievability:</p>		
<p>Consistent with identified tangata whenua and community outcomes</p>	<p>Yes- Significant engagement with mana whenua and understanding of their aspirations has led to the package of provisions which have been developed.</p>	<p>No – Does not achieve outcomes mana whenua seek in resource management in the current context.</p>
<p>Realistically able to be achieved within the Council's powers, skills, and resources</p>	<p>Yes- While some upskilling of Council staff is required and processes developed to implement the provisions and ensure that consultation has occurred, this is reasonably able to be achieved.</p>	<p>Yes- The operative plan provisions are being implemented within current resources.</p>
<p>Summary</p>		
<p>The proposed provisions connect Council's responsibilities of opening opportunities for local iwi to exercise their kaitiakitanga roles, with the responsibilities of elevating and protecting Wellington's Māori heritage.</p> <p>This links into principles of the Treaty of Waitangi, which the RMA s8 requires the council to 'take into account of'. Active engagement of iwi with their sites and areas of significance is demonstrated through SASM-O1 & O3, as the relationship is acknowledged and the value of exercising kaitiaki is endorsed.</p> <p>The operative plan objectives do not link the values of iwi with the activity of managing and protecting sites and areas of significance.</p>		

9.3 Evaluation of Historic Heritage Objectives

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objective
2. The current most relevant objective - the status quo

HH-O1 Recognising historic heritage

Historic heritage 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.

HH-O2 Protecting historic heritage

Historic heritage is retained and protected from inappropriate use, subdivision, and development.

HH-O3 Sustainable long-term use

Built heritage is well-maintained, resilient, and kept in sustainable long-term use.

General intent:

To identify, recognise and protect a broad range of historic heritage resources (including buildings, structures, areas, and archaeological sites) and ensure that they remain in active use for the appreciation of present and future generations.

Other potential objectives

Status quo:

'20.02.1 To recognise the City's historic heritage and protect it from inappropriate subdivision use and development'

Preferred objectives

Status quo

Relevance:

Addresses a relevant resource management issue

Yes -

- The preferred objectives recognise that the Council's only objective is not to only ensure that historic heritage is recognised and protected, but also that it:
 - is maintained;

Partly –

- The operative district plan objective is narrow in its focus, which is solely on protecting heritage values.
- This does not recognise the challenges of seismic resilience; public safety and the importance of buildings being used to

	<ul style="list-style-type: none"> ○ supports city resilience, public safety and is resilient during seismic events ○ is kept in a sustainable use, whether this be the same as it was built for, or a new use. <ul style="list-style-type: none"> • This approach better communicates the Council's desired outcomes for historic heritage and gives effect to the breadth of strategic direction. 	ensure they remain economically and culturally viable assets.
Assists the Council to undertake its functions under s31 RMA	<p>Yes –</p> <ul style="list-style-type: none"> • The proposed objectives will assist the Council to undertake its functions under s31 of the RMA, particularly s31(1)(a) to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district, within the context of a well-functioning urban environment. 	<p>Partly –</p> <ul style="list-style-type: none"> • Although it provides some direction with s31(1)(a), the management of the effects of use, development, or protection of land, it does not provide direction on the nuance on how the council can achieve this within the context of a well-functioning urban environment.
Gives effect to higher level documents	<p>Yes –</p> <ul style="list-style-type: none"> • Consistent with and gives more nuance to s6 of the RMA. • Gives effect to the RPS, National Planning Standards and is consistent with Our City Tomorrow: A Spatial Plan for Wellington City. 	<p>Partly –</p> <ul style="list-style-type: none"> • Consistent with the plainest interpretation of s6 of the RMA • Although the objectives give general effect to the RPS it is less aligned with relevant directions in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City. • Does not recognise mana whenua heritage.
Usefulness:		
Guides decision-making	<p>Yes –</p>	<p>Partly –</p>

	<ul style="list-style-type: none"> • In conjunction with the proposed policies the proposed objectives will effectively guide decisions on resource consent applications as they provide clear direction regarding the purpose of the Historic heritage provisions and the outcomes anticipated. • These are further supported by accompanying rules that clearly delineate those activities identified as compatible/incompatible with the purpose and outcomes sought by the objectives. 	<ul style="list-style-type: none"> • In conjunction with the policies, the objectives provide a level of guidance on how resource consents should be treated, but little direction on outcomes other than the protection of heritage values. • Associated rules and policies are unhelpfully grouped together and make no distinction regarding what Council's preferred outcome is when considering different works to historic heritage.
Meets best practice for objectives	<p>Yes –</p> <ul style="list-style-type: none"> • States the intent in plain English. • Covers the breadth of outcomes required to fulfil the Council's responsibilities under the RMA in the context of a well-functioning urban environment. 	<p>No –</p> <ul style="list-style-type: none"> • Vague, limited in usefulness. • Although similar provisions were common in several 'first generation' district plans, these have generally been replaced in subsequent plan reviews or specific plan changes with clearer and more instructive provisions.
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	<p>No -</p> <ul style="list-style-type: none"> • The proposed objectives and resultant policy cascade will help reduce costs by providing a clear consenting pathway for works that increase resilience and can enhance heritage values, including by removing barriers for internal seismic strengthening. • There will be increased cost for some landowners who have newly listed property. This has been considered, but overall is justified when considering heritage is a matter of national significance, as outlined within the 	<p>Partly -</p> <ul style="list-style-type: none"> • The current objectives and resultant policy cascade are effective in protecting heritage values, but do not sufficiently recognise opportunities to enhance heritage values or land on a workable balance of regeneration, resilience, and heritage outcomes.

	RMA, and the range of support and funding options council has in place.	
Acceptable level of uncertainty and risk	<p>Yes -</p> <ul style="list-style-type: none"> For existing owners of heritage listed items there is low to no risk. For owners of property that will now have a heritage listing through this process, there will be a level of uncertainty for them how the proposals affect them, Council has tried to mitigate this with early engagement on the listing process since November 2020. 	<p>Yes -</p> <ul style="list-style-type: none"> An option was to rollover operative provisions. For owners of property who would be newly listed, this would be a less flexible and responsive regime.
Achievability:		
Consistent with identified tangata whenua and community outcomes	<p>Yes –</p> <ul style="list-style-type: none"> Mana whenua feedback was reflected in HH-O1. Reflect community values of resilience and the council’s experience of seismic vulnerabilities 	<p>No –</p> <ul style="list-style-type: none"> There is no recognition of mana whenua values. The operative provisions do not reflect community values of resilience and the council’s experience of seismic vulnerabilities.
Realistically able to be achieved within the Council’s powers, skills and resources	<ul style="list-style-type: none"> The objectives are realistically able to be achieved within the Council’s powers, skills and resources, with any additional skills or resources required able to be sourced either in-house or on a contract basis. 	<ul style="list-style-type: none"> The status quo objectives are currently being implemented within the Council’s powers, skills and resources.
Summary		
<p>Proposed Objectives HH-O1 through HH-O3 provide clearer direction than the operative district plan regarding the Council’s desired outcomes for historic heritage resources in the context of a well-functioning urban environment.</p> <p>They cover a broader scope than that of the operative District Plan, which takes a singular approach focussing solely on the protection of heritage values, rather than simultaneously working towards achieving resilience outcomes and ensuring buildings are maintained and kept in use.</p>		

These complementary objectives give scope for changes to the policy approach to internal seismic strengthening and reconciling otherwise permitted minimisation of risk posed by unreinforced masonry chimneys on residential buildings.

The above analysis indicates that the preferred objectives are the most appropriate way to achieve the purpose of the RMA and the Council's functions under s31 RMA, give the greatest effect to the higher-level planning instruments, as well as providing greater certainty for decision-makers and Plan users. They are also unlikely to result in significant additional administrative or compliance costs being incurred.

9.4 Evaluation of Notable Tree Objectives

While not specifically required under s32, it is appropriate to also consider alternative objectives to those currently included in the Proposed District Plan, to ensure that the proposed objective(s) are the most appropriate to achieve the purpose of the RMA.

For the purposes of this evaluation, the Council has considered two potential objectives:

1. The proposed objectives
2. The current most relevant objective - the status quo

TREE-O1 Purpose

Notable trees are recognised for their contribution to the city’s amenity, history, ecology and sense of place and cultural value to mana whenua.

TREE-O2 Protecting notable trees

Notable trees are protected from inappropriate modification, subdivision, development and destruction.

TREE-O3 Maintaining notable trees

Notable trees are maintained to a safe and healthy standard.

General intent:

To identify, recognise and protect notable trees and ensure that they can be maintained to a healthy and safe standard for the appreciation of present and future generations.

Other potential objectives

Status quo:

‘20.02.1 To recognise the City’s historic heritage and protect it from inappropriate subdivision use and development’

	Preferred objectives	Status quo
<i>Relevance:</i>		
Addresses a relevant resource management issue	Yes - <ul style="list-style-type: none"> • The preferred objectives recognise that the Council’s only objective is not to only ensure that notable trees are recognised and protected, but also that they are maintained to avoid interference with property. • Objective One identifies that trees can be notable under the STEM evaluation method for a variety of reasons including 	Partly – <ul style="list-style-type: none"> • The operative District Plan objective focusses on historic heritage but does not address notable trees specifically, nor the range of other reasons trees can be notable.

	amenity, history, ecology, sense of place and mana whenua values. This better recognises the range values notable trees can have, than just heritage.	
Assists the Council to undertake its functions under s31 RMA	<p>Yes –</p> <ul style="list-style-type: none"> The proposed objectives will assist the Council to undertake its functions under s31 of the RMA, particularly s31(1)(a) to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district, within the context of a well-functioning urban environment. 	<p>Partly –</p> <ul style="list-style-type: none"> Although it provides some direction with s31(1)(a), the management of the effects of use, development, or protection of land, it does not provide direction on the nuance on how the council can achieve this.
Gives effect to higher level documents	<p>Yes –</p> <ul style="list-style-type: none"> Consistent with and gives more nuance to s6 of the RMA (for those trees that are listed for their heritage values). Consistent with s7 of the RMA (for those trees that are listed for their amenity and ecological value) Gives effect to the RPS, National Planning Standards and is consistent with Our City Tomorrow: A Spatial Plan for Wellington City. 	<p>Partly –</p> <ul style="list-style-type: none"> Consistent with the plainest interpretation of s6 of the RMA and s7. Although the objectives give general effect to the RPS it is less aligned with relevant directions in the National Planning Standards and Our City Tomorrow: A Spatial Plan for Wellington City. Does not recognise mana whenua values and that trees could represent these.
Usefulness:		
Guides decision-making	<p>Yes –</p> <ul style="list-style-type: none"> In conjunction with the proposed policies the proposed objectives will effectively guide decisions on resource consent applications as they provide clear direction regarding the purpose of the notable tree provisions and the outcomes anticipated. 	<p>Partly –</p> <ul style="list-style-type: none"> In conjunction with the proposed policies the proposed objectives provide a level of guidance on how resource consents should be treated, but little direction on outcomes other than the protection of heritage values.

	<ul style="list-style-type: none"> • These are further supported by accompanying rules that clearly delineate those activities identified as compatible/incompatible with the purpose and outcomes sought by the objectives. 	<ul style="list-style-type: none"> • Associated rules and policies are unhelpfully grouped together and make no distinction regarding what Council's preferred outcome is when considering relocation, removal or trimming of trees.
Meets best practice for objectives	<p>Yes –</p> <ul style="list-style-type: none"> • States the Council's intent in plain English. • Covers the breadth of outcomes required to fulfil the Council's responsibilities under the RMA in the context of a well-functioning urban environment. 	<p>No –</p> <ul style="list-style-type: none"> • Vague, limited in usefulness. Does not actually mention notable or heritage trees. • Although similar provisions were common in several 'first generation' district plans, these have generally been replaced in subsequent plan reviews or specific plan changes with clearer and more instructive provisions.
<i>Reasonableness:</i>		
Will not impose unjustifiably high costs on the community/parts of the community	<p>No -</p> <ul style="list-style-type: none"> • The proposed objectives and resultant policy cascade will help reduce costs by providing a clearer consenting pathway for works to trees that will reduce interference with property and give certainty who must carry out these works. • There will be increased cost for some landowners who have newly listed notable trees. This has been considered, but overall is justified when considering that the trees being added were nominated by property owners. 	<p>Partly -</p> <ul style="list-style-type: none"> • The current objectives and resultant policy cascade are effective in protecting notable trees (as evidenced by resource consent monitoring report) value. • They do not however provide certainty how different works with different levels of effects on notable trees should be weighted, and where there are multiple options, what the preference of the council is.
Acceptable level of uncertainty and risk	<p>Yes -</p> <ul style="list-style-type: none"> • For existing owners of notable trees there is low to no risk. • For owners of property that will now have a notable tree through this process, there will be a level of uncertainty for them how the 	<p>Yes -</p> <ul style="list-style-type: none"> • An option was to rollover operative provisions. For owners of property who would be newly listed, this would be a less flexible and responsive regime.

	proposals affect them the first time that they wish to undertake works. However, this can be mitigated with early engagement with the Council.	
Achievability:		
Consistent with identified tangata whenua and community outcomes	<p>Yes –</p> <ul style="list-style-type: none"> • Mana whenua feedback was reflected in TREE-O1. 	<p>No –</p> <ul style="list-style-type: none"> • There is no recognition of mana whenua values. • The operative provisions do not reflect the range of reasons a tree can be notable.
Realistically able to be achieved within the Council's powers, skills and resources	The objectives are realistically able to be achieved within the Council's powers, skills and resources, with any additional skills or resources required able to be sourced either in-house or on a contract basis.	The status quo objectives are currently being implemented within the Council's powers, skills, and resources.
Summary		
<p>Proposed Objectives TREE-O1 through TREE-O3 provide clearer and more workable direction than the operative district plan regarding the Council's desired outcomes for the management of notable trees.</p> <p>They address a broader range of outcomes than the operative plan and focus on notable trees specifically, which is not presently the case. The proposed objectives also increase the visibility of the values that notable trees can have for mana whenua.</p> <p>The above analysis indicates that the preferred objectives are the most appropriate way to achieve the purpose of the RMA and the Council's functions under s31 RMA, give the greatest effect to the higher-level planning instruments, as well as providing greater certainty for decision-makers and Plan users. They are also unlikely to result in significant additional administrative or compliance costs being incurred.</p>		

10.0 Evaluation of Reasonably Practicable Options and Associated Provisions

10.1 Introduction

Under s32(1)(b) of the RMA, reasonably practicable options to achieve the objective/s associated with this proposal need to be identified and examined. This section of the report evaluates the proposed policies and rules, as they relate to the associated objective(s).

Along with the proposed provisions, the Council has also identified through the research, consultation, information gathering, and analysis undertaken in relation to this topic a reasonably practicable alternative option to achieve the objective/s.

The technical and consultation input used to inform this process is outlined in section 5 of this report.

10.2 Evaluation method

For each potential approach an evaluation has been undertaken relating to the costs, benefits and the certainty and sufficiency of information (as informed by section 5 of this report) to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation is contained in the following sections.

10.3 Provisions to achieve Objective/s

For the purpose of this evaluation, the Council has considered the following potential options:

1. The proposed provisions
2. The status quo
3. A reasonable alternative

Historic Heritage

<p>Objectives:</p> <p>HH-O1 Recognising historic heritage Historic heritage 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.</p> <p>HH-O2 Protecting historic heritage Historic heritage is retained and protected from inappropriate use, subdivision, and development.</p> <p>HH-O3 Sustainable long-term use Built heritage is well-maintained, resilient, and kept in sustainable long-term use.</p>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Policies:</p> <p>Twenty one policies that:</p> <ul style="list-style-type: none"> Identify heritage buildings, structures, areas and archaeological sites with significant historic heritage values. Enable works that do not have significant effects on heritage values. Direct a flexible approach to works that support resilience, support long term uses, accessibility or can enhance heritage values. Encourage conservation plans to be prepared. Manage the removal or replacement of chimneys that could pose risk to life or property. Manage the modification of heritage buildings, heritage structures, heritage areas and scheduled archaeological sites. 	<p>Environmental</p> <ul style="list-style-type: none"> It is unlikely there is much environmental cost to these provisions, which will result in environmental benefits, identified in the next column. <p>Economic</p> <ul style="list-style-type: none"> There may be opportunity costs for landowners where heritage buildings, areas or structures could be developed at a more intense scale than in the absence of heritage listing. This may have impacts on employment, though the provisions enable a heritage restoration and development community. There will continue to be consenting costs where resource consents are required. This includes the cost of expert advice and assessment by the Council. There will be minor short-term costs to plan users, consultants, and the Resource Consent Team as they increase familiarity with the new provisions but is not a significant cost. <p>Social</p> <ul style="list-style-type: none"> There are unlikely to be significant social costs because of the provisions. The heritage provisions do limit the scale of change and redevelopment which may reduce the number of people who are able to live in areas subject to the provisions. <p>Cultural</p> <ul style="list-style-type: none"> There are unlikely to be much in the way of cultural costs because of the provisions, rather benefits. 	<p>Environmental</p> <ul style="list-style-type: none"> Historic heritage contributes contribution to an understanding and appreciation of the history, culture and sense of place of Wellington City, the Wellington region and New Zealand, and the wellbeing of the city, region and country's people. These provisions provide appropriate control over the modification of historic heritage to ensure that these benefits can be recognised, alongside enabling an appropriate level of growth and change. The provisions provide for development, including repair, restoration, reuse, and ongoing use. The intent of the provisions is to avoid demolition of historic heritage, including loss of embedded carbon and energy used in the construction of buildings and structures, and the generation of addition carbon from the construction of new buildings and structures. <p>Economic</p> <ul style="list-style-type: none"> The provisions specifically supporting reuse of historic heritage as a means of ensuring these places can be actively used for commercial activities that support employment, residential activity, and recreation. No resource consent is needed under the heritage rules to change a use, provided no external modifications are required. Recognising, protecting, and maintaining historic heritage can have economic benefits including urban regeneration, property value uplift tourism opportunities and construction job creation. <p>Social</p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> The provisions are informed by a significant amount of background evidence and monitoring. The provisions were consulted on during the Draft District Plan process and amended because of feedback. Not acting could risk the permanent loss of heritage values.

<ul style="list-style-type: none"> • Manage new buildings on the site of heritage buildings, heritage structures, heritage areas and within scheduled archaeological sites. • Manage the relocation or repositioning of heritage buildings, heritage structures and contributing buildings within heritage areas. • Seeks to avoid the permanent loss of scheduled historic heritage. <p>Rules:</p> <p>A rule framework that manages land use and building and structure activities as follows:</p> <ul style="list-style-type: none"> • Permits repair and maintenance of buildings and land within scheduled archaeological sites, as well as the removal of buildings that do not contribute to heritage values in heritage areas. • Manages the modification, demolition, repositioning or relocation of buildings and structures, and new buildings. <p>A complementary set of effects standards that address:</p> <ul style="list-style-type: none"> • Maximum height, grazing of stock, extent of modifications. <p>Definitions</p> <p>A set of relevant definitions, including:</p>		<ul style="list-style-type: none"> • These provisions have social wellbeing benefits as recognition and protection of significant historic heritage will ensure that it remains for future generations to enjoy, learn from, and identify with. <p>Cultural</p> <ul style="list-style-type: none"> • These provisions have cultural wellbeing benefits as the recognition and protection of historic heritage will ensure that present and future generations can enjoy, learn, and benefit from the identified buildings, structures, areas, and sites. 	
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- Built heritage
- Archaeological site
- Additions
- Alterations
- Partial demolition
- Total demolition
- Ongoing use
- Reuse
- Heritage building
- Heritage structure
- Heritage area
- Contributing building
- Non-heritage building
- Maintenance and repair
- Fabric

Schedules

SCHED1 – Heritage Buildings

SCHED2 - Heritage Structures

SCHED3 – Heritage Areas

SCHED4 – Scheduled Archaeological Sites

Design guide

A new Heritage Design Guide

Non-regulatory methods

Historic heritage advice note

Heritage resilience and regeneration fund

Conservation plans

Provision of advice

<u>Effectiveness and efficiency</u>	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objectives given they will provide increased environmental, social and cultural benefits as outlined above, with the least cost.</p>	<p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objectives given the benefits identified above, including reducing resource consenting barriers for works that increase resilience and support long term use.</p>	
<u>Overall evaluation</u>	<p>This option is the most appropriate way to achieve the preferred objectives because it provides clearer direction than the operative district plan regarding the Council's desired outcomes for historic heritage resources in the context of a well-functioning urban environment.</p> <p>They do this by:</p> <ul style="list-style-type: none"> • Reducing consenting costs for landowners who are undertaking activities that increase resilience and provide for sustainable long term uses; • Enabling reuse of buildings; • Enables appropriate activities, including activities such as repair and maintenance while managing potentially inappropriate activities; • Addressing archaeological sites which have no RMA protection at present; • Identifying historic heritage that represents a range of stories and themes of Wellington City's heritage and has particular regard to HNZPT's list; • Being unlikely to result in significant additional administrative or compliance costs; • Providing design guidance that visually shows what good outcomes for heritage and development look like; • Meeting the Council's functions under s31 RMA; and • Giving the greatest effect to the higher-level planning documents. 		
Option 2: Status Quo	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p><u>Objective</u></p> <p>One objective narrow in its focus, which is solely on protecting heritage values.</p> <p><u>Policies:</u></p> <p>11 policies that have a focus on protection of heritage values.</p> <p>Policies for groupings of activities, accompanied by lengthy explanations to provide certainty of policy intent.</p> <p><u>Rules:</u></p> <p>Different activities are grouped together in a single rule because they share a common activity status. Over 20 different assessment</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • There is no evidence that the operative provisions are resulting in environmental cost. <p><i>Economic</i></p> <ul style="list-style-type: none"> • There will be opportunity costs for landowners where heritage buildings, areas or structures could be developed at a more intense scale than in the absence of heritage listing under the operative provisions. Accordingly, this may have impacts on employment, though the provisions enable a heritage restoration and development community. • There are resource consenting costs this includes the cost of expert advice and processing by the Council. <p><i>Social</i></p> <ul style="list-style-type: none"> • There are unlikely to be significant social costs because of the operative district plan provisions. The heritage provisions do limit the scale of change and redevelopment which may reduce the number of people who are able to live in areas subject to the provisions. This would be fewer than the preferred option if new listings were not brought forward. 	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • The operative plan provisions do provide a level of protection of heritage values. Monitoring shows that only small number of heritage buildings have been demolished since the provisions were introduced. • Economic benefits arise from the reuse of heritage buildings for commercial activities as per the preferred option. <p><i>Economic</i></p> <ul style="list-style-type: none"> • There may be savings in terms of time and cost as the Council and community are familiar with the provisions. <p><i>Social</i></p> <ul style="list-style-type: none"> • These operative district plan provisions have social wellbeing benefits as recognition and protection of significant historic heritage will ensure that it remains for future generations to enjoy, learn from and identify with. <p><i>Cultural</i></p>	<p>It is considered that there is certain and sufficient information on which to adopt the preferred option, rather than rollover the operative district plan provisions because:</p> <ul style="list-style-type: none"> • The provisions are informed by a significant amount of background evidence and monitoring. • The provisions were consulted on during the Draft District Plan process and amended as a result of feedback. • Not acting could risk the permanent loss of heritage values of those places not presently listed. • The addition of new buildings, structures, areas, and archaeological sites increases representativeness of Wellington's heritage. • There is a common value in the community that heritage should contribute to the vibrancy of wellington city and be adaptable to change.

<p>criteria are included as part of the rule.</p> <p>Rules are grouped by activity status, rather than 'cascading' through activity status for the activity.</p> <p>Schedule</p> <p>Heritage buildings, areas, Māori sites and heritage trees</p> <p>No additional listings</p> <p>No management of archaeological sites</p> <p>Other Methods:</p> <p>Heritage Resilience and Regeneration Fund</p> <p>Provision of advice</p> <p>Conservation plans</p>	<p>Cultural</p> <ul style="list-style-type: none"> There are unlikely to be much in the way of cultural costs because of the provisions, rather benefits. At present however, important cultural heritage places of certain themes are underrepresented on the heritage schedule and can be demolished without consent. The preferred option seeks to increase representation. 	<ul style="list-style-type: none"> The operative district plan provision has cultural wellbeing benefits as they recognise and protect historic heritage. 	
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>While there is no evidence that the status quo provisions are resulting in environmental, social, or cultural costs that are significant they are not the most effective method of meeting the objectives</p>	<p>Efficiency</p> <p>While there is no evidence that the status quo provisions are operating inefficiently, there are potential regulatory uncertainty and unnecessary consenting costs from not specifically enabling reuse of heritage buildings or internal seismic strengthening.</p>	
<p>Overall evaluation</p>	<p>This option is not the most appropriate way to achieve the preferred objectives, mostly because they are inefficient in terms of potential unnecessary consenting costs for activities with comparatively minimal effects on heritage values, the cost of regulatory uncertainty and the failure to recognise the challenges of seismic resilience, public safety and the importance of buildings being used to ensure they remain economically and culturally viable assets.</p>		
<p>Option 3: Alternative approach to provisions – A more permissive regulatory framework</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p>Policy and rule framework:</p> <p>More enabling provisions for additions and alterations, and partial demolition of heritage by making these activities permitted subject to standards.</p> <p>More permissive approach to total demolition (restricted discretionary) where a</p>	<p>Environmental</p> <ul style="list-style-type: none"> Enabling works to heritage buildings through a permitted activity status would possibly risk significant degradation of heritage values as works would not require a resource consent. A lesser test for demolition would possibly increase loss of embodied carbon and energy. <p>Economic</p>	<p>Environmental</p> <ul style="list-style-type: none"> There is unlikely to be a significant environmental benefit to this option, rather costs. <p>Economic</p> <ul style="list-style-type: none"> A lower level of regulation could increase the level of enabled development across the city, resulting in more employment opportunities. 	<p>It is considered that there is certain and sufficient information on which to adopt the preferred option, rather than to adopt a lesser regulatory approach because:</p> <ul style="list-style-type: none"> The provisions are informed by a significant amount of background evidence and monitoring. The provisions were consulted on during the Draft District Plan process and amended as a result of feedback. Not acting could risk the permanent loss of heritage values of those places not presently listed.

<p>replacement building is proposed.</p> <p>Permitted removal of unreinforced masonry chimneys regardless of visual prominence.</p> <p>No archaeological sites provisions would be included and instead the Archaeological Authority process would be relied upon.</p>	<ul style="list-style-type: none"> • More permissive provisions could see other methods (such as heritage orders, covenants, or consent notices) being used instead which would create regulatory uncertainty and increase cost. • It is uncertain what impact on employment this option would have. <p>Social</p> <ul style="list-style-type: none"> • Greater potential for heritage loss could result in adverse impacts for social wellbeing, as any loss in heritage would impact the ability of future generations to enjoy, learn from and identify with their history. <p>Cultural</p> <ul style="list-style-type: none"> • There could be significant cultural cost as degradation of heritage values could be expedited using permitted activity status. • At present important archaeological sites are underrepresented on the heritage schedule and can be demolished without consent. This would continue under this option. 	<ul style="list-style-type: none"> • A lower level of regulation could increase economic opportunity and return for landowners. <p>Social</p> <ul style="list-style-type: none"> • This option may provide more opportunity for greater numbers of people to live in areas with otherwise restricted in development capacity due to the heritage provisions. <p>Cultural</p> <ul style="list-style-type: none"> • There are little to no cultural benefits. 	<ul style="list-style-type: none"> • The addition of new buildings, structures, areas, and archaeological sites increases representativeness of Wellington’s heritage. • There is a common value in the community that heritage should contribute to the vibrancy of wellington city and be adaptable to change.
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>This option is not the most effective method to achieve the objectives for historic heritage and its benefits are unlikely to outweigh its costs.</p>		<p><i>Efficiency</i></p> <p>While this option reduces apparent regulatory barriers in the District Plan it is likely to increase uncertainty in application and result in other methods being used to ensure heritage values are protected.</p>
<p><u>Overall evaluation</u></p>	<p>This option is not the most appropriate way to achieve the preferred objectives for this topic as it is inefficient and ineffective in terms of providing for environmental, social, and, cultural well-being</p>		

Notable Trees

<p>Objectives:</p> <p>TREE-O1 Purpose</p> <p>Notable trees are recognised for their contribution to the city’s amenity, history, ecology and sense of place and cultural value to mana whenua.</p> <p>TREE-O2 Protecting notable trees</p> <p>Notable trees are protected from inappropriate modification, subdivision, development and destruction.</p> <p>TREE-O3 Maintaining notable trees</p> <p>Notable trees are maintained to a safe and healthy standard.</p>			
<p>Option 1: Proposed approach (recommended)</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p>Definitions</p> <p>A set of relevant definitions, including:</p> <ul style="list-style-type: none"> • Notable tree • Trimming and pruning • Root protection area • Works arborist • Technician arborist <p>Objectives</p> <p>Three objectives that address:</p> <ul style="list-style-type: none"> • Recognising the value of notable trees. • Protecting notable trees from loss and inappropriate subdivision use and development. • The maintenance of trees and their health. <p>Policies</p> <p>Seven policies that:</p> <ul style="list-style-type: none"> • Identify notable trees scoring 110 on the STEM method or higher • Enable trimming and pruning that does not have significant effects on tree health. • Manages any other trimming and pruning and development within the root protection area. • Provides limited situations in which removal or relocation may be acceptable. <p>Rules</p>	<p>Environmental</p> <ul style="list-style-type: none"> • There are no identified environmental costs <p>Economic</p> <ul style="list-style-type: none"> • There will be administrative and financial costs for private landowners associated with these provisions, including: <ul style="list-style-type: none"> ○ Requiring landowners to contract an arborist to undertake permitted trimming. ○ Requiring landowners to apply for a resource consent for trimming and pruning that is not permitted. The deposit for a non-notified resource consent is \$2,145.00. It is unlikely that there will be many resource consents under these rules for trimming and pruning. ○ Any application to remove a notable tree would be significantly higher and could be publicly notified, with initial fee charges of \$20,800.00 prior to any refunds. • Works to notable trees on Council land are undertaken by Council’s arborists or by a contractor and paid for through operational budgets. • Notable trees have an impact on the development capacity possible on a site and accordingly the economic return of any development. 	<p>Environmental</p> <ul style="list-style-type: none"> • There would be less risk of the loss of notable trees, and the effects of subdivision, development and works to trees managed. • Trees with historical, amenity and ecological value would be retained. <p>Economic</p> <ul style="list-style-type: none"> • There are amenity benefits to the protection of notable trees which have associated economic value. • Notable trees themselves also have inherent economic value if were to be sold which are protected through their retention. The STEM assessment for each tree places a dollar value on each tree. • Permitting minor trimming and pruning avoids the need for a resource consent and reduces costs to landowners. <p>Social</p> <ul style="list-style-type: none"> • These provisions have social wellbeing benefits as recognition and protection of notable trees will ensure that they remain for future generations to enjoy, learn from and identify with. <p>Cultural</p> <ul style="list-style-type: none"> • These provisions have cultural wellbeing benefits as the recognition and protection of historic and culturally significant notable trees will ensure that 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as the preferred option has been consulted on through the Draft District Plan and there is a high degree of agreement on the value of notable trees.</p>

<p>A rule framework that manages land use activities as follows:</p> <ul style="list-style-type: none"> Permits trimming to reduce interference with property, ensure electrical safety or risk to safety. Permits small scale works within the root protection area of trees. Manages more significant trimming and pruning, or development within the root protection area. Provides a framework for the removal or relocation of notable trees. <p>Standards</p> <p>A complementary set of effects standards that address:</p> <ul style="list-style-type: none"> The qualifications that arborists must hold to undertake works on or under trees. Technical standards for infrastructure related works. <p>Schedules</p> <p>SCHED6 – Notable trees</p>	<p>Social</p> <ul style="list-style-type: none"> The protection if a notable tree will result in less development capacity than in the absence of the provisions. The effect of this will be minor given the relatively small number of notable trees. <p>Cultural</p> <ul style="list-style-type: none"> There is unlikely to be any cultural value costs as a result of these provisions. 	<p>they remain for future generations to enjoy, learn from and identify with.</p>	
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objectives given they will provide increased environmental, social, and cultural benefits as outlined above</p>	<p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objectives given the benefits identified above, including specifically providing for trimming and pruning as a permitted activity</p>	
<p>Overall evaluation</p>	<p>This option is the most appropriate way to achieve the preferred objectives because:</p> <ul style="list-style-type: none"> It will ensure that notable trees are recognised and protected through identification The rule framework enables appropriate activities, including activities such as trimming and pruning, while managing potentially inappropriate activities. It is efficient in terms of reducing consenting costs for landowners for reasonable maintenance (trimming and pruning) and avoid interference with property. It gives greater clarity and certainty for resource consent planners and landowners than the operative district plan provisions. 		
<p>Option 2: Status Quo</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p>Objectives</p> <ul style="list-style-type: none"> One objective for historic heritage which also covers notable trees. <p>Policies</p>	<p>Environmental</p> <ul style="list-style-type: none"> There are no identified environmental costs. <p>Economic</p> <ul style="list-style-type: none"> These are the same as the per the preferred option. 	<p>Environmental</p> <ul style="list-style-type: none"> Background and monitoring shows that the operative provisions are working generally, though there have been examples of highly rated notable trees being removed through the resource consent process. 	<p>It is considered that there is certain and sufficient information on which to pursue the preferred option over rolling over the status quo.</p>

<ul style="list-style-type: none"> One policy managing all types of activities that could occur. <p>Rules</p> <ul style="list-style-type: none"> Two permitted activity rules for trimming and works within the dripline of trees One discretionary activity rule for all other activities that are not permitted. Seven assessment criteria to be considered in consenting works on and around notable trees. 	<p>Social</p> <ul style="list-style-type: none"> As per the preferred option the protection of a notable tree will result in less development capacity than in the absence of the provisions. The effect of this will be minor given the relatively small number of notable trees. <p>Cultural</p> <ul style="list-style-type: none"> The operative district plan provisions do not recognise that mana whenua can have special associations with trees that mean they could be managed by notable tree provisions. 	<p>Economic</p> <ul style="list-style-type: none"> As per the preferred option there are amenity benefits to the protection of notable trees which have associated economic value. While trimming and pruning are permitted, there is vagary in the operative provision as to the qualifications of arborists who can undertake works, resulting in efficiency loss. <p>Social</p> <ul style="list-style-type: none"> As per the preferred option there are social wellbeing benefits as recognition and protection of notable trees will ensure that they remain for future generations to enjoy, learn from, and identify with. <p>Cultural</p> <ul style="list-style-type: none"> As per the preferred option there are cultural wellbeing benefits as recognition and protection of historic and culturally significant notable trees will ensure that they remain for future generations to enjoy, learn from, and identify with. 	
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>The status quo provisions are not the most effective method of meeting the objectives given they could result in environmental, social, and cultural costs as outlined above.</p>		<p>Efficiency</p> <p>The operative district plan provisions are not the most efficient method of meeting the preferred objectives.</p>
<p>Overall evaluation</p>	<p>This option is not the most appropriate way to achieve the preferred objectives as they do not provide a specific, robust, and clear process for assessing the effects of land use activities on and around notable trees.</p>		
<p>Option 3: Alternative approach to provisions – A more permissive regulatory framework</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p>Policy and rule framework:</p> <p>Provisions for the trimming and pruning of trees and work within the root protection area are enabled to be undertaken by people other than qualified arborists.</p> <p>More permissive approach to the removal of notable trees where offset planting is proposed.</p> <p>Schedule</p> <p>Rollover of operative district plan schedule. No addition of new trees.</p>	<p>Environmental</p> <ul style="list-style-type: none"> A more enabling approach increases risk to tree health and longevity as works would be undertaken by people without expert training or knowledge. The option risks greatly increasing the removal of notable trees with amenity heritage and ecological value with offset of a tree that contributes less. <p>Economic</p> <ul style="list-style-type: none"> There are few economic costs with this option, rather benefits. 	<p>Environmental</p> <ul style="list-style-type: none"> There are few environmental benefits to a more enabling approach, rather costs. <p>Economic</p> <ul style="list-style-type: none"> A lower level of regulation could increase the level of plan enabled development capacity across the city, resulting in more employment opportunities. A lower level of regulation would impose less financial cost on land owners to maintain their trees. <p>Social</p> <ul style="list-style-type: none"> This option may provide more opportunity for greater numbers of people to live in areas with otherwise 	<p>It is considered that there is certain and sufficient information on which to adopt the preferred option, rather than to adopt a lesser regulatory approach because:</p> <ul style="list-style-type: none"> The provisions are informed by background evidence and monitoring. The provisions were consulted on during the Draft District Plan process and amended as a result of feedback. This option could result in an increased risk of removal or degradation of notable trees. There is a commonly held values in the community that notable trees contribute to the vibrancy and amenity of Wellington City.

	<p>Social</p> <ul style="list-style-type: none"> The option risk expediting the removal of trees or degrading tree health which limits the ability of present and future generations to appreciate notable trees. <p>Cultural</p> <ul style="list-style-type: none"> This option is not consistent with the advice received from mana whenua who seek protection and recognition of the cultural values of trees with importance to them. 	<p>restricted in development capacity due to the heritage provisions.</p> <p>Cultural</p> <ul style="list-style-type: none"> There are little to no cultural benefits. 	
<u>Effectiveness and efficiency</u>	<p>Effectiveness</p> <p>The alternative provisions would not be the most effective method of meeting the objectives given they could result in environmental, social and cultural costs as outlined above.</p>	<p>Efficiency</p> <p>The proposed provisions are not the most efficient method of meeting the objectives given they likely do not meet the objectives of ensuring trees are retained for the appreciation of future generations and maintained to a healthy standard.</p>	
<u>Overall evaluation</u>	<p>This option is not the most appropriate way to achieve the preferred objectives as they are inefficient and ineffective in terms of providing for environmental, social, and cultural well-being.</p>		

Sites and Areas of Significance to Māori

Objectives:			
<p>SASM-O1 Purpose</p> <p>Sites and areas of significance to Māori are identified for their cultural significance and their contribution to an understanding and appreciation of the relationship mana whenua have with the landscape and the history of Wellington City.</p> <p>SASM-O2 Protecting sites and areas of significance to Māori</p> <p>Sites and areas of significance to Māori are retained and protected from inappropriate use, subdivision and development.</p> <p>SASM-O3 Kaitiakitanga</p> <p>Mana whenua are enabled to exercise kaitiakitanga in relation to sites and areas of significance.</p>			
Option 1: Proposed approach (recommended)	Costs	Benefits	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>A set of relevant glossary terms, including:</p> <ul style="list-style-type: none"> Wāhi Tapu, Wāhi Tīpuna, Kāinga, Mahinga Kai, Takiwā, Wāhi Taonga, Wāhi Tawhito, Marae, tikanga <p>Three objectives that address:</p> <ul style="list-style-type: none"> The purpose of the chapter, noting the relationship between mana whenua and their taonga, The protection of sites from inappropriate use, subdivision and development. Enabling ongoing use and development of marae <p>Six policies that:</p>	<p>Environmental</p> <ul style="list-style-type: none"> It is unlikely there is much environmental cost to these provisions, which will result in environmental benefits, identified in the next column <p>Economic</p> <ul style="list-style-type: none"> Depending on the values of a specific site and the outcome of consultation with mana whenua, there may be opportunity costs for landowners where a site could be developed at a more intense scale or in a different manner than in the absence of the provisions. There will be increased resource consenting costs as a greater range of activities than in the operative plan will require resource consent and consultation with mana whenua. There will be minor short-term costs to plan users, consultants, and the resource consenting staff as they increase familiarity with the new provisions but is not a significant cost. <p>Social</p> <ul style="list-style-type: none"> There are unlikely to be significant social costs because of the provisions. <p>Cultural</p>	<p>Environmental</p> <ul style="list-style-type: none"> The preferred option contributes to an understanding and appreciation of the history, culture and sense of place of Wellington City, the Wellington region and New Zealand, and the wellbeing of the city, region and country's people. The provisions will help ensure that the finite qualities of sites and areas of significance are not degraded, or that opportunities to ensure and increase prominence of the value of sites can be taken. The provisions have been balanced to enable ongoing use of existing buildings and structures and only trigger consultation when specific activities are undertaken. In this way they are more nuanced and purposeful than the operative district plan provisions. <p>Economic</p> <ul style="list-style-type: none"> Recognising and protecting sites and areas of significance can have economic benefits including urban regeneration, tourism opportunities. <p>Social</p> <ul style="list-style-type: none"> These provisions have social wellbeing benefits as recognition and protection of significant historic heritage will ensure that it remains for future generations to enjoy, learn from, and identify with. <p>Cultural</p> <ul style="list-style-type: none"> Strengthening the provisions to ensure that appropriate actions are taken around the management of sites and areas of significance by providing mana whenua the 	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> The provisions are informed by a significant amount of background evidence and consultation with mana whenua to understand their aspirations. The provisions were consulted on during the Draft District Plan process and amended because of feedback. Not acting could risk the permanent loss of sites and areas of significance and the opportunity to increase the representation and prominence of mana whenua values.

<ul style="list-style-type: none"> • Identify the sites and areas of significance with iwi partners, • Allow maintenance and repair of sites where the spiritual and cultural values of the site or area are protected, • Manage the construction of new buildings and structures within sites and areas of significance. • Provide triggers for mana whenua influence when there are modifications and alterations to sites and areas of significance, • Avoid destruction or demolition of sites and areas of significance, • Enable the ongoing activities at and within Maraes. <p>A rule framework that manages land use and building and structure activities that</p> <ul style="list-style-type: none"> • permits the maintenance and repair of sites and areas of significance, and cultural rituals, practices, and tikanga Māori • manages the modification of sites and areas of significance, new buildings and structures and the destruction of sites. 	<ul style="list-style-type: none"> • There are unlikely to be much in the way of cultural costs because of the provisions, rather benefits. 	<p>opportunity to decide which sites need greatest protection, thus providing opportunity to exercise kaitiakitanga and tino rangatiratanga.</p> <ul style="list-style-type: none"> • will enable iwi to have a greater role in how development of a site or area can protect those values it has for mana whenua. • Supports diversity of the visibility and representation of Wellington's heritage. • Reflects mana whenua aspirations for increasing the visibility of sites and areas within the City. 	
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<p>Schedules</p> <ul style="list-style-type: none"> • SCHED7 – Sites and Areas of Significance to Māori <p>A tangata whenua chapter which:</p> <ul style="list-style-type: none"> • Outlines who represents Tangata Whenua; and • Articulates relevant matters that are significant to Tangata Whenua. 			
<p><u>Effectiveness and efficiency</u></p>	<p><i>Effectiveness</i></p> <p>The proposed provisions are the most effective method of meeting the objectives given they will provide increased environmental, social and cultural benefits as outlined above with a reasonable level of cost.</p>		<p><i>Efficiency</i></p> <p>The proposed provisions are the most efficient method of meeting the objectives given the benefits identified above.</p>
<p><u>Overall evaluation</u></p>	<p>This option is the most appropriate way to achieve the preferred objectives because it provides clearer direction than the operative district plan regarding the desired outcomes of mana whenua for their sites and areas of significance.</p> <p>They do this by:</p> <ul style="list-style-type: none"> • Acknowledges how local Mana Whenua have a connection to these sites and seek active engagement when development is proposed; • Widening of the inventory of the sites and areas of significance to represent the taonga of both of Wellington’s iwi; • Aligning Council’s direction with the responsibilities of upholding te Tiriti o Waitangi as well as treaty settlements; • Enabling appropriate activities, including activities such as repair and maintenance while managing potentially inappropriate activities; • Being unlikely to result in significant additional administrative or compliance costs; • Meeting the Council’s functions under s31 RMA; and • Giving effect to the higher-level planning documents. 		
<p>Option 2: Status Quo</p>	<p>Costs</p>	<p>Benefits</p>	<p>Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions</p>
<p><u>Objectives</u></p> <p>One objective that is generic across the plan in all zones and areas enabling the exercise of tino rangatiratanga.</p> <p><u>Policies</u></p> <p>Three policies generically covering the identification and protection of sites with</p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • There is no evidence that the operative provisions are resulting in environmental cost. <p><i>Economic</i></p> <ul style="list-style-type: none"> • There are resource consenting costs this includes the cost of advice from mana whenua and processing of resource consents by the Council. <p><i>Social</i></p>	<p><i>Environmental</i></p> <ul style="list-style-type: none"> • Provides a level of protection over sites and areas of significance to a limited extent. <p><i>Economic</i></p> <ul style="list-style-type: none"> • There may be some savings in terms of time and cost as the Council, mana whenua and community are familiar with the provisions, though this does not recognise the cultural benefits of the preferred option. <p><i>Social</i></p>	<p>It is considered that there is certain and sufficient information on which to adopt the preferred option, rather than rollover the operative district plan provisions because:</p> <ul style="list-style-type: none"> • The preferred provisions are informed by a significant amount of background evidence and consultation with mana whenua. • The preferred provisions were consulted on during the Draft District Plan process and amended because of feedback. • Not acting could risk the permanent loss of sites and areas of significance and the opportunity to increase

<p>no specificity how this can be achieved.</p> <p>Rules</p> <p>One generic rule regarding the destruction of sites.</p> <p>Schedule</p> <p>A schedule of sites, with some not being subject to any additional controls.</p>	<ul style="list-style-type: none"> There are unlikely to be significant social costs produced by the operative district plan provisions. <p>Cultural</p> <p>There are cultural costs of rolling over the status quo is that:</p> <ul style="list-style-type: none"> The Operative District plan currently does not reflect the aspirations of both of Wellington's iwi and misses an opportunity to increase the representation and prominence of sites and areas of significance. This does not provide the opportunity for mana whenua to exercise kaitiakitanga and for these sites to be appreciated and understood by the people of Wellington City. The Council does not fully acknowledge the aspirations of mana whenua and take the opportunity to uphold te Tiriti o Waitangi as well as the details of the treaty settlements. 	<ul style="list-style-type: none"> There are minimal social benefits from the simplistic nature of the operative district plan provisions for sites and areas of significance, compared to the opportunities presented by the preferred option. <p>Cultural</p> <ul style="list-style-type: none"> There are limited cultural benefits resulting from the operative district plan provisions for sites and areas of significance. This includes direction for planners on how to assess or direct involvement with mana whenua for consents. 	<p>the representation and prominence of mana whenua values.</p>
<p>Effectiveness and efficiency</p>	<p>Effectiveness</p> <p>While there is no evidence that the status quo provisions are resulting in environmental, social, or cultural costs that are significant they are not the most effective method of meeting the objectives and meeting the aspirations sought by mana whenua</p>	<p>Efficiency</p> <p>The operative district plan provisions create potential regulatory uncertainty due to having one rule with a broad scope which could be triggered by multiple different activities.</p>	
<p>Overall evaluation</p>	<p>This option is not the most appropriate way to achieve the preferred objectives, because the status quo is ineffective at providing mana whenua the opportunity to exercise kaitiakitanga and tino rangatiratanga over sites of significance and would not increase the visibility and prominence of sites and areas within the City.</p>		

11.0 Conclusion

This evaluation has been undertaken in accordance with section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA.

The evaluation demonstrates that these proposals are the most appropriate option as they:

- Give effect to the higher order requirements of the RMA, National Direction, Regional and local direction.
- Align with the relevant directions in the National Planning Standards and the Compact goal and related directions in Our City Tomorrow: A Spatial Plan for Wellington City.
- Address deficiencies in the operative district plan provisions with respect to known policy gaps and vagaries of interpretation.
- Recognise that the Council has multiple outcomes for the protection, sustainable long term use and resilience of the City's historic heritage.
- Increases representation of the City's historic heritage.
- Will tangibly increase the representation of mana whenua values in the city and require consultation with mana whenua ensuring their views are incorporated into future development of the city.

12.0 Appendix 1: Summary of feedback and officer responses on the Draft District Plan feedback

Historic heritage

Submitter	Submission	Summary	Officer Response
1000 Katherine Mansfield birthplace	<p>Thorndon Heritage Area</p> <p>We support the proposed heritage area designation in Thorndon. However, the proposed Thorndon heritage precinct is too small (equating to the area as it was first defined in the 1970s) and should be extended north to the motorway intersection 3 opposite Harriett Street and along the west side of Tinakori Road. In other words, the boundaries shown in the Operative District Plan should be retained.</p>	<p>Seeks extension of heritage area in thorndon to align with that of the thorndon character area in the district plan</p>	<p>Note that the Council has a different policy approach to character as opposed to heritage. The area of Harriett street is within the Thorndon character area in the ODP, not heritage area.</p> <p>Will be raised with the Heritage team if there is a compelling case for these properties to be added into the heritage area for their significant heritage values. If this is not the case, status quo.</p>
1000 Katherine Mansfield birthplace	<p>Schedule of heritage items</p> <p>We support the new additions to the schedule of historic heritage items. However, we are concerned that the schedule is inadequate and does not represent what is distinctive about Wellington, the region and New Zealand. We believe a more proactive public engagement process should be undertaken. The debate over the Spatial Plan and this Draft District Plan have illustrated that the community has diverse views on heritage. The residential character of Thorndon, Aro Valley, Mt Victoria, Mt Cook and Newtown for example, are seen by many as one of the most distinctive aspects of Wellington. Public engagement on the draft schedule of heritage items may offer additions to the proposed schedule based on what residents</p>	<p>Consider that more proactive public consultation on the heritage list is needed.</p>	<p>Engagement on the proposed additions to the heritage list started in December 2020 with a public facing website and campaign calling for new nominations to be received. These additions were based on a thematic review of the existing heritage list against the 2013 'thematic review of wellington's heritage' to determine which types of heritage are not well represented. The proposed additions contribute to increasing representativeness and have been subject to public consultation in the Draft DP.</p>

	believe is important and needs protecting, including sites of importance to mana whenua.		
1000 Katherine Mansfield birthplace	<p>General heritage protection</p> <p>We are concerned that historic heritage (a matter of national importance at section 6f of the Resource Management Act) and character have been given inadequate weight in the Draft Wellington City District Plan.</p> <p>Wellington's character areas have been evolving over 150 years relative to the city's topography, to light and climate, to people's needs, to fashions that have come and gone, and the suburbs of Thorndon, the Terrace, Holloway Road, Aro Valley, Mount Cook, Mount Victoria, Newtown and Berhampore, in particular, have developed over generations into the Wellington identifiers that we know today. Removing and or reducing the rules for character areas in Wellington means that the more vernacular or everyday values of Wellington's most well-known suburbs will be vulnerable to loss.</p>	Considers that the plan gives inadequate protection to character and heritage values.	The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.
527 Charlotte Von Dadelsen	I am particularly concerned that heritage considerations have been specifically excluded from the formulation of proposals for Thorndon. The focus has been limited to matters pertaining solely to residential character which is wrong. Thorndon's	Considers the Council has separated character from heritage as a way of devaluing the significance of character areas.	Note that the Council has a different policy approach to character as opposed to heritage

	<p>historic heritage and residential character are inextricably linked and cannot be artificially separated. Separation is clearly designed to negate arguments supporting the protection of heritage and to favour intensification and the development of more intensive forms of housing.</p> <p>The protection of historic heritage is a matter of national importance and in this regard the Council should approach the future planning of Thorndon with a mindset of protecting, enhancing and promoting the suburb as a valuable heritage asset. This has been the policy for many years, and it is unconscionable that the Council is now actively working to oversee Thorndon's demise. Thorndon is a suburb worth fighting for.</p>	<p>Considers that the Council is not protecting the heritage values of Thorndon.</p>	<p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p> <p>A significant proportion of Thorndon will remain subject to Heritage Area Overlays (included new overlays introduced in the DDP), and character precincts.</p>
<p>1059 Alex Kay</p>	<p>Supports listing of 117 Campbell Street, Karori</p> <p>General heritage protection</p> <p>I support unlocking housing supply, but consider that our rich heritage can be afforded greater protection through the plan while still intensifying the inner and city fringe suburbs."</p>	<p>Supports listing of 117 Campbell Street, Karori</p> <p>Support unlocking housing supply, but consider that our rich heritage can be afforded greater protection through the plan while still intensifying the inner and city fringe suburbs</p>	<p>Supports listing of 117 Campbell Street, Karori</p> <p>Supports intensification alongside heritage protection</p>

<p>599 Alison Pharaoh</p>	<p>Definition of character must include heritage</p> <p>The definition of character does not sufficiently take into account heritage, and must do so. The only reason that Character Precincts in Mount Victoria have: “common, consistent natural and physical features and characteristics that collectively combine to establish the local distinctiveness and identity of an area, and that contribute to a unique ‘sense of place” [Draft District Plan definition] is because they are consistently original, late-nineteenth/very-early-twentieth century buildings on the land i.e. because of their heritage. This is Mount Victoria’s and Wellington’s heritage.</p> <p>The character, meaning and value of areas of Mount Victoria with particularly high heritage value has not changed since the current Operative District Plan was written. In its objectives, the City recognises the value of such heritage generally, and specifically and explicitly for Mount Victoria in the introduction to The Residential Guide, Appendix 2 Mount Victoria.</p> <p>Wellington has a unique opportunity to protect this heritage for future generations of Wellingtonians and New Zealanders.</p>	<p>Definition of character must include heritage</p>	<p>Note that the Council has a different policy approach to character as opposed to heritage</p> <p>The extent of the character precincts in the Draft District Plan have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p> <p>A significant proportion of Mount Victoria will be subject to Heritage Area Overlays (included new overlays introduced in the DDP), and character precincts.</p>
<p>1035 Anna Woolhouse</p>	<p>I am a joint-owner of 259 (-261) Mansfield st, Newtown, 6021 and would like this property to be added to the heritage schedule. I notice that it is not included in a ‘precinct’ of 17 other 2-storeyed pre-1930s buildings. It is part of the collection of houses and exshops (with houses) by the Russell Tce/Riddiford St roundabout. The property still has the wood fired oven used to bake for the tearooms which were located at 259 Mansfield st, (1911). There are ex-stables, having housing horses which</p>	<p>Nomination for heritage listing of property in Newtown</p>	<p>259 (-261) Mansfield Street, Newtown, 6021 passed to the heritage team for consideration.</p>

	<p>delivered the bread around Wellington. We would like to see it celebrated by the WCC as we owners do.</p>		
667 Centre Port	<p>Heritage</p> <p>Precise mapping of Maritime House is required.</p> <p>A heritage area identified as 'Pipitea Quay' is in the area of former Shed 35 (demolished in 2017). This heritage area should be deleted as the area is now a paved access area as part of the operational port.</p>	<p>Maritime house is not precisely mapped and needs to be.</p> <p>Shed 35 heritage area still is identified and needs to be removed</p>	<p>Check maritime house mapping with heritage team. This is correct?</p> <p>Agree - remove Shed 35 Heritage Area.</p>
845 Cho Yam Chan	<p>Historic Heritage/SCHEDI- Heritage Buildings Proposed 528 -233 Willis Street</p> <p>Oppose the proposed heritage listing 233 Willis Street (Proposed 528)</p> <p>As the owners of 233 Willis Street, we have strongly opposed and continue to strongly oppose the heritage listing of 233 Willis Street building or the facade.</p> <p>At the heart of Wellington City Council's Victoria Street Transformation initiative is the desire to provide high density housing for the city and the 233 Willis Street site is located in this area, also fronting onto Victoria Street.</p>	<p>Oppose the proposed heritage listing 233 Willis Street (Proposed 528) in any capacity.</p>	<p>Opposition to the listing will be noted with the heritage team.</p> <p>This building has had a heritage evaluation completed for it and will be checked to see if there is still a listing recommendation for this property.</p>

In order to achieve sustainable land use, we applied for and were granted Resource Consent approval (SR# 496847) under the Operative District Plan to construct two apartment buildings on the 233 Willis Street site.

We have taken this action because of the difficulty with existing building listed below and hence our opposition to the proposed heritage listing on the Draft District Plan:

3.1 The difficulty of the building being brought up to current building standard and requirements. The building when built was the biggest on the street. Now it is bounded at two legal side boundaries by two high rise buildings. The light into the existing building was originally via steel frame windows along these boundaries. The majority of windows have been covered by these two adjacent high rise buildings. Significant parts of the existing building have no light source for this reason. Furthermore, the adjacent site/buildings are able to further reduce the light source.

3.2 Earthquake strengthening requirement. The existing building is not worth strengthening for the above reasons.

3.3 Maintenance of the existing building and facade is difficult and cost prohibitive for the above reasons.

3.4 Change of use of this industrial building for housing is cost prohibitive and outcome is not in line with future proof builds.

	<p>3.5 Loss of property rights - strict heritage rules to deal with.</p> <p>4. Most importantly for us the loss of the opportunity to provide quality housing.</p> <p>Cho Chan and Julie Daysh.</p>		
683 Don Smith	<p>Amend the Draft District Plan to recognise that character is in part derived from heritage (as set out in the Operative Plan) in pre-1930s character areas (as defined in the Operative Plan), and use a comprehensive, holistic definition of character as a qualifying matter under the National Policy Statement-Urban Development. Retain demolition controls generally.</p>	<p>Seeks heritage and character values to be combined.</p>	<p>Note that the Council has a different policy approach to character as opposed to heritage</p> <p>The extent of the character precincts in the Draft District Plan have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p>

<p>1041 Graeme Spargo</p>	<p>Four properties at the corner of Queens Drive and Lyall Parade, Lyall Bay form a heritage cluster dating back circa 100 years. In accordance with Policy 21 of the Regional Policy Statement the properties 128 and 130 Lyall Parade (built circa 1915), and 132 Lyall Parade (built 1929) and 203 Queens Drive (circa 1925?) form a highly visible and contiguous remaining cluster of homes from this era.</p> <p>There are associations with the Fletcher family with at least 3 of these dwellings. As these properties are identified in the "High Coastal Hazard" zones there are also benefits of having assessment processes for any proposed changes to the current heritage structures (including proposals for removal or demolition). With wider proposed changes to the urban fabric in and around Lyall Bay and much of the city, recognizing this heritage cluster is an important opportunity for the narrative of Wellington's development. Images from the early development of this part of Wellington are attached.</p> <p>We are owners of one of the identified properties.</p>	<p>Nomination of four properties for heritage listings</p>	<p>Properties passed onto the heritage team -> confirmed that are unlikely to meet the criteria for listing.</p>
<p>618 Helen Heffernan</p>	<p>21 Glenbervie Terrace is included in both the list headed "Legal Descriptions" and as a provisional exclusion in the list headed "Protection required". It should be included. It is joined to another townhouse, 19 Glenbervie Terrace. It makes no sense to include 19 and not 21. Note 19C, 19D, 19E and 19F are garages under numbers 19 and 21 and, once again, it makes no sense to exclude them as they are an integral part of the building that comprises numbers 19 and 21.</p> <p>2A Parliament Street is listed as a provisional inclusion in the list headed "Protection required", but</p>	<p>Corrections to the list are proposed</p>	<p>Heritage team to confirm extent of listing</p>

	<p>not included in the list headed "Legal Descriptions". This property should be included as the house is a significant pre-1930s house built by Prime Minister Massey for his daughter.</p>		
<p>997 Joanna Morton</p>	<p>I support the proposed heritage area in Thorndon because of its historic value. It was part of the 1840 New Zealand Company settlement and is one of the oldest suburbs in New Zealand.</p> <p>In the proposed Thorndon Heritage Area, the addition of nearby period houses enhances the existing heritage shopping area.</p> <p>The housing in the proposed heritage area particularly illustrates the theme of "Houses and streets on difficult sites" identified in the 2013 WCC Thematic Heritage Study.</p> <p>The 2019 Pre-1930 Character Area Review also identifies this as an area where most of the houses are of a similar period and have not been significantly changed since they were built.</p> <p>The geographic location between the green spaces of Te Ahumairangi/Tinakori Hill and the Botanic Garden ki Paekaka makes the proposed Thorndon Heritage Area fairly isolated visually from other housing. This makes it a good location for a historic</p>	<p>Supports Thorndon Heritage Area and proposes extension to cover more of the previous character area, particularly the area between Park Rd and Thorndon Quay, around the Katherine Mansfield Birthplace –</p> <p>Also proposes extensions up St Mary St to include Randell Cottage</p>	<p>Properties passed onto the heritage team to confirm the merit of these properties.</p>

	<p>enclave where you can get a strong sense of another period.</p> <p>It has tourism value as a historic area, with the added benefit of being within walking distance of other tourist attractions. If anything, I would like to see the heritage area extended to cover more of the previous character area, particularly the area between Park Rd and Thorndon Quay, around the Katherine Mansfield Birthplace – both because most of the houses here are unchanged and because it enhances the Birthplace.</p> <p>I don't understand why the heritage area isn't extended a couple of houses up St Mary St to include Randell Cottage, the oldest remaining house in this area, rather than leaving Randell Cottage isolated.</p>		
<p>997 Joanna Morton</p>	<p>SCHED3- Heritage areas</p> <p>Submission: I value buildings that are evidence of the history of the city. To me part of the value of clusters of heritage houses is that they allow you to stand on a street and have a strong sense of what it was like to live on that street at another time. That is something you can't get the same way from a museum or a photo, or even if only one historic house on a street is retained. Very few clusters of historic houses are heritage listed in Wellington. With higher density and development expected through most of the city I would like to see at least a few of the most important clusters of historic houses preserved intact. I think this would strike a balance between necessary development and preserving evidence of</p>	<p>Considers Holloway Rd should be made into a heritage area Requests extension of current Aro St heritage areas Requests Roy St in Newtown made into a heritage area</p>	<p>Holloway road, Roy st and Aro street extensions raised with heritage team. Given that a large amount of residential housing is already on the list, and is not underrepresented on the thematic review this is not a priority for listing.</p> <p>Roy street is already identified as a character precinct.</p>

the history of our city. Additional clusters not yet proposed as heritage areas:

Holloway Rd and Aro Valley

I would hope to see at least part of Holloway Rd made into a heritage area. The cluster of heritage-listed buildings at the bottom end are among the oldest remaining houses in the city. Like Thorndon it makes a good historic enclave because it is visually isolated from other housing. It also complements the heritage shopping area and heritage-listed worker's cottages on Aro St, as well as the Nairn St Cottage nearby. I'd also hope that the current Aro St heritage areas might be extended. With the existing 1860s-1910s buildings in Aro Valley alongside the site of Moe-i-te-ra kainga near Tanera Park, the mara/garden sites in this area, and much of Aro Valley having been designated Māori Reserve by the NZ Company, this is potentially a rich area for interpretation of 19th century colonial history.

Roy St, Newtown

I'd hope to see Roy St in Newtown made into a heritage area. Newtown was built in a later period than Thorndon and Aro Valley – mainly in 1900-1909 – so it would add to evidence of the history of the city to preserve some clusters of houses here. The 2019

Pre-1930 Character Review shows that Roy St is one of the most intact/unaltered streets in Newtown. Its location next to the green space of Newtown Park/Zoo makes it partially visually isolated from other development so that would add to its value as a heritage enclave. Its location next to the terminus of the tram line (and nearby tram depot) that opened in 1904 potentially makes it a good candidate for interpretation of the impact of

<p>transport on the historical development of Wellington.</p>		
<p>support the proposed heritage area on Porritt Ave. I would particularly like to see 49 Porritt Ave heritage protected because former owner Kate Edger ran a private girls' school there in the 1890s when opportunities for girls' education were limited, and it is therefore part of the story of the development of girls' education in Wellington.</p> <p>Also supports Moir st, Elizabeth Street, doctors common and armour ave heritage areas</p>	<p>Supports Porritt Avenue, Moir Street, Elizabeth Street, Doctors Common and Armour Avenue Heritage Areas</p> <p>Would particularly like to see 49 Porritt Avenue listed.</p>	<p>Noted</p> <p>49 Porritt Avenue is a contributing building within a heritage area.</p>
<p>75 Taranaki Street-church Hall</p> <p>The church hall at Wesley Church, 75 Taranaki Street was previously proposed as a heritage building. I'm disappointed that I can't see it listed in the Draft District Plan and hope it will be heritage listed.</p>	<p>Church hall at Wesley Church, 75 Taranaki Street should be listed</p>	<p>The church hall is proposed to be listed and is subject to submissions in opposition.</p>

289 Karen Wong

Submission:

(Submitting this same piece under this section and subsection as feel it applies to both)

This submission focuses on the impact the City Centre Zone (CCZ) rules have in relation to adjoining Moir St, Mt Victoria (not just character area but also proposed HERITAGE area)

Moir Street is not only a character area but also a proposed HERITAGE area of 1-2 storey cottages and bungalows. Having 8 storeys builds right next to these houses will have HUGE adverse effect on this heritage area and the district plan policies that aim to protect such areas do not.

Moir Street is: characterised by 1-2 storey wooden houses. Most were established around 1880-1900 and have a strong, coherent character and heritage value. Located at one of the lowest areas in Mt Victoria, adjacent to the Central City Zone. Homes are located on very small sections, on a very narrow street. Meaning outdoor space and access to sunlight is at a premium

Moir Street uniquely identified in the draft District Plan as it is:
In the Medium Density Residential Zone (MDRZ);
and
Recognised as a character area.

The Draft District Plan has significantly constrained the extent of these to focus on areas that have the most important character values in the City; and
Recognised as a heritage area. There are only 4 heritage areas in the whole of Mt Victoria; and also adjacent to the Central Area

Concerned with the scale transition between CCZ and Moir Street

The submitters interpretation is not correct that an 8m building will always be able to be built on the boundary of this character & heritage area.

'CCZ-S3 Character Precincts – Adjoining Site Specific Building Height' requires that for any site adjoining a site identified within a Character Precinct: no part of any building, accessory building or structure may project beyond a line of 60° measured from a height of 12m above ground level from all side and rear boundaries that adjoin that precinct.

This would apply to Moir Street given its character precinct status.

There are no yard setbacks or HIRB for CCZ adjoining residential zones in the operative plan. This is managed at present through maximum height limit which in this area are presently 10.8m. The proposed increase is not considered significant at 12m.

Notwithstanding this Moir Street is also elevated over CCZ zoned sites which will help reduce the sense of bulk and dominance from adjacent buildings to a scale comparable to that existing in Moir Street. A 5m setback and reduction of height to 8m is not supported.

No other MDRZ has all three factors.

Issues with Draft District Plan.

The Draft District Plan rules will fail to protect the character and heritage values of Moir Street and do not align with the objectives and policies of the plan which seek to protect the important character and heritage areas and values of the City from inappropriate development and design. The rules will also not encourage or enable development in line with the draft Heritage design guides, in particular policies G8-G12.

This is due to the draft rules for the Central City Zone (CCZ) on the eastern side of Hania Street allowing very high buildings (up to 28.5m high) directly to the rear of the homes on Moir St. The outcome would be a wall of 8 storey builds directly overlooking and dominating 1-2 storey cottages.

Such development would have a significant adverse effect on the character, heritage and amenity of houses on both sides of Moir St. This includes loss of sunlight, overlooking, shading, wind, overdominance of building form and loss of privacy.

The Draft District Plan needs to acknowledge and respond to this very sensitive boundary transition in order to avoid detriment to the heritage and character area of Moir St.

A similar principle also needs to be applied at the interface of the CCZ and MDRZ.

It is considered appropriate to extend CCZ-S3 to adjoining MDRZ zoned heritage areas too.

	<p>Add new rule (to follow CCZ-S3).</p> <p>CCZ-SX – Heritage Areas in MRZ – adjoining site specific building height Identified heritage area:</p> <p>For any site adjoining a site identified within a Heritage Area: no part of any building, accessory building or structure may be higher than 8m high within 5m of the adjoining boundary or project beyond a line of 60° measured from a height of 8m above ground level from all side and rear boundaries that adjoin that precinct.</p>		
<p>762 The Methodist Church of New Zealand Te Haahi Weteriana O Aotearoa Wellington Methodist Parish</p>	<p>If the proposal to place the ‘whole site’ onto the Heritage List, rather than just the buildings mentioned above, this will prevent the operation of the site as a church. This “whole of site” listing becomes an onerous task for the church and the large number of not-for-profit organisations that are an integral part of this church. Not being able to use the grounds away from these historic buildings to generate some sort of income, with the “whole site” heritage listed is punitive. In the very worst case, without the possibility of income generation of some areas well away from the heritage buildings, this could lead to Wesley Church having to abandon the site as then present operations are unsustainable. The city would then be poorer. The church continually contributes to the city, especially those of lower economic standing.</p> <p>Rhetorically I am unsure if Wellington City Council are effectively creating public space using the heritage rules to do this. Is this ‘over the entire site</p>	<p>Opposes an extension of the heritage listing to include buildings not otherwise already listed. Considers this will not support a sustainable long term use.</p> <p>Do not support 10 storeys in Te Aro if no recession planes apply around the site</p>	<p>Listing extent opposition raised with heritage team for consideration.</p> <p>No recession planes apply within the CCZ. In the case of this listed heritage building, any resource consent for buildings on adjacent sites would need to consider the heritage values and effects. In addition to design controls such as maximum building depth and the requirement to obtain a resource consent will help ensure effects on heritage values are managed.</p>

	<p>heritage listing' a fair use of private land, that then places the site more in the public realm.</p> <p>We are unsure of the details surrounding "qualifying matter". We are unsure if through the draft spatial plan, and the "increase in heights in Te Aro to at least 10 storeys" if unlimited height is possible around the church. We would not support these changes if there are no recession planes</p> <p>If there are height recession plans around this site we would like to support this change.</p>		
<p>532 Nicola Koptisch</p>	<p>My late husband and I purchased 30 Hobson Street around 1981. The house had been planned for demolition and by purchasing the house it had been saved for more than 30 years from potential demolition. The house was built in 1905, the architect, Frederick De-Clere, was well known, see architectural plans and further details on page 2.</p> <p>It is very important for the city to retain the older historical parts of the city to create a sense of history and uniqueness for future generations and for tourism. So much of Thorndon has already been lost with the motorway."</p>	<p>Supports heritage protection</p>	<p>Noted.</p> <p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p> <p>A significant proportion of Thorndon will be subject to Heritage Area Overlays (included new overlays</p>

			introduced in the DDP), and character precincts.
996 R. Bell and M. McCormack	<p>My husband (Michael McCormack) and I are owners of 355 The Parade, which is scheduled to be listed as an Historic Heritage Building in the new District Plan. We wish to register our opposition to this listing.</p> <p>The primary reason for our opposition is the earthquake prone status of our building. We believe that when buildings are selected for heritage the cost to owners should be a consideration - and that means factoring in vulnerability to earthquakes. At the moment there is no cost-benefit analysis applied when selecting properties for heritage. In our opinion, the cost of heritage listing our already earthquake prone building is too high, especially as the values it represents can be found elsewhere, in less vulnerable buildings.</p> <p>In 2019 our building was identified by Beca (in a WCC commissioned survey) for a heritage listing because it had a “typical street façade and shop front,” and worked well to “define the end of The Parade.” Beca also noted it characterised several themes under-represented in W.C.C’s scheduled heritage listings, including “Visual Arts” and “Other</p>	Opposed to listing of 355 the parade for predominantly financial reasons.	Concerns passed to the heritage team.

19th century/ early 20th century migrations and ethnicities.”

Our building is not unique - similar buildings can be found all around both Wellington and New Zealand. It is not eligible for an Historic Places listing, it doesn't warrant a place on The New Zealand Heritage List, and nor is it ever likely to. It's reason for

inclusion on the WCC Plan is that it represents certain themes (namely "Trade and Commerce" through being a shop on the tram route and "migration" through having been occupied by immigrant families). We believe these themes could be just as easily represented by other places around Wellington.

We have owned our building since 2010. We were naive about masonry buildings, and bought it not out of a desire to own property or build wealth, but because we needed somewhere to run our business (my husband's art gallery). The building has been good to us, allowing us to have an income and raise our family for these past eleven years.

However, owning it has been stressful. The building is nearly a hundred years old. Its two stories are made from brick and mortar, and come from a time when earthquakes did not warrant a thought. There are no piles, and the building rests on sand. It has been strengthened twice, is due to be done again, and will likely need to be done again shortly after that (an update of the current code is imminent). We have, and will continue to have, enormous outgoings to keep people in and around our building safe.

In spite of all this strengthening, when an earthquake does hit¹, the building is not likely to survive. This is because older buildings are not strengthened to be saved - they are strengthened to save lives²³.

Heritage officers have been frank about the lack of financial assistance available to private property owners - for all intents and purposes, there is none.

We are not property developers, or wealthy landowners. We are an artist and a coffee shop owner, whose mortgage on this building is larger now than when we bought it 11 years ago. To pay for the next round of strengthening (expected to be several hundred thousand dollars) we will need to mortgage our family home. While strengthening our building will (hopefully) protect people when the next earthquake happens, it's never going to save the building. If protecting heritage is what you are trying to achieve, we believe you are better off protecting buildings which have already proven they can stand the test of time - wooden ones.

We are already burdened with the responsibility of keeping people in and around our building safe in the event of an earthquake. Adding heritage to this adds yet another layer of cost and responsibility. Dr Eric Crampton and Linda Meade's 2016 "Deadly Heritage" report states that "While the public enjoys the benefits of a pleasant urban environment featuring many older buildings, those buildings' owners are left to bear the cost..."

We agree, and hope you will consider carefully the reasons for listing our building, and the onus you

	are placing on private property owners when you do so.		
405 Tawa Historical Society	Heritage Structures - the only listing in Tawa currently is that of the Elsdon Best memorial. Within the past five years a Tawa war memorial has been built at the northern end of Oxford Street, close to the Elsdon Best memorial. In addition, another memorial, the World War I memorial rock, has been moved from Willowbank Park to a place close to the Elsdon Best and War memorials. We consider that it is appropriate to enlarge (or add to) the existing memorial area to include the other memorials now also in this area. Exact legal descriptions unknown (by me).	Nominates memorials in tawa for listing in the district plan	Nominations passed to heritage team
	Schedule 3: Heritage Sites – there are currently no listings in Tawa. We note that cemeteries in other locations ARE included and suggest that the Tawa Cemetery (Main Road, Linden - about 100 metres south of intersection with Fyvie Avenue) be added to this schedule. We understand that this cemetery is currently on the council's radar for recognition as a heritage site, but wish to formally recommend its addition to the register through this forum.	Nominates additional sites for listing	Additional sites are proposed for listing in Tawa including the Brown Farm house. There is an existing listing - the old school house. Nominations passed to heritage team.

<p>Secondly, former Tawa Flat Railway Station site on Duncan Street (see below, cross reference with Archaeological site). Major communications route through the area, since superseded. Part of Tawa's link to the outside world during late 19th and early 20th centuries. Exact legal descriptions unknown (by me).</p>		
<p>Schedule 4: Archaeological Sites - we understand that this is a new category and wish to recommend that all the old rail line through the Tawa valley (pre-1937) be formally added to it.</p> <p>Exact legal descriptions (many I suspect) unknown.</p> <p>Route of old (1885-1937) North Island Main Trunk railway line through Tawa valley and onwards to Johnsonville from the north:</p> <ul style="list-style-type: none"> • Line diverged from what is current route near front gate of Tawa College and headed along what is now Duncan Street as far as roundabout at junction of Duncan St, Tawa Street & Taylor Terrace. • Current green/lawn space above northbound platform at Redwood station is the site of former Tawa Flat railway station (see above x-ref with Heritage site). • Southward from old Tawa Flat station site, the route continued past the bottom of gardens of several houses on the westward side of Taylor Terrace (scar of track-bed is discernible in places today). 	<p>Nominates additional sites for listing</p>	<p>Nominations passed to heritage team.</p>

- The line curled around the hillside that makes up houses at the western end of Ryan Place and Zande Terrace.
- The line ran through area that is now south (steep) end of Taylor Terrace, across a bridge (or two) in Willowbank Park to the motorway interchange. I understand that end of Taylor Terrace was subject to some significant earthworks when residential development occurred obliterating much of the route through here.
- Route ran slightly east of motorway as it heads south from interchange, but soon ran on what became the motorway as far as Seton Nossiter Park in Paparangi (Belmont Viaduct site). A couple of old cuttings where the line slightly diverged from motorway route are still visible in this area. Recognition and signage of viaduct site in SN Park already exists.
- Southward heading route rejoined the motorway after viaduct and ran into Johnsonville on an alignment that roughly matches the motorway on/off ramps at Johnsonville and into old Johnsonville station site (now McDonalds/Countdown). Photographs of the old route exist in the Tawa Historical Society photograph collection and in private collections if further evidence or clarification of the route is required. The Tawa Historical Society promotes walking trails through the suburb and has written material available to those who wish to walk any of the historic routes currently listed. In due course we would like to add the old railway route to the list of walking trails, where appropriate and safe (i.e. NOT along the motorway!). We would like to install markers along the route (again, where appropriate and safe to do so) to illustrate its course and a display (photos/words) somewhere within the old

	<p>Tawa Flat station site, whether or not you deem it worthy of inclusion on the register.</p> <p>Values descriptions for above suggestions:</p> <p>Historic - Enlarged memorial - Y; Cemetery- Y; Railway Station - Y; Railway Route - Y Physical - Enlarged memorial - N; Cemetery- Y; Railway Station -Y; Railway Route - Y Social - Enlarged memorial -Y; Cemetery-Y; Railway Station -Y; Railway Route - Y Tangata Whenua - Enlarged memorial -Y; Cemetery-Y; Railway Station - probably N; Railway Route - probably N Rarity- (all unique to Tawa, but feature in many other places around NZ) Enlarged memorial -Y; Cemetery- Y; Railway Station - Y; Railway Route - Y Representativeness - Enlarged memorial - Y; Cemetery-Y; Railway Station - Y; Railway Route -Y</p> <p>I respectfully request that you consider these items for inclusion in the appropriate schedule to appropriately record and preserve their historic status.</p>		
<p>621 Victor Anderlini</p>	<p>It looks like whoever selected the proposed medium density housing areas did it from the perspective of Google Maps and didn't bother even driving past some of the areas selected. If they had it would have been apparent that a lot of the sites in the proposed medium density areas are steep, narrow and completely unsuitable for multi storied developments. They also would have seen that there are streets full of homes that are part of Wellington's heritage.</p>	<p>Considers areas identified for medium density development have a lot of heritage value.</p>	<p>Noted.</p> <p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p>

			New residential heritage areas are being added in the district plan.
876 Te Herenga Waka, Victoria University of Wellington	The Operative District Plan specifies the curtilage of the heritage listed Hunter Building so that works outside of the curtilage are not unnecessarily subject to the heritage rules of the Plan (i.e. works on the same "site" as a heritage building). We seek this to be retained.	Seeks retention of curtilage rules for hunter building	This is retained
876 Te Herenga Waka, Victoria University of Wellington	We note that the draft District Plan signals that heritage listing of the Robert Stout is under consideration. We are in two minds about this, particularly given the emerging approach of the Council's and Heritage NZ's heritage advisers in relation to the University's derelict Gordon Wilson building at 320 The Terrace.	Neutral on listing of Robert Stout building	Noted.
1054 Wellington's Character Charitable Trust - Felicity Wong	Supports the existing heritage listings as updated. Supports the WCC proposed new heritage listings, including the new heritage areas.	Supports new listings	Noted.

<p>1054 Wellington's Character Charitable Trust – Felicity Wong</p>	<p>Proposes new “heritage site curtilage controls” for sites adjacent to all listed heritage sites so bulk, height, and design are sensitive to adjacent heritage buildings.</p>	<p>Seeks controls for building adjacent to heritage buildings</p>	<p>Consideration of the impacts on the heritage values of adjacent buildings are contained in the district plan in a number of chapters including:</p>
			<ul style="list-style-type: none"> • Policy direction to respond to adjacent heritage buildings, structures and areas (CCZ, centres) • Lower height in relation to boundary responses adjacent to residential heritage areas.
			<p>With respect to individually listed residential heritage buildings - a different blanket height in relation to boundary responses is not considered necessary. There is a variety in the scale of listed residential heritage buildings across the city, including those of a 3 storey scale, whereby adjacent site development capacity could be unreasonably constrained with a stricter HIRB control.</p>
	<p>Proposes an extension to the boundaries of the Thorndon heritage area to include the area to its north up to the motorway intersection (as for area in operative DP).</p>	<p>Extension to Thorndon heritage area proposed</p>	<p>Raised with heritage team for consideration.</p>
	<p>Proposes a new “dereliction rule” whereby owners cannot argue the <i>benefits</i> of inappropriate development of heritage sites if their actions</p>	<p>Proposes a new “dereliction rule”</p>	<p>It is assumed the submitter is referring to the concept of ‘demolition by neglect’ where prolonged deferred</p>

contributed to dereliction or damage to the heritage site.

maintenance leads to an argument that demolition of a building is necessary and beneficial to ensure public safety, and the only cost effective option for an owner.

The Council cannot compel owners of any building to maintain a building other than where compliance is required with a building warrant of fitness BWoF (eg cable cars, sprinkler systems). It is assumed that the buildings the submitter refers do not need to comply with BWoF requirements and have not been updated for modern use.

In the case that demolition is proposed by an owner driven in part by earthquake strengthening requirements, it will need to be demonstrated that there are no reasonable alternatives to total demolition, including repairs and maintenance, strengthening, additions and alterations, repositioning and relocation. The purpose of this policy is to have a high level of evidence why demolition is the only option for the future of the building. The condition of the building will be a relevant factor in determining this. In any case however, earthquake strengthening costs typically greatly outweigh costs of deferred maintenance in such a situation.

	<p>Proposes a new rule to allow <i>facadism</i> only as a last resort, and otherwise discourages significant demolition of heritage buildings.</p>	<p>Proposes a new rule to allow <i>facadism</i> only as a last resort</p>	<p>The policy for additions and alterations (for which <i>facadism</i>) would be addressed, provides a framework (accompanied by Heritage design guidance) to ensure that an understanding of depth is preserved. See</p> <p>G36. Façadism is discouraged for heritage buildings and within heritage areas where the development leads to the loss of heritage values and the removal of heritage fabric. In adaptive reuse of heritage buildings and structures, an understanding and reflection of internal depth form and layout of the building is important.</p>
	<p>Acknowledge that the character of some areas (e.g. Thorndon) comes from heritage and that a comprehensive definition of character should be the benchmark for applying character as a qualifying matter under NPSUD</p>	<p>Acknowledge that the character of some areas (e.g. Thorndon) comes from heritage</p>	<p>Note that the Council has a different policy approach to character as opposed to heritage.</p>
<p>1090 Heritage Professionals</p>	<p>Our submission is that historic heritage (a matter of national importance at section 6f of the Resource Management Act) and character have been given inadequate weight in the Draft Wellington City District Plan.</p> <p>The Draft District Plan's approach to historic heritage and character appears in some instances to be predicated on flawed or incomplete information and analysis.</p> <p>There are some specific changes that should be made to the historical and cultural values section of the plan that will ensure that the historic heritage objectives at HH01-03 are met.</p>	<p>Considers Draft District Plan's approach to historic heritage and character appears in some instances to be predicated on flawed or incomplete information and analysis.</p>	<p>Noted</p>

<p>In addition to making changes to the Draft District Plan we submit that WCC should:</p> <p>a. Implement a sliding scale of fixed fees for resource consents to be paid up front. b. Continue to waive resource consent fees for heritage items</p>	<p>Suggest changes to resource consent processing practice for heritage items</p>	<p>Raised with the heritage team for consideration</p>
<p>The schedule of heritage items does not reflect what is important to Wellington</p> <p>13. We support the new additions to the schedule of historic heritage items; however, we are deeply concerned that the schedule is inadequate and does not represent what is distinctive about Wellington, the region and New Zealand.</p> <p>14. We are concerned that objective HH-01 Recognising Historic Heritage will not be met if the schedule is not representative. This objective is that</p>	<p>Do not consider the heritage list to be representative and are uncertain of methodology used.</p>	<p>Engagement on the proposed additions to the heritage list started in December 2020 with a public facing website and campaign calling for new nominations to be received. These additions were based on a thematic review of the existing heritage list against the 2013 'thematic review of wellington's heritage' to determine which types of heritage are not well represented. The proposed additions contribute to increasing</p>

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.'

15. The community's views on heritage and character were largely ignored in the development of the Spatial Plan. The council sought expert advice from Boffa Miskell on the character areas. The outcome was a flawed one, with excessive emphasis on integrity (as outlined below), but it did suggest wider protection than what was ultimately proposed in the spatial plan. The council then sought feedback from the public to the spatial plan and got a strong response, which led officers to recommend changes to the plan that expanded the area to be covered by the pre-1930s rule. The councillors rejected that advice and went back to the highly restrictive (extreme) spatial plan.

16. We are now concerned that WCC has not adequately sought the views of the community on historic heritage in the development of the Draft District Plan.

17. The community engagement in developing the schedule has been limited, despite the fact that this is the one opportunity for WCC to engage with the community on the heritage schedule every 10 years.

18. We understand from earlier correspondence with WCC that the only public involvement to date in the review of the historic heritage schedule has been a collection of nominations received over the last decade. The Historic and Cultural Heritage information sheet released with the Draft District

representativeness and have been subject to public consultation in the Draft DP.

Plan notes engagement with owners on proposed new heritage listings but not with the public.

19. The debate over the spatial plan and this Draft District Plan have illustrated the community has diverse views on heritage. The residential character of Thorndon, Aro Valley, Mt Victoria, Mt Cook and Newtown for example, are seen by many as one of the most distinctive aspects of Wellington.

20. Due to the lack of public engagement on the schedule of heritage items, it is unlikely to reflect what is important or distinctive. It is widely accepted internationally that the distinctive aspects of cities create economic opportunities.

21. So that Wellington's District Plan identifies the heritage places that people value, WCC should invest more resources to actively engage with the public about historic heritage, for example via traditional and social media or in person at libraries or the Sunday market.

The plan is based on flawed or missing information and analysis

22. As outlined above, the process for the review of the schedule of historic heritage items has been lacking. As well as insufficient public engagement, the methodology that has been used for selecting potential new places to add to the schedule is unclear. The Historic and Cultural Heritage information sheet released with the Draft District Plan has limited information about the methodology used.

<p>The character areas are likely to meet the threshold for protection as heritage areas</p> <p>31. The pre-1930s demolition rule is not a suitable tool to protect the heritage values of Wellington's inner-city housing. As our inner-city suburbs are valuable repositories of built heritage, we should be treating them the same as any other heritage area we value. This would also reduce the complexity of the District Plan.</p> <p>32. Our view is that much of the character areas are likely to meet the threshold for scheduling as historic heritage for their historical and physical significance.</p> <p>33. WCC should apply the Greater Wellington Regional Council 'Guide to historic heritage identification' to assess the value of the character areas.</p>	<p>Consider that much of the character areas are likely to meet the threshold for scheduling as historic heritage for their historical and physical significance.</p>	<p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan.</p> <p>New residential heritage areas are being added in the district plan. These are based on the information that Council has to date and the resourcing available.</p>
<p>We are concerned that objectives HH-02 Protecting Historic Heritage and HH-03 Sustainable Long-term Use will not be achieved if the provisions in the plan overall are too permissive of development.</p> <p>35. Heritage conservation, character protection and affordable housing are not mutually exclusive goals. We are concerned that the permissive approach of the Draft District Plan will unnecessarily sacrifice heritage and character while not achieving the desired affordable housing outcome.</p> <p>36. There are international examples of heritage and character protection and housing intensification occurring side by side. The intensification on brownfield sites and transport spines in Melbourne's inner suburbs is one example.</p>	<p>Concerned that objectives HH-02 Protecting Historic Heritage and HH-03 Sustainable Long-term Use will not be achieved if the provisions in the plan overall are too permissive of development.</p>	<p>Noted.</p>

<p>37. It is also notable that many of the cities that have been profiled in the Dominion Post's 'Re-imagining Wellington' series for their desirable transport, urban planning or housing also have strong heritage values, for example:</p> <ul style="list-style-type: none"> a. Copenhagen, known for the coexistence of a well-preserved heritage and new contemporary elements Seville, home of a world heritage site a. Graz, the historic centre of which is a world heritage site. <p>38. Internationally, best-practice urban heritage conservation takes a spatial or area based approach. One example is the Historic Urban Landscape (HUL) approach, successfully adopted by our neighbours in Ballarat, Victoria.</p> <p>39. A HUL approach is one way that could help to further identify mana whenua cultural heritage in Te Whanganui a Tara. More information about the HUL approach is at Appendix</p>		
<p>There are specific changes that should be made to the historical and cultural values section of the plan</p> <p>48. Under the heading 'sustainable long-term use' in the Historic Heritage chapter the Draft District Plan refers to the importance of original uses. We suggest that the term 'original' is removed as uses subsequent to the original use could also be important. This reflects the ICOMOS New Zealand Charter approach.</p>	<p>Suggests removal or modification of: <i>The original use of a building can be part of the reason why it is important and helps retain special associations between people and place.</i></p> <p>section also says that a change to a new use is an 'adaptive re-use' but a compatible new use may not require any adaptation</p>	<p>Disagree with the removal of text identifying that original use can be important,</p> <p>Agree that re-use may not require adaptation</p> <p>Separate reuse from works to adapt a building.</p>

<p>49. The section also says that a change to a new use is an 'adaptive re-use' but a compatible new use may not require any adaptation.</p>		
<p>In our view, 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.</p> <p>51. These words at 20.2.1.8 of the current District Plan are important for the protection of the values of contributing heritage areas and should be added to the Draft District Plan:</p> <p>a. Because of their contribution to the value of the heritage area the contributor buildings warrant the same treatment and control as listed heritage items in terms of building demolition, and the design of additions and alterations.</p> <p>52. Similarly, additions and alterations and demolition of contributing buildings should have the same considerations as for individual buildings e.g. HH-P17 should have the wording that is at HH-P10.</p>	<p>The values of contributing buildings in heritage areas should be protected to the same degree as individual heritage buildings in heritage areas</p>	<p>I recognise that the operative plan states that contributing buildings and structures are to be treated the same as individually listed buildings.</p> <p>I appreciate there is precedent for this approach to remain unchanged. However, I am more convinced that given the purpose of heritage area controls is to manage the effects on the values of the <u>area</u>, such is the scale which an assessment of effects should consider. Furthermore, most of the heritage area reports which Council is basing scheduling on are not detailed enough with respect to each individual building to rely upon for a site specific effects assessment. For individually listed buildings that are also within heritage areas, the building provisions take priority, though effects on heritage area values are also considered. No change in assessment scope is considered necessary.</p>

	<p>53. As per the current District Plan, structural strengthening which is visible from the exterior of the building should not be a permitted activity</p> <p>The move in the Draft District Plan towards making more activities permitted is likely to result in adverse effects on historic heritage. Finite environmental values like historic heritage need discretion through consent processes.</p>	<p>structural strengthening which is visible from the exterior of the building should not be a permitted activity</p>	<p>This proposal was reached after much consideration of the city's resilience goals more generally and specifically for heritage buildings. It is recognised that most strengthening does not occur in isolation, but as part of broader works to ensure sustainable long term use (such as additions and alterations).</p> <p>Heritage advisors have advised that there is not an example of internal seismic strengthening for which they would recommended a resource consent be declined.</p> <p>It is not anticipated that visible seismic strengthening will experience a rapid uptake despite being a permitted activity for the reasons outlined above. Design guidance is also provided in the Heritage Design guide how strengthening can be undertaken in ways that are less visible from the exterior of buildings.</p> <p>On balance removing resource consenting barriers to seismic strengthening be it visible from exteriors is considered an appropriate balance.</p>
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772 Zoe Perkins	Our heritage listed house cannot be altered, thus the proposed plan does not ensure fair sharing of light and space as it will allow sites surrounding our home to be built 21 metres or more. A maximum of 11 metres would be more acceptable.	Concerned that multi unit developments can be built to 21m adjacent to their site.	The DDP sets out a framework to achieve a balance of growth, change and amenity. The residential HIRB standards that have been developed seek to achieve this balance. In this case the HIRB standard which applies is 12m+60degrees. Other controls also include a maximum 20m building length control which seen to ensure a level of sunlight access to adjoining properties.
954 Matt Levine and Alicia Blaikie	The character, history and heritage of Mount Victoria is not adequately protected by the proposed plan. Please expand the character precinct to include more of the suburb, and strengthen the protections of the existing character. We support the areas recommended by Heritage New Zealand being added to Draft Spatial Plan proposed character areas. We also support the edge of Kent Terrace being zoned as part of the Mount Victoria Medium Density Residential Zone, not City Centre	expand the character precinct to include more of the suburb, and strengthen the protections of the existing character support the edge of Kent Terrace being zoned as part of the Mount Victoria Medium Density Residential Zone, not City Centre	The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values. These areas have been ratified through decision making by Council on the Final Spatial Plan. New residential heritage areas are being added in the district plan. These are based on the information that Council has to date and the resourcing available. The CCZ of Kent Tce is an existing situation

<p>818 Michael Kelly</p>	<p>Ostensibly, Wellington has been successful in its management of listed heritage. The vast majority of places initially included in the operative plan in 2000 have survived. However, a closer look reveals that the application of rules to protect that heritage has not been as successful as it should have been. Many buildings have been reduced to shells or even façades, additional floors added to buildings and shop fronts and ground floors altered beyond recognition. The general regime has been permissive, to ensure, it seems, that heritage is not seen to be getting in the road of the city's development. The city is poorer for this degradation of its built heritage. As a general observation, I would like to see the rules and their application match the aspirations on historic heritage as outlined in the Strategic Objectives</p>	<p>Does not consider the DDP provisions for heritage achieve the strategic objectives</p>	<p>Noted.</p>
	<p>Although there are undoubtedly more buildings, structures and objects of various kinds that could be added to the list to make it more representative, the primary reason for this state of affairs, and the focus of my submission, is the treatment of heritage housing. I am focussing on housing, not only because it is under-represented on the district plan or under threat from intensification, but because it is Wellington's greatest remaining heritage resource and needs much greater recognition and protection.</p> <p>There are multiple issues with the list of individual houses on the district plan.</p> <p>§ No comprehensive audit has been undertaken of Wellington's housing stock to establish whether or not the most important residential heritage is listed on the district plan.</p> <p>§ The list is based partly on a cursory examination of Wellington's streets in the 1990s (possibly</p>	<p>Requests consideration of more heritage areas in residential areas presently not identified for their heritage values.</p> <p>Concerns about transition height areas with the example of Myrtle Cres.</p>	<p>The Council has collected a large amount of nominations and background material of possible areas of the city that may have heritage value. These have been prioritised with heritage experts and been subject to a thematic review process against the 2013 document of the same name to increase representativeness of the current heritage list. A consideration of existing information and resourcing was also necessary. New residential heritage areas are being added in the district plan. These are based on the information that Council has to date and the resourcing available.</p> <p>Undoubtedly there are other residential areas of the city that have</p>

apocryphally, some of this was done from a motor vehicle) and relatively little has been done to upgrade that list since. It is simply not a credible, robust list.

§ No document has been written to establish what is important about Wellington's housing, how to identify significant houses in a comprehensive fashion and how to manage it as a heritage resource.

Allied to this is the treatment of heritage housing areas. At present just three such areas are listed on the district plan – eight cottages at the bottom of Aro Street, Salisbury Garden Court and Tarikaka Street Railway Settlement. To this the WCC proposes to add the streets and houses that make up what was once known as the Thorndon 'E' Zone, plus five heritage areas identified as part of the study of Mt Victoria undertaken in 2016-17 by this author.

The only other layer of protection is offered by 'Character Precincts', which are managed by rules that control demolition, additions and alterations for buildings in these areas constructed prior to 1930.

12. What is at stake could be called 'proportionality', for two primary reasons. The areas in Mt Victoria are being added to the list of heritage areas because a major study was commissioned on the suburb in 2016-17. If comparable studies were undertaken on other inner-city suburbs, similar areas would be revealed and, presumably, protected. For the sake of fairness and to respect the heritage in those other areas, those other suburbs should have that opportunity. Anything less would reveal this

heritage values, but it is not feasible, practical or realistic to assess them all for their heritage value.

The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values.

These areas have been ratified through decision making by Council on the Final Spatial Plan.

	<p>process for what it is – skewed and unreasonable. (I should note that a study was undertaken of Thorndon in 2012, but this did not lead to further protection because of complaints by some house owners).</p> <p>13. The second issue is that houses make up the vast majority of buildings in Wellington but comprise only a relatively small number of listings. So, for houses to be fairly represented on the list, more places should be listed. While protecting individual houses has its place, the better way to achieve this is to protect whole streets, because groupings of houses provide context, continuity and scale.</p> <p>Comments about the transition of heights between areas not currently identified as heritage eg myrtle cres.</p>		
<p>633 Mt Victoria Historical Society - Joanna Newman</p>	<p>Almost the entirety of Mt Victoria is a heritage area</p> <p>Definition of character to include heritage</p>	<p>Almost the entirety of Mt Victoria is a heritage area</p> <p>Definition of character to include heritage</p>	<p>Disagree with statement regarding mount Victoria.</p> <p>Note that the Council has a different policy approach to character as opposed to heritage.</p>
	<p>Tutchen Avenue to be included in the Porritt Avenue character/heritage area</p>	<p>Tutchen Avenue to be included in the Porritt Avenue character/heritage area</p>	<p>The Heritage team is considering whether an extension of this area into the Porritt ave heritage areas</p>

<p>Heritage areas</p> <p>We support the creation of heritage areas in the District Plan, but only to the extent that these at least give a similar level of protection to that afforded to Character sub-areas in the current Operative Plan to a small part of Mt Victoria.</p> <p>This level of protection should, however, cover the Character Precincts plus Heritage New Zealand's recommended extensions to the Character Precincts (see No. 1 above).</p>	<p>Supports heritage areas</p> <p>Seeks greater area subject to character provisions</p>	<p>Heritage areas give a high level of protection</p> <p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values.</p> <p>These areas have been ratified through decision making by Council on the Final Spatial Plan.</p>
<p>We support the Council's proposed additions to the inventory of heritage listed buildings in Mt Victoria. We would like to propose the following also for inclusion, on the basis that they represent significant local or national, social or architectural, heritage. (If this seems like a relatively high number for a suburb, this should not be surprising as Mt Victoria is one of the oldest suburbs in the city and retains most of its original housing. In fact, we believe this is a very modest number of additions considering the number of houses of architecture and social heritage value in Mt Victoria.)</p> <p>13 Austin Street Built by Samuel Atkins (of Etrick Cottage), home of Charles Bayertz 17 Brougham Street Owd Trafford 33 Brougham Street Hutchinson's house/Women's House 123-125 Brougham Street Ionian Flats 136/138 Brougham Street Rev Moir's wife's houses 9 Hawker Street Hamilton Flats (designed by Anscombe) 43 Hawker Street Bernard Freyberg's house</p>	<p>Makes nominations for new listings</p>	<p>Passed to heritage team for consideration</p>

	<p>71 Hawker Street Paterson's house (he built the Town Hall) 7 Paterson Street Waring Taylor's house 58 Pirie Street Winder's house 49 Porritt Avenue Kate Edger's house 23 Stafford Street Wellington Harbour Pilot Holmes's house 1 Tutchen Avenue Wellington Harbour Pilot Shilling's house Mount Victoria tunnel (Seatoun, Northland, Karori, Hataitai Bus, all listed)</p>		
<p>974 NZ Archaeological Association</p>	<p>Consideration should be given to expanding the criteria for evaluating significant historic heritage resources within the district plan. For example, the Auckland Unitary Plan evaluates a place under the following additional criteria to recognise the diversity of historic heritage places and develop a broader understanding and appreciation of values and significance</p> <ul style="list-style-type: none"> • knowledge: the place has potential to provide knowledge through archaeological or other scientific or scholarly study, or to contribute to an understanding of the cultural or natural history of New Zealand, the region, or locality; • technology: the place demonstrates technical accomplishment, innovation or achievement in its structure, construction, components or use of materials; • aesthetic: the place is notable or distinctive for its aesthetic, visual, or landmark qualities; 	<p>Recommends additional criteria for listing of buildings</p>	<p>These criteria are already addressed under the GWRC established methodology</p>

<ul style="list-style-type: none"> • context: the place contributes to or is associated with a wider historical or cultural context, streetscape, townscape, landscape or setting. 		
<p>Inclusion of a broader set of criteria will also provide greater alignment with the qualities of a historic heritage place as defined in the RMA. Further, it allows for significant heritage sites to be scheduled where historical information may not be available. For examples, those archaeological sites which have considerable knowledge potential.</p> <p>Changes sought:</p> <p>That the introductory text is reworded to encompass a broader range of historic heritage and later list site types. This will provide for greater alignment with objectives and policies within the section. For example:</p> <p><i>Historic Heritage sites and places including Buildings, structures, and areas and archaeological sites associated with Wellington’s past are a precious and finite resource and are part of what makes Wellington unique.</i></p> <p>That consideration is given to including a broader list of historic heritage value criteria to evaluate significant historic heritage. Further identification and protection of significant archaeological sites⁷ should also be a priority for the Wellington City Council to reflect the diversity of heritage places and significant Māori archaeological sites which have heritage and cultural values.</p>	<p>Seeks inclusion of reference to archaeological sites</p>	<p>Agree with this.</p> <p>Reference to archaeological sites added to intro para of chapter</p>

<p>HH-R9 and HH-R19: the total demolition of heritage buildings and archaeological sites should be raised to a Non-Complying Activity. The 'plan' states that historic heritage as a matter of national importance is protected from inappropriate subdivision, development, and use. Further historic heritage sites and places are precious and finite resources. A stronger activity status against total demolition offers greater protection for historic heritage and is in line with recommendations as part of the Heritage New Zealand Pouhere Taonga national assessment of RMA policies and plans review.</p> <p>• HH-R19: the demolition of archaeological sites should have s88 information requirements similar to the built heritage requirements under rule HH-R9. At a minimum these information requirements should align with policy HH-P21 and assessment of alternatives to total demolition that have been considered by the applicant, including evidence demonstrating why none are reasonable.</p> <p>Mitigation for the total demolition of archaeological sites should also go beyond preservation by record of archaeological information under the Heritage New Zealand Pouhere Taonga Act (2014). For example: Provide opportunities for increasing understanding and appreciation of the values of the scheduled archaeological site (HH-P20).</p>	<p>Seeks non complying activity status for destruction of scheduled archaeological sites.</p> <p>Seeks additional information requirements for demolition of scheduled archaeological sites.</p>	<p>NC status has been considered but ruled out</p> <p>Do not agree with information requirements proposed as those used for assessing earthquake prone strengthening and costs of works/return are not relevant.</p>
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744 Paul M Blaschke	<p>Rules Heritage Buildings and Structures:</p> <p>consideration should be given to the inclusion of archaeological controls for built heritage sites which are pre-1900 in date.</p> <p>This would cover any subfloor works or works which may affect the curtilage of the property with archaeological values. Further, provisions should include archaeological recording of the parts of pre-1900 buildings that are proposed to be modified (i.e., do not have this power under the HNZPT Act where this only applies if the building is demolished entirely).</p>	<p>consideration should be given to the inclusion of archaeological controls for built heritage sites which are pre-1900 in date.</p>	<p>The application of the Scheduled archaeological sites rules has been carefully considered and applied to those sites that council has robust information as to their significant heritage values.</p> <p>It is considered that the HNZPT AA process is sufficient to manage the archaeological values of sites not subject to the provisions.</p>
	<p>PART 2 – DISTRICT-WIDE MATTERS / Historical and Cultural Values / Sites and Areas of Significance to Māori / Rules: in consultation with mana whenua consideration should be given for the application of scheduled archaeological site rules to sites and areas of significance to Māori where archaeological values have also been identified.</p>	<p>Consider application of archaeological sites rules to SASMS</p>	<p>This conversation will be had, but given the nuanced and vastly different policy framework of the SASM chapter this is unlikely to provide any greater protection for the management of mana whenua values.</p>
	<p>1. Historic Heritage Advice Notes</p> <p>We support the inclusion of the provided heritage advice notes to supplement the objectives, policies, and rules under the corresponding chapters. However, the Accidental Discovery Protocol should be expanded to include the discovery of material that meets the definition of historic heritage, particularly significant archaeological sites that postdate 1900 (e.g., WWI or WWII deposits) and may not be covered under the Heritage New Zealand Act (2014) (i.e., through gazetting).</p>	<p>Expand the accidental discovery protocol information</p>	<p>Check with heritage team</p>
	<p>Strongly endorses Strategic objectives HHSASM-O1 through 5</p>	<p>Strongly endorses Strategic objectives HHSASM-O1 through 5</p>	<p>Noted</p>

<p>10 Tony Delorenzo</p>	<p>Specific amendments requested to the heritage listing for 1 Ranfurly Terrace.</p> <p>Submission then requests removal of heritage listing in its entirety.</p>	<p>Refer to submission for Ranfurly Terrace comments</p>	<p>Heritage team needs to validate extent of listing.</p>
<p>571 Environmental reference group</p>	<p>HH-O1 to HH-03 Support</p> <p>Support P2 through P6, P8, P9, P11, 13, 14, 17 through 21</p>	<p>Supports provisions</p>	<p>Noted.</p>
	<p>Amend HH-P1</p> <p>Support the evident provision for Maori history and culture in the policies.</p> <p>Amend to explicitly acknowledge ongoing Maori relationship with ancestral lands as per RMA Section 6 and strengthen the chapter's connection to sites of significance provisions.</p> <p>"Identify buildings, structures, areas and archaeological sites, sites of Significance with significant historic heritage values, and that contribute to</p> <p>Amendment: " ... an understanding and appreciation of Māori history, an understanding and appreciation of Māori history and relationship to their ancestral lands, lands, water, sites, waahi tapu, and other culture taonga, and culture."</p>	<p>Adds reference to SASMs</p>	<p>The policy that has already been drafted has been informed by mana whenua direction</p>

<p>Amend to explicitly have restricted discretion over the positive heritage and other effects of additions and alterations, such as improving the resilience, warmth, weather-tightness of homes, through the partial demolition of heritage buildings and structures. Well designed additions and alterations can also continue the building or structures historical narrative, which adds to the heritage richness.</p> <p>This including of the positive effects in the assessment criteria aligns with the provision of RMA section 104(1)(ab) and aligns with the DGs for the character precincts that state ‘the external appearance of buildings often assumes a ‘hybrid character’ due to repeated additions and alterations. It is important to recognise that change can be positive.</p> <p>Amendment: ‘ where it can be demonstrated that the work does not detract from the identified heritage values and the work contributes to the historical narrative...</p> <p>‘k. continues the site’s story with respect to the past’</p>	<p>Amend to have explicit discretion over positive effects such as improving resilience, warmth and weathertightness.</p> <p>Amend entry test to also include contribution to narrative and include policy limb of same effect.</p>	<p>These concepts are already addressed by the consideration of the extent to which sustainable long term uses is supported (P7)(1)(a).</p> <p>With respect to the policy entry criteria, this is not considered necessary. Any addition/alteration will continue the narrative of the values and story of the building. It is not considered necessary to add another limb to the policy on this concept either, as it is already addressed by way of sustainable long term uses and not an explicit requirement for works to achieve.</p>
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<p>Heritage buildings and areas</p> <p>Amendment: “Avoid the total demolition of heritage buildings and heritage structures unless it can be demonstrated that there are no reasonable alternatives to total demolition, <u>not taking into account the impacts of under investment or maintenance by the owner,</u></p> <p><u>Note: All reasonable alternatives to total demolition should be thoroughly considered in any resource consent application for total demolition.”</u></p>	<p>Consider deferred maintenance in total demolition resource consents to</p>	<p>It is assumed the submitter is referring to the concept of ‘demolition by neglect’ where prolonged deferred maintenance leads to an argument that demolition of a building is necessary and beneficial to ensure public safety, and the only cost effective option for an owner.</p> <p>The Council cannot compel owners of any building to maintain a building other than where compliance is required with a building warrant of fitness BWoF (eg cable cars, sprinkler systems). It is assumed that the buildings the submitter refers do not need to comply with BWoF requirements and have not been updated for modern use.</p> <p>In the case that demolition is proposed by an owner driven in part by earthquake strengthening requirements, it will need to be demonstrated that there are no reasonable alternatives to total demolition, including repairs and maintenance, strengthening, additions and alterations, repositioning and relocation. The purpose of this policy is to have a high level of evidence why demolition is the only option for the future of the building. The condition of the building will be a relevant factor in determining this. In any case however, earthquake strengthening costs typically greatly</p>
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		<p>outweigh costs of deferred maintenance in such a situation.</p>
<p>Amend to provide for the total demolition of identified non-heritage buildings and structures subject to the construction of a sympathetic new building or structure where appropriate. The amendment ensures that demolition does not result in vacant sites that would have a detrimental effect on the heritage area.</p> <p>Amendment: "...and total demolition of identified non-heritage buildings and structures <u>subject to the construction of a sympathetic new building or structure</u>".</p>	<p>Ensure that vacant land is not created and considered as part of the permitted activity for demolition of a non-heritage building</p>	<p>Zone based rules still apply in centres and CCZ and manage this issue.</p>

<p>Heritage buildings and areas</p> <p>Support the repositioning and relocation of contributing buildings and structures in heritage areas. Amend to consider the positive effects of repositioning and relocation. For example, enhancing the heritage area's social and environmental sustainability and long-term use and provision for its identified heritage values.</p> <p>Amendment: "4. The works will enhance the heritage area's identified heritage values and provide for its sustainable long-term use."</p>	<p>Amendment to consider the extent that the works will enhance the heritage area's identified heritage values and provide for its sustainable long-term use.</p>	<p>Repositioning and relocation are at the 'higher' end of the effects spectrum for works to heritage buildings as these activities pose significant risk to the structural integrity of buildings. The policy as drafted does not contain references to sustainable long term use as moving a building and putting it at risk is not needed to secure such a use. Repositioning and relocation are typically driven by the desire to undertake greater development on a site which a heritage building is located, or for infrastructure works. In those cases, it is more relevant to consider the appropriateness of the siting and what effects there will be on heritage values.</p>
<p>Scheduled Arch sites</p> <p>Amendment In the event of any new archaeological site being discovered, there must be an application for an Archaeological Authority from Heritage New Zealand Pouhere Taonga and appropriate accidental discovery protocols must immediately be followed.</p>	<p>NZAA process must be followed immediately on discovery of an archaeological site</p>	<p>This is covered in the HH advice note.</p>
<p>Supports HH-R1, 2, 4 through 8, 10, 12 through 16, 17 through 19</p>	<p>Supports HH-R1, 2, 4 through 8, 10, 12 through 16, 17 through 19</p>	<p>Noted.</p>

<p>HH-R3: Additions, alterations, and partial demolition of heritage</p> <p>Amendment Amend the rule to clarify that the rule applies to interior additions, alterations, buildings and heritage structures and partial demolition only. The rule currently reads as if it applies to the whole</p>	<p>Clarify that the permitted activity rule applies only to internal works</p>	<p>This is managed by way of the associated standard which requires these works to be internal (and not affect buildings with listed interiors)</p>
<p>Seeks non-complying activity status for total demolition under R9</p> <p>Amend the rule to require that the applicant proves that the demolition is not due to under investment and poor maintenance over a ten year period. The council may seek a different time period than ten years.</p> <p>Amendment:</p> <p>“Activity status: Non-Complying”</p> <p>6. “An assessment of alternatives to total demolition that have been considered by the applicant, including expert evidence demonstrating why none are reasonable.”</p> <p>“7. A record of the investment in, and maintenance work undertaken on the property that occurred over the previous ten years.”</p>	<p>Seeks non-complying activity status for total demolition under R9</p> <p>Seeks additional information requirements to manage demolition by neglect arguments.</p>	<p>It is assumed the submitter is referring to the concept of ‘demolition by neglect’ where prolonged deferred maintenance leads to an argument that demolition of a building is necessary and beneficial to ensure public safety, and the only cost effective option for an owner.</p> <p>The Council cannot compel owners of any building to maintain a building other than where compliance is required with a building warrant of fitness BWoF (eg cable cars, sprinkler systems). It is assumed that the buildings the submitter refers do not need to comply with BWoF requirements and have not been updated for modern use.</p> <p>In the case that demolition is proposed by an owner driven in part by earthquake strengthening requirements, it will need to be demonstrated that there are no</p>

		reasonable alternatives to total demolition, including repairs and maintenance, strengthening, additions and alterations, repositioning and relocation. The purpose of this policy is to have a high level of evidence why demolition is the only option for the future of the building. The condition of the building will be a relevant factor in determining this. In any case however, earthquake strengthening costs typically greatly outweigh costs of deferred maintenance in such a situation.
HH-R10 Support	Supports HH-R10	Noted.
HH-R11 Seeks amendment Amend the wording to clarify that the rule applies to interior Additions buildings and structures within a heritage area, including non- alterations, and partial demolition only. The rule currently reads as if it applies to heritage buildings and structures the whole building or structure. Activity status: Permitted Where: Compliance with HH-S1 is achieved. Amendment: "Internal additions, alterations and partial demolition of buildings and structures within a heritage area, including non-heritage buildings and structures"	the wording to clarify that the rule applies to interior additions and not exterior ones	The rule applies to all additions and alterations, including external ones. External alterations are not permitted by virtue of the standards

	<p>HH-S1: Permitted additions, alterations, and partial demolition</p> <p>Amend standard to clarify 'new floor visible from the exterior of the building'</p> <p>Does it mean new gross floor area, new flooring materials and additional storey, or alterations in floor heights? Changes to internal floors that are not identified exteriors should not require RC.</p>	<p>Clarify 'new floor visible from the exterior of the building'</p>	<p>Intention is to not permit new floor levels impeding the appreciation of architectural features and fenestration of buildings without consideration through the resource consent process. This would include the extent of visual effect. These works do however support providing a long term use and on balance are likely to be looked upon favourably.</p>
	<p>HH-S2 through 7: support</p>	<p>HH-S2 through 7: support</p>	<p>Noted.</p>
<p>737, 939 Andrea Jewell</p>	<p>Specifically, "Rowena's Lodge" at 115 Brougham Street (PT LOT 2 DP 12250 LOT 1 DP 34813 - ROWENA HOSTEL) should be classified as a Heritage Building. It is an iconic historical building of Mount Victoria and with careful and considered restoration could easily become a Wellington historical landmark.</p>	<p>Nomination for listing</p>	<p>Passed to heritage team</p>
<p>Argosy No1 Property</p>	<p>The heritage listing of 143 Lambton Quay should exclude the Athfield Addition</p> <p>8.2 As noted above, 143 Lambton Quay is recognised as a heritage building in respect of the former State Insurance Building, in both the operative Wellington District Plan and the Draft Plan. The entire external building envelope is recognised in both heritage listings.</p> <p>8.3 The former State Insurance Building comprises the first eight floors of the building. In 1998, a three storey addition designed by Athfield Architects, was constructed on top of the former State Insurance Building (Athfield Addition).</p>	<p>Seeks exclusion of a building addition from listing of the State insurance building.</p>	<p>No. painting or altering the addition would be considered a permitted activity and at the same time could have major adverse effects on the heritage value of the state building.</p>

8.4 The Wellington City Council Heritage Inventory describes the history, architectural information and cultural value of the building. The Heritage Inventory's recognition of the heritage values of the building is limited to the former State Insurance Building. It describes the Athfield Addition as "a large and somewhat incongruous" addition.

8.5 Heritage New Zealand Pouhere Taonga lists the former State Insurance Office Building on the New Zealand Heritage List/Rarangi Korero. The building was registered on the New Zealand Heritage List/Rarangi Korero in 1981 (before the Athfield Addition was constructed) and the listing describes the former State Insurance Office Building and not the Athfield Addition.

8.6 The Athfield Addition does not have any heritage value and should be excluded from the heritage listing of 143 Lambton Quay in the Draft Plan. It is not appropriate for this addition to be subject to the controls of being a heritage building in the Draft Plan when it has no heritage value and can be easily distinguished from the former State Insurance Building.

8.7 Argosy seeks the following amendment to Schedule 1, DP Ref 181, "Protection required column" of the Draft Plan:

"Entire external building envelope of former State Insurance Building.

Listing excludes the 1998 three storey addition designed by Athfield architects

<p>Argosy supports historic heritage objectives and policies that enable maintenance, repair and reasonable works</p> <p>8.8 Policy HH-P2 provides for encouraging the maintenance and repair of built heritage where undertaken in accordance with recognised conservation principles and methods. Argosy supports this policy and seeks for it to be retained.</p> <p>8.9 Policy HH-P4 enables works to built heritage that have certain outcomes. Argosy recognises that works to built heritage will sometimes be required and supports this policy, and seeks for this policy to be retained.</p>	<p>Supports policies 2 - 4</p>	<p>Noted</p>
<p>8.10 Policy HH-P7 creates criteria to determine whether additions, alterations, and partial demolition of heritage buildings “detract from heritage values”. Argosy supports this policy and seeks for it to be retained.</p>	<p>Supports policy</p>	<p>Noted.</p>
<p><i>There should not be heritage controls on new floor levels where only the exterior of a heritage building is scheduled</i></p> <p>8.11 Policy HH-P3 enables works internal to built heritage. As noted above, three of Argosy’s sites are currently scheduled in relation to the exterior envelopes of the buildings.</p> <p>8.12 Argosy opposes policy HH-P3.2 and standard HH-S1.1.b, which would restrict works internal to built heritage where new floor levels will be visible to the exterior of buildings. This is unnecessary because the internal additions to buildings are unlikely</p>	<p>The drafting of the policy is not sufficiently clear to restrict its additional or mezzanine floors being constructed which are visible through tall windows</p> <p>Seeks deletion of rule and standard restricting new floor levels being added as a permitted activity.</p>	<p>Intention is to not permit new floor levels impeding the appreciation of architectural features and fenestration of buildings without consideration through the resource consent process. This would include the extent of visual effect. These works do however support providing a long term use and on balance are likely to be looked upon favourably.</p> <p>I consider the policy is very clear that the intention is to prevent additional floor levels. I acknowledge the standard could be made clearer.</p>

to detract from the heritage values of the exterior of a heritage building. Instead, this policy imposes an unreasonable burden on internal works.

8.13 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.

8.14 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.

8.15 Argosy seeks for policy HH-P3.2 to be deleted.

8.16 Argosy also seeks for standard HH-S1.1.b to be deleted

<p>8.17 Argosy supports the following rules (subject to its opposition to standard HH-S1.1.b) on the basis that they recognise that works for heritage buildings will be appropriate in certain circumstances:</p> <ul style="list-style-type: none"> (a) Rule HH-R1: Maintenance and repair of scheduled heritage buildings and heritage structures; (b) Rule HH-R3: Additions, alterations and partial demolition of heritage buildings and heritage structures; (c) HH-R6: Repositioning of heritage buildings and heritage structures on their existing site; and (d) HH-R8: Relocation of heritage buildings and heritage structures beyond the existing site. 	<p>Support for rules</p>	<p>Noted</p>
<p>8.18 Rule HH-R9 establishes that the total demolition of heritage buildings and heritage structures is a discretionary activity, and that an application for a resource consent made in respect of HH-R9 must be publicly notified.</p> <p>8.19 It is unnecessary for HH-R9 to specify a notification status for resource consent applications made under this rule. Where it is appropriate for a resource consent application to be publicly notified, s 95A of the Resource Management Act 1991 provides sufficient guidance for the consent authority to decide if public notification is appropriate.</p> <p>8.20 Argosy seeks for the “notification status” in rule HH-R9 to be deleted.</p>	<p>Remove notification presumption</p>	<p>On balance it is considered that is appropriate to publicly notify heritage buildings to be demolished, given their significant heritage values. The purpose of the notification presumption is to act a disincentive against demolition.</p>

	<p>8.21 Standard HH-S4 identifies height limits for heritage buildings. The minimum height above ground level for the sites at 360-366 Lambton Quay (Stewart Dawsons Corner) is the “height of existing building”. This is unclear.</p> <p>8.22 As noted above, the height of the existing building at 360 Lambton Quay is approximately 15.5m. Argosy seeks amendment of HH-S4 to provide that the minimum height above ground level for the sites at 360-366 Lambton Quay (Stewart Dawsons Corner) is “16m”.</p>	Seek minimum height for Stewart Dawsons corner building	Agree in the context that the site behind the listed buildings has been developed, aligning the minimum height is sensible.
1127 Clare Bibby	Multiple nominations for listing made	Multiple nominations for listing made	Passed to heritage team
645 COR associates Ltd	<p>The inner city suburbs established before or at the turn of last century are an essential part of what give Wellington its character.</p> <p>We lose this at our peril. This doesn't mean to say that they are static without development or change happening within their boundaries, but it does mean that due consideration should be given to preserving streetscapes as much as possible. For example, the area at the top of the Cable Car - Upland Road, North Tce and the boundaries of the Botanic Garden - are an integral part of the identity of the Cable Car, Wellington's prime tourist</p>	Comments on the heritage character of the inner suburbs	<p>Note that the Council has a different policy approach to character as opposed to heritage</p> <p>The extent of the character precincts in the DDP have been informed by site specific analysis of over 5000 properties, along with consideration of streetscape values.</p> <p>These areas have been ratified through decision making by Council on the Final Spatial Plan.</p>

	<p>attraction. To allow unfettered development within this area would mean losing the heritage character associated early development of the Cable Car and the Botanic Garden.</p> <p>Most of the period villas and cottages from the turn of the 20th Century were constructed using endemic timbers. Once these are lost, they are lost forever. Recovered building materials, especially endemic timbers, should be part of a circular economy. Additionally, the respectful re-use of these timbers would honour the Council's commitment to mana whenua</p>		
<p>245 David Hindley</p>	<p>I am an owner of 6 Prince Street in Mount Victoria, which is listed on the WCC heritage schedule. My request is that WCC review the list of properties on the heritage schedule without a long delay. I have been told by council staff that such a review last happened in 2006/2007, so it is long, long, long overdue.</p> <p>The house is a standard 1895 villa with no outstanding characteristics. There are thousands like it. A previous owner ran a strong campaign to get it heritage listed with the Council and the then NZ Historic Places Trust. When NZHPT reviewed their listing in 2014 they found there was no reason for it to apply and the listing was removed. (I attach their letter as a PDF) However WCC has not looked into this matter for 14 years!!!! I urge you to either review the schedule without delay or introduce a mechanism for considering the listing or listing removal of individual properties. The listing makes the house difficult to sell, affects its value etc. etc. etc.</p>	<p>Requests removal of heritage listing of a property</p>	<p>Passed to the heritage team for consideration</p>

<p>1083 Glenside Progressive Association</p>	<p>Glenside Reserve being Lots 246, 248 and 250 Middleton Road Three lots form the larger block of the Glenside Reserve but only lot Number 246 is referred to in the Draft District Plan. 248 and 250 should be included in the search feature as Open Space. In 2013, number 246 Middleton Road (circled in red above) was gazetted as changing from Recreation Reserve to Heritage Historic Reserve status however this not reflected on the plan and probably should be, as it changes the activities permitted on the site. Reference below:</p> <p><i>Pursuant to section 24 of the Reserves Act 1977, the Wellington City Council hereby gives notice that: Following a resolution updated the 28th day of August 2013, the classification of the reserve described in the Second Schedule to this notice is hereby changed from recreation reserve to historic reserve for the purposes specified in section 18 of the Reserves Act 1977.</i></p>	<p>Rezoning request</p>	<p>Passed to responsible staff member for consideration</p>
	<p>A survey marker for the centre line of the railway tunnel, and view shaft on property 395 Middleton Road. Support for this heritage nomination is attached in Appendix A, B, C, from Glenside Progressive Assn. Inc, the Tawa Historical Society and the Rail Heritage Trust. Part of Lot 2 DP76164. Approximate location of marker 41.197092, 174.820693</p> <p>A concrete milkstand on road reserve. Approximate location 41.20574 174.81178. Appendix D refers. We would like these sites to be included on the proposed District Plan.</p>	<p>Nomination for listing</p>	<p>Passed to heritage team for consideration</p>

3.2.2 Burial site 28 Westchester Drive

There is a well-recognised but unmarked **burial site at 28 Westchester Drive.**

In 1841, a woman was buried on block 28 Westchester Drive in the vicinity of the red dots on the map above. It is possible the corrugated shed on the site was built over her. A significant memorial has been constructed by Council on Westchester Drive nearby but the actual burial site was not found at the time.

Council planners need to be aware that the actual site is not the Gravesite Memorial so that earthworks are not mistakenly approved and her bones disturbed. We ask that the general site be marked in some way on the District Plan.

Heritage Team assessment of historic heritage nominations made as part of the Draft District Plan process

Heritage nominations/submissions on Draft Wellington City District Plan	Nominator	Initial comments
Fullfords Hall, 38 Cleveland Street, Brooklyn	Elin Lloyd	Unlikely to meet current criteria.
12a Parliament Street	Helen Heffernan	Include within the Ascot Street Heritage Area.
Dam, Tyers Stream Reserve, Ngauranga	Lynn Cadenhead	Likely to meet current criteria. Further research required.
Tutchen Avenue, Mount Victoria	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
Willow Grove, 17 Parkvale Road, Karori	Tim Hawley	Likely to meet current criteria. Supportive owner.
Milk Stand, Glenside	Claire Bibby/Glenside Progressive Association	Likely to meet current criteria. Further research required
Hurston, 1 Mersey Street, Island Bay	Heritage NZPT, Historic Places Wellington	Heritage New Zealand Pouhere Taonga Category II. Likely meets criteria. Further research required.

Burns Upholsterer, 47-49 Martin Square, Te Aro	Historic Places Wellington	Likely to meet current criteria. Further research required.
Stafford Street, Mount Victoria	Joanna Newman/Mt Victoria Historical Society	Likely to meet criteria. Further research required.
Wilkinson Holiday flats, 5-7 and 9-11 Grass Street, Oriental Bay	Historic Places Wellington	Unlikely to meet current criteria.
Survey Peg, Glenside	Claire Bibby/Glenside Progressive Association	Likely to meet criteria. Further research required.
Drake Reserve, Glenside	Claire Bibby/Glenside Progressive Association	Unlikely to meet current criteria
Sinclair Head Observation Post	Barry Insull	Unlikely to meet current criteria
Nugent's' Cave	Martin Jenkins	Unlikely to meet current criteria.
Frederick/Haining Street, Te Aro	Elizabeth Cox	Unlikely to meet current criteria.
Hay Street, Oriental Bay	Keep Wellington's Character	Unlikely to meet current criteria.
Newman House, 15 and 17 Hawkstone Terrace, Thorndon	Historic Places Wellington	Unlikely to meet current criteria.
Samuel Brown House, 22 Hanson Street, Mt Cook		Unlikely to meet current criteria.
Coffey House, 230 Oriental Parade	Historic Places Wellington	Unlikely to meet current criteria.

Lower Kelburn - Easedale St; Kinross St; Bolton St; Wesley Rd; Aurora Terrace; Clifton Terrace; San Sebastian Rd; Everton Terrace; Onslow Terrace, Talavera Terrace; Clermont Terrace; Salmont Place; Salamanca Road (as far as Kelburn Park), Gladstone Terrace and Rawhiti Terrace near the cable car.		Unlikely to meet current criteria.
33 Brougham Street	Joanna Newman/Mount Victoria Historical Society, Rosemary Bromley	Unlikely to meet current criteria.
43 Spencer Street, Crofton Downs	John Galloway	Unlikely to meet current criteria.
Roy Street, Newtown	Joanna Morton	Likely meet current criteria. Further research required.
Tawa (multiple sites, including memorial, main trunk line etc.) and site in Johnsonville	Tawa Historical Society	A wider study of the northern suburbs is recommended in the future.
Tawa Flat Cemetery	Tawa Historical Society	Likely to meet current criteria. Further research required.
13 Austin Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
17 Brougham Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
123-125 Brougham Street - Ionian Flats	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.

9 Hawker Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
43 Hawker Street - Bernard Fryberg's House	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
71 Hawker Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
7 Paterson Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
58 Pirie Street - Winder's House	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria
49 Porritt Avenue - Kate Evans House	Joana Newman/Mount Victoria Historical Society	Keep as contributor to the Porritt Avenue Heritage Area.
23 Stafford Street	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
1 Tutchen Avenue	Joana Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
Mount Victoria Tunnel	Joanna Newman/Mount Victoria Historical Society	Likely meet current criteria. Further research required.
6 Prince Street	David Hindley	Meets criteria.
Bolton Street (area above motorway, i.e. Easdale and Kinross)	Jane Meares	Likely to meet current criteria. Further research required.
Fank Kitts Park/Waterfront	Wellington Civic Trust	Unlikely to meet current criteria.

Extension to Thorndon heritage area (west along to Harriet Street)	Katherine Mansfield Birthplace/Felicity Wong and Wellington's Character Charitable Trust	Unlikely to meet current criteria.
Thorndon	Various	Recommend the =Thorndon Shopping Centre is updated to include properties at 2-6 Upton Terrace. Recommend 5 Torless Terrace as a heritage building and Calgarry Avenue, Torless Terrace and Poplar Grove as a heritage area.
259-261 Mansfield Street	Anna Woolhouse	Likely to meet current criteria. Further research required.
128, 130, 132 Lyall Bay Parade and 203 Queen's Drive	Graeme Spargo	Unlikely to meet current criteria.
St Mary Street	Joanna Morton	Unlikely to meet current criteria.
Patanga Crescent	Joanna Morton	Unlikely to meet current criteria.
Northern Tinakori Road (area around park rd. and Katherine Mansfield Street)	Joanna Morton	Unlikely to meet current criteria.
Aro Valley (extension to shopping centre heritage area)	Joanna Morton	The extent of the Aro Valley Shopping Centre Heritage Area and the Aro Valley Cottages Heritage Area is sufficient.
Holloway Road	Joanna Morton	Likely to meet criteria. Further research required.
Tamera Park/Mariama Crescent etc.	Joanna Morton	Unlikely to meet current criteria.

30 Hobson Street	Nicola Koptisch	Unlikely to meet current criteria.
Myrtle Crescent	Michael Kelly	Likely to meet criteria. Further research required.
138 Brougham Street, rev. Moir's wife's houses	Joanna Newman/Mount Victoria Historical Society	Unlikely to meet current criteria.
Burial site 28 Winchester Drive, Glenside	Claire Bibby/Glenside Progressive Association	Unlikely to meet current criteria.
38 Hobson Street	Joseph Bulbulia	Unlikely to meet current criteria.
Mount Victoria	Joseph Bulbulia	Unlikely to meet current criteria.
Berhampore	Various	Recommend the Berhampore Shopping Centre Heritage Area is updated to include Milton Street.
Hobson Street	Joseph Bulbulia	Unlikely to meet current criteria.
Mount Cook	Katherine Mansfield Birthplace	We recommend research into a Wright Street Heritage Area.
Mt Crawford Prison	Enterprise Miramar	Likely to meet criteria. Further research required.
Newtown	Various	We recommend Russell Terrace and Roy Street as heritage areas.
Aro Valley	Various	Unlikely to meet current criteria.
Claremont Grove/Austin Street area	Phillip Cook	Unlikely to meet current criteria.

Thomas King Observatory	Heritage NZPT	Heritage New Zealand Pouhere Taonga Category II. The observatory is within the expanded Botanic Gardens Heritage Area. Recommend upgrading to individual listing.
Shed 35	Centre Point	Demolished. Removed from schedule.
233 Willis Street	Cho Yam Chan	Façade listing only.
Church Hall, 75 Taranaki Street	Joanna Morton	Meets criteria.
75 Taranaki Street - Methodist Church	The Methodist Church of New Zealand, Wellington Parish	Meets criteria.
355 The Parade, Island Bay	Rachel Bell and Michael McCormack	Meets criteria.
Robert Stout Building	Victoria University	Meets criteria
Rowena Lodge, 115 Brougham Street	Andrea Jewell	Already included in the Armour Avenue Heritage Area.
143 Lambton Quay	Argosy	Meets criteria.
Te Ngākau Civic Square	Wellington Civic Trust	Note Precinct provisions in CCZ chapter.

Notable trees

Submitter	Submission	Response
<p>744.10 Paul M Blaschke</p>	<p>Policy TREE-P1 is clearly not being implemented currently and should be amended to read "Identify and promote the values of notable trees having regard to...."</p> <p>I recommend a similar policy to ECO-P6 regarding protections and restoration initiatives for SNAs be also added to the notable tree policies. Specific incentives similar to historic heritage incentives should be considered as notable tree protection can be important for landowners in respect of opportunity costs.</p>	<p>Objective 1 which provides the direction for this policy which is focussed on recognition (and by inference promotion) of values. The policy is centred on identification as a means of providing an evidence base for recognition.</p> <p>The policy framework for notable trees does contain a policy that addresses incentives for landowners. Policy 6 identifies that landowners will be supported by council to take long term care and maintenance of their notable trees through the provision of education and arboriculture advice.</p> <p>In the context of SNAs the policy scope includes community groups and restoration. This is because SNAs can be restored and maintained through replanting and weed plant removal, which is commonly undertaken by community groups. This is in contrast to notable trees which are typically standalone on private property or on council road or recreation reserve.</p> <p>Council is investigating support programmes for SNA owners which could include incentives such as fencing and pest control assistance. No such formalised support programme is available for notable tree owners. Instead, when approached by owners, Council's arboriculture team provides 1:1 assistance and advice about management approaches for trees on the list.</p>
<p>1094 Chorus Spark Vodafone</p>	<p>INF-OL-R64 Maintenance and upgrading of underground infrastructure</p> <p>In the notable tree overlay, permitted activity standards are sought to allow low impact work under and around notable trees.</p>	<p>Agree that maintenance of existing infrastructure should be permitted subject to the standards in TREE-S4 regarding equipment type and supervision by technician arborist.</p> <p>Where undertaken on previously disturbed ground this activity is permitted.</p> <p>*Needs change to associated TREE rule to remove infrastructure.</p>

<p>1094 Chorus Spark Vodafone</p>	<p>Amend Rule INF-OL-R64 such that earthworks are permitted in formed road reserves in the historic heritage and sites and areas of significance to Māori overlays.</p>	<p>Earthworks can be undertaken within the root protection areas of notable trees for the purpose of maintaining existing infrastructure.</p> <p>Earthworks are permitted on sites of heritage buildings and structures and within a site in a heritage area so long as they do not exceed a contiguous area of earthworks must not 10m² in any 12-month period and any volume of earthworks must not exceed 10m³ in any 12-month period.</p> <p>The road reserve is not a site and the earthworks rules do not apply to road reserves within heritage areas.</p> <p>*needs 'site' added to rule in earthworks chapter.</p> <p>Within heritage areas or on the site of a heritage building, the maintenance or upgrading of underground infrastructure that does not involve earthworks on ground previously undisturbed is permitted. Do not agree that outside of the previously disturbed area this should be permitted as can result in effects on heritage values.</p> <p>New underground infrastructure rule R65 does not apply to the road reserve</p> <p>*clarify in separate rule?</p>
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	<p>Add suitable standards for permitted excavation within the protected rootzone. The relevant permitted standard from the Auckland Unitary Plan in regard to notable trees (E26.4.5.4) is attached.</p> <p>E26.4.5.4. Notable trees - works within the protected root zone to enable trenchless methods at a depth greater than 1m below ground level</p> <p>(1) Excavation must be undertaken by hand-digging, air spade, hydro vac or drilling machine, within the protected root zone at a depth of 1m or greater. (2) The surface area of a single excavation must not exceed 1m². (3) Works involving root pruning must not be on roots greater than 35mm in diameter at severance. (4) Works must not disturb more than 10 per cent of the protected root zone. (5) Any machines must operate on top of paved surfaces and/or ground protection measures. (6) Any machines used must be fitted with a straight blade bucket. (7) All works must be undertaken under the direction of a qualified arborist</p>	<p>Agree – these standards are essentially the same as those in TREE-S4</p>
<p>1094 Chorus Spark Vodafone</p>	<p>INF-OL-R66 Above ground customer Connections</p> <p>Above ground customer connections in the root protection area of a notable tree require resource consent. If the connection is above ground and does not involve earthworks, it is unclear why there is a control in regard to the rootzone.</p> <p>Delete clause 3(a)(i) in regard to the root protection zone of notable trees.</p>	<p>Agree</p>

<p>1001 Wellington Botanical society</p>	<p>Part 4 – Appendices, Design Guides and Schedules SCHED6 - Notable Trees</p> <p>Wellington Botanical Society welcomes the inclusion in this schedule of numerous native trees species:</p> <ol style="list-style-type: none"> 1. Native trees which occur naturally in Wellington Ecological District 39.01: Northern rātā, cabbage tree / tī kōuka, rimu, ngaio, miro, kahikatea, mataī, nīkau, large-leaved milk tree / ewekuri. 2. Native trees which do not occur naturally in Wellington Ecological District 39.01 and are potentially weedy: pōhutukawa, pūriri, karaka. Note: pōhutukawa could be adversely affected by myrtle rust. 3. Native trees which do not occur naturally in Wellington Ecological District 39.01 and which at this time do not appear to be potentially weedy: Kauri, black beech / tawhai rauriki, hard beech / tawhai raunui, kōwhai / <i>Sophora tetraptera</i> (there is a <i>Sophora</i> species which occurs naturally in Wellington Ecological District 39.01. 	<p>Supportive submission</p>
<p>881 Argosy NO1 Property</p>	<p>The Draft Plan identifies three notable trees at Argosy's property at 7 Waterloo Quay (i.e. at the corner of Whitmore and Waterloo Quay, Lambton Quay), as identified in Schedule 6:</p> <ol style="list-style-type: none"> (a) Tree 242: Pohutukawa; (b) Tree 243: Pohutukawa; and (c) Tree 244: Pohutukawa. 	<p>Agree with the requested amendment.</p>

Argosy supports provisions which enable trimming and pruning of notable trees where there is interference with public accessways

Policy TREE-P2 allows trimming and pruning of notable trees where the works maintain or improve tree health; prevent interference with property or network utilities; or are essential due to a serious threat to people or property.

Argosy supports TREE-P2, but considers it would be reasonable to also allow trimming or pruning of notable trees to prevent interference with public footpaths.

This proposed amendment would be consistent with the categories already recognised in TREE-P2 because it would enhance public safety and prevent notable trees being damaged where the canopy overhangs public footpaths.

For example, the notable trees at 7 Waterloo Quay overhang the footpath on Waterloo Quay and frequent pruning and trimming is necessary to prevent the trees from becoming a nuisance (and potential safety hazard) to pedestrians.

Argosy seeks the following amendment to TREE-P2:
“Allow the trimming and pruning of notable trees where the works:

1. Maintain or improve tree health;
2. Prevent interference with public footpaths, property or network utilities; or
3. Are essential due to a serious threat to people or property.”

<p>881 Argosy NO1 Property</p>	<p>10.7 Argosy also supports TREE-P3, which allows other trimming or pruning which meets certain criteria.</p>	<p>Supports provision</p>
<p>881 Argosy NO1 Property</p>	<p>10.8 Rule TREE-R1 establishes requirements for trimming and pruning of notable trees, however these are not entirely consistent with the relevant policy TREE-P2.</p> <p>The policy recognises that trimming and pruning should be allowed to maintain or improve tree health, but this is not recognised in the rule.</p> <p>Rule TREE-R1 should also provide for trimming or pruning of notable trees to be permitted where the works prevent inference with public footpaths, in accordance with our comments on policy TREE-P2 above.</p> <p>10.10 Argosy seeks the following amendments to TREE-R1:</p> <p>Permitted where:</p> <ul style="list-style-type: none"> a. The trimming and pruning is necessary to: <ul style="list-style-type: none"> i. comply with the Electricity (Hazards from Trees) Regulations 2003; or ii. The works are necessary to prevent interference <i>with public footpaths</i>, buildings, structures or network utilities and are undertaken to the minimum extent required to prevent interference and TREE-S1 is complied with; or 	<p>Agree with the submission point.</p>

	<p>iii. The works involve the removal of broken branches, dead wood and diseased vegetation and TREE-S1 is complied with; or</p> <p>iv. The works will maintain or improve tree health and TREE – S1 is complied with; or</p> <p>v. The works are essential due to a serious and imminent threat to the safety of people or damage to property and TREE-S2 is complied with.”</p>	
881 Argosy NO1 Property	<p>We also note that TREE-S2, which provides for emergency trimming or pruning work, is necessary but in the case of a true emergency it may be difficult to advise the Council of works at least one hour prior to the works commencing. This is particularly onerous as the activity would otherwise be permitted.</p> <p>10.12 Argosy seeks the following amendment to TREE-S2:</p> <p>“The works are undertaken or supervised by a works arborist and Council is advised as soon as practicable either before (if possible) or after the works occurring at least 1 hour prior to the work commencing</p>	Do not agree with the submission point. The required timeframe is not unreasonable. In any case it would take time for an arborist to arrive.
852 Paula Warren	I strongly support the DP protecting notable trees.	Supportive submission
717 James Fraser	There must be greater tree protections included in the district Plan. Here in Newtown trees are an essential part of the Zealandia 'Halo' which provide feeding corridors for native birds to the Town Belt and other parts of the Natural Environment. Heritage specimens need to be named listed and offered maximum protection. Trees and greenery act as sumps to remove excess water and surface run off. New developments	Benefits of tree cover in the urban environment outlined.

	should include as little hard surface as possible to encourage planting and habitat for insects and birds.	
571 Environmental reference group	<p>Notable Trees</p> <ul style="list-style-type: none"> • Agree with Objectives TREE 01 to 03 • Agree with Policies TREE 01-04 	Supportive submission
571 Environmental reference group	<p>TREE-P5</p> <p>Destruction</p> <p>Only allow the destruction of notable trees where:</p> <ol style="list-style-type: none"> 1. A serious and imminent threat is posed to the safety of people or property; or 2. Dead, or in a state of terminal decline; or 3. Relocation has been explored but is not practicable and likely to ensure the survival of the notable tree. <p>Can't allow tree destruction just because you can't relocate it.</p>	<p>The submission has some merit as relocation is not tied to any trigger why relocation may need to occur. This needs to be considered. This could be that practicable alternatives to retention of the tree in its current position have been assessed but ruled out.</p> <p>The intention is to ensure that destruction is the last resort.</p>
571 Environmental reference group	<p>TREE-P6</p> <p>Support for Landowners</p> <ol style="list-style-type: none"> 1. Support landowners to take long term care and maintenance of notable trees through the provision of education and advice. 2. Support landowners by organising and paying for two- yearly checks of notable trees. 3. Support landowners by organising and paying for all tree maintenance that is identified through the two-yearly checks. 	Submission provides suggestions for additional assistance and incentives to be offered to owners of notable trees.

571 Environmental reference group	TREE -R1, R3, R4, R5- We agree Activity Standards for Notable Trees- We agree	Support
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Sites and Areas of Significance to Māori

Who	Feedback Received	Response
<i>Heritage New Zealand Pouhere Taonga Takiwa o Te Putahi a Maui</i>	<ol style="list-style-type: none"> 1. Context; <ol style="list-style-type: none"> 1. States “The introduction refers to the ‘Sites of Significance to Mana Whenua Chapter’. However, the chapter is named ‘Sites and Areas of Significance to Māori’ in the Draft Plan.” 2. Policy <ol style="list-style-type: none"> 1. Want a definition for ‘close proximity’ for P5 3. Rules <ol style="list-style-type: none"> 1. Wants R8 to be RD or C, not permitted. 2. Wants R9 to be RD not C. 3. Suggests that the subdivision rule in SASM be in the subdivision chapter, not in SASM 4. Suggests the same as earthworks 5. States EW-R21 is the same as SASm-r3 4. Definitions <ol style="list-style-type: none"> 1. HNZPT would like the following definitions to be replaced; <ol style="list-style-type: none"> 1. Wāhi tapu 2. Wāhi tipuna 2. And the deletion of wāhi tūpuna. 	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. Accept and change 2. Policy <ol style="list-style-type: none"> 1. Accept and change 3. Rules <ol style="list-style-type: none"> 1. Decline, following Iwi’s lead 2. Decline, following Iwi’s lead 3. Accept and change 4. Accept and change 5. Accept and change 4. Definitions <ol style="list-style-type: none"> 1. Decline, following Iwi’s lead 2. Decline, following Iwi’s lead
<i>General Public</i>	<ol style="list-style-type: none"> 1. Site inventory <ol style="list-style-type: none"> 1. Wants to add another site within the schedule. 	<ol style="list-style-type: none"> 2. Site inventory <ol style="list-style-type: none"> 1. Decline, following Iwi’s lead
<i>Kainga Ora</i>	Support	No action
<i>Investore</i>	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. Feels that with the chapter being incomplete, that it is difficult to 	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. Will be completed 2. Site Mapping

	<p>comprehend how this will affect land owners.</p> <p>2. Site Mapping</p> <p>1. Would like the Korokoro - Takapū Ara line to be shifted outside of their property.</p>	<p>1. Decline, following Iwi's lead</p>
<i>Wellington International Airport Limited</i>	<p>1. Context</p> <p>1. Would like to see how the rules will operate in regards to sites which have been heavily modified. Needs more context to how this will affect site.</p>	<p>1. Context</p> <p>1. Emphasis on the activities adjacent to sites and areas of significance, which are modified, are still to have rules applied to them. However, SASM-R3 addresses the modification of features integral to a CAT A or B site.</p>
<i>New Zealand Archaeological Association</i>	<p>1. Site identification</p> <p>1. In the case of identified scheduled archaeological sites, NZAA wishes to add this to the SASM list.</p>	<p>1. Site identification</p> <p>1. Mana whenua partners have identified the sites and areas of significance that they wish to have protected.</p>
<i>WCC Environmental Group</i>	<p>1. Context</p> <p>1. Wants changes to the introduction to alter 'Often sites no longer exist physically'.</p> <p>2. Grammar to be changed of the introduction.</p> <p>3. Agrees within the intent of the SASM introduction.</p>	<p>1. Context</p> <p>1. The introduction chapter has been changed. The introduction does acknowledge that some sites' physical remains may not exist, but that its significance is still there. There are many sites included within the schedule which do not have physical remains, but are still important to mana whenua.</p> <p>2. Introduction rewritten</p> <p>3. No action.</p>
<i>General Public</i>	<p>1. Context</p> <p>1. General comment about the integration of sites and areas of significance with historic heritage. Also wants greater visibility of Māori heritage within the city.</p>	<p>1. Context</p> <p>1. No action, as no direct mention to the SASM provisions. The chapter aims to elevate the presence of Māori heritage within the city, with the partnership with mana whenua.</p>

VUWSA	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. General comment about the Tangata Whenua chapter and that 'District Plan must be amended in order to fully acknowledge the connection of Māori to their historic land, and to elevate their mana by engaging in a genuine partnership' 	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. The approach that the SASM chapter takes to engage with iwi and action their aspirations of how their sites are managed, reflects the responsibilities of Council as outlined by te Tiriti. No action needed.
General Public	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. General comment of mana whenua cultural presence within the City. 	<ol style="list-style-type: none"> 1. Context <ol style="list-style-type: none"> 1. No action required. SASM chapter aims to elevate the presence of mana whenua cultural presence within the City.
CentrePort Ltd	<ol style="list-style-type: none"> 1. Context; <ol style="list-style-type: none"> 1. Wishes to have clarification over the SASM provisions' interaction PORTZ Zone 	<ol style="list-style-type: none"> 1. Context; <ol style="list-style-type: none"> 1. Refining of provisions have addressed SASMs within the PORTZ Zone.
COR Associates Ltd	<ol style="list-style-type: none"> 1. Supports the chapter 	<ol style="list-style-type: none"> 1. No action needed
General Public	<ol style="list-style-type: none"> 1. Context; <ol style="list-style-type: none"> 1. Grammar edits to introduction to remove 'Site and Areas of Significance to Māori' in first sentence. 2. Edits to introduction to rewrite in 'plain English'. 3. Edits to introduction, removal of one word. 4. Edits to introduction. 5. Edits to introduction. 	<ol style="list-style-type: none"> 1. Context; <ol style="list-style-type: none"> 1. Not adopted. 2. Not adopted, due to rewrite of introduction. 3. Not adopted, due to rewrite of introduction. 4. Not adopted, due to rewrite of introduction. 5. Not adopted, due to rewrite of introduction.
Wellington City Youth Council	<ol style="list-style-type: none"> 1. Supports the chapter 2. Sites categorisation; <ol style="list-style-type: none"> 1. Concerns of mana whenua's ability to change the significance of SASMs. 3. Sites categorisation; <ol style="list-style-type: none"> 1. Concerns about diminishing the SASMs through categorisation. 4. Site identification; 	<ol style="list-style-type: none"> 1. Supports the chapter; <ol style="list-style-type: none"> 1. No action. 2. Sites categorisation; <ol style="list-style-type: none"> 1. There are processes which mana whenua will be able to change the categorisation of SASMs, through a plan change. 3. Sites categorisation; <ol style="list-style-type: none"> 1. Within the rule framework the categorisation of SASMs have minor differences to

	<p>1. Wanting to have the correct cultural name for the sites and areas to be applied.</p>	<p>how the SASMs are protected. This categorisation is more based off how mana whenua view their SASMs.</p> <p>4. Sites identification; 1. We have encouraged the use of te reo Māori for place names.</p>
<i>VicLabour</i>	<p>1. Supports the chapter; 1. Endorses the approach taken for the SASM chapter.</p>	<p>1. Supports the chapter; 1. No action.</p>
<i>General Public</i>	<p>1. Mapping adjustment; 1. Wants changes to mapped streams in Thorndon: Whakahikuwai stream, Tiakiwai, pakuao stream.</p>	<p>1. Mapping adjustment; 1. The approach of the chapter is to enable mana whenua to dictate where they want their taonga located. No action.</p>
<i>Wellington Civic Trust</i>	<p>1. Mapping query; 1. Questioning around the SASM placed on the harbour.</p>	<p>1. Mapping query; 1. This SASM covers the whole harbour, as it is a part of the statutory acknowledgement areas.</p>
<i>Landowner</i>	<p>1. Mapping adjustment; 1. Asked for the review of inclusion of house within takiwā.</p>	<p>1. Mapping adjustment; 2. Conversation with Morrie was held regarding the takiwā and site was removed from the takiwā.</p>

Appendix 2: List of Consultation to Date – Sites and Areas of Significance to Māori provisions

Month	Date	Subtopic	Attendees	Notes
August	04.08.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	5.08.2021	SASM with Morrie and Victoria		
August	06.08.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	Meeting prep with Morrie
August	12.08.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	13.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	17.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	18.08.2021	Chapter work	Jade Wikaira, Onur Öktem-Lewis, Sarah Dickson	Both for TW chapter and SASM - this takes into account two meetings (was in two parts)
August	19.08.2022	Chapter work	Jade Wikaira, Onur Öktem-Lewis, Sarah Dickson	Both for TW chapter and SASM
August	20.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	20.08.2021	Chapter work	Jade Wikaira, Onur Öktem-Lewis, Sarah Dickson	
August	25.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
August	27.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	

August	31.08.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
September	10.09.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
September	23.09.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
September	24.09.2021	Working at Ngāti Toa	Sarah Dickson	3-5pm
September	29.09.2021	SASM work shared and coms - in relation to TEPP	Kristine Ford, Sarah Dickson, Onur Öktem-Lewis	Inner WCC coms
September	30.09.2021	SASM categories	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
September	31.09.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	4.10.2021	Working at Ngāti Toa	Sarah Dickson	Half day visit 1:30-5pm
October	5.10.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	6.10.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	8.10.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	12.10.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	13.10.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
October	14.10.2022	trading and events in public places policy and the SASM	Kristine Ford, Sarah Dickson, Onur Öktem-Lewis	
October	15.10.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	

October	22.10.2021	SASM identification and narrative	Morrie Love, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	Finishing up polygons
November	03.10.2021	SASM team hui	Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
November	15.11.2021	SASM identification and narrative	Sarah Dickson and Jono Moore	National Archives visit
November	25.11.2021	SASM work shared and coms	Victoria, Sarah Dickson, Onur Öktem-Lewis, Jono Moore	
December	07.12.2021	Sites of Significance in Wellington KAUMATUA	Ammon Katene, Onur Öktem-Lewis	
February	24.02.2022	Catch up post NTR Kaumatua SASM Hui	Jono Moore, Sarah Dickson, Onur Öktem-Lewis	
March	1.03.2022	SASM - touch base on project status and needs	Meredith Robertshawe, Mark Lindsay, Sarah Dickson	
March	2.03.2022	RE: Te Aro Park - Outdoor Dining Licence. SASM	Helen Smith, Kristine Ford; Kate Brown, Sarah Dickson	
March	3.03.2022	WCC district plan meeting - RMA/Sites of Significance re filming and events	Tom Chi, Nicci Boucher, Ashleigh Flynn, Sarah Dickson, Anna Stevens	
March	7.03.2022	PCC Plan Change SASMs 2nd Hui: Slides and Maps / Mihimihi with WCC staff on SASMs	Sarah Dickson, Onur Öktem-Lewis, Jono Moore, Caroline Rachlin, Torrey McDonnell	
March	21.03.2022	Hui with NTR	Sarah Dickson, Onur Öktem-Lewis (NTR), Jono Moore, Adam McCutcheon	
April	19.04.2022	March WCC Sites of Significance deliverables	Sarah Dickson, Onur Öktem-Lewis (NTR), Jono Moore, Adam McCutcheon	Meeting highlighting potential changes to the chapter

April	28.04.2022	Hui on SASM provisions	Sarah Dickson, Onur Öktem-Lewis (NTR), Adam McCutcheon, Torrey McDonnell (PCC)	Meeting clarifying the potential changes, checking that this is workable within the plan and with Ngāti Toa Rangatira's aspirations
May	6.05.2022	WCC District Plan māhi	Sarah Dickson, Onur Öktem-Lewis (NTR), Adam McCutcheon	Going through the chapter and clarifying intention of policies, rules and standards
May	9.05.2022	WCC District Plan māhi	Sarah Dickson, Onur Öktem-Lewis (NTR), Adam McCutcheon	Going through the chapter and clarifying intention of policies, rules and standards
May	18.05.2022	Finalising the SASM Chapter and related Content	Sarah Dickson, Adam McCutcheon, Jade Wikaira	Going through the chapter and schedule
May	19.05.2022	Hui for changes for the Sites and Areas of Significance to Māori chapter	Sarah Dickson, Adam McCutcheon, Morrie Love	Going through the chapter, schedule, and associated documents for the chapter.