



HERITAGE NEW ZEALAND
POUHERE TAONGA

Statement of General Policy:
The Administration of the
New Zealand Heritage List/ Rārangi Kōrero

Summary of Submissions

30 October 2015

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Public consultation process

The Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) requires that Heritage New Zealand Pouhere Taonga (HNZPT) consult on five draft statements of general policy by making them publicly available and inviting public comments [HNZPTA section 17]. These comments must be considered before adopting the draft as a statement of general policy. The draft policies were notified on 3 February 2015 and public submissions closed on 17 April 2015. The final policies will be available from heritage.org.nz no later than 20 November 2015.

This document summarises submissions, and HNZPT responses to suggestions by submitters, on the administration of the New Zealand Heritage List/Rārangi Kōrero.

The other four statements of general policy consulted on address:

- the administration of the archaeological provisions under the HNZPTA
- the management and use of historic places owned, controlled or vested in HNZPT
- the administration of the National Historic Landmarks List/Ngā Manawhenua o Aotearoa me ōna Kōrero Tūturu
- the statutory role of advocacy.

Summary of submissions overview

Submissions by Stakeholder

There were **52** out of a total of **71** submissions that referred to, or made comment on, the Draft New Zealand Heritage List/Rārangi Kōrero Policy document.

In total, the 52 submitters made **245** separate submission points or comments.

Percentage of submissions **by group** in full:

Group / Organisation	No. of Submitters	%
Consultant/Professional Organisation	1	1%
Heritage Owner	3	5%
Industry	3	5%
Other Organisation	3	5%
Regional Heritage Organisation	4	7%
Central Government	5	9%
National Heritage Organisation	6	11%
Local Authority	7	13%
Iwi	8	15%
Individual	12	23%
Total Submitters	52 out of 71	100%

General Comments of Support / Opposition

Out of the 52 separate submitters to the Draft New Zealand Heritage List/Rārangī Kōrero Policy, there were **20 comments giving general support**. The majority of submitters went on to comment or further submit on particular policies or objectives with the document. There were no submitters voicing general opposition to the document. However, one submission takes issue with Pākehā governmental systems in general.

Support and Opposition

Objective / Section	No. of Submissions
General Comments	31
Introduction/Glossary	2
Objective 1	11
Objective 2	4
Objective 3	16
Objective 4	27
Objective 5	15
Objective 6	16
Objective 7	28
Objective 8	27
Objective 9	15
Objective 10	3
Objective 11	12
Objective 12	7
Objective 13	6
Objective 14	25
Total Submissions	245

There were generally positive comments about the inclusivity of the application process, although again the dominant suggestion for change was to give greater regard to the rights and comments of property owners during this process.

Key Themes

Clarification of wording

The largest number of submissions points were in regard to small changes and requests for clarification. There was general overall support for the objectives of the Draft New Zealand Heritage List/Rārangī Kōrero Policy. However, there were suggestions for small changes and clarification of some of the policies in every objective of the policy.

The most prevalent amongst these was the request that where the document refers to “we”, “our” and “us”, this wording be amended to refer to “Heritage New Zealand”, in line with the other Heritage New Zealand Pouhere Taonga (HNZPT) policy documents. Other small changes requested centre on the need for clarification of policy wording.

Application and consultation process

The next largest theme by number of submission points was in regard to the application and consultation process for entry on the Draft New Zealand Heritage List/Rārangi Kōrero Policy. This theme was particularly highly represented in submissions on Objectives 7, 9 & 14.

Several supporting comments came with the suggestion that the timeframes for the various application stages be significantly reduced. There was concern, mostly from organisations with large property portfolios, that the aspirational timeframes for each stage were too long. Some submissions suggested amended timeframes of reviews 3 or 6 months, down from 1 year.

Some submissions argued for greater consultation of property owners at all steps of the application/consultation/review processes.

Ownership of and access to information

Ownership of and access to information was another prominent theme. Some Maori groups expressed concern about the security of information provided showing the location of wāhi tapu wāhi tupuna, and other taonga. However, there was broad support for the expansion of the types of information used in reporting for the List in particular the inclusion of maps and photographs which were seen as being very valuable for identification and understanding.'

Summary of submission points

Note the following abbreviations are used in these tables:

Heritage New Zealand Pouhere Taonga (HNZPT)

Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA)

New Zealand Heritage List/Rārangi Kōrero (the 'List')

Resource Management Act 1991 (RMA)

Note that Policy numbers in the final version may well have changed since the publicly notified version. When they occur, these changes have been noted in the 'HNZPT Response' or 'Revision to Policy' fields. Policy numbers in the 'Submission Point' or 'Relief sought' fields retain their original, publicly notified, numbers.

General comments

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
1-14	Y	Generally support Objectives 1 to 14 and all the related policies	None	Noted	No change required
1-14	Y with changes	The document makes no reference to adopting international best practice in regards to the List.	HNZPT should be benchmarking its "inclusive" List to those used overseas and adopting innovative and relevant Objectives and Policies as it deems appropriate.	Heritage New Zealand has used international examples for comparative analysis as a matter of course, but HNZPT are not considering clarifying the policy.	No change required
1-14	Y with changes	Notes this Policy refers to "we", "our" and "us" and...	...recommend this wording be amended to refer to Heritage NZ, in line with the other HNZPT policies [We have] reviewed.	Agree	Amended
1-14	Y with changes	Notes this Policy refers to "the Act" while a number of the other HNZPT policies reviewed refer to "HNZPTA".	We recommend consistent terminology be used in the policies to enhance comprehension.	Noted	Amended

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
1-14	Y with changes	Subject to the particular matters raised below, the submitter supports the following draft Heritage New Zealand policies particularly as it has a number of internal policies that align with them: Administration of the NZ Heritage List/Rarangi Korero Policy	None	Noted	No change required
1-14	Y	Recognise that the transport network may contain or pass in close proximity to land and buildings that are listed in the Heritage New Zealand List and supports the processes, objectives and policies outlined in this draft policy.	None	Noted	No change required
1-14	Y with changes	The constant use of “we” and “our” is not very professional.	The reference should be to HNZPT.	Noted	Amended
1-14	Y with changes	Generally supportive of the intent of all three statements of policy but is concerned that the policies are unduly extensive, particularly in length and...	...could be refined further to provide clarity and ease for readers	Noted	Check policies for surplus text and editing where necessary
1-14	Y with changes	Supportive of referencing the Act throughout the policies, this is currently occurring sporadically and at times this referencing is inconsistent. Some policies repeat the Act without specific reference to it whilst other policies alter the wording of the Act within a policy which creates a different intent.	There should be a consistent approach to both referencing and repetition of the Act within the policies.	Noted	Ensure consistency across policies and referencing of the HNZPTA in footnotes
1-14	Y with changes	Old nineteenth-century churches are often impractical to adapt to modern worship practice, standards of comfort or technology. Adapting such buildings to fit modern requirements, or achieve compliance to legislation, such as accessibility requirements, can be fraught with difficulty.	It should be accepted that, in certain circumstances, destruction or demolition may be the only practical option.	This is outside of the scope of the New Zealand Heritage List/Rārangi Kōrero policy refer to Advocacy Policy.	No change
1-14	Y	[The policies] support the need to work collaboratively with owners, iwi and relevant organisations to identify historical and cultural history; and that the research undertaken to determine eligibility of an item or site on the list is robust and reliable.	None	Noted	No change required
1-14	Y with changes	None of the objectives 1-14 address the need for the List to be a dynamic rather than a static document, although it is acknowledged that policy 6.2 assumes	The list should be dynamic and be subject to a process of consistent, planned and	HNZPT prioritises assessments and reviews using the	No change

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		that more recent places and sites will be added to the list. Policies under objective 7 however, imply that listing will be, from HNZPT's perspective, a passive rather than an active process, in which more proposals will be submitted to HNZPT in any one year than can be processed annually (7.10). This suggests there is little scope for listings initiated by HNZPT. Perspectives on what constitutes heritage have changed dramatically since the introduction of New Zealand's first national heritage legislation in the 1950s, our understanding of New Zealand history has changed fundamentally and research on New Zealand's architectural history has progressed significantly. It is reasonable to assume that this process will continue and that aspects of our past that are scarcely considered at present will assume much greater importance in the future.	thoroughly researched review and augmentation. This objective needs to be addressed in a clearly articulated policy. Without such a policy there is a danger that listings will occur in an ad hoc fashion or in response to crises, a policy (or rather lack of policy) that did not served the NZHPT well in the past. Furthermore, without such a policy of systematic and regular review, the aspiration that the list will be 'authoritative, respected and comprehensive' (Objective 4) will not be achieved.	criteria (Risk/Alignment/ Impact/ Significance/ Efficiency). However, availability of resources impacts upon our ability to comprehensively review the List. The prioritisation process is laid out in Policies 7.10 & 7.11.	
1-14	Y with changes	The role of Heritage New Zealand as the record keeper for information on the nation's historic and cultural heritage is not adequately addressed in policies 1-14. The experience of the Canterbury earthquakes of 2010-11 has highlighted the importance of maintaining high quality records not just for the purpose of listing and advocacy, but also as a permanent documentary record of heritage that may be lost through natural hazards, fire or demolition. The limitations of the records maintained by the NZHPT in the past have been highlighted by recent events, especially in regard to photographic records of historic places. Even the most cursory survey of the photographs included on the List on the HNZPT website indicates that photographic documentation of sites is of a very poor standard, often of little more than 'snapshot' quality. While significant emphasis is placed on written documentation of historic places there is no corresponding emphasis on high-quality visual	All listed buildings should be thoroughly documented through photographs of a professional standard, including exterior and interior views, significant details and including chattels identified in any listing. Ideally HNZPT should employ an in-house photographer with appropriate skills for the documentation of the range of sites listed by HNZPT. Alternatively professional photographers should be commissioned to record, at the very least, all category one historic places. As a minimum, HNZPT staff should be provided with appropriate photographic equipment (a	HNZPT currently documents List entries to a high standard at the time of entry. However, availability of resources impacts upon our ability to document all existing places on the List to the highest standards.	Amended 11.3(b) to include "high quality photos"

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		documentation. Given that the heritage values of many sites are closely related to their visible features a corresponding emphasis on thorough visual records is essential.	digital SLR such as a Canon 5D and lenses of similar quality) and training to produce visual records of an adequate standard.		
1-14	Y	Consider that there is good material in the Policies that will assist with providing leadership and direction in key areas of work, and will support initiatives aimed at identifying and protecting New Zealand's important heritage places and areas.	None	Noted	No change required
1-14	Y with changes	Generally supportive of the Draft Policies and the pragmatic approach taken by HNZPT in its drafting. Particularly supportive of the way in which HNZPT has sought to recognise and balance the importance of heritage protection with the rights of landowners and the need to use land.	None	Noted	No change required
1-14	Y with changes	It is considered that the Draft Policies are, in some instances, unduly onerous and ambiguous. Recent case law has emphasised the need for care to be taken when using strong language such as "avoid" and "protect" in policy documents. Submitter seeks that the language used in the Draft Policies is appropriate and will not be interpreted in an unintended way.	Ensure that the language used in the Draft Policies is appropriate and will not be interpreted in an unintended way.	Noted	Reconsidered use of terms such as "avoid" and "protect".
All Policies and Guideline documents	Y with changes	It is noted that many policies are simply a restatement of sections of the Act and therefore add little guidance as to how HNZPT intends to administer the HNZPTA. There are differences in style and structure between the policies, with some having explanation and others not, when they would benefit from having reasons and explanation. Generally, the policies are repetitive, lengthy, lack clarity, and some policies are worded as methods.	Re-wording of policies	Noted	Reviewed style and structure of policies.
All Policies and Guideline documents	Y with changes	The views and values of Māori will inform decision making, assessments and actions under the HNZPTA (as opposed to just being taken into account)	The views and values of Māori will inform decision making, assessments and actions under the HNZPTA (as opposed to just	These issues are covered by policies 2.3 & 11.4(a)	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
			being taken into account)		
All Policies and Guideline documents	Y with changes	There is an expectation that HNZPT will provide resourcing (including funding and training opportunities) that support Māori effectively engaging in processes.	HNZPT should provide resourcing (including funding and training opportunities) that support Māori effectively engaging in processes.	Outside the scope of this Policy	No change required
All Policies and Guideline documents	Y with changes	Acknowledges and supports the many significant aspects of these draft statutory policies, under HNZPTA, that aim to improve the position and engagement with Iwi/hapū with regard to protecting heritage.	None	Noted	No change required
All Policies and Guideline documents	Y	The suite of policies is clear and thorough. It provides an open and transparent picture of the objectives of HNZPT and encourages engagement from stakeholders.	None	Noted	No change required
All Policies and Guideline documents	Y	The policies include principles for sustainable management, methods of promoting conservation, and objectives that are well defined and would apply equally well in other historical and cultural organisations. It was noted that the definition of historical and cultural heritage seemed to exclude moveable heritage. While appropriate in the context of Heritage New Zealand, this would not be the case for [our organisation], and some other elements of the heritage sector.	None	Noted	No change required
All Policies and Guideline documents	Y with changes	Our main submission is that mana whenua, as first peoples and in relation to Te Tiriti o Waitangi, should be recognised as partners, not merely as key stakeholders. We realise that this will not always be possible, especially when the policy is determined by the legislation; however, the policies could be strengthened.	Specific policies addressed in this submission	See specific responses to submission 65	See specific responses to submission 65

Introduction/Glossary

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
Intro	Y with changes	Comment should be made that the List replaces the former Register, to remove doubt or confusion.	Note that the List replaces the former Register.	This is outlined in paragraph 4 of 'Legislative Context', however, this could be made clearer	A revision to the introduction has been.
Intro	Y with changes	It was noted that the Glossaries could usefully offer definitions of 'Heritage'.	Add a definition of 'Heritage' to the Glossary.	Throughout the document we use the standard dictionary definition of heritage.	No change required

Objective 1: Purpose and principles

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
1.5	Y with changes	Organisations set up to continue and develop the work previously carried out by the branch committees of NZHPT should be treated as an automatic stakeholder re the List. They are not just any "heritage society".	Further recognition of former branch committees	Noted	Addition of policy 1.6: HNPT recognises the special relationship it has with national, regional and local heritage organisations.
1	Y with changes	There are approximately 17,000 Historic Places scheduled in the relevant territorial authority district plans. Submit that the List be "comprehensive" and the majority of the heritage listed in district plans needs to be considered for inclusion on the List.	Heritage items listed in district plans should be considered for inclusion on the List.	District plans may involve heritage that may not meet the criteria for listing under the HNPTA. Where places do meet the criteria they can be considered for List entry.	No change required
1.3	Y with changes	Using the sole phrase "New Zealand's distinct society" implies a uniformity that is not representative of our Historic Places and the regions, towns etc. they inhabit.	List needs to reflect the differences in NZ society/heritage	This is taken from the HNPTA (Section 4)	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
1.1	Y with changes	The Act prescribes the process for inclusion.	Objective 1.1 should be amended to read: "The New Zealand Heritage List includes nationally, regionally and locally significant heritage, where appropriate, in accordance with the criteria set out in the Act." (P.7.)	The term 'significant' implies that a Heritage List entry meets the HNZPTA's criteria. Assessment against HNZPTA criteria is covered by the policies under Objective 8	No change required
1.4-1.6	Y with changes	Support this Policy to guide Heritage New Zealand's administration of the List. Suggests removing the word "we" from all policies.	Remove the word "we" from policies 1.4, 1.5 and 1.6.	Noted	Revised all policies to remove references to 'we'
1	Y	Acknowledge that the List is New Zealand's only national statutory record of our rich and diverse place-based historical and cultural heritage.	None	The first sentence of the introduction refers to the List as being the only national statutory List of placed based heritage.	No change.
1.1	Y	Policies 1.1 and 6.1 recognise locally significant heritage and will not exclude further examples of heritage already listed. This is positive for local authorities and communities. Anyone can propose an entry and owners are informed but their permission is not a requirement for advancing a nomination through the listing process. However, justification has to be made in an application.	None	Noted	No change required
1.1	Y with changes	Amendments better reflect the provisions of the HZNPTA. Section 66 sets out criteria for inclusion on the List, which can only occur if HNZPT is satisfied in relation to those criteria.	Amend as follows: The New Zealand Heritage List includes nationally, regionally and locally significant heritage. where appropriate, in accordance with the criteria in the Act.	The term 'significant' implies that a Heritage List entry meets the HNZPTA criteria. Assessment against HNZPTA criteria is covered by the policies under Objective 8.	No change required
1.2	Y with changes	Amendments better reflect the provisions of the Act. Section 66 sets out criteria for inclusion on the List, which can only occur if HNZPT is satisfied in relation to	Amend as follows: ...and cultural heritage throughout New Zealand	The term 'significance' implies that a Heritage List entry meets the	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		those criteria.	of significance to people and communities provided the criteria in the Act are met.	HNZPTA's criteria. Assessment against HNZPTA criteria is covered by the policies under Objective 8	
1.6	Y with changes	As worded, this a very high threshold.	Amend as follows: ...and involve the least possible practicable alteration or loss of it; and	This is wording directly from the HNZPTA.	No change required

Objective 2: Māori heritage values

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
2.4	Y with changes	The implementation of this policy does raise a number of questions around pragmatism. We assume the responsibility for getting a Māori heritage assessment falls on the applicant. How is the applicant to know which iwi and hapū to contact? What is expected where a number of hapū have interests? Will iwi and hapū expect payment? Who determines what level of assessment is adequate given the allowance for variation dependent on strength of connection and relevance? As all proposed entries are required to be assessed for Maori heritage, what is the bottom line and what does the nil or minimum assessment involve?	Review and maintain the concept that the Māori heritage assessment should be commensurate with the strength of connection and relevance.	Usually HNZPT would be the ones to contact the relevant iwi/hapu.	No change required
2.2	Y with changes	There are currently no sites of significance to the hapū within the submitter's exclusive area of Interest. It is difficult to source the resources required to collate the site information and submit applications to the List.	Financial assistance from HNZPT would be very beneficial to aid in identifying sites and entering them on the List.	Heritage New Zealand staff are available to assist identifying sites of significance to hapū.	No change required
2	Y with changes	We re-iterate our previous position, set out in the July 2012 submission on the Heritage New Zealand Pouhere Taonga Bill, that reads: - "Currently wāhi tapu or wahi tapu area are the definitions used to identify areas of cultural significance to Iwi in the Historic Places	HNZPT recognise that the statutory definition for wāhi tūpuna, wāhi tapu and wāhi tapu area, should be a guideline rather than an exhaustive list.	The definitions are stated in the HNZPTA	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		Register. Consider this definition to be too narrow and recommends that another term, such as wahi tupuna or wāhi taonga, be available to Iwi to use which may be a better way of encapsulating the cultural significance of a site to Iwi. In any event the statutory definition should be a guideline rather than an exhaustive list.” We note our later submission on the Supplementary Order Paper No. 135, dated 29 November 2012, the introduction of the term wāhi tupuna was supported: “The inclusion of ‘wāhi tūpuna’ as a definition for a place of importance to Māori is a positive change which better encapsulates the range of cultural significance a site may have to Māori.			
2.1	Y with changes	Amendments better reflect the provisions of the HNZPTA. The Act prescribes the process for inclusion in sections 65-73.	Amend as follows: “...as historic places and areas of interest to Maori, wahi tupuna, wahi tapu and wahi tapu areas in accordance with the provisions of the Act.”	Assessment against HNZPTA criteria is covered by the policies under Objective 8.	No change required
2.2	Y with changes	Amendments better reflect the provisions of the HNZPTA. The Act prescribes the process for inclusion in sections 65-73.	Amend as follows: “...identify sites of interest to Maori and enter them on the New Zealand Heritage List in accordance with the provisions of the Act.”	Noted	Added 'significant' to Policy 2.2

Objective 3: Access to information

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
3	N	That all information on all heritage and significant historic information is managed and operated by the local whanau hapu iwi and marae of a Local Authority and Regional Council where it pertains to Maori histories.	That all information on all heritage and significant historic information is managed and operated by the local whanau hapu iwi and marae of a Local	Policy 3.3 allows for Iwi and hapu views on availability of information to be recognised.	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
			Authority and Regional Council where it pertains to Maori histories.		
3.1 & 3.2	N	That all heritage and significant historic information on settlers housing architecture are to be operated by the museum and genealogical organisations that are located in the Local or Regional information on settlers housing architecture are to Authorities.	That all heritage and significant historic information on settlers housing architecture are to be operated by the museum and genealogical organisations that are located in the Local or Regional information on settlers housing architecture are to Authorities	HNZPT makes available information about all List entries.	No change required
3.1-3.11	Y	Objective 3 Policies 3.1 – 3.11 –the submitter supports access being freely available and acknowledges that costs may be recovered under the Official Information Act 1982 if information is requested.	None	Noted	No change required
3	Y with changes	Understands that the HNZPT needs to know of iwi interests areas to be able to assess an application fully.	But concerns about the security of the any information provided showing the location of waahi tapu, waahi tuupuna, and other taonga	The purpose of the List is to be an available source of information and therefore HNZPT doesn't collect sensitive information as part of this process.	No change required
3.3	Y	Support this policy - in particular the inclusion of maps and photographs can be very valuable for identification and understanding.	None	Noted	No change required
3.3	Y	Note that some of the school heritage listings are very scanty on detail...	...and should be expanded	HNZPT has an ongoing programme to upgrade our List information.	No change required
3/4	Y	Support improved information systems and collaboration between agencies in the management and maintenance of heritage information, and facilitation of access by the community.	None	Noted	No change required
3.5	Y with changes	...does “referenced New Zealand Heritage List reports” include deficient registration reports? These also	Answer to question	Yes, it does and this information is available	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		contain significant information and research.		online.	
3.6	Y with changes	...how is "sensitive information" defined?	Answer to question	Sensitive information is defined as information that an interested party doesn't want released. I.e. information that is confidential	Change made to Policy to indicate that the collection of confidential information will be avoided.
3.1	Y with changes	To ensure that the submitter receives all information about the heritage value of the property if it is included on the List, HNZPT should be required to provide information to all relevant stakeholders.	HNZPT provides necessary and is required to provide accurate notification to owners, registered interests, relevant local authorities and the appropriate iwi and hapū of historical and cultural heritage included on the List.	Use of the verb 'required' suggests that this is a statutory requirement.	Change made to strengthen the wording at Policy 1.1.
3.3, 3.6, 3.7, 3.8, 3.9 and 3.10	Y with changes	Remove the word "we" from policies 3.3, 3.6, 3.7, 3.8, 3.9 and 3.10. For example, amend Policy 3.6 to: 'As the List is a matter of public record, the collection of sensitive information to support List decisions is avoided.' Rather than "As the List is a matter of public record, we will avoid the collection of sensitive information to support List decisions."	Remove "we" from policies 3.3, 3.6, 3.7, 3.8, 3.9 and 3.10.	The word 'we' should rightfully be removed. However, all policies are active sentences.	The word 'we' has been removed from the all objectives and policies.
3	Y with changes	Policy 3.5 recognises the need to provide referenced reports but this does not go far enough in recognising the need to make information available for researchers studying New Zealand's culture and history.	Policies under this heading should address the need to make information accessible for academic research and for educational purposes at primary, secondary and tertiary levels.	We agree, however the policies listed under the Access to Information objective indicate that the information will be made available to all.	No change required
3.1	Y with changes	When HNZPT notifies landowners of cultural heritage on their property, the notification should include a clear explanation of the legal protection afforded to the site, funding options for protection of the site and encouragement to liaise with hapū regarding protection of the site.	When HNZPT notifies landowners of cultural heritage on their property, include a clear explanation of the legal protection afforded to the site, funding options for protection of the site and encouragement to	We do this already by notification correspondence with owners which explains legal protection and HNZPT recommendations.	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
			liaise with hapū regarding protection of the site in the notification.	Liaison with iwi or hapu may be appropriate in some cases.	
3.2-3.3	Y with changes	There should be options to list wāhi tapu and wāhi tapu areas privately so that sensitive information is not publicly available.	Provide options to list wāhi tapu and wāhi tapu areas privately so that sensitive information is not publicly available.	The purpose of the List is to be a public record of New Zealand's Heritage. Refer to policy 3.6	No change required
3	Y with changes	Note the government's intentions in terms of open data (NZGOAL) and specifically to the desire to have a Creative Commons licence put on the List. It may also be helpful to consider putting the List on data.govt.nz as a dataset which is updated at regular intervals.	Have a Creative Commons licence put on the Heritage List. Consider putting the List on data.govt.nz as a dataset.	HNZPT has concerns about appropriate use of List data, especially around maintaining up-to-date data. We do provide downloadable information from our website.	No change required
3	Y with changes	In order to promote re-use, HNZPT could consider how the shared data should be structured to comply with relevant standards. For geographic data, this may mean GIS standards as well as the Legal Descriptions mentioned in section 11.2a. The Submitter would like to work with HNZPT on shareable GIS referencing.	Consider how the shared data should be structured to comply with relevant standards.	HNZPT has concerns about appropriate use of List data, especially around maintaining up-to-date data. We do provide downloadable information from our website.	No change required
3.5	Y with changes	The more information that is accessible online, the more comprehensive will be the heritage resources available to various communities of interest. On the basis that Policy 1.6 recognises identification for the purpose of inclusion on the List has been fully researched and documented, Policy 3.5 could usefully commit further than making List reports available upon request to making them available online. Since the items are already on the List, this would not be a project of an urgent nature and one that could be integrated, resources permitting, into an ongoing process of List reviews.	Policy 3.5 could usefully commit further making List reports available online.	HNZPT makes the text information in List reports available on the List Online. We supply fully referenced copies of List reports on the rare occasions when they are requested.	No change required

Objective 4: Relationship with the Resource Management Act 1991

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
4.1	Y with changes	Heritage values exist for a variety of reasons and there sometimes seems to be a lack of clarity as to what is actually being protected, the extent of the protection and why. Having clarity of these can provide certainty for future decisions in regards to items of historical importance, whether it is for the local and regional councils, the property owner or Heritage New Zealand.	...policy 4.1 does endeavour to ensure the information is sufficient for statutory purposes, but this could be made clearer and stronger	HNZPT acquires information at the time of Listing to the extent necessary for the Listing process.	No change required
4.3	Y with changes	suggest rewording Policy 4.3 to read 'We maintain contact will have a collaborative working relationship with local authorities, particularly in relation to consent applications and the change [and] review of policy statements and plans, to provide information about List entries and guidance on appropriate RMA management provisions of these entries.	suggest rewording Policy 4.3 to read 'We maintain contact will have a collaborative working relationship with local authorities, particularly in relation to consent applications and the change [and] review of policy statements and plans, to provide information about List entries and guidance on appropriate RMA management provisions of these entries.	Agree with the first part; regarding the second part, this will be covered by the Statutory Advocacy Policies.	Consider revision to 4.3
4.1	Y with changes	With respect to 4.1 the policy refers to HNZPT endeavouring to keep necessary and sufficient information to inform RMA and other legislative processes. I submit that this is a blanket statement and cannot possibly apply to every registered site in terms of the information that is held. This information evolves in terms of mana whenua participation and their reconnection with the land. We have found that our tuupuna koorero becomes accessible when we have the opportunity to once again walk our land. This information often becomes available 'post application' and so is missed when HNZPT considers the application.	Reconsider policy 4.1	If information received is significant enough to warrant a review of the List entry then this can be considered. In all cases, additional information can be added to our Listing files post-entry onto the List.	Add new policy: 4.4 'HNZPT will continue to collate information relating to List entries as it is received.'
4	Y with changes	There is no reference to the importance of the List in any actions undertaken under the RMA or when	Refer to the importance of the List in RMA processes and	The HNZPTA requires that the List is used in	No change required.

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		advising territorial authorities in regard to inclusion of Historic Places for protection under their district plans and related advocacy. Both of these areas have legal status and the List and the Objectives and Policies must meet certain criteria before it can have any affect.	advising territorial authorities.	certain RMA processes. This is noted in the policy in the section on relationship with the RMA.	
4	Y with changes	There is no reference to the importance of the List in any actions undertaken under the RMA or when advising Territorial Authorities (TA) in regard to inclusion of Historic Places for protection under their District Plans and related advocacy.	Both of these areas have legal status and the List and the Objectives and Policies must meet certain criteria before it can have any affect.	The HNZPTA requires that the List is used by territorial authorities in certain RMA processes. Refer to the introduction to Objective 4; however, we can't make policies for other agencies.	No change required
4	Y	[We] support the advocate work that HNZPT is doing in regards with District Plans to improve the regulatory basis for heritage conservation and to ensure the assessment of resource consent applications takes into account historical and cultural heritage values.	None	Noted	No change required
4.1	Y with changes	We believe the wording in section 4.1 is unclear and recommend this be amended as follows:	4.1 HNZPT endeavours to ensure that information in the New Zealand Heritage List is...	Agreed	Make change: 4.1 HNZPT endeavours to ensure that information in the New Zealand Heritage List/Rārangī Kōrero is...
3/4	Y	Support improved information systems and collaboration between agencies in the management and maintenance of heritage information, and facilitation of access by the community.	None	Agreed	No change required
4.1	Y with changes	Policy 4.1 "endeavours" to do what?	Answer question	Agreed, that the policy should be altered for clarity	Change: 4.1 HNZPT endeavours to ensure that information in the New Zealand Heritage List/Rārangī Kōrero is...
4.2	Y with	It is important that local authorities receive details of	Amend Policy 4.2 (page 11) to:	Consultation is covered	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	changes	List entries, proposals and reviews on an annual and quarterly basis. Encourages HNZPT to strengthen the current wording so that it is clear that there are opportunities for local authorities to provide feedback on proposals regarding the List. Encourages HNZPT to work closely with local authorities at the early stage of listing.	"We inform and seek early comment from local authorities about proposed New Zealand Heritage List entries and review in their areas of jurisdiction and supplies local authorities with details of New Zealand Heritage List entries, proposals and reviews on an annual and quarterly basis, together with sufficient explanation to promote an understanding of the purposes and effects of the New Zealand Heritage List."	by policies under Objective 9 (particularly 9.1)	
4	Y	I support the statement that 'We may advocate for the retention of heritage values for the List entries in both statutory and non-statutory processes'	None	Noted	No change required
4.2 and 4.3	Y with changes	Suggest rewording Policy 4.2 and 4.3 to remove the word "we".	Remove the word "we" from Policy 4.2 and 4.3.	Noted	All policies are being revised to remove the word 'we' in favour of 'HNZPT'
4	Y with changes	The determination of entries onto the List is informative to local authorities when revaluating the specific heritage item list as required under the RMA within their respective district plans.	Statement	Noted	No change required
4	Y with changes	There is an assumption underlying policies 4.1-3 that the HNZPT List will include all significant heritage buildings that may be subject to RMA processes. However nationally and even internationally significant heritage buildings, for example, the Christchurch Town Hall, are listed by local authorities but not by HNZPT.	An additional policy is needed to address the need for HNZPT to liaise with local authorities to ensure that the HNZPT List is regularly updated to include the most significant heritage buildings and sites included in district plan heritage lists. Regular and systematic review of the List is essential if it is to aspire to be 'authoritative'.	HNZPT notes that this policy provides information to territorial authorities and we prioritise places for entry using criteria (Risk/Alignment/ Impact/ Significance/ Efficiency). HNZPT may also include places already identified by	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
				territorial authorities on the List.	
4.1-4.3	Y	This Policy recognises and supports efforts that recognise the relationship between the RMA and other legislation. This helps promote an efficient and streamlined approach to the consenting process	None	Noted	No change required
4	Y	Supports the statement that ‘We may advocate for the retention of heritage values for the List entries in both statutory and non-statutory processes’	None	Noted	No change required
4	Y with changes	“We may advocate for the retention of heritage values for New Zealand Heritage List entries in both statutory and non-statutory processes”. Given that the purpose of the HNZPT Act 2014 is “to promote the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand”, while there may be discretion to advocate for retention of identified heritage values, there is wide expectation that HNZPT will meaningfully engage in relevant processes to advocate against loss of such identified heritage values.	If HNZPT elects as a matter of policy not to advocate in particular cases, it should help facilitate the involvement of other communities of interest in relevant processes. It could, for example, usefully notify local heritage groups interested in Category II items that are the subject of consent applications within their locality if HNZPT elects not to advocate on behalf of those List items.	Outside the scope of this policy, refer to Advocacy policy document	

Objective 5: Relationship with the Resource Management Act 1991

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
5	Y	City Councils continue to offer the owners of houses or buildings which have a heritage listing, some financial assistance and advice, when the owners of listed buildings are intending to renovate the building. So that the building can be restored appropriately with a view to preserving and retaining the special features of the	None	Noted. HNZPT administers the National Heritage Preservation Incentive Fund to assist conservation work at	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		building for future generations to see and appreciate.		places on the List. Refer to the Advocacy Policy.	
5	Y with changes	With respect to Objective 5, historical and cultural heritage entered on the List is conserved for the future, we submit that this Objective would be better addressed by including by default listed items in the relevant statutory processes, subject to the relevant local authority having the right of objection, thus superseding the need for much of the advocacy included in Policies 5.1-5.3.	Objective 5 would be better addressed by including by default listed items in the relevant statutory processes, subject to the relevant local authority having the right of objection, thus superseding the need for much of the advocacy included in Policies 5.1-5.3	The HNZPTA does not provide for this. This would also require a change to the RMA.	No change required
5	Y with changes	The property rights of owners are in general understated or over-assumed. Listing a place under the powers of the HNZPTA is a lawful declaration that the place is deemed to have a public amenity benefit. The principle of "public good" warrants public financial recognition of such public amenity benefit rather than just public advocacy while leaving the financial risk as entirely a private one. The Public Works Act in contrast has for very many decades compensated property owners for public good benefit.	Thus, the statutory policies should include at the very least the potential of covenants, foregone income (remissions etc.) or investment as tools for offsetting the ownership risks of listing.	The HNZPTA does not provide for this. Listing in itself does not create positive obligations of heritage place owners	No change required
5	Y with changes	In Objective 5 there is only reference to advocacy and promotion but more is needed to ensure that the options for the present and future are safeguarded specifically funding to assist owners and councils to undertake works of conservation and protection from natural disaster for those places on the list.	Provide for funding to assist owners and councils to undertake works of conservation and protection from natural disaster for those places on the list.	Noted. HNZPT administers the National Heritage Preservation Incentive Fund to assist conservation work at places on the List. Refer to the Advocacy Policy.	No change required
5.1	Y with changes	Policy 5.1 advocates for the protection of "List entries", which seems to forget that these are places in the real world, not entries in a virtual list.	Statement	Noted.	Amended to 'protection of places on the Heritage New Zealand List/Rarangi Korero'
5.3	Y with	However, within a 10 year review cycle it is not always	It is suggested that the following	HNZPT often works with	Amended 4.3 to

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	changes	timely or appropriate for local authorities to list places of heritage value that are recently registered on the Heritage New Zealand List/Rarangi Korero in district plans.	sentence, or similar, be added in the Administration of the NZ Heritage List/Rarangi Korero general statement of policy under Policy 5.3 (page 12): "...HNZPT will work with local authorities to reduce duplication of process. "	local authorities in the preparation of their District Plan schedules. HNZPT provides listing reports to local authorities on a regular basis. This is covered by the Statutory Advocacy policy.	include collaboration with councils.
5	Y with changes	Details on the cost for land owners have not been clearly considered in the policies. This should be something that is considered and addressed as part of these policies.		The HNZPTA requires us to recognise the interests of owners, particularly with regard to advocacy; this is covered in more detail in the Statutory Advocacy policy. However, recommendations made by HNZPT should specifically consider the interests of owners.	Amended 5.4 to specifically refer to the interests of owners.
5	Y with changes	Submit that it is not always possible to conserve	Objective 5 should include the words 'where appropriate' for the future.	This is an aspirational Objective, not a Policy	No change required
5.3	Y with changes		Policy 5.3 should substitute the word 'entries' for 'proposals' for the List, to better reflect the provisions of the Act. (p.12.)	Agreed	Amended 5.3 (Now Policy No. 5.4)
5	Y with changes	[We do not] exist just to conserve its heritage but rather to build upon and adapt it to serve each new generation. This includes maintenance, restoration and modification.	Statement	Agreed. The best conservation method is continued, appropriate use. This is covered by the Advocacy policy	No change required
5.2	Y with	Suggest rewording Policy 5.2 to remove the word "we".	Amend Policy 5.2 to remove	Noted	Amended.

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	changes		word "we".		
5	Y with changes	...there is a widespread public misconception that inclusion on the NZ Heritage list provides protection for heritage...	...it is important that HNZPT educates the public about the limitations of the list for the purposes of conserving heritage for the future.	Noted	Added a statement in the Introduction that inclusion in the List has no direct regulatory consequences.
5	Y with changes	Consider that the wording of this Objective is inflexible and may not always be achievable in the particular circumstances.	Amend as follows: Objective 5: Historical and cultural heritage entered onto the New Zealand Heritage List is conserved for the future where practicable	This is an aspirational objective	No change required
5	Y with changes	This is a very strong objective as it is not always possible to conserve.	Amend as follows: Historical and cultural heritage entered on the New Zealand Heritage List is conserved where appropriate for the future.	This is an aspirational objective	No change required
5.3	Y with changes	Amendments better reflect the provisions in the HNZPTA, HNZPT can make recommendations that a local authority should take into account only for entries on the List (section 74).	Amend part of as follows: For New Zealand List proposals entries, HNZPT may...	Agreed	Amend to 5.3 (Now Policy No. 5.4)

Objective 6: Scope of the New Zealand Heritage List

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
6.2	Y with changes	In Policy 6.2 the word “historiography” is probably not a term that the layman would easily understand. Is there a better word, or can an explanation be provided?	Replace ‘historiography’ in 6.2.	Agree	Deleted 'historiography'
6.2	Y with changes	Policy 6.2 other peoples also see the past and present as a continuum.	Statement	6.2(c) refers particularly to iwi and hapu, not exclusively.	No change required
6.2(c)	N	6.2(c) makes no sense.	Clarification	Noted	Amended 6.2(c)
6.2	Y with changes	Not opposed to including a variety of themes and ideas about heritage on the list. However, considering HNZPT is against including a minimum age and has justified this extensively in policy 6.2, it would be advantageous if the policy did give some indication of ideas and themes that may be considered when deciding whether or not a property should be on the list.	Policy 6.2 should give some indication of ideas and themes that may be considered when deciding whether or not a property should be on the list.	The HNZPTA does not provide for themes, but does provide broad criteria to which each proposal must be assessed, on a case by case basis.	No change required
6.1	Y with changes	Currently the intention of this policy (to include additional types of heritage) is not fulfilled as it constrains types of heritage to what is on the list already. “HNZPT does not exclude additional examples of types of heritage not already represented on the List from potential entry, recognising that heritage of importance in a particular location or to a particular community, iwi or hapū is not devalued by the entry of heritage located elsewhere.”	Revise policy.	Noted	Amended 6.1 to provide clarity.
6.2	Y with changes	This policy broadens what is considered to be heritage, rather than focusing on justifying, not utilising, a minimum age.	This policy should be reframed to exemplify some characteristics/themes which are useful when identifying what should be on heritage list.	Noted, however heritage is the things we want to keep for future generations, not merely 'old' things.	No change required.
6.3	Y with changes	Part 3 Subpart 2 of the HNZPTA provides processes for protecting archaeological sites whether or not they are listed on the New Zealand Heritage List/Rārangī Kōrero. It is therefore unnecessary to provide another	Remove Policy 6.3 in its entirety	The archaeological sections of the HNZPTA provide for the modification or	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		mechanism to protect archaeological sites, particularly when it is not clear what it is meant by “the provisions of this policy can be satisfied”.		destruction of sites, not recognition. The HNZPTA doesn't exclude archaeological sites from entry onto the List	
6.5	Y with changes	Allowing other agencies to conduct assessment studies should be allowed but there should be greater specificity of who these agencies are.	Applications for entry on the List are identified and assessed in the context of national, regional and local thematic studies and heritage identification and assessment studies, where such studies exist or are undertaken by us. or other agencies.	HNZPT uses heritage studies to identify and assess applications for entry on the List. These studies may be thematic, typological, national, regional, or local and may be prepared by us or other agencies. HNZPT has the expertise to assess the quality of reports produced by other agencies.	No change required
6	Y	In particular, supportive of the approach HNZPT is proposing for the scope of the heritage list as set out in Objective 6, especially the adoption of no minimum age for entries and recognising that age should not be the resounding criteria to warrant protection.	None	Noted	No change required
6.1	Y	The inclusive nature of the list and the stated willingness to list further examples of types of heritage that are already on the list is positive and consistent with commitment to identifying significant modern heritage buildings and structures	None	Noted	No change required
6.2	Y	Support Policy 6.2 in which it is stated there is no minimum age for listing, especially in view of the need to identify modern heritage while it still retains, if indeed it does, a high level of integrity.	None	Noted	Amended 6.2 c) to: ‘the passage of time may be necessary for an enduring association with the place to be formed and heritage values to become

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
					apparent'.
6.5	Y	Policy 6.5 usefully signals the value of thematic studies to aid in assessing significance and is an approach that the submitter also takes.	None	Noted	No change required
6.2(b)	Y with changes	It is not clear what the term 'historiography' means in the context of this policy. Historiography is commonly understood as being the study of the writing of history.	Perhaps the phrase should be revised to read 'inconsistent with contemporary conservation philosophy and historical practice....' Some revision of this sentence is called for to clarify its meaning.	Agree	delete 'historiography'
6.1	Y	Policies 1.1 and 6.1 recognise locally significant heritage and will not exclude further examples of heritage already listed. This is positive for local authorities and communities. Anyone can propose an entry and owners are informed but their permission is not a requirement for advancing a nomination through the listing process. However, justification has to be made in an application.	None	Noted	No change required
6.4	Y with changes	Only properties that make a contribution to the historical and cultural heritage of New Zealand should be owned by Heritage New Zealand. All properties in its portfolio therefore should be entered on the List rather than simply considered for entry on the List.	If properties are of insufficient heritage or cultural value to justify entering on the List then they should be disposed of.	The relief sought is relevant to the Properties Policy.	No change required
6	Y with changes	For some New Zealanders (both those born and bred, and immigrants alike), items on the heritage list may not represent their heritage. Further, the paragraph as worded suggests that each locality must have an item included on the List. However, some localities, such as new settlements or townships, may not have heritage items that warrant inclusion on the List.	Amend as follows: As the New Zealand Heritage List represents the heritage of all New Zealanders, it should include historical and cultural heritage of national, regional and local significance to people and communities in all localities across New Zealand.	Noted	Amend wording to ensure it is not interpreted in the way the submitter describes.

Objective 7: The application process

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
7.5	Y with changes	Policy 7.5 notes the potential for cases where the applicant is not the owner, requiring HNZPT upon receipt of the application to “inform the owner that an application has been received for their property as soon as practicable”.	In cases where the applicant is not the owner, HNZPT informs the owner that an application has been received for their property upon receipt as soon as practicable.	In order to meaningfully inform owner(s), HNZPT may need to do initial research upon the receipt of an application.	No change required
7	Y	Fully support Objective 7 where any person can make an application to nominate an historic place (etc.) to the NZ Heritage List	None	Noted	No change required
7.13	Y with changes	Support policy 7.13 in general, but also proposed that it is amended so that applications for the List are not progressed if resource consents are held for substantial physical change to the place, in order to avoid abortive costs.	Amend to: “Applications should not be progressed where proposals for entry on the New Zealand Heritage List for any property are undergoing, or subject to resource consent/s or certificates of compliance for, substantial physical change at the time of application which could impact on an assessment of significance.”	The focus of this policy is on physical change, not whether a Resource consent has been signed off or not.	No change required
7.10	Y with changes	Support the process described in section 7.10 to prioritise applications. However, we recommend the wording be amended to reflect that at times HNZPT may not receive more applications than it can process.	Amend 7.10 to: When HNZPT receives more applications than can be processed annually, it will undertake a preliminary assessment...	This policy is not dependant on the number of applications received in any one year and should be rephrased.	Amended to 7.10 to clarify policy intent.
7.14	Y with changes	We note and support HNZPT advising applicants and owners as to whether their application has been prioritised, if it has been accepted for progression. We are unclear what happens to proposals that are not accepted for progression.	We suggest a process diagram be included in the Policy as this may make the processing, prioritising, adopting, rejecting and advising of applicants/owner stages much clearer.	A diagram could be considered as part of a guideline document to these processes, but is not necessary for a policy document.	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
7.5, 7.6	Y with changes	If the third party applicant was always required to approach the owner prior to making heritage application to gain knowledge of the site or building concerned then some applications may not be followed through, thus reducing administration and assessment workload...Requiring the applicant to approach the owner would seem reasonable given the potential use limitations and cost implications when a building is heritage listed. The owner should be given the right to comment point-by-point on the specific views and justifications of the applicant.	Review this policy position (together with 7.6 and 11.2(c)) with a view to requiring all applicants that are not the owner to consult with the owner. The application needs to facilitate transparency of views and include the owner's support or opposition and the owner's justification for their position. A secondary policy would then be that HNZPT communicates directly with the owner to obtain directly information pertinent for its deliberations.	The HNZPTA does not require applicants to consult with owners. HNZPT always contacts owners as soon as practicable of a nomination and consults them during assessment.	No change required
7.5	Y with changes	Consider that heritage listing should be a meaningful consultative process. If an application is received, the owner should not be merely informed, but adequately consulted before an application is progressed.	Policy 7.5 should be amended to read, "Where the applicant is not the owner, the application process must provide for the involvement of the owner."	The HNZPTA does not require applicants to consult with owners. HNZPT always contacts owners as soon as practicable of a nomination and consults them during assessment.	No change required
7	Y	The draft application process is also key in ensuring that the protection of heritage is both an open and inclusive process; and that it is the heritage, and not ownership, that is the key determinant of whether an item is protected or not. The submitter is fully supportive of this approach, whilst ensuring that the owner's rights are considered and they are fully engaged with the process. In particular, policy 7.12 that sets out when an item should not be listed. This provides clear guidelines and parameters for the nominee, owners, public interest and Heritage New Zealand.	None	Noted	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
7	Y with changes	External applications alone will not ensure that the List is 'authoritative, respected and comprehensive' [Objective 4] and has sufficient scope [Objective 6].	While the ability of other parties to submit applications for entry to the list is supported by [us], the section headed 'The Application Policy' needs to clearly state that HNZPT will also submit applications each year so that the list can develop in a logical and rigorous manner.	Agreed	Amend policy 7.1 for clarity
7.1	Y	Support Policy 7.1, in which it is stated that anyone can propose entry to the list and that owners are informed but that their permission is not a requirement for advancing a nomination through the listing process. This may be particularly critical in listing significant modern movement residential buildings.	None	Noted	No change required
7.5	Y with changes	Support the inclusion of the landowner in the application process, however it considers that the landowner needs to be actively involved in the dialogue surrounding this process.	Retain as drafted, but amend Policy 7.5 as follows: In cases where the applicant is not the owner, HNZPT informed the owner that an application has been received for their property as soon as practicable- and takes into consideration any feedback received from the owner.	Noted	Amended policy 9.4 to take feedback into account (note new policy number is 9.6)
7.14	Y	Support the notification of owners of the outcome of any assessment process.	None	Noted	No change required
7.10-7.11	Y with changes	Efficiency is an objective yet applications can take over a year to be processed. We suggest that preliminary assessment and prioritisation should occur more often than annually.	It would be more efficient if HNZPT could work with hapū to list a group of sites rather than being assessed and prioritised individually.	Increasing the number of preliminary assessments every year is an operational matter. HNZPT often groups assessments of sites in a region for efficiency.	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
7.11	Y with changes	Wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add 'mana whenua views' to the list of factors taken into account	Views are taken into account when an application is progressed, not when an application is received. This is covered under policies in Objective 8	No change required
7	Y with changes	To enable HNZPT to carry out its statutory functions, s.67(1) of the HNZPTA states that: "Heritage New Zealand Pouhere Taonga or any other person may apply to Heritage New Zealand Pouhere Taonga to enter a historic place or historic area on the New Zealand Heritage List/Rārangi Kōrero".	The wording from the Act should be adopted in the policy to clarify that besides property owners or members of the public, HNZPT generates its own applications for entries onto the List.	Agreed	Amended Policy 7.1
7.11	Y with changes	Policy 7.11 identifies the desirability of generating agreement and support in prioritisation of applications. Heritage values exist independent of an owner's agreement as to the existence of those values.	Heritage New Zealand's prioritisation of applications should not give undue weight to an owner's agreement to any application that would result in risk to significant heritage fabric.	Policy 7.11 outlines HNZPT's approach to applications. All criteria are considered.	No change required
7.13	Y with changes	Plans for heritage places evolve and change, and improved outcomes are often achievable through well-informed discussion and negotiation.	The threshold for "substantial physical change" therefore should be consented change and not merely planned change.	HNZPT are focused on actual changes, not planned ones. Therefore there is no need to refer to consented change, as some changes may not require consents.	No change required
7.5	Y with changes	If the owner is not the applicant, it is appropriate that the owner is consulted before a decision to progress the application is made.	Amend as follows: ...that an application has been received for their property as soon as practicable, and consults with the owner before the application is progressed.	HNZPT always contacts owners upon receipt of a nomination, when an application is prioritised and consults during assessment. This is covered by policies 7.5	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
				& 9.3	
7.12	Y with changes	This [change sought] is consistent with, and reinforces, the other policies and the objective in section 7 of the Policy.	Insert new subparagraph (e) as follows: e) the owner has been consulted.	Agree	Added 7.12(e)
7.14	Y with changes	If the owner is not the applicant, it is appropriate that the owner is involved in the process and adequately consulted.	Insert New Policy [called 7.14, then renumber the current 7.14 to 7.15] as follows: Where the applicant is not the owner, the application process must provide for the involvement of the owner.	HNZPT always contacts owners upon receipt of a nomination, when an application is prioritised and consults during assessment. This is covered by policies 7.5 & 9.3	No change required

Objective 8: Assessment of proposals

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
8	Y with changes	We note there is no comprehensive description of Category 1 & 2 and no indication what is “significance” or meaning of “special or outstanding”. All heritage is intrinsically local so if a community has a very “special or outstanding” cultural and historical attachment to a heritage building would it qualify as Category 1? If not – why not?	Insert a comprehensive set of definition of the Categories 1 & 2	The policy restates the HNZPTA. However, guidelines will be created to assist clarification.	No change required
8	Y	Fully support all the proposals listed under Policies - Objective 8	None	Noted	No change required
8.8	Y with changes	The policy in relation to the List needs to include recognition that our sites are in some cases of international significance.	Recognise that some sites are in some cases of international significance.	Agree that some sites have international significance. 8.8 simply states that proposals must meet the criteria in the Act to be eligible for entry on the List.	Amended Policy 1.1 to include 'internationally'

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
8	Y with changes	The use of the term “significance or value” in the first bullet point of paragraph 1 of the preamble seems redundant, since significance assessment are based on values assessments.	Revision for clarification	Agree, however this is wording direct from the HNZPTA.	No change required
8.2	Y with changes	Policy 8.2, what is meant by the “merits” of a proposal?	Request for clarification	By ‘merits’ we simply mean the dictionary meaning. The intent of the policy is that look at each proposal on a case by case supporting another policy under the scope of the List in that more than one type of heritage may be represented on the List.	No change required
8.2	Y with changes	Policy 8.2, the two parts of the policy don’t seem to go together, they should be separated.	Revision for clarification	Noted	Separated into two policies 8.2 and 8.3.
8.7	N	Policy 8.7 makes no sense	Request for clarification	Policies 8.7, 8.12, 8.14 & 8.22 (now nos. 8.9, 8.14, 8.16 & 8.24) set out guidance to the appropriate part of the List a proposal may fit. While 'wordy' they do make sense.	Some amendments made to increase clarity.
8.11	Y with changes	Policy 8.11 makes a tautological argument	Revision for clarification	Noted	Revised policy - now 8.13. Also clarified point in policy 8.5.
8.12	Y with changes	In Policy 8.12 it is not clear why the List entry needs to be contiguous. This effectively rules out interrelated historic places that are non-contiguous, e.g., the Tamaki Tupuna Maunga, which could be a single entry on the list	That List entries not be contiguous.	The HNZPTA does not allow for serial Listings. Therefore a contiguous area is required for all entries.	No change required
8.15	Y with changes	Policy 8.15 there is no need to repeat the HNZPTA, this is policy, which should develop the Act.	Revision for clarification	This policy is included for completeness and to	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
				aid understanding	
8.19	N	Policy 8.19 makes no sense	Request for clarification	Noted.	Amended policy to aid clarity.
8.16	Y with changes	This is an unnecessary policy considering both the Act at section 66(5) and policy 8.15 indicate it is necessary for all three criteria need to be met as the word 'and' is used.	Policy 8.16 should be removed in its entirety	Noted	Consider merging the two policies
8.18	Y with changes	Suggest rewording Policy 8.18 to remove the word "we"	Suggest rewording Policy 8.18 to remove the word "we"	Agree	Reword policies across the document.
8.27	Y with changes	Suggest use of commas as follows,	The Māori Heritage Council will have regard to public use of, and public access to, water bodies or land comprising streets or roadways proposed for entry on the List, as wāhi tapu or wāhi tapu areas.	Agree	Reworded 8.27 (Now 8.29)
8.7	Y with changes	Policy 8.7 recognises that a historic place 'is comprised of a single, integrated whole' but it would be prudent to include a policy that specifically excludes the identification of individual parts of a building as was done in the past in the case of the Canterbury Museum.	The identification of the relative heritage significance of individual parts of an historic place should be undertaken in a conservation plan, not through listing. It is also important, in recognising that some of our most significant heritage buildings have been added to over many decades, that the listing of a place is subject to a single category.	Noted	No change required
8	Y	Support this Objective as it provides certainty to landowners and other interested parties.	None	Noted	No change required
8.1	Y with changes	It would be helpful if the guidelines and application form for requests to list wāhi tīpuna, wāhi tapu and wāhi tapu areas was on the website. The guidelines on the website seem to apply to historic buildings instead.	The guidelines and application form for requests to list wāhi tīpuna, wāhi tapu and wāhi tapu areas should be available from the website.	Noted. The application and guidelines for wāhi tapu, wāhi tapu areas and wāhi tupuna are referred to on the	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
				HNZPT website as being available from the Registrar. This is to allow for a conversation to be had, because of the special nature of these places.	
8.24 & 8.26	Y with changes	The policies 8.24 and 8.26 concerning wāhi tapu and what can be included is confusing, should be clarified and may benefit from some explanation.	Request for clarification	Agreed	Revision to policies made to aid clarity.
8.1	Y with changes	Policy 8.14 states: "HNZPT maintains guidelines for the entry of historic places, historic areas, wāhi tūpuna, wāhi tapu, and wāhi tapu areas on the New Zealand Heritage List". [submitter probably meant to quote '8.14', but wrote the text from '8.1']	It is assumed that, as a matter of process, those decisions are made by the Board of HNZPT upon the recommendation of the Māori Heritage Council.	Decisions are made by the Maori Heritage Council in the case of wāhi tapu, wāhi tapu areas and wāhi tupuna, and by the Board in the case of historic places and historic areas	No change required
8.7	Y with changes	While curtilage is used in the HNZPTA, 'grounds' is more user friendly for people referring to the policy, and more people know what it means. It would be more appropriate to use grounds in the policy and have a footnote which references curtilage and cross-refers to the definition in the glossary.	Amend as follows: ...including, where appropriate, its curtilage grounds or setting if necessary...	While 'grounds' may be an appropriate term for churches, 'curtilage' is more widely applicable to other types of places.	Heritage definition of curtilage added to the Glossary section
8.24	Y with changes	Grammatical amendment – it seems like a word is missing	Amend line 1 as follows: ...the New Zealand Heritage List should not include residential sites or dwelling places...	Agreed	Revision to Policy made

Objective 9: Consultation

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
9	N	In 2013 the submitter put the building on the market, as they had seriously outgrown it. The Council CV was \$1.57 million, the highest offer received was \$800,000 due to the fact it is Grade 1. You should all be utterly ashamed of yourselves for not disclosing to owners of heritage buildings what really happens to them when you get put your stamp on it.	Provide more guidance on what listing means.	Policies 9.1 & 9.3 (Now 9.1 & 9.4) give the opportunity for all interested parties to make written submissions and undertake consultation with interested parties. Further, Policy 12.5 recognises that decisions may have consequences for owners. When a place is proposed for listing HNZPT is upfront with owners about the implications of entry on the List.	No change required
9.4	Y with changes	Our [organisation] is not just any other “agency” with an interest in heritage identification.	Former branch committees should be included to a greater extent than other local heritage groups	Noted.	New policy 1.6 added
9.3	Y with changes	Support in part Policy 9.3 as it relates to consultation during the consideration of an item for listing. It notes that owners (and other parties) will be consulted at various stages “as appropriate to the circumstances”. The stages include receipt of the application, prior to public notification, prior to making a recommendation to local or regional councils, following independent assessment of the proposal, and prior to deciding whether to confirming entry onto the list. However, it is appropriate for the owner of a site	Retain Policy 9.3 but amend as follows: HNZPT consults with owners at each of the following stages and with, iwi and hapū, and others having an interest at the following stages, as appropriate to the circumstances: a)...[as before] b)...[as before] c)...[as before] d)...[as before] e)...[as before]	Agree	Revised for clarity

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		subject to an application to be involved during each of the above stages given their direct interest. Consultation with other listed parties (iwi, hapu and others having an interest) should remain with the as appropriate status.			
General	Y	[We] support objective 9	None	Noted	No change required
General	Y with changes	There is a lot of process included in this section and the next two that probably shouldn't be there. This is a General Policy document that should be setting high level policies. The process material should be included in guidelines.	Statement	Noted.	Reviewed policies to ensure they are not overly process focussed.
General	Y with changes	...greater recognition and certainty needs to be given to property owners when identifying properties which are to be included on the list. Moreover, believe that it is unnecessary to just obtain the opinion of any individual.	Opinions should instead be obtained and sought from expert and specialist in these fields only and this should be defined in the definitions as to who is eligible.	Agree	Policy 9.5 altered to refer to consultation rather than opinions and added a new 9.6 policy regarding feedback
9.4	Y with changes	Greater specificity of who is an agency/individual with an interest in heritage identification and assessment is needed.	Landowners are consulted as part of the identification process and their views are taken into account prior to the item being listed.	Agree	Policy 9.5 altered to refer to consultation rather than opinions and added a new 9.6 policy regarding feedback
9	Y with changes	Heritage listing of church properties can lead to imposing requirements without due regard to the owners' ability to fund, or modern worship needs.	Statement	Listing doesn't create regulatory requirements. Regulatory requirements arise from scheduling under a district plan; this is covered by the RMA.	No change required
9	Y	Support this objective and policies and considers that consultation and early input is key to an efficient and streamlined approach. It helps maintain positive relationships between parties and helps avoid ongoing	Support	Noted	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		disputes.			
9.3	Y with changes	...wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	Amend opening statement to: HNZPT consults with those having an interest...circumstances, always giving particular regard to the views of owners and of iwi/hapu: ..."	HNZPT adopts a case by case approach to consultation depending on the nature of the heritage place.	No change required
9.2	Y with changes	Policy 9.2 states: "HNZPT will consider entry by agreement with the owners and any registered interests in each case, but if there are several owners or registered interests, or if the New Zealand Heritage List entry proposal is of particular interest to the public and it would be of benefit to notify, then public notification will be considered".	Explanation could be usefully provided as to the broad principles applied by HNZPT in assessing whether or not there is a "particular interest to the public".	Noted. It is difficult to define 'particular interest to the public' succinctly.	No change required
9	Y with changes	Seek that the Policy is amended to better provide for consultation with the owner, in the event that a party other than the owner makes an application for a site to be entered on the List. It would also be appropriate for HNZPT to keep the owner of a heritage building informed of all communications with third parties in relation heritage buildings.	Amend to better provide for consultation with the owner, in the event that a party other than the owner makes an application for a site to be entered on the List. Keep the owner of a heritage building informed of all communications with third parties in relation heritage buildings.	HNZPT fields a large number of calls from people about places for a variety of reasons. It would not be efficient for us to contact the owners of sites about these communications in all cases. HNZPT uses its discretion and contacts owners when it is deemed important to do so. Policy 7.5 insures that we notify owners of any nomination we receive for their property and 9.4 states when we notify owners during the listing process.	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
9.1	Y with changes	Under the HNZPTA, HNZPT must follow the process as set out in the Act, and not merely a process consistent with it.	Amend into line 2 as follows: ...HNZPT gives notice by a process consistent in accordance with the requirements of the Act...	Agree	Revised as stated
9.3	Y with changes	Amendments better reflect the provisions of the HNZPTA, see section 67(4).	Delete and insert into line 1 as follows: ...with owners, iwi and hapu, and others having an a registered interest at the following stages...	Agree	Revised this policy – now 9.4.
9.4	Y with changes		Amend last word as follows: ...heritage identification and assessment is sought whenever possible appropriate.	Agree	Revised this policy- now 9.5.

Objective 10: Consultation

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
10.3 and 10.5	Y with changes		Suggest rewording Policy 10.3 and 10.5 to remove the word “we”.	Noted	Revised throughout document.
10.1 & 10.4	Y with changes	Wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	10.1 add: “...having regard to mana whenua views and to tikanga a iwi” 10.4 add: HNZPT “gives notice to, consults with, and does not override the views of any holders...”	These policies relate to consultation, where we take all views into account. Policies 2.3, 2.4 & 10.2 cover consultation with iwi and hapu groups. All HNZPT staff are given guidance to give regard to tikanga.	No change required

Objective 11: Decision making

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
11.2	Y	Support Policy 11.2 in that it requires evidence of consultation with the owner(s) of land affected and their views expressed. This ensures the owner(s) views are considered as part of the decision process.	None	Noted	No change required
11	Y	Support Objective 11	None	Noted	No change required
11	Y with changes	Would like to see a clear policy statement on the need for documentation of the list to include high quality photographs.	High quality photographs should be included in the list of documentation for listing.	Availability of resources impacts upon our ability to document places on the List to the highest standards. The policy is expected to last for 10 years and the standard may change with changes in technology.	11.3(c) (Now Policy No. 11.4(b)) amended to include 'high quality of photos'
11.3	Y with changes	The list that follows in policy 11.3 does not expressly consider the known history of refurbishments, modifications, alterations, changes in use and site movements and changes to the surrounding environment. Despite the generality of subclause (a), this omission should be addressed	Insert a new subclause to policy 11.3 that covers the known history of refurbishments, modifications, alterations, changes in use and site movements and changes to the surrounding environment.	Agreed	Included reference to physical description
General	Y with changes	In Objective 11, clear guidelines need to be prepared to ensure that information supporting List decisions is sufficient and appropriate to the circumstances of the proposed entry.	Prepare clear guidelines to ensure that information supporting List decisions is sufficient and appropriate to the circumstances of the proposed entry.	Policies under Objective 11 outline how this objective is to be reached	No change required
11.6	Y with changes	Although support this policy, there should be greater specificity about what "appropriate comparative analysis" entails.	There should be greater specificity about what "appropriate comparative analysis" entails.	Noted	Comparative analysis briefly explained see 11.9.
11.1-11.3	Y	I support Objective 11. With respect to the policies 11.1, 11.2 (a) and 11.3 where the wording refers to	None	Noted	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		'sufficient' evidence			
11.2c	Y with changes	wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: "...consultation with the owner(s) and mana whenua of the land affected..."	Noted	Amended policy 11.2 c (Now Policy No. 11.3c) includes evidence of consultation with the owner(s) of the land and relevant iwi and hapu groups as well as others affected by the proposal and states the views expressed
11.3d	Y with changes	wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: "... the account relies, with specific reference to mana whenua views"	Noted. All sources are referenced. If a reference has come from a mana whenua source, this would be noted.	No change required
11.8	Y with changes	wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	amend: "...includes sufficient evidence of support by the appropriate..."	Noted. Views of mana whenua will be considered and HNZPT require evidence of that consultation before making a decision.	No change required

Objective 12: Decision making

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
12.5	Y	Policy 12.5 acknowledges that decisions have consequences for owners and that decisions should therefore be consistent with the "general principles of administrative law and natural justice".	None	Noted	No change required
12.7	Y	Policy 12.7 notes that decisions take into account issues identified during the consultation process.	None	Noted	No change required
12	Y with	The overall decision as to whether or not a historic	The overall decision as to	Policy 12.7 undertakes	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	changes	place or area is of Māori interest should be made alongside iwi and hapū, and not be left to the Māori Heritage Council or its delegated authority to determine alone.	whether or not a historic place or area is of Māori interest should be made alongside iwi and hapū, and not be left to the Māori Heritage Council or its delegated authority to determine alone.	to take into account issues raised...during the consultation process when making decisions on List entries. (Refer to Objective 2, particularly 2.2 & 2.3)	
12	Y with changes	Consider that decisions regarding the preservation of heritage building are sometimes driven by enthusiasts with no consideration as to the financial consequences to the owner. This may lead to a sense of resentment from those associated with the building that may in turn adversely affect the care and maintenance of a building.	Statement	Noted. This is outside the scope of the policy	No change required
12.1	Y with changes	...wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add a provision: Where mana whenua have expressed an interest in another historic place or area [i.e., other than wahi tupuna, etc.], the Board and the Maori Heritage Council make the decision together using consensus decision-making.	Noted. The Maori Heritage Council has a mandate to make decisions on wāhi tapu places/areas and wāhi tupuna as derived from the HNZPTA. The Board makes decisions on Historic Places/Areas, but the Maori Heritage Council is consulted if a Historic Place/Area is of interest to Maori. (See policy 12.2)	No change required
12.1	Y with changes	Policy 12.11 addresses decisions on List proposals. Informing the public of decisions "by way of notice" should be extended to encompass such advice on HNZPT's website.	Policy 12.11 addresses decisions on List proposals. Informing the public of decisions "by way of notice" should be extended to encompass such advice on HNZPT's website.	Agree	Revision made to 12.11
12.6	Y with changes	Amendments better reflect the provisions of the Act.	Delete part as follows: ...with regard to the particular	Decisions take into account all matters	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
			merits of the case, and are fair and reasonable. in the public interest.	raised during the process. This policy seeks to ensure that all decisions are considered by the public to be reasonable.	

Objective 13: Maintenance of the New Zealand Heritage List

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
13.3	Y with changes	That an inspection schedule be established as part of the maintenance of the list to include all listed items. That this be actively implemented on a regular basis (five yearly reviews) and not just before or after there are major changes to a feature.	That an inspection schedule be established as part of the maintenance of the list to include all listed items, actively implemented on a regular basis (five yearly reviews) and not just before or after there are major changes to a feature.	With 7,000 places on the List we are unable to commit to regular inspections of Heritage Places and therefore focus our attention on places where substantial change is proposed.	No change required
General	Y with changes	There is a need for a specific policy on regular review of the list. The policy document recognises the need to update the list to take into account changes to buildings or sites on the list but [we] believe there is a need to build in a process of planned review and augmentation of the list based on a developing understanding of our history to ensure that the list is relevant and representative. The policy as expressed seems reactive rather than proactive, relying on others to promote the addition of buildings or sites to the list. This would inevitably be ad hoc.	Add policy	With 7,000 places on the List we are unable to commit to regular inspections of Heritage Places and therefore focus our attention on places where substantial change is proposed.	No change required
General	Y with changes	A policy is required here that sets out a process of internal review to ensure that all listings are supported by the standard of information required for new listings.	Add policy	This is covered by policy 13.2	Revised policy for clarity (now 13.1).

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
13.2, 13.4 and 13.5	Y with changes	Suggest re-wording to remove the word "we"	Suggest re-wording to remove the word "we"	Noted	Changed throughout document.
13.4	Y	[We] support the explicit recognition of the role of landowners and the impact that owning heritage sites and places can have.	None	Noted	No change required
13	Y with changes	This Objective appropriately recognises that HNZPT operates, maintains, and develops the List to the "highest standards achievable within available resources". The phrase "within available resources" appropriately recognises the constraints placed upon HNZPT in carrying out its duties, which may include feasibility, time, personnel, financial and practicality restraints.	This phrase should also apply to private owners of historic and cultural heritage.	Noted, but this is outside the scope of this policy document.	No change required

Objective 14: Maintenance of the New Zealand Heritage List

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
14.8	N	Does not support Policy 14.8 s.79 review to remove an entry from the NZ Heritage List. Our tuupuna still exist on the lands in their metaphysical form and still communicate with mana whenua through wairua when mana whenua are given the opportunity to reconnect to the land and the koorero of our tuupuna. Whilst their physical footprint may have disappeared their wairua will/may remain. To totally remove that 'X' from a register that is meant to retain an historical record of NZ effectively denies the existence of our tuupuna in that time and space.	That the existence of tupuna is still recognised after a place is physically demolished or removed	Agreed. This issue is known to us and addressed in operational procedures. We take a values based approach to reviews and recognise intangible values and only remove places from the List where there are no longer sufficient heritage values for the plan to remain on the List.	No change required
14.7	Y with changes	We note local authorities and regional councils have significant interest in historic places as they have the legislative powers under the Resource Management Act	We suggest this should be reflected by specifically mentioning them in the list of	Noted	Reworded policy to include specific reference to the

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		1991 to protect Heritage List items.	important stakeholders, rather than grouping them in the catch-all of “others having an interest”. We recommend the wording in section 14.7 be amended to this effect.		territorial authority, and regional council.
14.1	Y with changes	[We] agree that entries on the Heritage List should be subject to review and removed if appropriate, particularly following a destructive event.	The policy should allow for owners to be consulted before any review is initiated.	Agree	Policy 14.1 now specifies that the owner will be contacted when a review application is received.
14.3	Y with changes	The proposed one year decision timeframe is too long...	... and should be reduced to three months.	Noted. However, the timeframe is specified by the Act.	No change required
14.5	Y with changes	The proposed one year decision timeframe is too long...	Likewise, a review once initiated should be completed within six months.	Some reviews require extensive consultation, hence the need for 12 months.	No change required
14.9	Y with changes	Remove the word 'given' (as it appears twice)	Remove the word 'given' (as it appears twice)	Agreed	Wording revised.
14.3	Y with changes	The policy 14.3 concerns applications for review of a listing.	Clarification should be provided that is consistent with the HNZPTA, as any person can make an application for review.	Noted	Reworded policy for clarity
14.1	Y with changes	wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: ...”Maori Heritage Council (in the case of ... or any other historic place or historic area of particular interest to mana whenua)...”	This distinction is specified by the HNZPTA.	No change required
14	Y with changes	[We] consider that the timeframes included in the policy are excessive, particularly as entry on the Heritage List gives rise to statutory requirements and obligations (including under the Resource Management Act 1991) and may restrict the use of the land.	Shorter timeframes will provide more certainty to owners, applicants, local authorities and directly affected persons, especially where the entry has	Some reviews require extensive consultation, hence the need for 12 months. There are no direct consequences of	No change required

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
			been demolished	List. This is covered by District Plan scheduling.	
14.1	Y with changes	The owner should be consulted before a review is initiated.	Amend as follows: ...a review of any New Zealand Heritage List entry after consulting with the owner and making such inspections and enquiries and engaging in such other consultation...	Noted	Policy 14.1 now specifies that the owner will be contacted when a review application is received.
14.3	Y with changes	It is unduly onerous for owners, occupiers and iwi and hapu to wait one year for HNZPT to decide whether to initiate a review. This timeframe should be shorter. It is also appropriate that the owner is advised of whether a review has been initiated or not.	Amend line 3 as follows: ...will decide whether or not to initiate the review within one year three months, and the applicant and owner will be advised of the outcome...	Noted. The timeframe is specified by the Act.	No change required
14.5	Y with changes	It is unduly onerous for owners, occupiers and iwi and hapu to wait one year for HNZPT to complete its decision on a review. This timeframe should be shorter.	Amend as follows: When a review is initiated under section 78 of the Act, it should be completed expeditiously and usually within one year six months from the date of initiation.	Some reviews require extensive consultation, hence the need for 12 months. There are no direct consequences of List. This is covered by District Plan scheduling	No change required
14.8	Y with changes	Under the HNZPTA, section 79 is referred to as a "removal" that HNZPT makes inquiries into, and not a review. The timeframe for HNZPT to inquire into the removal from the List of a historic place etc. that has been demolished or destroyed should be shorter. There are various statutory protections and obligations that arise from being included on the List (e.g. planning and consenting decisions under the Resource Management Act 1991). If a historic place etc. has been demolished or destroyed, it is unduly onerous for owners, occupiers, and those with a registered interest in the property, to wait up to one year for HNZPT to make a decision to	Amend line 1 and line 2 as follows: An inquiry under section 79 of the Act to remove an entry from the New Zealand Heritage List... ...should be completed as soon as possible and normally within one year three months of HNZPT receiving confirmation...	Noted. The word 'removal' is used by the HNZPTA and policy should reflect this. The work required for a Section 79 removal is not as potentially lengthy as Section 78 review, and so agree that this could be achieved in a shorter, 6 month, timeframe.	Revised policy.

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
		remove the historic place etc. from the List.			
14.9	Y with changes	Notice of removal should be given as soon as is practicable. There are various statutory protections and obligations on territorial authorities in relation to historic places etc. included on the List (e.g. planning and consenting decisions under the Resource Management Act 1991). It is also appropriate to notify the owner.	Insert into line 2 as follows: ...notice will be given as soon as is practicable to the relevant territorial authority and to the owner and other interested parties ...	Noted. Notification is usually within 2 weeks of a Board decision.	Revise policy (and 12.11) to reflect this.
14.9	Y with changes	Under the Act, section 79 is referred to as a "removal" and not a review.	Amend as follows: Section 79 reviews removal in the case of destruction or demolition.	Agreed	Revised policy as suggested.