



HERITAGE NEW ZEALAND  
POUHERE TAONGA

## Advocating for the Conservation of Historical and Cultural Heritage

Statement of General Policy for Heritage  
New Zealand Pouhere Taonga's  
Statutory Role of Advocacy

## Summary of Submissions

28 October 2015

# Contents

<b>Public consultation process</b>	<b>1</b>
<b>Overview of submissions</b>	<b>1</b>
<b>Key themes by stakeholder group</b>	<b>3</b>
<b>Submissions on introductory sections of the Policy</b>	<b>7</b>
Introduction	7
Challenges in conserving historical and cultural heritage	8
Methods of promoting the conservation of historical and cultural heritage	8
<b>Submissions on the Principles</b>	<b>9</b>
<b>Submissions on the objectives and policies</b>	<b>10</b>
Promoting the conservation of historical and cultural heritage	10
Addressing the most important issues	11
Information base for advocacy	12
Working with iwi and hapū	12
Engaging with the community and local groups	12
Working with owners	13
Engaging with the community and local heritage organisations	13
New: Working with industry, business and professional groups	13
Working with local government	13
Working with central government	15
<b>Summary of Submission Points</b>	<b>16</b>
General submissions and submissions on introductory sections	16
Principles	34
Objective 1 – Principles of valuing and conserving historical and cultural heritage	38
Objective 2 – Prioritising involvement	40
Objective 3 – Targeting protection mechanisms	48
Objective 4 – Early Input	50
Objective 5 – Sound information base	52
Objective 6 - Recognising Maori values	53
Objective 7 – Conserving Maori heritage	56
Objective 8 – Promoting engagement with historical and cultural heritage	58
Objective 9 – Community involvement	59
Objective 10 – Working with Owners	66
Objective 11 – Working with local government	73
Objective 12 – Promoting heritage protection in planning processes	74
Objective 13 – Promoting heritage protection in consenting processes	79
Objective 14 – Promoting awareness of archaeological authority requirements	83
Objective 15 – Representing historical and cultural heritage values in the development of government policy	87

## 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](http://heritage.org.nz) no later than 20 November 2015.

This document summarises submissions, and HNZPT responses to suggestions by submitters, on:

*The statutory role of advocacy conferred on HNZPT Pouhere Taonga by section 13(1)(c) and on the [Māori Heritage] Council by section 27(1)(i).* [HNZPTA, s 17(1)(b)(v)]

The other four statements of general policy consulted on address:

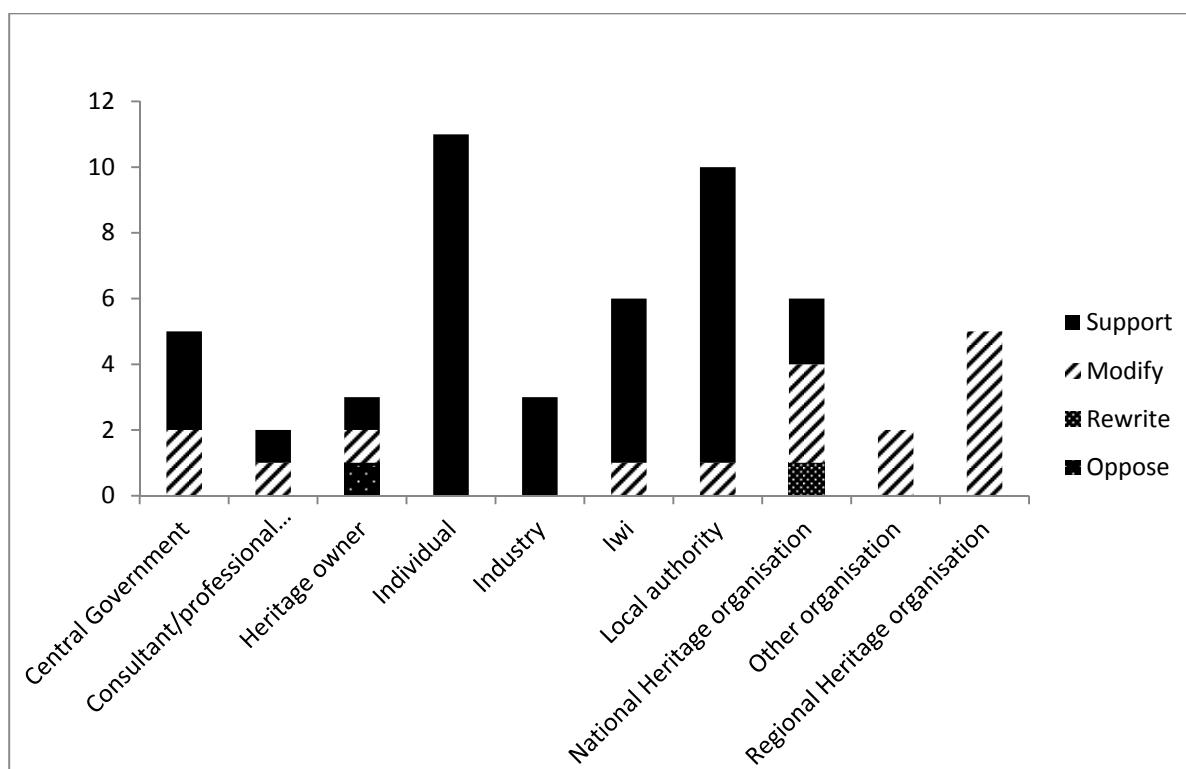
- the administration of the archaeological provisions under the HNZPTA
- the management and use of historic places owned, controlled or vested in HNZPT
- the administration of the New Zealand Heritage List/Rārangi Kōrero
- the administration of the National Historic Landmarks List/Ngā Manawhenua o Aotearoa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

## Overview of submissions

There were 71 submissions received on the five policies and 53 of the submitters made comments relevant to the draft General Statement of Policy: Statutory Advocacy (Advocacy Policy). Table 1 and Figure 1 show a breakdown of the submissions by stakeholder group and overall position. The majority of submissions were from individuals and local authorities, with one local authority submission representing the views of nine councils.

**Table 1: Breakdown of submissions by stakeholder group and position**

Stakeholder group	Oppose	Rewrite	Support if Modified	Support	Total
Central Government			2	3	5
Consultant/professional organisation			1	1	2
Heritage owner	1		1	1	3
Individual				11	11
Industry				3	3
Iwi			1	5	6
Local authority			1	9	10
National Heritage organisation		1	3	2	6
Other organisation			2		2
Regional Heritage organisation			5		5
<b>Total</b>	<b>1</b>	<b>1</b>	<b>16</b>	<b>35</b>	<b>53</b>



**Figure 1: Breakdown of submissions by stakeholder group and position**

The majority of submissions supported the policies and made suggestions for expanding or clarifying the objectives and policies, or for new policies that were within the scope of the draft Advocacy Policy. Some expressed overall support but disagreed with one or more of the objectives or policies. The key points raised by sector are spelt out below. Points related to definitions and editorial matters are not discussed here, but will be taken into account when revising the policies.

Only one submitter expressed significant opposition to aspects of the Advocacy Policy. One expressed opposition but suggested revisions that would resolve their concerns. Fifteen submitters expressed support for the Policy subject to some modifications and 35 expressed support for the Policy, with or without comments and suggestions.

The submission points are summarised below by stakeholder group and by Objective. A full list of the 303 submission points and the HNZPT response is set out in Appendices 1 to 3.

A third of the general comments expressed overall support for the advocacy policy or for all five policies. The key themes to emerge from the analysis of the submissions are:

- recognising the interests of owners and owners' property rights
- recognising the costs of owning and maintaining historic heritage
- facilitating upgrades to improve functionality of heritage places or reduce risk
- recognising the kaitiaki of iwi and hapū in all types of advocacy
- protecting archaeological sites under the RMA while avoiding overlap with the HNZPTA (the Archaeology Policy)

- the benefits of working collaboratively with a wide range of industry, business and professional groups as well as local heritage organisations and owners of multiple heritage sites
- how HNZPT will prioritise its involvement in advocating for historic heritage, and when adversarial methods might be used.

## Key themes by stakeholder group

### Central Government

Three submissions from central government expressed unqualified support for the policies, in particular the transparent statement of HNZPT objectives, providing leadership and direction and recognition of Māori cultural values. These submitters also commended HNZPT's commitment to working with stakeholders and ensuring that Māori, iwi and hapū are engaged and consulted on heritage places and matters that are likely to be relevant for them.

Two submitters expressed qualified support for the Advocacy Policy, suggesting modifications to address their concerns. While they supported the concept of engaging early with heritage owners, these submitters wanted a more collaborative relationship with owners. They were concerned that not enough was being done to take account of (rather than simply recognise) the interests of owners, in particular the additional costs of operating and maintaining heritage buildings. These submitters stressed the need to facilitate ongoing occupancy and use of heritage buildings to conserve them, if necessary adapting them to be fit for purpose. This could give rise to conflicts between the owners' needs and heritage outcomes. Another theme expressed was that heritage protection needs to be within the context of the overall balance of sustainable management and the importance of communities to be able to provide for their on-going social, economic cultural and environmental wellbeing.

### Local government

Nine submitters from the local government sector expressed support for the Advocacy Policy and some gave examples of how their plans and other mechanisms work to protect historic heritage. Several noted that while local authorities have an important role to play in heritage protection, many do not have heritage expertise and rely on the advice of HNZPT. One submitter argued for more government funded incentives rather than relying on local authorities.

Councils were strongly supportive of a collaborative approach and involvement early in the planning and consenting processes. This should be acknowledged as a two-way process. Submitters sought clarification of the extent of protection HNZPT envisages, stronger guidance and a greater emphasis on public education. One submitter noted that the planning process, in considering the economic, social and environmental aspects of heritage conservation, often exposes tensions between those who support conserving heritage and those who oppose it.

A combined submission representing the views of 9 councils suggested that any proposed changes to Part 2 of the Resource Management Act 1991 (RMA) should be assessed before the Advocacy Policy is finalised. This submitter also noted the need for guidance to ensure that there is consistent interpretation of the Advocacy Policy by HNZPT and those we work with. Several local government submitters sought clarifications and clear definitions of terms used, and proposed editorial

changes. One Council sought clarification of the relationship between local authorities and the Māori Heritage Council.

Local government submitters were supportive of objectives and policies aimed at avoiding regulatory overlap between the RMA and the HNZPTA, and ensuring alignment in consenting requirements. Local authorities have strong working relationships with iwi and hapū and would like to see iwi management plans, often referred to in regional and district plans, specifically acknowledged in the Advocacy Policy. One submitter pointed out that the intention to have all historic places that have been entered on the New Zealand Heritage List added to plan schedules needs to take account of the 10 year plan review cycle and local issues and difficulties in adding all places to the schedules, and to look at a wider range of protection mechanisms.

One submitter was supportive of the overall Advocacy Policy but proposed more extensive modifications, particularly the section on increasing awareness of the archaeological authority provisions of the HNZPTA and avoiding regulatory overlap with the RMA. This submitter's comments relate to both the Advocacy Policy and the Archaeology Policy. They are discussed in more detail below in the discussion on objectives 13 and 14. This submitter also echoed a theme common with submissions from local heritage groups, that the Advocacy Policy should be clearer that there will be occasions when the potential destruction of significant historic heritage will justify adversarial methods.

### **Consultant/professional organisation**

Several submitters from various categories suggested that the scope of our community engagement was too narrow and should include NZIA, IPENZ, the real estate, property and insurance sectors, education providers, CDEM and USAR. Architects and engineers are important advisors to heritage building owners and council, and engagement with these professional groups was seen as particularly important. A submission from a major consulting firm strongly supported the Advocacy Policy and noted the importance of HNZPT being resourced to provide advice to heritage owners and developers and the importance of the guidance series. This submitter also strongly supported recognising the interests of owners, identifying risks and protecting public safety, but sought clarity on how significance will be determined. While the balance between regulatory and non-regulatory methods was supported, the policy on identifying information gaps was not clear but having good information will be important in having effective input to resource management processes.

### **Heritage owners**

One of the submissions saw financial and technical support as important in assisting owners maintain and improve heritage properties. Another was from a heritage owner concerned at an apparent loss of market value of a property because it was entered on the HNZPT List (although this may be intended to refer to council scheduling). Another from an individual associated with an owner was concerned that as covenants are "in perpetuity", they should be based on a full assessment of values and owners and the community should have a say in placing covenants on heritage properties. A submitter managing a range of heritage properties for educational use sought acknowledgement in the policies that adaption and alteration is essential for ongoing productive use of heritage places, and that public safety must be given greater weight. This submitter also requested that the policies recognise a wider range of protective mechanisms, and that covenants should only be used for significant heritage. This submitter also suggested that the Advocacy Policy should cover incentives offered by HNZPT.

The views of organisations that own heritage, such as infrastructure providers and local authorities are discussed in the “industry” and “local authority” sections respectively.

### Individual

Ten individual submitters supported the principles, objectives and policies without qualification. Several of these submitters proposed that the Advocacy Policy should recognise iwi management plans and require that these be taken into account. Submitters requested that HNZPT take a proactive, preservation objective where sites are actively researched, in collaboration with mana whenua. They also pointed out that meaningful involvement of iwi and hapū in planning processes will require that they be adequately resourced. One individual submission addresses matters related to heritage professionals and is discussed with submissions from professional organisations.

### Industry

The three submissions from key transport and telecommunications infrastructure agencies supported the Advocacy Policy. These submitters specifically supported the objectives and policies around working collaboratively, early engagement, recognising the interests of owners, and avoiding regulatory overlap between the HNZPTA and the RMA and working towards national consistency in requirements. Submitters commented that the HNZPT policies are statements of good practice and align with their own internal policies and best practice guides. Submitters appreciated the intention to balance the preservation of heritage against the operational needs of heritage owners. One submitter cautioned about using imprecise language in the policies in the light of the interpretation of “avoid” in the King Salmon Case, and that objective 13 was overly ambitious.<sup>1</sup> The policies and objectives should also acknowledge the benefits of working collaboratively with industry and business. One example of this is integrating earthquake strengthening proposals with upgrading building services such as telecommunications infrastructure

### Iwi

Overall, iwi submitters supported the Advocacy Policy and HNZPT’s advocacy role, and caution against any scaling back of advocacy effort. HNZPT’s advocacy for cultural heritage in resource management planning processes and in the development of government policy was particularly valued, with appropriate recognition of the role of manawhenua. In particular, one submitter supported reducing regulatory barriers to work to reduce risk to historical and cultural heritage, such as earthquake strengthening.

Submitters requested that the Advocacy Policy recognise the role of iwi and hapu as kaitiaki of their ancestral lands, water, wāhi tūpuna, wāhi tapu, and other taonga. Submitters also wanted recognition of the role of Iwi Management Plans. Working collaboratively with HNZPT was seen as vital to achieving the objectives set out in the Advocacy Policy, and the Waikato Tainui Memorandum of Understanding was noted as an example of working together.

HNZPT could also encourage owners to develop relationship with iwi and hapū, and assist local community groups access information on manawhenua perspectives. Several submitters mentioned the need for resourcing iwi and hapū to carry out investigations and be involved in

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<sup>1</sup> Environmental Defence Society Inc v New Zealand King Salmon Company Ltd (“New Zealand King Salmon”) [2014] NZSC 38.]

statutory processes, and the need for HNZPT to work with iwi and hapū to build capacity. Clarification is needed that while the statutory provisions of the HNZPTA for Māori Heritage Council input to planning process refers specifically to wāhi tapu areas, the Council has a broader and more general advocacy role for Māori heritage.

### **National Heritage organisations**

Most submitters indicated support for the Advocacy Policy and the significant role HNZPT plays in conserving our finite historical and cultural heritage resource. One sought an overall statement of why the policies have been prepared and what they are intended to achieve. The policies are seen as being high level, and any intention to support them with detailed guidance should be clearly stated. One instance where guidance is lacking is resolving the tension between life safety and preserving heritage.

Submitters overall did not want to see HNZPT's ability to take an active advocacy role restricted. However, criteria are needed to reconcile on the one hand public expectations that HNZPT will advocate for heritage, and on the other hand resource constraints limiting involvement. Without criteria, prioritisation could be undermined by expectations to save heritage of lower significance. In particular smaller local councils do not have heritage staff and rely on HNZPT advice, and there is a risk that advocacy for locally important heritage will fall to local groups by default. Comments on criteria for prioritisation were inconsistent –submitters were both critical of relying on the List categories to determine priorities for advocacy, and critical of policies downplaying the role of the List in determining which significant heritage to argue for. One submitter felt that HNZPT should be able to advocate in an adversarial forum when required, whether or not there are reasonable alternatives to the proposal.

One submitter made further suggestions for policies aimed at reducing regulatory overlap and confusion between the HNZPTA and the RMA, particularly for pre-1900 buildings.

This submitter also highlighted that the Advocacy Policy does not state specifically that HNZPT will advocate for archaeology, nor does it provide clear criteria for determining priorities for advocacy.

### **Other organisations**

Two organisations representing church property managers submitted in overall support of the policy, but requesting changes to recognise the challenges faced by owners of heritage properties, particularly where there is no commercial income source to offset the costs. Churches own a considerable number of heritage buildings on the List and these buildings make a highly visible contribution to heritage streetscapes throughout New Zealand. These submitters support policies aimed at identifying and reducing risk, but sought recognition that in some cases, demolition may be the only alternative. One submitter provided examples of churches damaged in the Canterbury earthquakes. In common with other heritage owners, these submitters wanted to see greater recognition of the need for adaptive reuse and redevelopment of heritage places as the needs of users change. A building in use is more likely to be maintained and conserved.

### **Regional Heritage organisations**

Regional heritage organisations wanted a greater recognition of the costs to owners of conserving heritage, particularly in provincial areas where there is little opportunity for financial return on the investment and sources of funding are few and only provide a proportion of the cost. HNZPT should provide more incentive funding to owners. HNZPT should encourage councils to seek their advice



on heritage early in RMA planning processes, and HNZPT is urged to work collaboratively with local heritage groups, civic trusts and similar organisations and community groups, who have local knowledge and contacts. One submitter noted will need to be reviewed regularly. There is a danger that the focus will be on Category 1 historic places and Landmarks at the expense of a much greater number of Category 2 places that make up the historic character of our townscapes – a topic ignored in the policies – and left to local groups to defend. Each case should be considered on its merits. The policy should be more explicit about whether or not HNZPT will actively advocate (using RMA processes) for all places on the List and acknowledge that there will be occasions when an adversarial stance is warranted. This submitter suggested advocating for a National Policy Statement on historic heritage.

## Submissions on introductory sections of the Policy

The majority of submission points addressed the objectives and policies. As shown in Table 2, 100 submission points addressed the introductory sections of the Advocacy Policy and the Principles, and over three hundred submission points concerned the objectives and supporting policies. In redrafting the Advocacy Policy, HNZPT also considered numerous minor editorial suggestions (not shown on the table or discussed in this document). A detailed breakdown of general comments and submissions on the introductory section is given in Appendix 1.

**Table 2: Breakdown of submission points by section of the Policy**

Section	Submission points
General comments, introductory sections and Principles	100
Objective 1: Valuing and conserving historical and cultural heritage	11
Objective 2: Prioritising involvement	25
Objective 3: Targeting protection mechanisms	10
Objective 4: Early input	6
Objective 5: Sound information base	6
Objective 6: Recognising Maori values	33
Objective 7: Conserving Māori heritage	9
Objective 8: Promoting engagement with historical and cultural heritage	4
Objective 9: Community involvement	15
Objective 10: Working with owners	31
Objective 11: Working with local government	7
Objective 12: Promoting heritage protection in planning processes	23
Objective 13: Promoting heritage protection in consenting processes	19
Objective 14: Promoting awareness of archaeological authority requirements	14
Objective 15: Representing heritage values in development of government policy	9
<b>Total</b>	<b>322</b>

### Introduction

One submitter requested deletion of the statement that historic heritage is a fragile, non-renewable, finite resource, and infers from the Heritage List policy recognition of heritage as a continuum of the past and present, that new heritage can be created to replace what is destroyed. No change has been made, as the submitter misinterprets the statement in the List Policy that

“new heritage” can replace existing heritage if it is destroyed. Once heritage is destroyed it cannot be replaced.

## **Challenges in conserving historical and cultural heritage**

Several submitters proposed that HNZPT should take account of the principles of sustainable management, as set out in the RMA, when making submissions on plans and resource consents and in its advocacy role generally. A new paragraph has been added to this section to discuss the connection between the over-arching RMA principle of sustainable management and the requirement to protect historic heritage from inappropriate subdivision, use and development as a matter of national importance.

Several submitters wanted more emphasis in the Advocacy Policy on the difficulties faced by owners of historic heritage, where the costs of ownership may be higher than non-heritage buildings. The market value of these buildings may be diminished by perceptions of restrictions on the ability to use, adapt and alter these buildings. While in many cases sensitive alterations to heritage buildings to improve functionality and improve safety can enhance the market value and rental value, many heritage owners are unable to realise such returns. This is the case for many heritage buildings outside the major centres and buildings that do not have an income stream such as private dwellings and churches. This has been acknowledged in the section on Challenges.

Submitters also pointed out the need for external funding for conservation of heritage properties and suggested that research is needed on the economics of heritage conservation. Owners of multiple heritage properties may have to rationalise their property portfolio and sell or demolish structures that no longer meet the owners requirements and are too expensive to adapt or maintain.

Several submitters pointed out the difficulty of conserving heritage in or around operating infrastructure which has specialist and evolving operational requirements. This point was also made by operators of educational facilities.

## **Methods of promoting the conservation of historical and cultural heritage**

One submitter noted the current review of sections of the RMA and suggested that the policy should not be finalised until the outcome of this review is known. The policy covers confirmed amendments and policy direction at the time it was approved. The review of the RMA is ongoing and the outcome of the current round will not be confirmed until 2016. Future amendments to the RMA can be accommodated through guidance on the Advocacy Policy. The HNZPTA requires this Advocacy Policy to be in place by 20 November 2015.

## Submissions on the Principles

Most of the submissions made a mixture of general points that applied to the whole Policy and specific comments related to the Objectives. Very few submitters commented on the Principles. A detailed breakdown of the submission points relating to the Principles is given in Appendix 2.

### **Principle 1: Valuing historical and cultural heritage**

One submitter questioned the assumption that people value heritage, and that they may do so for the reasons set out in the Principle.

### **Principle 2: Safeguarding historical and cultural heritage**

One submitter questioned the assumption that heritage is finite and non-renewable.

### **Principle 3: Enhancing resilience**

There was general support for the concept of enhancing resilience or survival of historical and cultural heritage. One submitter wanted further discussion of how the inherent tension between life safety and retention of heritage values is to be managed in relation to earthquake-prone heritage buildings.

### **Principle 4: Addressing the most important issues**

Several submitters commented on the Objectives that sit under this policy, and the detailed comments are discussed below. Concerns were expressed that the Policy does not give sufficient guidance or criteria for determining what comprises “our most significant historic and cultural heritage”. Some were concerned this would mean focussing on Category 1 and Landmark places and leaving advocacy for Category 2 and other heritage to local groups, others thought this was open for interpretation on a case by case with no clear criteria.

### **Principle 5 (was 6): Best practice**

Two submitters mentioned the value of guidance material, either the HNZPT Sustainable Management guidance series or specific guidance produced jointly with industry or professional organisations. No comments specifically addressed the concept of best practice but several submitters wanted to see more emphasis on sustainable management as defined in the RMA, balancing conservation of historic and cultural heritage with the ability of communities to provide for their social, economic, and cultural well-being and their health and safety (see RMA Part 2 for full definition).

### **Principle 6 (was 7): Māori heritage**

Submissions from Iwi authorities, hapū and associated individuals were all supportive of the principle of recognising and protecting places of significance or value to Māori.

### **Principle 7 (was 8) : Recognising the interests of owners**

The majority of submitters addressing this issue supported the overall principle of recognising the interests of owners, although some felt that more weight should be given to taking account of rather than simply recognising these interests. Some submitters felt not enough weight was attached to the private costs of owning heritage versus the public benefits. Others wanted more recognition of the need for ongoing adaption so that heritage buildings would have an ongoing productive use (although this is addressed within Principle 3).

### **Principle 8 (was 9): Working collaboratively**

Most submitters were supportive of the concept of working collaboratively, and suggested a much wider group of sectors and agencies that HNZPT should be working with.

### **Principle 9 (was 10): Engagement**

Submitters who addressed engagement wanted to see more emphasis on proactive engagement with and upskilling of local heritage and community groups and raising the awareness of professional groups such as planners, architects and engineers (both practicing and in training) of the importance of heritage.

## **Submissions on the objectives and policies**

The majority of submission points addressed specific objectives and policies as shown in Table 2 above. The key areas of concern were Objective 2 and associated policies on prioritising involvement in advocating for heritage conservation, working with owners, and objectives and policies relating to working with local government and input into RMA planning and RMA and Building Act 2004 consenting processes. A detailed breakdown of submissions on the Objectives and Policies is given in Appendix 3.

### **Promoting the conservation of historical and cultural heritage**

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#### **Objective 1: Principles of valuing and conserving historical and cultural heritage**

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This objective was generally supported, although one submitter queried whether this would need re-evaluating in the light of proposed changes to the RMA. Submitters supported recognising the interests of owners, and the need to protect public safety and address risks, although some submitters wanted greater weight given to public safety and explicit recognition that a building that is in use is more likely to be maintained and conserved. Changes to the objective to address submissions are:

- clarify which of the bullet points are taken directly from the HNZPTA,
- highlight that heritage in use is more likely to be cared for and maintained
- acknowledge the need to take account of relevant government policy.

## Addressing the most important issues

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### Objective 2: Prioritising involvement

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This objective and the associated principle and policies were of concern to many submitters. Submitters wanted certainty about what comprises “significant” historical and cultural heritage. Many wanted policies setting out clear criteria for determining the significance, and several wanted this linked to the New Zealand List categories. However, there was concern that this could either be interpreted narrowly to mean that HNZPT would focus entirely on Category 1, and if advocacy for other types of heritage is left to local groups, they will need to be better resourced. Conversely without clear criteria and guidance, interpretation of “significant” would become ad hoc and diverted from nationally significant issues by pressure to advocate for locally significant heritage. Some submitters expressed concern that this objective would mean leaving advocacy for Category 2 places to local groups without the resources or standing to advocate effectively.

Several submitters felt that the Policy should be clear that adversarial methods will be necessary in some cases, not just as a last resort. Some suggested that focussing on the most significant heritage did not fit with HNZPT’s statutory functions under section 13 of the HNZPTA. [HNZPT comment: the advocacy function in section 13 is enabling rather than prescriptive and does not make reference to specifically advocating for heritage items on the New Zealand Heritage List]. Several noted that not all important historic heritage is entered on the List.

The introduction to this objective explains the criteria for assessing significance and clarifies that “adversarial methods” to be used as a last resort refers to submitting against resource consent proposals and appealing unsatisfactory decisions. New objectives address monitoring the effectiveness of HNZPT’s advocacy and a commitment to work with local heritage organisations to ensure they are able to be involved in the conservation of local heritage.

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### Objective 3: Targeting protection mechanisms

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The main concern expressed about this policy is that the range of mechanisms proposed is too narrow. Some expressed concerns about covenants and suggested that a full heritage assessments and community support should be required and these should only be arranged for significant heritage. However, covenants are negotiated between the owner and HNZPT with no opportunity for public input. Others wanted clearer policies around selecting protection mechanisms including less formal arrangements such as memoranda of understanding.

Some submitters felt that too much onus was being placed on local authorities to provide incentives, and that central government should also provide incentives. A new policy recognises the role of the HNZPT Heritage Preservation Incentive Fund.

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### Objective 4: Early input

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This objective was generally supported, the only change needed is a minor change to policy 4.2 to reflect the need to work collaboratively with local authorities.

## Information base for advocacy

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### Objective 5: Sound information base

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Several submitters raised the need for research on the economics of heritage conservation as an information gap. While it an area where further work would be productive, policy 5.2 has retained the focus on information needed to assess and mitigate risk. In some locations, the lack of an obvious economically viable use for a heritage place will be a risk factor.

## Working with iwi and hapū

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### Objective 6: Recognising Māori values

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Overall, submitters wanted a HNZPT to strengthen its advocacy role. Submitters were supportive of principles, objectives and policies aimed at recognition and protection of sites of significance or value to Māori through RMA planning processes, whilst recognising the role of iwi and hapū as kaitiaki of their ancestral lands, water, wāhi tūpuna, wāhi tapu, and other taonga. Several submitters requested recognition of Iwi Management Plans and other planning documents and greater recognition of iwi and hapū in planning processes.

Submitters identified a need for a proactive approach to research and conserve sites. Iwi authorities and associated hapū and individual submitters noted that they would need funding to research cultural sites to be able to effectively participate in RMA and HNZPTA processes. Most proposed that proactive, joint programme to investigate sites is needed. This is an important issue, but is outside the scope of this Advocacy Policy. The resource that HNZPT can provide is time rather than money, for example working collaboratively on conservation projects and input to RMA planning processes. This is set out in Objective 7. The policies have been amended to propose greater collaboration between iwi and hapū, HNZPT and local authorities.

### Objective 7: Conserving Māori heritage

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This objective and associated policies were supported by submitters. Submitters wanted to extend the policies setting out the role of the Māori Heritage Council in making recommendations to local authorities on the conservation of wāhi areas. However, these policies reflect the functions set out in the HNZPTA, sections 74 and 75. HNZPTA works with local authorities to provide protection for wāhi tapu sites, wāhi tapu areas and wāhi tūpuna in RMA plans.

## Engaging with the community and local groups

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### Objective 8 (now 10) : Promoting engagement with historical and cultural heritage

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This objective was generally supported and no changes were made to the objective or policies.

## Working with owners

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### Objective 10 (now 8): Working with owners

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Whilst many submitters were supportive of the recognition of the interests of owners in the objective and policies, many wanted these provisions to go further. Submitters raised issues of the costs of owning heritage and the perceived loss of value of places identified as heritage. This highlights the need for research into the economics of heritage conservation mentioned above.

## Engaging with the community and local heritage organisations

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### Objective 9: Community and local heritage organisation involvement

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This objective has been reframed to emphasise the value of community involvement and local communities' understanding of the value of their local and historical heritage. It addresses another issue raised by submitters, that if HNZPT resources are focussed on nationally significant heritage (Objective 2), then collaboration with local heritage organisations will be essential to ensure that heritage of local importance is advocated for (new policy 9.3).

A new introduction to this objective emphasises the important role of local groups and discusses many of the issues raised by submitters.

## New: Working with industry, business and professional groups

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### New Objective (now 11): Working with industry, business and professional groups

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HNZPT works collaboratively with a wide range of industry, business and professional groups to achieve mutually beneficial outcomes that are positive for heritage.

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This new objective and supporting policies was added at the suggestion of several submitters to highlight the importance of developing and maintaining relationships with a wide range of industry, business, professional groups, and organisations. Given the new responsibilities under the HNZPTA, collaboration with national and regional civil defence groups will be important. These submitters saw opportunities for mutually beneficial outcomes through greater collaboration. There is also an opportunity to work with owners of multiple heritage properties, who often have specific operational requirements. A new introduction to this objective suggests groups where collaboration would be beneficial.

## Working with local government

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Submitters were generally supportive of the objectives and policies relating to working with local government.

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### Objective 11 (now 12): Working with local government

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This objective was well-supported, with some concerns expressed about the extent of reliance on local authorities. A new policy on HNZPT advising local authorities of heritage values reflects these

concerns. An additional policy responds to the need to work collaboratively with agencies involved in emergency management.

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**Objective 12 (now 13): Promoting heritage protection in planning processes**

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Submitters were concerned that, taken in conjunction with Objective 2, it could mean that HNZPT's involvement in RMA planning would be restricted to the formal plan development phase. They wanted assurance that HNZPT would continue to act as an expert advisor, particularly to smaller councils without specialist planning staff. This will be addressed in specialist guidance material, such as the revised guidance on RMA planning and historic heritage. This guidance will also address the importance of early involvement and the need for good information about the heritage values of place proposed for scheduling in plans and methodologies for heritage assessment. Another matter that will be addressed in guidance is making provisions that encourage improving the functionality of heritage places and reducing risks, for example through earthquake strengthening.

One submitter thought the Policy should address situations where communities object to heritage and oppose its conservation - this is addressed in policy 2.2. Another suggested that items entered on the New Zealand Heritage List/Rārangī Kōrero should be automatically entered onto RMA plan schedules, but this would require a law change. A new policy has been added to emphasise the role of iwi and hapū in RMA planning.

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**Objective 13 (now 14): Promoting heritage protection in consenting processes**

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Some submitters wanted to soften these policies, others wanted them expanded. For example, one submitter felt that this objective sets too high a threshold, whereas another did not want to see HNZPT opposition to destruction of significant heritage restricted only to when there are no reasonable alternatives. Others questioned what is a "reasonable" alternative to an option that would result in destruction of historic heritage and suggested that the test should be a "reasonably practical and economically viable" alternative. These submitters also sought commitment to HNZPT supporting applications for improving the functionality of heritage places and reducing risks, as for objective 12 (now 13). One submitter sought recognition of the role of iwi and hapū, and a new policy has been added to address this.

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**Objective 14 (now 15): Promoting awareness of archaeological authority requirements**

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Submitters were supportive of promoting recognition of the requirements under the HNZPTA for obtaining an archaeological authority if there is reason to suspect that an archaeological site would be modified or destroyed by activities. The policies supporting this Objective have been revised to take account of submitter concerns that the Advocacy and Archaeology Policies were not consistent, and to better reflect the provisions of the HNZPTA.

Submitters also supported avoiding duplication between HNZPTA and RMA consenting processes, but requested greater clarity on dealing with potential overlaps with the RMA consenting processes, for example for demolition of buildings. Some comments, such as clarity on when an archaeological authority would be declined, are dealt with in the Archaeology Policy. Questions were raised about council scheduling archaeological sites for protection in the absence of good information on the sites, and this will be addressed through guidance. A new policy has been added encouraging consultation with iwi and hapū.



## Working with central government

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### **Objective 15 (now 16) : Representing historical and cultural heritage values in the development of government policy**

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There was overall support for this objective, with an expectation that HNZPT will monitor the development of legislation to ensure the ongoing protection of historical and cultural heritage. One submitter suggested that HNZPT could include an aspirational goal to develop a National Policy Statement (NPS) on Heritage, and in response a more general policy was added to support initiatives that promote national consistency – which could include a NPS or other national instruments. Several submitters identified economic analysis of historic heritage conservation as an information gap, and although no change was made to this policy, it will be considered for future work programmes. Two submitters suggested that HNZPT advice should recognise the balance of protection and development expressed in the RMA platform of sustainable management, and this is addressed in a new paragraph in the section on challenges in conserving historical and cultural heritage.

## 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)

Resource Management Act 1991 (RMA)

### General submissions and submissions on introductory sections

Section	Theme Text	Submission	Relief Sought	Response
Background	Editorial	"What does the policy cover" p. 4	Amend as follows: the overarching principles for advocating for the conservation of historical and cultural heritage; the methods we will use; <u>objectives, setting out the outcomes we are seeking;</u> <del>and the</del> Policies we will follow in achieving those Objectives	Accept
Background	Financial assistance and costs	Wish to see HNZPT adequately funded to carry out these important roles, noting funding is dependent on long term central government support.	Need secure funding	Reject - outside the scope of the advocacy policy
Background	Legislative context	What does the Statutory Advocacy Policy cover? The text states that: "Section 13(1)(c) confers a very broad advocacy role. It is supported by specific sections of the HNZPTA such as the power under section 14(1)(a) to advocate Heritage New Zealand's interests at any public forum or in any statutory planning process". Stated this way, the text conveys broad discretion. Accurately but alternatively stated, section 14(1)(a) empowers HNZPT to "advocate its interest at any public forum or in any planning process in which it has standing under an act" and section 13(1)(c) states one of its functions is "to advocate for conservation and protection of historic places, historic areas, wāhi tapūna, wāhi tapu and wāhi tapu areas". Read this way, it appears there is a greater expectation that HNZPT will engage in advocacy	Quote section 14(1)(a) in full in the section What does the Statutory Advocacy Policy cover?	Reject - "standing" is an unnecessary qualifier in the context of this policy.
Introduction	Valuing heritage	"Why Conserve Historical and Cultural Heritage?" Amendments	p. 5 "Why Conserve Historical and Cultural	Reject. While new heritage

Section	Theme Text	Submission	Relief Sought	Response
		reflect that not all heritage is fragile and non-renewable. Heritage NZ's draft New Zealand Heritage List/ Rarangi Korero Policy at Policy 6.2 states that HNZPT recognises that the Heritage List should be representative of all generations, up to the present and the perception of the past and the present as a continuum – reflecting that "heritage" is continually created.	Heritage?" para 3 Delete "fragile and non-renewable. And p. 6 Delete 1st line as follows: Historical and cultural heritage is a finite resource: once destroyed, it cannot be replaced.	can be "created", it cannot replace lost heritage - once lost, it cannot be recreated.
Methods	Legislative context	We note that the Government is currently proposing changes to the RMA, in particular changes to sections 6 and 7 (Part 2) which may influence councils' planning and policy. We note the Government's intention to introduce a Bill for passage through the House by the end of 2015, and the timeline for HNZPT to finalise the draft Statutory Policies by November 2015. The implications of the proposed RMA amendments should be carefully assessed before the Statutory Policies are finalised.	The implications of the proposed RMA amendments should be carefully assessed before the Statutory Policies are finalised.	Reject - the RMA reform programme is extensive and ongoing, and where decisions are known, the policies reflect those decisions. The Policies must be finalised by November 2015 (HNZPT Act)
Challenges	Adaptive reuse	Not all New Zealand's historical and cultural heritage is a 'fragile and non-renewable legacy'. (p.5.) Heritage is a limited rather than 'finite' resource, of which not all is 'at risk from natural hazards' or constantly 'under threat from development'. (p.6.) Not all development constitutes a threat. Sensitive development may enhance a place's historical and cultural value and ensure that it remains viable. To survive, communities need to change and develop, and their historical and cultural heritage continually created and recreated. The life of a building and its evolution over time is part of its character. Historic places that remain in public use are more likely to be well maintained and valued.	Recognise sensitive adaptive reuse	Accept in part: adaptive reuse recognised in 3.1 and 14.1, and in 1.1
Challenges	Adaptive reuse	Places of worship are central to the work and mission of the Churches. Built to the glory of God, in a form and design relevant at the time of their building, they remain an expression of faith of the worshipping communities who developed and constructed them. However, the evolving nature of worship over time necessitates that buildings too much change to remain alive and relevant. Buildings preserved as monuments to the past cannot do this.  Policies attempting to conserve internal or external fabric and fixtures should be administered with sensitivity to the changing	Recognise the need for adaptive reuse	Noted - it is already recognised in the Policy, e.g. in Principle 3

Section	Theme Text	Submission	Relief Sought	Response
		requirements of faith communities. Church buildings are not museums, but need to evolve and adapt rather than be locked in time.		
Challenges	Adaptive reuse	See submission on the draft General Policy for the Management and Use of Historic Places Owned, Controlled, or Vested in HNZ. This section (page 16 Adaption, Development and New Construction) appropriately recognises that it can be beneficial and even necessary to facilitate the sustainable use of a historic place through development, new constructions, and adaptation to enable the place to serve a useful purpose. This should be carried over into policies for private owners of heritage buildings, in particular the introduction, Objective 6, Policies 6.2 and 6.4.	Insert provisions recognising that it can be beneficial and even necessary to facilitate the sustainable use of a historic place through development, new constructions and adaptation to enable the place to serve a useful purpose.	Noted - this is covered throughout the policy which makes provision for facilitating adaptive reuse
Challenges	Adaptive reuse	Under threat is too strong. Not all development will threaten heritage. Some development may even enhance historical and cultural heritage.	Amend first line: Our historical and cultural heritage is at risk from natural hazards and [DELETE under threat] [ADD from inappropriate] development.	Accept
Challenges	Adaptive reuse	See submission on the draft General Policy for the Management and Use of Historic Places Owned, Controlled, or Vested in HNZ. Policy 4.1 of the General Policy for Management states... <i>methods and actions to be followed to achieve the outcomes sought, including indications of major physical work planned, including for conservation, the development of facilities and interpretation, management and development of supporting heritage collections, and actions to manage risk.</i> This implicitly supports development of historic places owned by HNZ, including major physical work and providing for facilities. This is appropriate. However, this policy should also apply to historic places in private ownership.	Insert provisions recognising the development of historic places, including physical works and providing for facilities.	Noted - This is covered in the section on "Challenges" and throughout the Policy.
Challenges	Editorial	"Challenges" para 3 amend	...also promotes reducing regulatory barriers to activities that improve <del>survival</del> <u>resilience</u> such as earthquake strengthening...	Accept
Challenges	Editorial	"challenges" para 6	...where, <u>in our opinion</u> , there are <del>reasonable</del> <u>reasonably practicable</u>	Reject - unnecessary qualification in a section

Section	Theme Text	Submission	Relief Sought	Response
			alternatives.	that is introductory only
Challenges	Financial assistance and costs	What are the challenges in conserving and historical and cultural heritage? HNZPT identifies that: "Our historical and cultural heritage is at risk from natural hazards and under threat from development" and that "In some areas, the pressure of development results in demolition of heritage buildings". The pressure of development is significant, as are the costs associated with heritage retention, and the statement "generating an economic return is important to enable owners to care for the building" could more usefully be stated as an imperative.	The statement "generating an economic return is important to enable owners to care for the building" could more usefully be stated as an imperative.	Reject - this is in an overview discussion of key issues for heritage. An imperative is not appropriate and in any case would not be universally true - e.g. it may not be important for dwellings.
Challenges	Financial assistance and costs	Support the ten principles for sustainable management of historic heritage as set out on pages 11 and 12 of the document. Clearly, there is a collaborative approach needed in the protection of heritage (objectives 10, 11 and 12). Nevertheless, it is concerning that the distinct message from the general policy statement is that Heritage New Zealand's advisory role is reliant on local government in the provision of incentives to enable heritage protection. As heritage is of national importance, there is the need for a greater degree of financial support at a central government level rather than the "last resort" approach as stated in this document with regard to financial support (e.g. purchase).	Greater degree of financial support from central government.	Accept in part - role of HNZPT in providing incentive funding highlighted. However, Central government support beyond the scope of the policy. Have clarified what is meant by purchase by central government being a last resort
Challenges	Heritage vs economics and reasonable use	The cost of ownership of heritage properties has become an increasing financial burden, as Churches struggle to meet heritage obligations, mounting insurance premiums and seismic strengthening requirements. (p.8.) The costs of identification, protection, preservation and conservation of historical and cultural heritage should be recognised and taken into account. (p.16.) Restrictions on owner's property rights will not only affect its use and function but also affect its commercial value. (p.13.)	Recognise the cost of heritage ownership and affect of restrictions on use on property values.	Accept - discussed on pages 8-9 and in policy 8.4
Challenges	Heritage vs economics and reasonable use	Many heritage buildings do merit protection, but it is not appropriate to apply the same criteria to all. In some circumstances, it must be accepted that demolition may be the only available or appropriate option.	In some circumstances, it must be accepted that demolition may be the only available or appropriate option.	Noted -policy 14.2 acknowledges that in some cases there may not be reasonable alternatives to

Section	Theme Text	Submission	Relief Sought	Response
				demolition
Challenges	Heritage vs economics and reasonable use	Provision for significant infrastructure, needs to be carefully balanced against the protection of heritage sites. In light of operational requirements, it will not always be appropriate or practicable to protect heritage sites at or near operational infrastructure. Avoidance of effects on heritage sites in all circumstances is therefore not appropriate or reasonable. Overall, 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.	Support	Noted/Retain
Challenges	Heritage vs economics and reasonable use	A number of the submission points seek to ensure the policies in relation to the protection and conservation of historical and cultural heritage provide for an appropriate test and include additional matters that are important for HNZPT to consider when making decisions, such as costs for owners and economic viability (e.g. by using terms such as "where appropriate" and "reasonably practicable").	Recognise economics of heritage ownership and owners who do not have revenue streams to offset costs.	Noted - recognised on pages 8-9 and policy 8.4
Challenges	Heritage vs economics and reasonable use	Objective 13 of the draft New Zealand Heritage List Policy 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. See submission on the draft New Zealand Heritage List Policy.	Insert provisions recognising constraints on private owners and that private owners should only be required to operate "within available resources".	Noted - this is covered at various points throughout the Advocacy Policy, however the policy is about advocacy, not HNZPT directly imposing requirements on owners.
Challenges	Heritage vs economics and reasonable use	"What is statutory Advocacy?" When owners have multiple sites and buildings, with insufficient funds to maintain them all, choices have to be made. It is difficult when the choice is between a less functional and more expensive to maintain heritage building and a more functional and less expensive to maintain more modern building (that also has greater community use).The wording is quite emotive, and is not appropriate.	...in some cases heritage protection measures may <u>be unaffordable and restrict the uses owners can make of a property and may conflict with the objectives and needs of the owner.</u> <del>our advice may not be well received.</del>	Reject - this section deleted, now covered within "Challenges" section

Section	Theme Text	Submission	Relief Sought	Response
Challenges	Heritage vs economics and reasonable use	HNZPT has focused policies on the protection of historic heritage and the contribution that this protection has to the wellbeing of communities. However, this protection needs to be within the context of the overall balance of sustainable management and the importance of communities to be able to provide for their on-going social, economic cultural and environmental wellbeing.	protection needs to be within the context of the overall balance of sustainable management and the importance of communities to be able to provide for their on-going social, economic cultural and environmental wellbeing.	Accept - added a discussion on sustainable management
Challenges	Heritage vs economics and reasonable use	<p>Recognising the need to protect and manage historic heritage places and buildings from inappropriate use, modification and development. Balancing this, is the need to ensure that these places can be efficiently managed in a manner that supports its teaching, learning, research and administrative functions, and meet the constantly changing demands associated with these functions, including an organisation's statutory obligations to provide safe places to work, teach and learn.</p> <p>It is important that any policies avoid uncertainty around processes and do not place unnecessary burden on land owners, particularly for modifications and maintenance. At a high level, the submission seeks for Heritage New Zealand's statutory policies to:</p> <ul style="list-style-type: none"> <li>· Provide greater emphasis on the need for flexibility in respect to how heritage buildings are managed, given the constantly changing demands of the tertiary education sector and the need to ensure that buildings are fit for purpose. This is particularly important for minor modifications to interiors and to building's extent of place.</li> <li>· Ensure that HNZPT takes proactive steps to simplify and reduce duplication of processes that may be otherwise covered under the RMA and/or by territorial authorities, and ensure there is clarity and efficiency in respect to how processes operate</li> <li>· Provide for public safety without constraint</li> <li>· Provide for efficient use of buildings with specific functional needs while protecting historic heritage where practicable.</li> <li>· Promote adaptive re-use of buildings and structures as an appropriate way of preserving historic heritage.</li> <li>· Ensure support and collaboration with the owners of heritage</li> </ul>	Flexibility, allowing efficient adaptive reuse, providing for public safety, reducing regulatory duplication, collaboration with owners	Noted - the Policy addresses adaptive reuse and the operational needs of owners of heritage buildings

Section	Theme Text	Submission	Relief Sought	Response
		places and/or archaeological sites.		
Challenges	Heritage vs economics and reasonable use	"Challenges" para 4: These paragraphs focus on owners of heritage buildings generating income from the commercial use of such buildings. However, many heritage buildings do not have commercial uses, or forms of income streams. For example, there is no income stream for CPT from its heritage churches. Further, any funding sources are inadequate to cover the costs associated with the maintenance of heritage buildings. These matters should also be addressed in these paragraphs.	Amend as indicated	Accept
Challenges	Heritage/character areas	There is not enough recognition in the draft policies of the "character of whole areas". That is, the contribution of specific listed places and landmarks to the wider character of neighbourhoods or places. This may be an over-arching assumption but it is important enough to warrant specific note in the statutory policies.	Recognise character areas	Reject - the policy includes recognising and conserving <b>historic</b> areas, and this includes the contribution to the character of localities, neighbourhoods and towns. Character areas <i>per se</i> are not part of the HNZPT mandate
Challenges	Heritage/character areas	Churches are the largest group of owners of listed HNZPT List properties. Several Church properties on the Heritage List are likely to be selected for inclusion on the proposed list of National Historic Landmarks. Many of New Zealand's towns and cities have grown up around cathedrals and parish churches first established by missionaries and early settlers. This historic centrality, in areas originally established as residential, has led to many church buildings now being sited on central city locations, with a correspondingly high public profile and regional identity. They give our cities and towns their historical "heart". The Churches of New Zealand greatly value their historic inheritance and are committed to the preservation and maintenance of their heritage properties.	Recognise contribution of heritage such as churches to local community identity and streetscape	Reject in part - the policy includes recognising and conserving <b>historic</b> areas, and this includes the contribution to the character of localities, neighbourhoods and towns. Character areas <i>per se</i> are not part of the HNZPT mandate. However, work on valuing historic heritage is ongoing
Challenges	Interests of owners	"Challenges" These paragraphs focus on owners of heritage buildings generating income from the commercial use of such buildings. However, many heritage buildings do not have commercial uses, or forms of income streams. For example, there		Agree - also residential properties have a use but not an income stream



Section	Theme Text	Submission	Relief Sought	Response
		is no income stream for CPT from its heritage churches. Further, any funding sources are inadequate to cover the costs associated with the maintenance of heritage buildings. These matters should also be addressed in these paragraphs.		
Challenges	Interests of owners	See submission on the draft General Policy for the Management and Use of Historic Places Owned, Controlled, or Vested in HNZ. As a matter of reciprocity and equity, these principles (recognising the imbalance between responsibilities and resources etc) should be carried through into the HNZ's other policies that apply to heritage in private ownership, who face the same struggles and pressures in the management of their heritage buildings. For example, owners should be able to assess their active portfolio for the purposes of worship, mission and ministry, and assess affordability and other attributes. When owners have multiple sites and buildings, with insufficient funds to maintain them all, choices have to be made. It is difficult when the choice is between a less functional and more expensive to maintain heritage building and a more functional and less expensive to maintain more modern building (that also has greater community use).	Insert provisions recognising the imbalance between the responsibilities and the resources available to carry them out; the affordability and justification of ownership; and, that private owners will endeavour to protect historic places, where appropriate.	Noted - this is covered in the section on "Challenges"
Glossary	Definitions	A range of different but associated technical terms - including 'protection', 'recognition', 'preservation', 'conservation', 'maintenance', 'restoration', 'safeguarding', 'promotion', 'adaptation' are used throughout the draft Statutory Policies. However it is often not clear what is actually intended or covered by particular terms or combinations of terms in relation to the particular sections of the proposed policies. The Glossary to the draft Statutory Advocacy Policy includes the same definition of 'conservation' as provided in the HNZPTA section 6. The Glossary to the draft General Policy for the Management and Use of Historic Places Owned, Controlled or Vested in HNZPT includes definitions of 'preservation', 'reconstruction' and 'restoration' derived from the ICOMOS NZ Charter. However beyond these definitions, there is no explanation of the distinctions between the technical terms used through the draft policies. Clarification is also required for a range of terms where judgement and/or	Clarify terms used - include adequate definitions and explanations of technical terms and terms requiring judgement.	Noted – Glossary reconsidered.

Section	Theme Text	Submission	Relief Sought	Response
		interpretation will be required. Such terms include: 'sufficient knowledge', 'minor effects', and 'reasonable alternatives'. There should be accompanying explanation of how these matters will be determined, against which criteria, and by whom through what processes.		
	Editorial	This Policy refers to “we”, “our” and “us”. This should refer to Heritage NZ, in line with the other HNZPT policies reviewed.	Use Heritage NZ not "we"	Accept
	Editorial	9. It is noted that this Policy is written differently from the other 4. It is also noted that wording of specific Policies differ from those in other Policies, for example in the Draft General Policy for the Management and use of Historic Places Owned or Controlled or Vested in Heritage New Zealand, Policy 5.1 wording refers to Heritage New Zealand. However, in this Policy the wording used is ‘we’ (being HNZPT), it is considered that all wording of policies with the same intent should use identical wording so that there is no confusion to users.	All wording of policies with the same intent should use identical wording so that there is no confusion to users.	Accept
	Editorial	<p>INTERPRETATION</p> <p>We note there is a typographical error on page 10 where a closing quotation mark (") is missing after HNZPT (fourth paragraph beginning “In this policy...”).</p> <p>OBJECTIVE 6</p> <p>We note a typographical error in the first sentence on page 20, with an unnecessary “to” in the sentence. We also note the subsection titled Working with iwi and hapū is missing a full stop (after advocacy) and is missing a few tohutō (macrons) on words including wāhi tapu and wāhi tupuna.</p> <p>SECTION 8.2</p> <p>This sentence is missing the word “to” so it reads “to assist the public to understand and appreciate”.</p>	Correct typographical errors	Noted
	Editorial	<p>Objectives should not simply be a restatement of legislative provisions, but instead be drafted in the form of a clear statement that sets out what is to be achieved, where and when; and To give effect to objectives, policies should be a statement that clarifies how the following matters will be addressed:</p> <ul style="list-style-type: none"> <li>• How the policy will progress achievement of an objective/s; •</li> </ul>	Amend objectives to set out desired outcomes and policies to set out how these will be achieved.	Accept in part - the objectives generally set out a desired ongoing state and the policies set out how the objectives will be achieved

Section	Theme Text	Submission	Relief Sought	Response
		Where it applies; • What course of action is to be taken and when; and • Who it applies to.		
	Editorial	Enter the following words into the Glossary: 'heritage covenant', 'heritage order', 'notice of requirement', 'heritage site' and 'heritage protection authority'. And add photos	Enter the following words into the Glossary: 'heritage covenant', 'heritage order', 'notice of requirement', 'heritage site' and 'heritage protection authority'.	Reject - these terms are defined in relevant legislation
	Editorial	The Policy appears to be rather repetitive. While it has a very thorough discussion of the importance of historical and cultural heritage, it does not discuss the HNZPTA until page 13. Abbreviate some of the discussion, especially examples of situations that are best left to the objective and policy sections. The section on statutory advocacy (page 8-9) repeats much of the information best left until later, it would be better to refer to the following sections on objectives and policies. All definitions could be included in the glossary and not both in text and glossary. The different legislations should be subsections – RMA, POA, Building etc etc. – these should either have a list of them and then general statements about how the HNZPT link, or specific with the main legislations. Objectives 11-13 all appear to be relating to RMA and could possibly be combined. In addition there are extra spaces and irregular spaces throughout the document. There also seem to be extra full stops. Some of the grammatical structure is awkward. (Submitter provided 13 pages of editorial changes as tracked changes.)	Discuss HNZPTA earlier, spell out legislation in separate sections, consolidate, eliminate duplicate discussion before objectives and policies, combine objectives 11-13.	Noted. These editorial suggestions have been taken into account in editing the Policy, and any superfluous spaces and full stops have been removed. Objectives 11, 12 and 13 cover different aspects of HNZPT input into RMA processes and have been retained.
	Editorial	Support the Draft General Statement of Policy: Statutory Advocacy with a few minor alterations, especially rewording to avoid the use of "we" and "our"	Remove we and our - editorial suggestions pages 9, 10, 16, 17 18, and throughout (see submission)	Accept
	Editorial	The definition of curtilage is based on a 2004 Ministry for Culture and Heritage policy document. Oppose - The term is used only once in the policy and is practically the same as "Setting", which is found in the ICOMOS Charter.	Oppose - Delete "curtilage" from glossary and policy	Accept
	Editorial	It is important to ensure that there is consistency across the policies and the provisions for heritage buildings owned by Heritage NZ, and those in private ownership.	Consistency with the properties policy	Noted. The policy does not treat heritage managed by HNZPT differently from that

Section	Theme Text	Submission	Relief Sought	Response
				managed by other owners.
	Editorial	<p>In general, the policies are poorly written and should not have been put out to public consultation without a sound edit. This submission does not provide minor corrections of an editorial nature.</p> <p>References to the HNZPTA, in all the Policies, should consistently be to either “The Act” or “The HNZPTA”, but not both, seemingly at random.</p> <p>Shortening the name “Heritage New Zealand Pouhere Taonga” to “Heritage New Zealand” is inappropriate and might be seen as disrespectful of tangata whenua. We suggest that HNZPT is more appropriate if an abbreviation is required.</p>	Consistent use of abbreviations for the HNZPTA and Heritage New Zealand	Accepted - HNZPT and HNZPTA used as abbreviation
	Editorial	It is noted that many policies are simply a restatement of sections of the HNZPTA and therefore add little guidance as to how HNZPT intends to administer the Act. 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.	Make policies consistent	Noted
	Editorial	“Protected, preserved and conserved” would seem to the layman to be much the same thing. They should be differentiated, perhaps with reference to the ICOMOS charter. Some policies footnote the relevant passages of the HNZPTA, while some do not. We suggest that this is unnecessary and often seems to be merely repeating the HNZPTA rather than developing Policy.	Define terms	Noted
	Editorial	<p>All policies:</p> <p>a. The order of the contents needs to be reconsidered. The sections / chapters relating to “Interpretation” should follow directly after the Contents. This would aid in the general reading of the documents. Two of the policies should have a section on Interpretation added for consistency.</p> <p>b. Words that are defined in the glossary should be highlighted within the documents. This will aid those that are not familiar with heritage terms in reading the policies and highlight words which have a very specific meaning.</p>	Reorder, make key sections consistent across all policies, highlight words defined in glossary within Policies	Accepted in part, document reordered and words from glossary highlighted.

Section	Theme Text	Submission	Relief Sought	Response
	Editorial	Supportive of referencing the HNZPTA throughout the policies, this is currently occurring sporadically and at times this referencing is inconsistent. Some policies repeat the HNZPTA without specific reference to it whilst other policies alter the wording of the HNZPTA within a policy which creates a different intent. There should be a consistent approach to both referencing and repetition of the HNZPTA within the policies.	Editorial	Accepted
	Editorial	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 the Turnbull, and some other elements of the heritage sector		Noted - the definition used comes from the RMA
	Editorial	It has also been noted that some of the Policies have repeated the wording of various sections of the HNZPTA. It is considered that this be checked through all the Policies to ensure consistency so that there is no misinterpretation of what the HNZPTA and the Policy states.	That if the wording of the Policy is to directly use the wording of the HNZPTA, that it be exact so that there is no misinterpretation and confusion for users between the Policy and the HNZPTA.	Accept - amendments made
	Editorial	Various editorial changes (see table in submission) aimed at: acknowledging the need for adaptive reuse downplaying the finite nature of heritage resources - use "limited" and acknowledge intergenerational equity acknowledging the costs of maintaining heritage and the conflict with the needs of the owner, and introducing the concept of "reasonably practicable" (in early discussion and in the Policies) recognising property rights replace "curtilage" with "grounds" government funding support recognise private costs versus public benefits	Table of proposed changes provided	Noted - editorial suggestions taken into account in redrafting policy
	General comments	Many of the documents are slanted towards Maori protocols or values. There are two reasons for this. (i). this approach would benefit the better identification, protection, preservation and conservation of the historical and cultural heritage of New Zealand and not just specifically Maori Heritage. (ii). Working in the	Policies for all heritage types the same	Reject - it is not clear what change is sought.

Section	Theme Text	Submission	Relief Sought	Response
		communities we believe that there is currently a negative connotation related to Maori Heritage issues especially those relating to Maori Archaeology. If the Policies for dealing with Heritage was the same and as near to being the same for all heritage then there would not be a us and them mentality developed.		
	General support for Advocacy Policy	The focus of the policies is on early informed input based on sound heritage information, working with iwi and hapu, owners, communities and local government.	Support	Noted
	General support for Advocacy Policy	Te Mana o Ngāti Rangitahi Trust supports the Objectives and Policies within this Policy.	Support Objectives and Policies	Noted/Retain
	General support for Advocacy Policy	Support this policy and the advocacy role HNZPT has under the Act. In particular, support the policy of early engagement and recognising the interests of owners. Submitter owns a number of historic buildings and structures and has its own policies for managing these which align with the policies and objectives in this draft policy.	Support, particularly early engagement and recognising the interests of owners.	Noted/Retain
	General support for Advocacy Policy	<p>We support the Policy and the important role HNZPT plays in advocating for the preservation and conservation of New Zealand's heritage. We support comments made in the Introduction and throughout the document regarding the finite nature of heritage and the importance of advocating for and preserving New Zealand's historical and cultural heritage. We also note the complexities HNZPT faces in advocating for such preservation, particularly around balancing owner's rights and managing finite resources.</p> <p>In addition, we acknowledge and appreciate the significant work HNZPT does in safe-guarding New Zealand's heritage and in making its historic places accessible to New Zealanders and visitors. We note the importance of HNZPT being sufficiently resourced (in terms of both suitably skilled people and funds) to undertake its significant role.</p>	Support	Noted/Retain
	General support for Advocacy Policy	Supports all objectives and policies	Support	Noted/Retain

Section	Theme Text	Submission	Relief Sought	Response
	General support for Advocacy Policy	Supports Principles, Objectives and Policies	Supports Principles, Objectives and Policies	Noted/Retain
	General support for Advocacy Policy	Support all Principles, Objectives and Policies	Support	Noted/Retain
	General support for Advocacy Policy	<p>“Working together for the past into the future”. (Cultural Heritage Strategy for the Western BOP (June 2009)).</p> <p>New Zealand’s cultural heritage is not divided by local government boundaries. A holistic approach by heritage agencies, professionals, the community and owners is required to address the challenges of conserving and protecting the historical and cultural heritage of our nation.</p> <p>Supports the objectives and policies identified in this policy and where possible will continue to work collaboratively with Heritage NZ, the community, tangata whenua and owners to achieve integrated sustainable management of the regions historic and cultural heritage, for the benefit of current and future generations.</p>	Support	Noted/Retain
	General support for Advocacy Policy	We strongly support the advocacy role that HNZPT fulfils particularly with regard to advice within the statutory and development realm. The provision of sound, relevant and timely advice to land owners and developers can have a significant effect on the retention of heritage fabric and items. HNZPT has to be adequately resourced both in term of dollars and specialist skills to fulfil their statutory advocacy role.	Strongly support	Noted/retain
	General support for Advocacy Policy	The principles for sustainable management of historic heritage outlined on pp. 11-12 are soundly based and supported.	Support	Noted/Retain
	General support for Advocacy Policy	Support Principles, Objectives and policies	Support	Noted/Retain
	General support for Advocacy Policy	I submit in support of Principles 1 - 10 I submit in support of Objectives 1 to 15 and all the related policies	Support	Noted/Retain
	General support for Advocacy Policy	Supports all Principles, Objectives and Policies	Supports all Principles, Objectives and Policies	Noted/Retain
	General support for Advocacy Policy	We appreciate that this is a challenging area to work in and that there is a range of views across Councils and communities that you	Support	Noted

Section	Theme Text	Submission	Relief Sought	Response
		are working with.		
	General support for Advocacy Policy	Support all Principles, Objectives and Policies	Support all Principles, Objectives and Policies	Noted/Retain
	General support for Advocacy Policy	We are comfortable with the Statutory Advocacy policies as proposed	Support	Noted/Retain
	General support for Advocacy Policy	Support all principles, objectives and policies	Support	Noted/Retain
	General support for Advocacy Policy	Strongly support the ethic established in the draft Statutory Advocacy Policy Principle 9 (p 12), that HNZPT will work collaboratively with local authorities and others (including heritage owners, tangata whenua and communities). We endorse the integration of this ethic of collaboration: <ul style="list-style-type: none"> <li>through the draft Statutory Advocacy Policy, both specifically as for example in Objective 11, and more broadly in Objectives 7, 8, 9 and 10 and the Policies underpinning them</li> </ul>	Support objectives 7, 8, 9, 10, 11	Noted/Retain
	General support for Advocacy Policy	We continue to look for opportunities to work with HNZPT to ensure that our activities have minimal impact on historical and cultural heritage, while allowing the benefits of UFB and RBI to be realised. We therefore support the development of the General Statement of Policy: Statutory Advocacy, which recognises HNZPT's primary advocacy role of giving advice in addition to engaging with the public, heritage owners, heritage and other professionals, councils and government.	Support	Noted/Retain
	General support for Advocacy Policy	Support all Principles, Objectives and Policies	Support all Principles, Objectives and Policies	Noted/Retain
	General support for Advocacy Policy	Recognises and supports HNZPT in their role as advocate for the safeguarding of historical and cultural heritage. Understands that historical and cultural heritage is a fragile and non-renewable legacy and as such its protection is imperative. Consequently, supports the overarching objectives and policies of the Draft General Statement of Policy: Statutory Advocacy.	Support	Noted/Retain
	General support for Advocacy Policy	Support Principles, Objectives and Policies	Support Principles, Objectives and Policies	Noted/Retain
	General support for	Finally we would like to compliment you on the clarity and	Support	Noted/Retain



Section	Theme Text	Submission	Relief Sought	Response
	Advocacy Policy	conciseness of the policies. The document was a pleasure to read.		
	General support for all policies	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 regards to protecting heritage.	Support	Noted/Retain
	General support for all policies	Supportive of the general direction that HNZPT is taking in your approach to the general policy for the five key activities that you have addressed.	Support	Noted/Retain
	General support for all policies	This department considers 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.	Support	Noted/Retain
	General support for all policies	HNZPT should be commended for acknowledging Māori cultural concepts and perspectives in these documents. I see that processes, such as the Māori Heritage Council, are also included that will ensure Māori, iwi and hapū are engaged and consulted on heritage places and matters that are likely to be relevant for them.	Overall support	Noted/Retain
	General support for all policies	Heritage contributes to defining Hamilton in the local context and also helps tell the City's story. Accordingly, it is important that historic heritage at both a local, regional and national level is identified, managed, protected, conserved and appreciated. In response to this, and in addition to the statutory requirement placed on Council, HCC has established a Heritage Advisory Panel and is currently developing a Heritage Plan and Funding Guidelines	Support	Noted
	General support for all policies	It is important to promote the identification, protection, preservation, and conservation of historical and cultural heritage under the HNZPTA The preparation of these general statements of policy will help guide the work of HNZPT and those working with heritage issues.	Support	Noted/Retain
	General support for all policies	Subject to the particular matters raised below, support the draft HNZPT policies particularly as the organisation has a number of internal policies that align with them. Many of the principles, policies and objectives proposed within	Support - discuss iwi consultation in one policy only	Noted - each policy is intended to stand alone so each has objectives and policies on consultation with

Section	Theme Text	Submission	Relief Sought	Response
		the draft policies are 'Good Practice' and a responsible Crown entity would endeavour to give effect to them. The organisation has informally adopted the Policy for Government departments; management of historic heritage as a guide for its internal heritage policies and guidelines. The organisation is supportive of early consultation with iwi. However, it considers there is scope to have a general policy in one of the policy documents, rather than repeating it across a number of policies.		iwi.
	General support for all policies	We are supportive of the policies	Support	Noted/Retain
	General support for all policies	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. The submitter commends the work and those involved in producing it. We were very pleased to have the opportunity to discuss the policies and provide feedback	Support	Noted/Retain
	Guidance	The General Policy documents are set at a high level and do not provide guidance for HNZPT staff, professionals or the layperson on how the HNZPTA will be operationalised. While this is the intent of the General Policies, and the submitter understands that the current guidelines series will be continued and developed, specific reference should be made to guidelines in the General Policies for the sake of clarity.	Refer to guidelines in the policies	Noted - will consider producing new guidance to accompany the Policy
	Guidance	We appreciate the importance of establishing effective working relationships at local and regional levels, and having clear frameworks in place to support constructive interactions between HNZPT staff, our councils, tangata whenua and communities. However we note that there have been some differences between individual HNZPT staff in their interpretation of statutory and policy provisions. Such inconsistencies can create confusion, uncertainties and delays. We recommend that when the draft Statutory Policies are finalised, comprehensive guidance is developed for all involved in the processes (within HNZPT and its regional offices, in local government and other agencies, and other process participants) to	Comprehensive guidance is developed for all involved in the processes (within HNZPT and its regional offices, in local government and other agencies, and other process participants) to ensure consistency and clarity. This guidance should be developed through a process involving local government, tangata whenua and communities as well as HNZPT and the New Zealand Archaeological Association (NZAA).	Noted - will consider producing new guidance to accompany the Policy and update existing guidance.

Section	Theme Text	Submission	Relief Sought	Response
		ensure consistency and clarity. This guidance should be developed through a process involving local government, tangata whenua and communities as well as HNZPT and the New Zealand Archaeological Association (NZAA).		
	Legislative context	Although each of the Statements of General Policy includes an introduction, outline of the legislative context and an interpretive section they lack a clear explanation as to why they have been prepared (aside from being a requirement under s.16 HNZPTA) and what they are seeking to achieve. The policies would benefit from this further contextual information, such as that set out in the Conservation General Policy (pg.8) and the General Policy for National Parks (pg.9).	Set out rationale for preparation of policies and what they will achieve	Accept - see page 6 "Why publish a policy?"
	Legislative context	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. The language used in the Draft Policies should be appropriate and not able to be interpreted in an unintended way. [ref Environmental Defence Society Inc v New Zealand King Salmon Company Ltd ("New Zealand King Salmon") [2014] NZSC 38.]	Take care in using language such as "avoid"	Noted - however this document describes how we will advocate, it is the wording in RMA plans that will be subject to legal interpretation.
	Legislative context	The Policy does not contain any reference to the Legislative Context under which it is published and in particular the HNZPTA and the RMA. Quotes sections 3 [quoted on page 3 of Policy], 13 and 14, nor the Building Act requirements.	The Policy should contain reference to Legislative Context as per all the other Policies.	Noted - Section 3 is quoted on page 3 of Policy. Section 17 on p. 9, sections 13 and 14 discussed on page 9 along with section 27.
	Legislative context	Amendments seek to ensure that Heritage NZ's guidelines, as set out in the draft policies, are consistent with the provisions of the Act. This is to ensure certainty and clarity in the interpretation of the HNZPTA by HNZPT and to ensure that the policies do not inadvertently widen the scope of any of the provisions in the Act.	Ensure correct interpretation of the HNZPTA	Noted
	Maori representation/ Treaty	Treaty Relationship The submitter has an expectation that the Crown will honour Te Tiriti o Waitangi (the Treaty) and the principles upon which the Treaty is founded. Kaitiakitanga	Acknowledge treaty relationship	Noted - covered on page 19 under heading "Working with iwi and hapu"

Section	Theme Text	Submission	Relief Sought	Response
		<ul style="list-style-type: none"> <li>· In keeping with kaitiaki responsibilities, the submitter has an interest in ensuring sustainable management of natural resources, including protection of taonga and mahinga kai for future generations</li> <li>· The submitters are both users of natural resources, and stewards of those resources. At all times, they are guided by the tribal whakatauki: “mō tātou, ā, mō kā uri ā muri ake nei” (for us and our descendants after us).</li> </ul> <p>Whanaungatanga</p> <p>The submitter has a responsibility to promote the wellbeing of iwi and hapū, and ensure that the management of their assets and the wider management of natural resources supports the development of iwi members.</p>		
	Process of preparing policies	“Policy” has to be a climbing frame, not a cage; if these statutory policies are kept under continuous review and fine-tuned to align with the market (New Zealand as it keeps evolving) rather than to align with administrative convenience, then we will all benefit.	Review and fine tune the policies to keep them current	Noted - the policies will be addressed within 10 years or if there is a significant change in circumstances
	Process of preparing policies	Concern over the process by which these Policies will be developed. The Policies state that “HNZPT will consider all submissions received on the draft policy.” In line with standard practices for other jurisdictions:	Requests the opportunity to meet with those who make the decisions on submissions and speak to our submission Requests that a document outlining how issues raised in submission have been addressed be made available	Accept

## Principles

Principle	Theme	Submission	Relief Sought	Response
1	None	This sentence should be deleted or, alternatively, amended to reflect the reality that not every person values heritage and that the use and function of a property may be more important.	<del>People value heritage because it establishes and enhances our sense of place and national identity.</del> Or People <u>may</u> value heritage because it establishes....	Accept in part - reworded

Principle	Theme	Submission	Relief Sought	Response
2	None	Reword the Principle to take account of the wording of the HNZPTA	Historical and cultural heritage is a <del>finite, non-renewable limited</del> resource <del>that</del> and the options of present and future generations should be safeguarded. <del>for present and future generations.</del>	Reject - this Principle is not simply a restatement of the HNZPTA, and if it were it would say that "the <u>conservation</u> of NZ's historical and cultural heritage should safeguard the options of present and future generations". This principle is about safeguarding the resource.
3	General support for Advocacy Policy	Support HNZPT's advocacy towards increasing the resilience of New Zealand's historical and cultural heritage.	Support	Noted/Retain
3	None	We support the principles set out in the draft Policy. In particular we consider that "Principle 3: Enhancing resilience" appropriately recognises that advocacy for the conservation of historical and cultural heritage takes into account adaption needed for the on-going use of buildings and structures. As identified above, we have developed a best practice guide for installation of telecommunications equipment into heritage buildings in a manner that minimises physical and visual impact. This involved consultation with HNZ. Allowing for the installation of new services or technology to heritage buildings is essential to ensure that these buildings remain desirable for tenants and owners and are able to offer the same advantages as non-heritage buildings. This in turn is likely to result in investment in these buildings, therefore ensuring heritage values are protected and maintained long-term. While we recognise that particular care needs to be taken to connect new services (or upgrade existing services) with respect to heritage buildings, we consider that this needs to be balanced with the need to allow continued use in a manner that can adapt to remain competitive. We consider the Chorus best practice guide allows for this to occur and we acknowledge the contribution made by HNZPT in the development of this document. We consider that there is a continued need for communication and collaboration as this document is utilised and refined in the quickly evolving telecommunications environment.	Support	Noted/Retain
3	Editorial	Reword principle	...historical and cultural heritage from natural <u>and non-natural hazards</u> . <del>and</del>	Reject - fire is a natural hazard that may also be the result of human

Principle	Theme	Submission	Relief Sought	Response
			other hazards such as fire-	activity, and is a key risk to NZ heritage
6	Protection of wāhi tapu sites	<p>The Regional Policy Statement (RPS) provides a framework for sustainably managing the regions natural and physical resources. It highlights regionally significant issues with our land, air, fresh and coastal water, infrastructure and biodiversity, including issues of significance to iwi. It directs the management of resources by Regional, city and district councils through the setting of objectives, policies and methods.</p> <p>The RPS for the Bay of Plenty identifies the damage and destruction of special cultural sites (waahi tapu, sites of traditional cultural activities and other ancestral sites and taonga with which Māori have a special relationship) as a regionally significant issue under matters of national importance. The development and implementation of appropriate policies and methods is a way of addressing the issue, integrated management is also necessary in order to achieve better outcomes through greater collaboration and coordination of the role of heritage agencies, professionals, owners and the community.</p>	RPS important in safeguarding heritage, particularly cultural sites	Accept - role of RPS on pages 10, 11, and policy 13.1 and will be discussed further in guidance
6	Protection of wāhi tapu sites	<p>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.</p> <p>RECOMMENDATION A: wherever possible, mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.</p>	See specific submission points	Noted
7	None	Supports the explicit recognition of the role of landowners and the impact that owning heritage sites and places can have	Support and retain	Noted/Retain
8	None	Supports the need to work collaboratively in relation to the management of historical and cultural heritage.	Support and retain	Noted/Retain
8	None	Given the scale of the UFB rollout we are constantly looking for opportunities to deploy our network as efficiently as possible while ensuring we meet our necessary statutory obligations. This has included seeking global archaeological authorities in some areas (eg. Dunedin). Given the UFB rollout is a national programme of works any	Add industry and infrastructure providers	Accept - new Objective and policies added to recognise the role of a wide range of wide range of business and industry groups

Principle	Theme	Submission	Relief Sought	Response
		opportunities to achieve national consistency are supported. In this regard we consider that working with HNZPT at a national office level to establish an agreed set of principles and processes around global authorities for our works provides significant benefits. Principle 9 [now 8] recognises that the most effective way of promoting conservation, protection and preservation of historical and cultural heritage is working collaboratively with a range of interest groups, including “businesses”. It is not clear whether this includes industry and utility providers , with the subsequent objectives and policies: who we work with in advocating for historical and cultural heritage not specifically recognising this group.		
8	None	Add funding entities - local, private, e.g. Lotteries	Add collaboration with funding entities - local, private, e.g. Lotteries	Accept in part- incentive funding is discussed in policies 13.7 and 3.2
8	General support for Advocacy Policy	<p>Council acknowledges that it has a role to play with regards to Heritage Protection. As a small Council with limited resources and little to no Heritage expertise in house, it is considered fundamental that Council has a strong ongoing working relationship with HNZPT to ensure the requirements under both the HNZPTA and the RMA are met.</p> <p>Council has a role of advocating on behalf of it’s communities when approached for comments by organisations that may have an effect on them. Therefore the main themes of the submission are to support Policy direction that requires HNZPT to:</p> <ul style="list-style-type: none"> <li>• establish and maintain relationships between owners of Heritage sites;</li> <li>• consult and take into consideration the interests of iwi, hapu, landowners, applicants and affected parties when HNZPT is making a determination on applications pertaining to an archaeological sites and Heritage features;</li> <li>• establish and maintain a collaborative working relationship with local authorities; and</li> <li>• have information readily available online.</li> </ul>	Support (see specific submission points)	Noted/Retain
5, 9	Guidance	We support and see an opportunity for HNZPT to provide best practice and information (Principle 6) and work collaboratively (Principle 9) with telecommunications providers and heritage building owners for the	Support providing guidance	Noted/Retain

Principle	Theme	Submission	Relief Sought	Response
		<p>benefit of historic and cultural heritage. HNZPT is in an integral position as the primary source of advice and information with respect to works on heritage buildings, one of these areas includes the strengthening of earthquake prone buildings. We understand that HNZPT has been actively involved in working with owners of heritage buildings throughout the country in this regard. Many of these buildings are multi-tenanted units such as apartments, commercial or mixed use. As part of the information supplied to building owners we consider that the need to appropriately future proof the building should be communicated. This is based on our experiences where strengthening works undertaken to a heritage building (an apartment) has resulted in removing any opportunity for further internal cabling, therefore connecting the tenants to UFB would require extensive external works and consequently a significant effect on heritage values. In this instance we have not been able to proceed with the request for service. Had the building owner been aware of the need to future proof the building during strengthening works the appropriate ducts and cabling could have been installed and therefore this situation avoided. We see HNZPT as being in a position to be able to pass on this information as part of its role in advocating for best practice in addition to working collaboratively with telecommunications providers when exceptions do arise.</p>		

### Objective 1 – Principles of valuing and conserving historical and cultural heritage

Draft Objective	Policy	Final objective	Theme	Submission	Relief Sought	Response
1	0		Interests of owners	<p>We have no objection to the objective and policies and strongly support the retention of the policies associated with:</p> <ul style="list-style-type: none"> <li>• the need to protect public safety and acknowledgement of the risks that may be posed by heritage structures and;</li> <li>• the recognition of the rights of owners.</li> </ul>	Support	Noted/Retain



Draft Objective	Policy	Final objective	Theme	Submission	Relief Sought	Response
1	0		Interests of owners	Supports the recognition of the interests of owners.	Retain in Policy	Noted/Retain
1	1.1		None	While curtilage is used in the Act, '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.	...contribution of the curtilage <u>grounds</u> and setting...	Accept - curtilage is not used in the HNZPTA so deleted but retained setting, as it suggests a connection with the heritage item.
1	1.1		Interests of owners	These aspects of the interests of owners should also be recognised when identifying, protecting, preserving and conserving historical and cultural heritage.	recognise the interests of owners, <u>including use of their land and economic effects</u>	Reject - too specific for this general list which is largely based on the requirements of the HNZPTA
1	1.1		None	Add two new bullet points of matters to be recognised when identifying, protecting, preserving and conserving historical and cultural heritage.	<u>recognise the cost of heritage protection, preservation and conservation recognise that heritage that is in use is more likely to be cared for and maintained</u>	Accept in part - bullet point 6 addresses use and maintenance, but costs are recognised in policy 8.4
1	1.1		Interests of owners	Supports the explicit recognition of the role and interests of landowners.	Support and retain	Noted/Retain
1	1.1		None	Policy 1.1 recognises "that the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage should ... take account of the cumulative effects of a series of incremental changes". The policy could usefully state that incremental changes to both places and areas on the New Zealand Heritage List will be considered.	Address incremental changes to both places and areas on the List	Accept - added "places and areas" to 1.1
1	1.1		Interests of owners	Policy 1.1, bullet point 9: recognise the interests of owners. Most of the matters listed under policy 1.1 commence with the phrase to 'take account of'. In contrast the interests of the owner are to be 'recognised'. We believe that 'taking account of' a matter is a more active and requires a higher degree of consideration than to merely 'recognise' something. To 'recognise' may only require a passive acknowledgement that the interest exists, but suggests that those views may then be readily discounted.	Replace the word 'recognise' with the words 'take account of'.	Reject - Most of this list directly reflects the wording in the HNZPTA. The bullet points have been linked to the HNZPTA sections 13, 14 and 27, and bullet point 3 has been changed to "recognise" not "respect"

Draft Objective	Policy	Final objective	Theme	Submission	Relief Sought	Response
				Given that heritage listing can potentially limit the use and change of use, and has cost implications regarding maintenance and operations, it is imperative that the interests of the owner are given equal weighting to the other important matters listed in the bullet points.		
1	1.1		None	Add new bullet points to policy recognising the cost of heritage protection and that heritage in use is more likely to be cared for and maintained	Add new bullet points recognising the cost of heritage protection and that heritage in use is more likely to be cared for and maintained	Accept - bullet points added to policy 1.1 and policy 8.4
1	1.1		None	The safety of people who occupy heritage buildings must be given greater weight. Public safety is a mandatory outcome in its own right, not simply a matter to have regard to.	Add: - Enable those who occupy historical and cultural heritage structures to do so safely. Minimise the risk posed by heritage structures which do not meet the relevant requirements of the Building Code.	Noted - this is covered on p. 8, in Principle 3, and under policy 1.1 and 13.5
1			None	Amend to reflect that restrictions may have an actual effect on commercial value, as opposed to merely a "perceived" effect. Further, restrictions may also affect the function and use of a building.	...restrictions on owners' property rights and may be perceived as reducing <u>reduce the function and use, and</u> commercial value of heritage properties.	Reject - requirements for conservation need not reduce functionality and use.

## Objective 2 – Prioritising involvement

2	0		Reliance on local groups or councils	If HNZPT moves to further reduce its involvement in advocacy, much of the load will inevitably be transferred to voluntary community heritage groups. Following the dissolving of the old Branch Committees these groups are trying to find their feet and are under pressure to grow and develop. Post-earthquake Christchurch is an extreme example of this, but demands are large in many other centres. Participating in RMA and similar	HNZPT might consider the example of the Department of Conservation, which has adopted a partnership approach with voluntary and community groups. The Department acknowledges that it cannot achieve its strategic	Accept - added new policies under objective 9
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				<p>processes places a large demand on volunteer effort. This cannot completely replace the role of HNZPT, particularly if it lessens its role in Category Two places. 10. We urge HNZPT to consider adopting a partnership approach whereby it would work together with voluntary groups to achieve common aims. The benefits would be mutual.</p> <p>HNZPT should also not overlook its own membership, which could be a valuable resource for volunteer input.</p> <p>It is disappointing that the policy does not even mention the voluntary heritage sector, let alone how the two might work together.</p>	<p>aims without this approach.</p> <p>Some ways in which such a policy might work for HNZPT are: · Information sharing on issues and strategies · Consultation on submissions · Practical and moral support from HNZPT to groups, e.g. staff advice</p>	
2	0		None	<p>The policy does not appear to address the issue of advocacy relating to threatened buildings/sites which are not on the list including those which are not on the lists of territorial authorities. There is a need to develop a policy which directly addresses this situation. If advocacy for such buildings/sites is to be left entirely to community groups this needs to be specifically acknowledged in the policy and if that it so, it reinforces the need for a much stronger policy on the relationship between HNZPT and community groups.</p>	<p>Develop a policy on advocating for unlisted, unscheduled heritage</p>	<p>Noted- this is covered by Objective 2 and associated policies to the extent that advocating for places not on the List falls within the criteria, and includes a policy on working with local heritage organisations (policy 2.5 and Objective 9).</p>
2	0		None	<p>HNZ's role in advocating for historic and cultural heritage is strongly supported and the need to prioritise the allocation of resources is acknowledged.</p>	<p>Support</p>	<p>Noted/Retain</p>
2	0		None	<p>while issues of risk and resilience are recognised in the draft policies (e.g. Policies 2.1, 11.2, 12.1), further clarity regarding HNZ's position on how the inherent tension between life safety and retention of heritage values is to be managed in relation to earthquake-prone heritage buildings would assist.</p>	<p>Further clarity regarding HNZ's position on how the inherent tension between life safety and retention of heritage values is to be managed in relation to earthquake-prone heritage buildings would assist. Also relates to objectives 11 and 12</p>	<p>Noted - this is covered in part by policy 13.5 and will be the subject of further guidance once proposed changes to the Building Act regarding earthquake prone buildings are finalised.</p>
2	0		None	<p>Support the prioritising involvement policies as they align with some of our aspirations.</p>	<p>Support</p>	<p>Noted/Retain</p>
2	0		None	<p>Appreciates the need for HNZPT to prioritise workstreams and make the most efficient and effective use of funding. Also understands that it is more effective to devote resources to early</p>	<p>Doesn't support reducing advocacy effort - expect a robust review and assessment process</p>	<p>Noted - covered by policy 2.4, monitoring the effectiveness of HNZPT advocacy</p>

				advice and input to the development of plans and policies. However, cautions HNZPT against the scaling back of their participation as an active advocate, especially with regard to policy and consent processes, for the conservation of historical and cultural heritage.	be implemented to measure the effectiveness of the proposed scaling back of any adversarial or non-adversarial intervention by HNZPT in the protection of historic and cultural heritage.	
2	0		None	The policy relating to community groups is inadequate. It seems to envisage only the limited role of providing information about information held by HNZPT on local historical and cultural values and providing information on legislative processes and guidance on best practice. Such a policy could be met by merely providing a few pamphlets but a much more active approach is required than this if the role of protecting Category 2 buildings is to be largely left in the hands of local communities. Although this is never explicitly stated in the policy, reading between the lines it is difficult to avoid the conclusion, that the focus of HNZPT efforts will be on the landmark list and Category 1 buildings, especially given the budget constraints they face. If this is indeed the case, it is vital to provide stronger policies around education of community groups because the Category 2 buildings collectively contribute greatly to the character of New Zealand. Furthermore, unlike the policy in relation to working with building owners there is no recognition that there could be occasions when it is appropriate to work collaboratively with community groups on resource consent applications.	Acknowledge the role of community groups, particularly if advocacy for Category 2 buildings is largely to be left to local groups.	Accept - Added policy 9.2
2	0		None	Under the heading "What is statutory advocacy" (page 8), the draft states:Our key advocacy role is giving advice. However, in some cases heritage protection measures may restrict the uses owners can make of a property and our advice may not be well-received. The bullet points in the following paragraph emphasise the provision of advice and non-regulatory methods of heritage conservation. The only mention of statutory advocacy is in the third point, which speaks almost as an after-thought, of:-"Where necessary, becoming involved in the formal consent process."This playing down of statutory RMA-type advocacy is carried on to later stages of the draft. Under the heading	These limited statements are not in accordance with HNZPT's statutory functions in section 13 and should be more aligned to the full intent of the Act.It should also be kept in mind that, while larger local authorities tend to employ heritage professionals for their RMA work, smaller councils often reply on HNZPT's staff advice.	Rejected - "Advocacy" means arguing for something - in this case heritage. The majority of current advocacy work is providing advice to owners, consent applicants, and councils. A very small proportion of HNZPT current workload is involved with submitting in opposition to resource consents, and an even smaller proportion in appeals -

				<p>“Addressing the most important issues” (page 17), two key statements are made: The majority of our advocacy work focuses on providing information and advice...Adversarial methods such as submitting against proposals and appealing decisions should be a last resort.Overall the statements in this section are extremely cautious and qualified. Summing them up: · HNZPT has to establish clear priorities for it advocacy work · To determine significance, the criteria for the Heritage List “can be used”. · Non-adversarial methods are more effective · Adversarial methods such as submissions against proposals and appeals should be a “last resort”</p>		and these mostly appeals against plan decisions, not resource consents.
2	0		None	<p>Urges HNZPT to modify the draft policy to: · Clarify and strengthen HNZPT’s role in statutory advocacy · Strengthen the role of the NZ Heritage List as the basis for decisions on advocacy action · Recognise and involve the voluntary heritage sector in its advocacy work.</p>	<p>Modify the draft policy to: · Clarify and strengthen HNZPT’s role in statutory advocacy · Strengthen the role of the NZ Heritage List as the basis for decisions on advocacy action · Recognise and involve the voluntary heritage sector in its advocacy work.</p>	Noted and generally Accepted - see individual submission points
2	0		None	<p>While there are limits to HNZPT’s resources, consequently HNZPT needs to prioritise the cases it participates in and the actions it takes. To maintain credibility HNZPT needs to develop clear criteria for its decision-making. There are strong public expectations of the role HNZPT will play in the protection of New Zealand’s Heritage. At the same time, constraints on financial and staff resources, and the expectations of Government, may limit HNZPT’s scope of action. HPA submits that the present draft policy does not adequately address how HNZPT will seek to reconcile these conflicting expectations.</p>	<p>The present draft policy does not adequately address how HNZPT will seek to reconcile these conflicting expectations.</p>	Noted - this is covered in Objectives 2, 3, and 4
2	0		None	<p>When determining when advocacy for a heritage place is warranted HNZPT needs to recognise that not all heritage places are registered or listed. This occurs for a number of reasons, including a lack of resources by HNZPT. When a community identifies a potential heritage site as being in imminent threat HNZPT should undertake a review as to the significance of the</p>	<p>The List is not comprehensive and reducing resources to supporting only Cat 1 would severely inhibit the activities of HNZPT in the advocacy and protection of Heritage.</p>	Reject - the List status of a heritage item is a primary indicator, but not the only indicator, of heritage significance.

				<p>site. In the decision of the Environment Court, Donnelly v Gisborne District Council A013/99, relating to the issuing of a Heritage Order for the protection of the Peel Street Toilets in Gisborne, the judge noted the words of Judge Sheppard in Decision No A83/94 that the determination of heritage is based on “the view of a reasonably ordinary person who is well informed and representative of the community at large”. i.e. not whether something is on a list or not. 8. HPA understands that HNZPT may decide to make a practical decision to provide considerably less resources for advocacy (formal and informal) to the List’s Cat 2 Historic Places etc. HPA submits this is in direct conflict and undermines HNZPT general List Policy of making it authoritative, comprehensive and of lasting value.</p>	<p>In view of the disproportionate number of listings in Category 2, which if a decision were made to reduce support for Cat 2 listing it will be popularly perceived that HNZPT is abdicating its responsibility for the advocacy and preservation of Heritage and the List.</p>	
2	0		None	<p>Prioritising involvement – the role of the NZ Heritage List. Concerned at the apparent playing down of the role of the Heritage List, in particular what seems to be an attempt to sidestep the List when addressing HNZPT’s involvement in heritage issues. The List and its forerunners have been based on thorough research and a large amount of work by heritage professionals and volunteers over 45 years. It has credibility and has become a key part of our heritage system. Despite this, the draft policy downplays the List and avoids acknowledging its key role in judgements of heritage value. Objective 2, Policy 2.2 states that “Assessment of significance takes account of the criteria used to determine significance when entering items onto the NZ Heritage List.”. This is a surprising statement. It suggest that HNZPT will pick and choose what places it finds significant, “taking account” of the List criteria. One would expect that any significance assessment would look first and foremost at whether or not the item had List status, and in which category. This downplaying of the List is a consistent theme throughout the policy. In fact, it never states outright that List status will be a criterion for advocacy action. There is no mention of the List categories and how they might influence HNZPT decisions on its advocacy roles. An assumption seems to be developing that HNZPT will in future not advocate for or take</p>	<p>Give more weight to List status in prioritising work</p>	<p>Reject - See previous comment - the NZ Heritage List status of a heritage item is a primary indicator, but not the only indicator, of heritage significance.</p>

				protection action on Category Two places. Yet this policy avoids stating that prioritising will be based on List status. The downplaying of Category Two places may well be implied, but to avoid the issue in a detailed policy statement of this type is not credible. The importance of List status in the RMA system is illustrated by the decisions of the Environment Court in the case of Harcourts Building. The Category One status of that building was a key factor in the decisions of the Court to deny consent to demolish. One has to ask whether HNZPT would in future devote resources to fighting this case through the RMA system. Similarly with the issuing of a Protection Order for the No9-11 Building in Gisborne which as a Category 2 building.		
2	0		None	Consistency throughout policies. Bullet 4 Efficiency refers to "identification". This should also be referred to in the Objective 2.	HNZPT prioritises its work by focussing on promoting the <u>identification</u> , <u>protection</u> , <u>preservation</u> and conservation of...	Reject - the primary focus of HNZPT's <u>advocacy</u> is promoting protection and conservation, in this context identification is a subset, relating primarily to identification in plan schedules so sites can be protected.
2	0		None	The paragraphs under the heading "addressing the most important issues" appear to have an introductory/ explanation function. The 4th paragraph refers to the emphasis on early informed advice and ends with adversarial methods such as submissions and appeals being a last resort. This paragraph should be amended to say that potential destruction may warrant adversarial methods on the basis that it involves the loss of a non-renewable legacy. Such an amendment would better encompass the policy 13.2 regarding the possibility of opposing resource consent applications that result in the destruction of significant historical and cultural places, sites or features where there are reasonable alternatives.	This paragraph should be amended to say that potential destruction may warrant adversarial methods on the basis that it involves the loss of a non-renewable legacy.	Reject - Objective 2 and policy 14.2 need to be read together. The non-renewable quality of heritage is discussed on page 7
2	2.1		None	The policies are all generally obvious, worthy etc BUT there is a real sting in the tail. With the creation under the new HNZPTA of the new Landmarks category there will be greater emphasis on individual places at the the end of the list, ie Landmarks and Category I. It would be administratively easy to make all	include wording to the effect that 'each case is considered on its merits' and that a registration by HNZPT as Landmark, Category 1 or Category 2 does not preclude	Noted- this is already implicit in Objective 2 and associated policies, particularly policies 2.2 and 2.3

				Category 2 places as 'second grade' and by default not worthy of being defended by HNZPT should the fate of one of them end up in the Environment Court or the like. In reality the Category 2 places - there are 4 times as many of them compared to Category 1s - are perhaps not so important individually, but they are likely to be the very sorts of places, individually or in clusters, that give areas character.	increasing the level of HNZPT interest in the conservation of Category 2s should the context of time or place of the conservation risk make this appropriate.	
2	2.1		None	There is a need for greater policy guidance on prioritisation (i.e. Policies 2.1-2.3), particularly in relation to demands for protection of places of low heritage significance or areas having 'character' value. In particular we note that as the national heritage agency HNZ's focus should principally be centred on places of outstanding significance to NZ, but that this is often distracted by local communities advocating that it 'saves' places of low heritage significance or areas of 'character' vs. heritage value.	More guidance on prioritisation, particularly on places of lower heritage significance, clarify national focus.	Noted - will consider producing guidance to accompany the Policy and/or revision of existing guidance
2	2.1		Reliance on local groups or councils	<p>Introduction and Policy 2.1</p> <p>The objective and policies around prioritisation of involvement are unclear as to what HNZPT consider to be significant and where and when advocacy resources would be expended. The criteria proposed do not provide any certainty either for regulatory authorities, landowners, developers or heritage interest groups. It would be considerably clearer if significance was attached to HNZPT registered items and/or items listed in Regional and District Plans with an additional policy around exceptions for unidentified heritage. In the worst case scenario HNZPT, at a minimum should have involvement with items on the Heritage New Zealand List. This should not be limited to Category 1 items.</p> <p>HNZPT play an essential advocacy /advice role particularly with smaller Local Authorities who have limited or no heritage expertise available to them. Any reduction in support could lead to a loss of historic heritage or inappropriate works being undertaken. Any reduction in support could lead to smaller local authorities being reluctant to list heritage items. If HNZPT is unable to provide the staff resource a fund should be made</p>	Concern at potential lack of heritage support to smaller local authorities	Noted - this objective does not preclude providing advice to local authorities and this is covered in the section "Working with local government, particularly Objective 12



				available to support Local Authorities who may need to engage external heritage advice. The bullet point on efficiency is difficult to understand and should be reworded.		
2	2.1		None	Significance denotes by its definition that it must be an important aspect, and not just "some aspect".	Significance – The significance of the place in terms of its ability to illustrate an association with some aspect <u>an important aspect</u> of our heritage, culture and identity.	Noted - but the significance assessment would take account of the degree of importance of the aspect of our heritage.
2	2.1		None	Clarify what the outcomes and strategic policies are and where they can be found.	...is aligned to HNZPT outcomes and strategic priorities.	Noted - currently the outcomes and priorities are set out in the Statement of Intent and Statement of Performance Expectations
2	2.2		None	If these are already criteria delete otherwise replace "taking account of" with "including".	... when entering items onto the New Zealand Heritage List, taking account of cultural, physical, and historic values.	Accept - see reworded policy 2.3
2	2.2		None	The HNZPT criteria for significance should be spelled out in the policy so that the criteria used are transparent to the reader. A policy would along the following lines may be more transparent: • When entering items onto the New Zealand Heritage S66(3) HNZPTA shall be used to determine significance.	When entering items onto the New Zealand Heritage S66(3) HNZPTA shall be used to determine significance	Accept in part: "takes account of" amended to "is based on" the s 66 criteria.
2	2.3		Covenants	The retention of heritage relies on the awareness of the general public and on their advocacy. Since the status of a covenant ensures the perpetuity of identified historical values, it should be mandatory that the support of the community is gained before that status is reached.	Require community support before a covenant is placed on a historic place	Reject. A heritage covenant as set out in the HNZPTA is negotiated with the owner and any party with a legal interest in the land. Requiring community support would restrict the owner's property rights (the owner must agree) Note that a covenant is not necessarily in perpetuity, it may be for a specified time period or until a specified event occurs.

2	2.3		None	Whether there is support from the landowner is relevant to Heritage NZ's advocacy for heritage.	Amend as follows: Policy 2.3: Our advocacy for significant historical and cultural heritage takes account of whether there is community [and/or landowner] support for retention of heritage.	Accept
2	2.3		None	With regard to 'Addressing the most important issues' on p. 17 of the document, it is stated that HNZPT will submit against proposals and appeal planning decisions as a 'last resort'. The policy suggests that HNZPT will rarely use the RMA submission and/or appeals process to advocate for the conservation of historic heritage resources. DOCOMOMO NZ submits that the policy should acknowledge that adversarial methods might be necessary where HNZPT forms an expert view that such an approach is required in order to sustainably manage significant heritage. This is particularly relevant to Policy 2.3, in which it is stated that advocacy by HNZPT will take account of community support for retention, as it is typically during the submission and/or appeal process that community efforts to prevent demolition of historic buildings and places are galvanized.	Adversarial methods may be needed to sustainably manage significant heritage	Noted - clarified that adversarial methods (i.e. appeals) are a last resort, as distinct from submissions, which are mostly not adversarial.
2	2.3		None	Community support should be significant as opposed to any support sufficing. Support from the owner should be considered, including what they need to achieve, and their issues.	...takes into account of whether there is <u>broad</u> community and <u>owner</u> support for retention of heritage.	Accepted in part - see revised 2.2 including owner support

### Objective 3 – Targeting protection mechanisms

3	0		None	Supports the explicit recognition of the role of landowners and the need to support them due to the impact that owning heritage sites and places can have.	Retain policies 3.1 to 3.3	Noted/Retain
3	0		None	Objective 3 and associated policies are supported as the mechanisms proposed are well balanced between regulatory and	Support	Noted/Retain

				non-regulatory approaches.		
3	0		None	Notwithstanding that the policy sensibly notes: "It is more effective to devote resources to non-adversarial methods", there could usefully be some policy recognition of the leadership role of HNZPT in pursuing Environment Court proceedings on matters of principle (such as the Masonic Tavern and Harcourts cases).	Address the need for taking an adversarial role	Reject - the policy is clear that the focus of HNZPT advocacy is on early involvement and non-adversarial methods. Major cases are determined on a case by case basis.
3	0		None	To be consistent with objective 2, specific heritage protection mechanisms should only be used in relation to significant historical and cultural heritage. This change is required through the document given the broad definition of heritage.	AMEND TO : We promote the use of the most appropriate protection mechanism to achieve the best outcome for significant historical and cultural heritage.	Reject - this objective is about mechanisms, determining which heritage to advocate for is covered in Objective 2
3	0		None	Achieving the best outcome may not be possible. As currently drafted this objective appears high-handed rather than encouraging, which may give rise to negative perceptions by building owners.	...achieve the best <u>possible</u> outcome for historical...	Reject - qualifier not necessary
3	3.1		None	Policy 3.1 states: "We encourage local authorities to provide incentives for heritage protection, including but not limited to rates relief, loans and grants, fee waivers, and relaxation of planning provisions to facilitate adaptive reuse where such a relaxation would lead to a better heritage outcome". There could usefully be a related policy stating that HNZPT will develop robust cost-benefit analyses of various incentive options to underpin its promotion of such protection mechanisms.	Develop cost benefit analysis of incentive options to underpin promotion	Noted - this is one of the information gaps in policy 5.2 and 16.3
3	3.2		None	Outcomes may not always be positive, but could be the "least negative" outcome.	...protection work that will result in positive <u>the best possible</u> outcomes for heritage.	Reject - HNZPT will not support funding applications if they do not result in a positive outcome for heritage
3	3.2		None	Policy 3.2 should also address incentives provided by HNZ.	AMEND TO "We provide incentives and support owners of historical and cultural heritage in their applications for funding for significant heritage protection work that will result in positive outcomes for heritage."	Accept - new Objective 3.4 added on HNZPT Incentive Fund

3	3.3		None	Policy 3.3 should provide that HNZPT will investigate and apply the most appropriate protection mechanisms. A collaborative 'partnering' approach should be used when agreeing with parties on the mechanism to be used - this approach is supported by the principles of the HNZPTA (section 4) which recognise that there is value in collaborative approaches.	AMEND TO "We support, in <u>collaboration with owners</u> , the most appropriate mechanisms for protecting significant historical and cultural heritage, which could include, <u>memoranda of understanding</u> , seeking addition to a plan schedule, agreeing a covenant with the owner, issuing a notice of requirement for a heritage order or other mechanisms."	Accept in part - added memorandum of understanding. All these mechanisms provide for input from or agreement of the owner.
3	3.x		None	Policy 3.1 relates to adaptive reuse. However, work that is not adaptive reuse, but is required for the ongoing use of a building, for its intended purpose, in light of modern day needs should also be supported (e.g. accessibility, heating, electricity, toilets).	<u>We encourage the relaxation of planning provisions to facilitate the continued use of historical and cultural heritage, for its intended purpose, whilst meeting the changing needs of society and technology.</u>	Noted - this is addressed in Objective 13 and policy 13.1 bullet point 5

### Objective 4 – Early Input

4	0		None	We strongly support HNZPT policy around early involvement as this approach is the effective means of providing clear scope and direction at the outset of a project. While this is supported HNZPT need to ensure that they have the staff and resources to be involved timeously in the conceptual development of projects.	Support	Noted/Retain
4	0		None	Better outcomes will be achieved by providing for early input, at the stage that issues arise, and not only before decisions are made. Further, some issues that arise are not as a result of active decisions by owners. For example, buildings will degrade if not maintained. It is often not an active decision not to maintain buildings; owners are just doing what they can, with what they	...being involved in the process of identification, protection, <u>preservation</u> and conservation...before decisions <u>and issues</u> , affecting historical and cultural heritage are made	Reject - preservation in this context may imply "no change" and this objective is about input to decision-making processes

				have.	occur.	
4	4.1		None	Consultation and early input is key to an efficient and streamlined approach. It helps maintain positive relationships between parties and helps avoid ongoing disputes	Retain policies 4.1-2	Noted/Retain
4	4.2		Early Engagement	We support HNZPT's commitment to early engagement with councils and others. This is expressed in relation to several different aspects of resource management processes, including: <ul style="list-style-type: none"> <li>• Policy 4.2 that HNZPT will provide heritage input to local authorities at the early stages of revising policy statements, plans and other policy documents</li> <li>• Policy 11.1[now 12.1]that HNZPT will seek consultation with councils on the heritage components of plans at the pre-planning consultation stage.</li> </ul>	Support 4.2 and 12.1	Noted/Retain
4	4.2		None	As well as encouraging local authorities to provide incentives, HNZPT needs to ensure that councils seek advice early on in the process whether it be regarding new plan provisions or the discussion regarding proposals for restoration or conservation of heritage properties. Interaction early on in the process can result in a better outcome for all.	HNZPT needs to ensure that councils seek advice early on in the process whether it be regarding new plan provisions or the discussion regarding proposals for restoration or conservation of heritage properties (3.1)	Accept - amended Policy 4.2
4	4.2		None	Promoting the conservation of historical and cultural heritage. Objective 4 and Policies 4.1-4.2 reword Policy 4.2 to read 'We will establish and maintain a working relationship in order to provide efficient and effective heritage input to local authorities at the early stages of revising policy statements, plans and other documents'.	Retain but 2 reword Policy 4.2 to read 'We will establish and maintain a working relationship in order to provide efficient and effective heritage input to local authorities at the early stages of revising policy statements, plans and other documents'.	Accept in part - amended to "encourage local authorities to seek"

## Objective 5 – Sound information base

5	0		None	Objective 5 and Policies 5.1 – 5.4 – Supports Policy 5.1 ensuring information obtained through Heritage assessments are available to owners and decision makers. Seeks clarification, though, on who the decision makers are? Is it HNZPT or organisation?	Retain Objective and policies . Clarification, though, on who the decision makers are?	Noted - "decision makers" includes local authorities making decisions under the RMA
5	0		None	The extent of protection measures should clarify whether it is an area, the entire structure, part of the structure or even the footprint as a few examples of how items of historic value can be identified to avoid ambiguity of what is actually of historical value. This information, as outlined under the General Statement of Policy for Statutory Advocacy, will ensure the knowledge is accessible to all including the private land owner or for use in the statutory planning processes. It will also ensure that any planning decisions have the best of interest for protecting the historical value.	Clarify the extent of proposed protection measures	Noted - where proposals are made to place items on the NZ Heritage List on plan schedules, information on the List extent and whether the interior warrants protection is provided. For older List entries this information may not be available. HNZPT and councils need to work together where information is sparse to obtain the information in the most effective manner
5	5.1		None	Any entry within the New Zealand heritage list must be accompanied by an accurate assessment of the historical value, intensive and exhaustive research and agreement of others from the general public that what has been established as an historical account is definitive. Any account entered on the covenant document must be derived from in-depth and thorough research. Any deviation reduces the integrity of New Zealand Heritage and minimizes the effectiveness of its advocacy.	Proposal for a covenant should be based on thorough in-depth research	Reject - there is no information requirement for agreeing a covenant. In practice sufficient information would be needed to derive appropriate conditions to protect the heritage asset
5	5.1		None	This policy mentions that heritage assessment information will be available to owners. But it does not clarify whether owners will be actively involved in the sense of being able to review and comment on, perhaps even oppose certain opinions contained in the heritage assessment. Also, will owners be invited to seek the views of a different heritage expert	All owners of heritage places must be given the opportunity to review heritage assessments and obtain/submit alternative assessments to ensure objectivity and balanced outcomes are determined.	Reject - This policy is about making information available, not preparing the assessments.

5	5.2		None	<p>It is unclear what Policy 5.2 refers to. Does the policy mean that HNZPT will continue to review items on the HNZPT list and review and upgrade records that are deficient or does it mean that it will seek additional information from Archaeological Authority and resource consent applicants if HNZPT consider an information gap in an application? The intent of this policy requires clarification.</p> <p>If the policy refers to HNZPT continuing their upgrade process this is strongly supported. If the policy refers to the regulatory environment it needs to be clear that any additional information, required to fill a gap, is necessary and relevant to the application in hand. It would be unfair to expect applicants to undertake expensive additional research solely on the grounds that more information would benefit the historic record.</p>	Clarify	Accept - this policy is about identifying and managing risk. - amended to "methods of improving the management of this risk"
5	5.2		None	<p>Policy 5.2 states: "We identify gaps in the information needed to assess risks to historical and cultural heritage and methods of improving the resilience of this heritage". The economic resilience of heritage requires a comprehensive understanding of the costs and benefits of heritage retention at both a site specific and macro-economic level. The policy should direct HNZPT to become a leading source of well-informed information on the economics of heritage.</p>	The policy should direct HNZPT to become a leading source of well-informed information on the economics of heritage.	Reject - the policy is about managing risk to heritage. Other information gaps are addressed in policy 16.3

## Objective 6 - Recognising Maori values

6	0		Financial assistance and costs	<p>Eight submissions: I submit also that Maori input to processes is meaningless when iwi and hapu are not resourced to upgrade their knowledge of their cultural landscape.</p>	Provide resources to iwi and hapu	Reject – outside the scope of the Advocacy policy
6	0		Iwi management plans	<p>We note that Objectives 6 and 7 of the draft Statutory Advocacy Policy provide for HNZPT to work with iwi and hapu, and to recognise the relationship of Maori and their culture and traditions with and their role as kaitiaki of their ancestral lands, water, sites, wahi tupuna, wahi tapu and other taonga. We point out that many local authorities have strong working relationships with the iwi, hapu and whanau in their areas - for example, the</p>	Recognise local authority working relationships with iwi hapu and Iwi Management Plans in Objectives 6 and 7. We recommend that the Statutory Advocacy Policy makes specific acknowledgement (possibly	Accept - added policies 6.3 and 6.4 re Iwi Management Plans

				well-established commitment of Environment Canterbury and Ngai Tahu to our Tuia joint work programme. We note that many iwi and hapu have prepared their own Management Plans for the taonga, resources, sites and landscapes in their takiwa, with their own objectives, policies and kaupapa. Many council plans and policies refer to and are aligned with Iwi Management Plans.	under Objective 6) of Iwi Management Plans and any policies and provisions included in those Plans for the historic heritage of the iwi or hapu.	
6	0		Iwi management plans	Four submitters: The submitter, as an Iwi Authority on behalf of its 68 Marae and 33 Hapuu has significant provisions within its Iwi Management Plan that direct and guide developers as to how they should treat Waahi Tapu. The submitter also has an existing accord with the Ministry for culture and heritage and this submission supports the continuation of that relationship and the contents within that accord.	include a statement that states: "Where developers are proposing to develop, then they are to give effect to Whaanau, Hapuu, Iwi, Marae management plans and adhere to the guidelines within those plans where such plans exist"	Accept in part - added policies 6.3 and 6.4 re Iwi Management Plans
6	0		Iwi management plans	The submitter has had an Iwi Management Plan in place since 2012 and was awarded the Nancy Northcroft Planning Practice Award: Supreme Practice Award by NZPI in 2013 and Best Practice Award: Non-Statutory Planning for the Iwi Environmental Management Plan, May 2013.		Noted
6	0		Maori representation/Treaty	The submitter seeks to continue to work with HNZPT and embrace the Memorandum of Understanding and work towards a greater understanding for the wider public with regards to historical and cultural heritage.	Note the Memorandum of Understanding	Noted
6	0		None	The role of HNZPT in statutory advocacy including RMA processes is supported in principle. The provisions in the draft policy should be strengthened to ensure greater provision is given for Māori values in relevant statutory processes. HNZPT should also be actively working with iwi and hapū to build capacity to assist them to carry out their role as kaitiaki of natural heritage.	That objective 6 be amended, as follows: Objective 6: In all advocacy work HNZPT recognises [and provides for] the relationship of Māori and their culture and traditions with and their role as kaitiaki of their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga. That Policies 6.1 and 6.2 be amended as follows: Policy 6.1 We promote recognition of [and provision for] the relationship of	Reject - "Providing for" is beyond the scope of HNZPT authority and capability and is not an advocacy function. The proposed additional policy is covered within Objective 7 and associated policy, and the policies under Objective 7 address the scope of HNZPT assistance in "providing for" the role of iwi and hapu as kaitiaki of their historic heritage.



					Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga in carrying out our advocacy functions. Policy 6.2 We recognise [and provide for] the role of iwi and hapū as kaitiaki of their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga. That a further policy be inserted as follows: [HNZPT works actively with iwi and hapū to build capacity to assist them to carry out their role as kaitiaki of their cultural heritage.]	
6	0		None	Supports the advocacy work of HNZPT and that, as a strong component of this advocacy work, HNZPT works with iwi and hapū to recognise Māori values (Objective 6). Considers it extremely important that HNZPT acknowledges and accommodates the role of iwi and hapū as kaitiaki of their ancestral lands, water, wāhi tūpuna, wāhi tapu, and other taonga.	Acknowledge role of iwi and hapu as kaitiaki	Noted/Retained -and added policies 6.3 and 6.4 on iwi management plans
6	0		None	Issue: The views and values of Māori will inform decision making, assessments and actions under the HNZPTA (as opposed to just being taken into account) Issue: Ensure HNZPT has an accurate contact database for Māori to ensure the relevant iwi and hapū are notified as necessary. There is an expectation that HNZPT will provide resourcing (including funding and training opportunities) that support Māori effectively engaging in processes.	HNZPT to provide resources (including funding and training opportunities) to support effective Maori engagement in planning processes.	Rejected in part- funding is outside the scope of the policy but training is addressed in Objective 7
6	0		None	The following overall recommendations are made: · That HNZPT continues, and strengthens, its advocacy for the protection of Māori heritage · That HNZPT Pouhere Taonga considers our submission and addresses this submission fully before adopting the statements	Support	Noted/retain

				of general policy.		
6	0		Protection of wāhi tapu sites	Ten submissions state: I submit that whilst I have signalled support for the draft policies, the policies are geared to administrating rather than identifying heritage that should be preserved outright. RMA does it better under district plans as heritage items and rules. Having good knowledge and the information about heritage in front of you is preferable to learning about the whenua/koorero as you go (developments etc.). This often results in sites/waahi tapu being destroyed because of lack of knowledge. By that stage the RMA process has progressed far enough to justify 'considerable financial investment' by developers being the grounds (among others) to grant an authority. c. I submit that HNZ/Crown consider a proactive, preservation objective where sites are actively researched. Too many times the feedback is that 'there are known sites in various locations but the lack of resources means that the sites are not 'authenticated. The stories are therefore not accessed by the right people (mana whenua) and any development may proceed on the basis that there is no koorero. Note that I consider mana whenua to be the appropriate people rather than archaeologists. This needs to be a shared approach rather than solely science based.D. I submit that overall the policies lack this proactive approach.	HNZ/Crown consider a proactive, preservation objective where sites are actively researched	Reject - outside scope of advocacy policy
6	0			The submitter respectfully requests that HNZPT Pouhere Taonga accord this submission the status and weight due to the tribal collective, currently comprising over 50,000 members, registered in accordance with section 8 of the Act.	Give weight to submission	Noted
6	6.2		None	clarify how 'recognise' will be put into effect, especially in relation to decision-making, for example in policy 6.2	clarify how 'recognise' will be put into effect, especially in relation to decision-making, for example in policy 6.2	Noted

## Objective 7 – Conserving Maori heritage

7	0		Iwi	That the Statutory Advocacy Policy makes specific reference to	That a new policy be inserted as	Accept - discussion and policies
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			managem nt plans	Iwi Management Plans, specifically any policies included in those plans for the heritage sites of the Iwi.	follows: We acknowledge and recognise the policies and provisions in Iwi Management Plans pertaining to physical and intangible cultural heritage	6.3 and 6.4 re recognising Iwi Management Plans added
7	0		None	The submitter supports the need to work collaboratively with hapū and iwi. However, Auckland Airport also considers that landowners need to be included in the dialogue surrounding this process where that is relevant.	7.1-6 Retain as drafted, but include additional policy that recognises the role that landowners play in consultation with iwi and hapū around the conservation of Maori heritage.	Accept - added policy 6.4
7	0		None	The policies are supported.	That Policies 7.1 to 7.3 be retained.	Noted/Retain
7	0		None	Supports Heritage New Zealand’s policies developed to achieve Objective 7, the conservation of Māori heritage. Expects HNZPT to continue to work closely with iwi and hapū to achieve the desired outcomes of this policy objective.	Support - Continue to work closely with iwi and hapu	Noted/'Retain
7	0		None	Supports HNZPT in its engagement with local government to advocate for the protection of historic and cultural heritage. It is imperative HNZPT work with local authorities to ensure that they are consulted on the heritage components of resource management plans at the pre-planning consultation stage. The Trust expects HNZPT will specifically advocate for the recognition and protection of cultural heritage and sites, in consultation with iwi and hapū, in the objectives, policies and methods in RMA plans, including encouraging the development of schedules and appropriate rules to protect cultural heritage.Expects that Heritage New Zealand, as the central advocate for historic and cultural heritage will work with local government to offer advice and support for local government heritage management responsibilities and develop best practise methodologies and frameworks with regard to the protection of historic and cultural heritage.	Continue working with local authorities to advocate for the recognition and protection of cultural heritage and sites, in consultation with iwi and hapu, in RMA plans and processes. Also relates to objectives 11, 12, 13	Noted/Retain
7	7.1		None	As already mentioned, the submitter has experience in seeking out relevant cultural values / appropriate tangata whenua / iwi views. There are generally overlapping interests in urban, rural	That HNZPT gives consideration to the preparation of an internal manual to provide some detail in	Noted – HNZPT relies on its Maori Heritage staff to assist in identifying the correct

				and regional areas. There is a risk in assuming that the correct group/s can be easily identified, when in fact there can be many groups with interests – even some where the linkage may not be obvious. Also it is possible that the perspectives and wishes of Māori differ between iwi.	guidance and/or process for engaging with or recognising the correct iwi group/s to engage and the approach to balancing opinions.	people/groups to engage with.
7	7.4		None	Maori interest in all land is recognised	add: "...wahi tapu areas, wahi tupuna, or any other historic place or area of particular interest to mana whenua"	Amend- This policy is related to specific provisions in the HNZPTA (s 74 and s 75).
7	7.4		None	Supports Policy 7.1 HNZPT will work with iwi and hapu to identify Maori built heritage at risk and how they may be conserved. Suggests rewording Policy 7.4 to read "The Maori Heritage Council works with local authorities to provide input on any resource consent applications HNZPT is notified about that may affect wahi tapu areas". This establishes the type of relationship the Maori Heritage Council is to have with local authorities.	Support but suggests rewording Policy 7.4 to read "The Maori Heritage Council works with local authorities to provide input on any resource consent applications HNZPT is notified about that may affect wahi tapu areas". This establishes the type of relationship the Maori Heritage Council is to have with local authorities.	Accept in part - made this change to policy 7.6
7	7.6		None	Suggests rewording Policy 7.6 to read ' We will work with local authorities to ensure they are aware of their responsibilities to take into account of any recommendations of the Maori Heritage Council on proposals that may affect wahi tapu areas. This makes it clear who 'we ' is intended to be.	rewording Policy 7.6 to read ' We will work with local authorities to ensure they are aware of their responsibilities to take into account of any recommendations of the Maori Heritage Council on proposals that may affect wahi tapu areas. This makes it clear who 'we ' is intended to be.	Accept

### Objective 8 – Promoting engagement with historical and cultural heritage

8	0	10	None	Maori knowledge and tikanga is valued throughout all policies	add: (v) reflect the dual heritage of Aotearoa New Zealand	Noted - addressed in Objectives 6 and 7
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8	0	10	None	The policy has no reference to educating the general public about the role of HNZPT and the relevance of protecting New Zealand's historical and cultural heritage. At present there are many misconceptions relating to the work of HNZPT, what it means for a building to be scheduled, funding etc. This can create issues for owners of heritage buildings in terms of getting insurance, obtaining mortgages and selling properties. HNZPT has a roll to play in making sure that the general public of New Zealand are well informed about the heritage that is Listed, the implications and the work of the organisation and this should be added to the Policy.	HNZPT has a role to play in making sure that the general public of New Zealand are well informed about the heritage that is Listed, the implications and the work of the organisation and this should be added to the Policy.	Noted - addressed in Objective 10 (was 8) and associated policies
8	8.3	10	None	now 10.3	...or site has been irretrievably lost, but is not a <u>complete</u> substitute for retaining and conserving...	Reject - This is an important concept that should not be diluted at the policy level
8	8.3	10	None	Supports Policy 8.3 in which it is stated that interpretation material is no substitute for retaining and conserving heritage.	Support	Noted/Retain

### Objective 9 – Community involvement

9	0	11	Engaging with business and professionals	The New Zealand Institute of Architects should be an important focus for HNZ's advocacy for heritage but there is no mention of the Institute in the policy. The great majority of architects are focused on new building and, demonstrate little knowledge of or interest in the history and heritage of their profession. Because architects routinely interact with built heritage through their professional activities it is important that the profession as a whole is both informed and sympathetic towards heritage. The failure of the NZIA to express any view on the destruction of built heritage following the Canterbury earthquakes is indicative of the profession's lack of interest in and engagement with heritage. Architects who have positive attitudes towards heritage, including the small sub group of heritage or conservation architects, represent a tiny fraction of the profession and there is widespread prejudice towards heritage	Engage with NZIA	Accept - Added Objective 11 and associated policies addressing professional organisations such as NZIA
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				generally and towards HNZPT within the profession. This presents a great challenge to HNZPT in terms of advocacy, both in terms of overcoming this prejudice and persuading architects to engage with the heritage sector. Much damage has occurred to heritage buildings because of the failure of architects to advise clients in an appropriate way with regards to heritage, often through ignorance of well-established processes, or through a wilful disregard for the heritage requirements of district plans. Because architects often work at the interface between building owners and local authorities it is essential that they are well informed about heritage processes and are in a position to give sound advice to their clients, including advising them to consult with HNZPT at an early stage in planning building work on heritage structures.		
9	0	9	None	Objective 9 identifies the need for: "Local communities and community groups ... [to] have the skills and information to actively participate in decision-making on how that heritage is managed". Giving effect to that objective, Policy 9.2 states that HNZPT will "provide information on the legislative processes available for protecting historical and cultural heritage ..." If HNZPT decides for some reason not to submit on a proposal with the potential for adverse effect on Listed heritage of local significance, there could usefully be some policy direction on how it will formally engage with local communities or local groups.	Add a statement about informing local groups if we decide not to submit on a proposal affecting a Listed heritage item of local significance	Accept in part - relationships with local groups is covered in Objective 9, and is elaborated on in a new preamble to Objective 9
9	0	11	None	Understanding of the value of heritage should be an integral part of the New Zealand educational curriculum and HNZPT should be working with the Ministry of Education, schools and other education providers to develop resources to promote awareness of heritage. Staff of HNZPT have contributed to the courses I have taught on New Zealand architectural history and the history and theory of heritage conservation at both undergraduate and post graduate levels at the University of Canterbury, and it is important that HNZPT continues to engage with tertiary education providers to assist in the development of courses dealing with heritage issues and specifically with heritage	add a policy around becoming involved in professional tertiary education	Accept - added a new Objective 11 and associated policies

				conservation as part of its advocacy role.		
9	0	9	None	Objective 9 concerning community involvement and local communities' understanding the value of their local and historical heritage is expressed in a slightly patronising form. It should be amended to acknowledge the major role of local communities in identifying and advocating the value of local heritage.	Rewrite - acknowledge major role of communities	Accept in part - this is discussed in a new preamble to Objective 9
9	0	11	None	Policy mentions engaging with the public, heritage owners, heritage and other professionals, councils and government. This list of key stakeholders could be further extended to include industry and businesses, which would incorporate utility and service providers in order to recognise the benefits of collaboration between the two groups.	Expand list of key stakeholders to include industry and businesses	Accept - added new Objective 11
9	0	11	None	The role of Civil Defence and USAR in disaster recovery has a significant impact on the recovery of heritage. It is therefore important that HNZPT engage with both organisations to develop MOUs that embed the significance of heritage within the policies and processes followed by both Civil Defence and USAR. While HNZPT has an important advisory role in post disaster situations it is essential that Civil Defence and USAR are able to clearly identify listed heritage buildings from readily available databases so that their first-response actions are informed by an awareness of the need to have regard to the protection of heritage. Through these means much unnecessary damage to, or loss of heritage, could be avoided.	Add a policy around working with CDEM and USAR to raise awareness of historic heritage	Accept - Added new Objective 11 and will continue to forge relationships with MCD, regional organisations and USAR
9	0	11	None	It is appropriate to provide a separate objective within the General Policy that recognises this group, under a heading "Objective X: Working with Industry Groups". The key areas of consideration for the policies could include: working proactively and collaboratively with industry; recognising the need for national consistency; acknowledging and providing for changes in use of heritage buildings and the need to respond with a flexible best practice approach; and collaborating with industry to develop holistic advice and information on seismic strengthening of heritage building, Specific drafting suggestions include	Objective X: Working with Industry Groups HNZPT works collaboratively with industry groups to ensure that works can be managed in an efficient and heritage best practice manner to achieve mutually beneficial outcomes. Policies X.1 We will work proactively with key industry groups (such as utility service providers and operators)	Accept - added new Objective 11 and policies as suggested

					<p>to provide advice and determine mutually beneficial processes for activities to ensure efficiencies are realised while historical and cultural heritage values are maintained.X.2 We will recognise the need for national consistency when dealing with industry groups and ensure that the degree of variability in advice and conditions is limited to addressing with regional specific matters when processing archaeological authorities.X.3 We will recognise that as the use of heritage buildings evolves there will be a demand for changes including connections to new technology and services. We will work with industry groups to ensure that best practice documents are developed to provide the necessary flexibility, while ensuring that historic and cultural values are protected.X.4 We will collaborate with the relevant industry groups to ensure that information and advice provided to heritage building owners is holistic and includes their requirements for future-proofing, therefore avoiding the potential for historic and cultural heritage features to be affected at a later date.</p>	
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9	0	11	None	<p>Good insurance is essential for the protection of heritage buildings but since the Canterbury earthquakes the actions of insurance companies has often proved to be prejudicial to the protection of heritage. Inflated premiums that make it impossible to secure cost effective cover for heritage buildings has led to unnecessary demolitions while intransigence of insurance assessors has also resulted in building owners resorting to demolition as the only means to resolve intractable deadlocks with their insurers. Where insurers have worked constructively with owners, such as at Riccarton House and the Ngaio Marsh house, excellent outcomes have resulted. HNZPT needs to engage with the Insurance Council to ensure that the industry has a better understanding of the needs of heritage building owners, of the importance of heritage as a national resource, and to minimise the prejudice against heritage structures, often based on ignorance, that seems to be rife in the industry.</p>	<p>Add a policy about working with the insurance industry to raise the profile and understanding of historic heritage</p>	<p>Accept - added a new Objective 11 and associated policies</p>
9	0	11	None	<p>The real estate industry has limited awareness of the importance of heritage as a national resource and advice given to clients, often based on incomplete or faulty understanding of heritage legislation, is often inconsistent with the recognition of heritage values. Increased understanding of the role of HNZPT and of local authorities in regulating decision making relating to heritage would lead to greater co-operation with the real estate industry and better outcomes for heritage. While there is a small group of property developers nationally who recognise the intrinsic value of heritage as well as the commercial benefits that can be generated by heritage buildings, there is much ignorance and prejudice within the industry that leads to short-sighted decision making and the unnecessary compromising or destruction of heritage. HNZPT and its predecessor, NZHPT, are commonly seen as the 'enemy' by property developers and HNZPT should be addressing this misconception by engaging directly with property developers as a whole, rather than dealing with individual developers when specific threats to heritage arise.</p>	<p>Add a policy on working with real estate and property sector to raise the awareness of historic heritage</p>	<p>Accept - added a new Objective 11 and associated policies</p>

9	0	11	None	Experience during the Canterbury earthquakes clearly indicates that the great majority of engineers have little appreciation of historic and cultural heritage and limited understanding of traditional building systems and materials and the way these behave under seismic stress. Most engineers have only been trained to design and analyse modern building systems using industrial materials and have limited ability to deal sympathetically with heritage structures. HNZPT needs to actively engage with the engineering profession in order to increase awareness of heritage issues and provide educational opportunities for engineers to improve their understanding of structures utilising traditional building materials and systems.	Add a policy on working with professional organisations to raise the profile of heritage issues.	Accept - added a new Objective 11 and associated policies
9	0	11	None	While engagement with local government, iwi, community groups and heritage building owners is supported, this engagement is too narrow and excludes some of the key players involved in decision making that impacts on heritage. These include the NZIA, IPENZ, the real estate industry, property developers, the insurance industry, education providers, Civil Defence and USAR. Advocacy, if it is to be effective, needs to be broadly based and reach all sectors of society where decision-making has an impact on heritage.	Broaden the scope of people we engage with to include professional organisations, civil defence organisations, insurance, property sector etc	Accept - added a new Objective 11 and associated policies
9	0	11	None	Principle 9 the principle of working collaboratively has not been carried through effectively into the actual policies. There is a need to develop for specific policies relating to working collaboratively with professional groups such as the Institute of Architects, IPENZ, the Real Estate Institute, USAR, Civil Defense, the insurance industry and education providers such as the schools of architecture and and engineering. The Christchurch earthquake has clearly revealed the major problems caused by a lack of heritage awareness on the part of many professional groups.	Develop policies acknowledging the need to work collaboratively with a wider range of professional groups and sectors - Institute of Architects, IPENZ, the Real Estate Institute, USAR, Civil Defense, the insurance industry and education providers such as the schools of architecture and and engineering.	Accept - added a new Objective 11 and associated policies
9	0	9	None	Objective 9 re community involvement: Here HNZPT appears to totally underestimate the potential for positive partnerships with community groups, especially those with a heritage focus that have developed from the disestablishment of the old NZHPT branches. Are your actions really only to be limited to making	Take account of the potential for positive partnerships with community groups, especially heritage groups. Need to be more proactive and acknowledge local	Accept in part - this is discussed in a new preamble to Objective 9 and a new objective 9.3

				<p>information available about local historical and cultural heritage, the legislative processes that are available to protect our heritage and guidance on good practice? We consider your community involvement needs to be more proactive if you want to have good working relationships with local heritage societies. We have local knowledge and contacts. We have expertise. At present you have very little contact with the community outside of the areas where your regional offices are located. This is understandable as your staff numbers are limited, their operational areas are extensive and we know they cannot be everywhere at once. Surely it would be beneficial to develop better relationships with the key heritage groups in each region? Last year, we were pleased that David Watt was able to attend our AGM in Bulls as this gave us all a chance to catch up and talk about current activities of mutual interest.</p>	<p>knowledge and expertise.</p>	
9	0	9	None	<p>More generally under policies for the overall HNZPT advocacy role, there is merit in including the value of HNZPT engaging with other organisations or NGOs in reaching the desired outcomes. The Civic Trusts and the many historical societies are obvious cases in point. It will need care to ensure that the policies are not so worded as to enable HNZPT to “dump” difficult cases on to non-statutory groups - which is one of the risks of the point noted in #1 above where decisions on deployment of HNZPT funds may restrict the ability of HNZPT to exercise its statutory function. A pragmatic solution would be to include in the wording of policies a general “duty to liaise and communicate” and, in cases where HNZPT becomes aware by notification of a threat to a listed place - in particular of the Category 2 variety - a policy duty to inform a relevant capable local interest group.</p>	<p>Include in the wording of policies a general “duty to liaise and communicate” and, in cases where HNZPT becomes aware by notification of a threat to a listed place - in particular of the Category 2 variety - a policy duty to inform a relevant capable local interest group.</p>	<p>Accept in part - this is discussed in a new preamble to Objective 9 and a new objective 9.3</p>
9	9.3	9	None	<p>Maori knowledge and tikanga is valued throughout all policies</p>	<p>Add: 9.3 We assist local communities and community groups to access information reflecting mana whenua perspectives on local historical and cultural heritage if it is available.</p>	<p>Reject - this is covered in Objectives 6 and 7. e.g. policy 6.4</p>

## Objective 10 – Working with Owners

10	0	8	Covenants	Objective 10: Working with Owners“HNZPT works collaboratively with owners to achieve mutually beneficial heritage outcomes”With respect to the placement of a covenant HNZPT must recognize its collaborative consultation with owners extends to that of a future sequence of owners. Therefore the restrictions placed on the preservation of heritage values must be of such significance that future generations of owners can readily accept the responsibility. It is imperative that the heritage values demonstrate a degree of identified historical importance.I submit these comments in the light of my recent experience with owners. In the first place they undertook ownership without knowledge that a covenant was in the process of being placed on the building. The Covenant was officially registered after the signing of the ownership documents. At present, owners are undergoing the reforming of the covenant, but what remains “worthy of preservation” in no way reflects any items of national importance and are of limited local interest. As I read the situation no member of the public was consulted nor those who had historical knowledge of the building. Therefore as I submit these comments, it re-emphasizes my opinion that the property is of questionable ‘covenant status’. Thus it reduces my belief in the efficacy of the process undertaken by Heritage New Zealand	Recognise that a covenant also affects future generations and should only be placed on heritage with significant values	Reject - a covenant is arranged by agreement with an owner (as stated under Methods), there is no provision for community involvement, nor does the place need to be of national significance if the owner agrees to or proposes a covenant.
10	0	8	Financial assistance and costs	Would like to see more emphasis being placed on financially assisting and encouraging owners of historic places to protect and conserve them. The emphasis seems to be on individual property rights over the overarching requirement to identify and protect heritage assets. Respecting private property rights and encouraging voluntary protection needs to involve adequate financial assistance for owners or the outcomes will be the opposite, i.e. loss of historic heritage.	Increase funding to heritage owners	Reject - we administer an preservation incentive fund allocated by government, increased funding for heritage owners would be a matter of central government policy
10	0	8	Financial assistance and costs	To ensure the ongoing viability and resilience of a heritage site, decisions should recognise the cost of heritage preservation and the available economically viable options.	Recognise the cost of heritage preservation and the available economically viable options.	Accept - see policy 8.4
10	0	8	Financial	Heritage buildings are costly to maintain, and many heritage	Acknowledge funding issues	Accepted in part - acknowledged

			assistance and costs	churches were damaged during the Canterbury earthquakes. There is no real commercial use for these churches to generate income to offset costs. Other sources of funding are sparse and some church groups will not use Lotteries funding. Many of the facilities are no longer fit for purpose.		on page 8
10	0	8	General support for Advocacy Policy	Overall, Auckland Airport is generally supportive of the Draft Policies and the pragmatic approach taken by HNZPT in its drafting. Auckland Airport is 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.	Support	Noted/Retain
10	0	8	Interests of owners	Working with owners. Objective 10 and Policies 10.1-10.6 – Council supports HNZPT working with owners to evaluate mutually beneficial options for the protection, preservation and conservation of historical and cultural heritage.	Support Objective 10 and policies 10.1 to 10.6	Noted/Retain
10	0	8	Interests of owners	Supports the explicit recognition of the role of landowners and the impact that owning heritage sites and places can have.	Retain 10.1-6	Noted/Retain
10	0	8	None	The proactive response set out in the objective and policy is strongly supported provided HNZPT are adequately resourced to do so.	Support	Noted/Retain
10	0	8	Interests of owners	Seeks the retention of the principles, objectives and policies of the Draft Policies that: (a) Recognise the interests of land owners and seek to support owners of heritage sites and places. Submitter considers that these provisions are appropriate as heritage ownership can often have the impact of benefiting the public at considerable expense to the site owner. A number of the provisions also recognise that it may not always be practicable to protect heritage. (b) Seek to ensure close alignment and minimise overlap between the HNZPTA and RMA processes. Auckland Airport supports efficiency and streamlining in the planning and consenting process. (c) Encourage consultation at an early stage.	Retain policies supporting working with owners and recognising their interests, minimising regulatory duplication and early consultation	Noted/Retain

10	0	8	Interests of owners	The text states that: "HNZPT specialists encourage owners to contact them for guidance and support, and in giving advice we are respectful of the interests of the owners and their plans for the property". In order to avoid any apparent bias, the word "respectful" might usefully be replaced with "mindful".	Use "mindful"	Reject - respect is the preferred term
10	0	8	Covenants	<p>Methods p 13 Paragraph 4</p> <p>a) At no time in this policy is an explanation that the negotiation of a covenant results in its being "in perpetuity". The process of developing a policy on this issue is important.</p> <p>b) Prior to reaching covenant status, it is imperative that heritage values should be identified as having significance enough to enhance national identity and provide researched evidence of its worthiness of such high order protection.</p> <p>c) Covenant status should be afforded only when there is community support for such a high degree of protection and preservation since its placement is binding on inter-generational ownership.</p> <p>d) It is imperative that 'covenant status' should reflect values of such a kind that future generations continue to acknowledge and appreciate its historical importance.</p> <p>e) Any 'covenanted' building should be open to public scrutiny since by the very nature its 'value' rests the continued appreciation and an awareness by the general public of its place in the national history.</p>	Under "Methods" explain what a covenant entails - lasting, by agreement, based on protecting heritage values - but only where significant enough to enhance national identity - and with community support	Reject - a covenant is arranged by agreement with an owner (as stated under Methods), there is no provision for community involvement, nor does the place need to be of national significance if the owner agrees to or proposes a covenant.
10	0	8	None	HNZPT policy needs to ensure the balancing of public good against private rights. HNZPT should engage to work proactively with the owners of heritage places in order to achieve reasonably practical outcomes for heritage places, rather than the theoretically 'possible'.	Aim for "reasonably practical" outcomes	Reject - It is not clear what change is sought. The issue may be with the term "mutually beneficial" although this isn't explicit in the comment.
10	0	8	None	The Trust supports Objective 10, to work with owners to achieve mutually beneficial heritage outcomes. The Trust believes these relationships will not only improve the ability to HNZPT to advocate for the protection of historical and cultural heritage, but will also mitigate risk around the accidental or intentional destruction of historical and cultural heritage. The Trust submits that HNZPT encourages owners to develop relationships with iwi	Support - encourage owners to develop relationships with iwi and hapū to further develop understanding and collaboration around historical and cultural heritage.	Accept - see 8.7

				and hapū to further develop understanding and collaboration around historical and cultural heritage.		
10	10	8	Financial assistance and costs	<p>I would like to suggest that City Council's 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 building for future generations to see and appreciate.</p> <p>When I did the renovations to my home the City Council paid for the architects fees, which was a great help to me, and together we were able to decide on the best way to go about renovating the house while preserving the special features of the house.</p>	Support encouraging council financial assistance	Noted/Retain
10	10.1	8	None	<p>The Ministry represents the Crown as owner and landlord of state schools and is directly engaged across the entire property portfolio as asset manager. The Ministry is responsible for ensuring that the education outcomes required by the Crown are met. Sometimes education and heritage outcomes may be in conflict. The ability for the Ministry to seek the advice of HNZPT is important in such situations.</p> <p>It is vital that there is a collaborative working relationship between the Ministry and Heritage New Zealand. This encourages a team approach and working in partnership on specific matters.</p>	Support objective 10 and associated policies	Noted/Retain
10	10.1	8	None	<p>Policy 10.1 sees a change in the adverb from 'collaboratively' to 'proactively'. These words have different meanings: the word 'collaboratively' is preferred. This is because it says something about the essential nature of the relationship desired with the owner. A collaborative relationship is preferred. Furthermore, the proactive approach is specifically covered by policy 10.3 in the idea of early engagement, and thus replacing the word 'proactively' in policy 10.1 with 'collaboratively' will not lose this concept.</p>	Replace the word 'proactively' with the word 'collaboratively'.	Noted - however, working collaboratively is covered in Objective 8, this policy is about reaching out to owners

10	10.1	8	None	The use of the phrase 'evaluate mutually beneficial options' may be unintentionally limiting. As mentioned, for school property there may be conflicts between education outcomes and heritage outcomes. Options may require trade-offs and offer less than best solutions for either or both outcomes. There are currently buildings located on school grounds that may have heritage value; but which have no educational use. There is also a peculiar situation with Otahuhu College that may provide anecdotal evidence relevant to this policy. The main block of Otahuhu College is heritage listed, Historic Place Category 2 – List number 532. Some think it is only the facade that has heritage value and the heritage listing provides little clarity about what exactly has heritage value. A science room in the main block has been closed because of its heritage status, although this is unclear and is being assessed. The current situation certainly seems inconsistent with objective 10 and policy 10.1. Also it is inconsistent with the notion that historic places 'are used for a suitable purpose' and there is 'continuation of the original or long term function or use if compatible with preserving and conserving heritage values' – refer to policy 7.5 and 7.6(ii) of 'Management and use of historic places owned or controlled or vested in Heritage New Zealand'.	Review the use of the phrase 'evaluate mutually beneficial options' with a view to using a phrase that accommodates trade-off options and solutions so as to keep places of heritage value used, especially when this relates to the continuation of their original function.	Accept - policy 10.1 amended remove "mutually beneficial" and add" that take account of maintaining and enhancing the usability of the place"
10	10.2	8	None	Support	Support	Noted/Retain
10	10.3	8	None	Strongly endorse the importance of engagement as early as possible with landowners, as in the commitment at Policy 10.3 [now 8.3], that HNZPT will engage with owners early in the consent application process. This is crucial because once a consent application is made, councils are under strict time requirements under Part 6 RMA for processing the application.	Support early engagement with owners	Noted/Retain
10	10.3	8	None	Supports the idea of engaging early and notes that taking the initiative could even be strengthened further by inserting the word 'proactively' within this policy	Insert 'proactively' between the words 'work' and 'with owners'.	Reject - "proactively" not appropriate in this policy. It is used in a more global sense in 10.1
10	10.4	8	Financial assistance and costs	Section 1.1 of the advocacy policy states that you will "recognize the interests of owners". This statement should be extended to include the need to take account of the financial implications and	Extend Policy 1.1 to include financial implications, ability of owners to pay, particularly in	Policy 1.1 sets out the requirements of the Act. Policy 10.4 recognises the costs to



				the ability of owners to pay for preservation and conservation of New Zealand's historical and cultural heritage. We have been involved in a number of cases recently where HNZPT staff seem to have little comprehension of the ability of owners in provincial and rural areas to undertake work to a standard commensurate with staff expectations. Not only do owners in our area not have the funds, or the projected rental returns, to spend large amounts on restoration work but also there are few funding agencies able to support their work, apart from Lottery Environment & Heritage which only provides grant for a proportion of the cost.	provincial areas, and lack of funding available.	owners, but could perhaps be expanded
10	10.4	8	None	Support	Support	Noted/Retain
10	10.4	8	None	Supports adaptive reuse of heritage structures. HNZPT should also support owners' resource consent applications for the adaptive reuse of heritage places where the outcome of the proposal will not materially affect heritage values. In many cases owners will design their changes so as to avoid affecting significant heritage values and this is an appropriate threshold for HNZPT to provide support. In accordance with policy 10.5 demonstrably beneficial heritage outcomes are not required where the overall resilience of the heritage structure is improved.	SUPPORT AND AMEND "We recognise the cost of heritage preservation and support opportunities to adaptively reuse heritage structures to ensure their on-going viability and resilience including supporting owners' resource consent applications where the outcome will not materially affect significant heritage values."	Accept - added "or has no adverse effects" to policy 8.5
10	10.4	8	None	Now 8.4	We recognise the cost of heritage preservation and <u>take into account economically and functionally viable options in, and supporting opportunities to adaptively...</u>	Reject - this is encapsulated in "ongoing viability and resilience"
10	10.6	8	None	This policy should cover where HNZPT advocate for any changes relating to scheduled heritage items. Any change may significantly impact an owner's rights, responsibilities and use of their building.	We recognise the interests of owners by consulting with and advising owners when we propose to advocate for <u>any changes</u> inclusion of a property on a plan schedule or if we submit that plan rules be made	Reject - the existing wording sets out exactly the changes we might propose when having input to a district or regional plan

					more stringent for scheduled heritage items.	
10	10.6	8	None	Concerns with this policy as worded. The objective covering this policy speaks of the collaborative relationship HNZPT desires to have the owner. Yet this policy is written in a form that puts substantial weight on the position of HNZPT over and above that of the owner. The specific words that convey this are: 'recognise', 'advising owners' and 'rules be made more stringent'. The Ministry strongly prefers a more collaborative choice of wording as suggested below.	Replace this policy with 'We take into account the interests of owners by consulting with them when we propose to advocate for inclusion of a property on a plan schedule or if we submit that plan rules be altered for scheduled heritage items.'	Reject - the current wording proposes both consultation, and advising owners if we propose that their property be included in a plan. Removing "advising" would remove our commitment to notify owners when making submissions to an RMA plan that affects their property.
10	10.7	8	None	New - HNZPT should support owner's resource consent applications where they are consistent with conservation plans that have been prepared for the property. This will assist with improving process efficiencies.	ADD "We will streamline processes and support resource consent applications for activities and works that are consistent with the conservation plan for a property".	Reject - while HNZPT can support applicants, it has no control over RMA processes. The role of conservation plans will be dealt with in guidance
10	10.7	8	None	mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: 10.7 We assist owners to work with mana whenua, where appropriate, to achieve mutually beneficial outcomes.	Accept in part - see 8.7
10	10.7	8	None	The requested amendment better reflects the provisions of the Act, see section 13(2) and 14(2).	<u>We recognise the property interests of owners including their use of and plans for the property.</u>	Reject - this does not reflect the requirements of the HNZPTA
10	10.8	8	None	HNZPT needs to be more efficient and effective in its engagement with owners of heritage buildings. There is room for innovative relationship building which will reduce the demands on HNZ's staff time, to appropriately protect heritage structures and enable ongoing adaptive re-use.	NEW - ADD We will work with owners who control multiple heritage structures and who have demonstrated a long term commitment to achieving good heritage outcomes to achieve relationship based agreements, and reduce the reliance on regulatory protection mechanisms.	Accept in part - see new policy 8.8 - this policy is broader than suggested and does not restrict collaboration to committed owners.

10		8	None	"Working with owners" there are often multiple and conflicting pressures faced by the owners of heritage buildings. This should be recognised in the policy. When owners have multiple sites and buildings, with insufficient funds to maintain them all, choices have to be made. It is difficult when the choice is between a less functional and more expensive to maintain heritage building and a more functional and less expensive to maintain more modern building (that also has greater community use).	...we are respectful of the interests of the owners and their plans for, <u>and use of,</u> the property. <u>We also recognise the pressures faced by owners, including lack of funding and building functionality.</u>	Accept in part - see new policy 8.8 -
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### Objective 11 – Working with local government

11	0	12	Heritage vs economics and reasonable use	Overall supports the policy as it recognises the importance of historic heritage and the contribution that protection of historic heritage has to the wellbeing of communities. However, this protection needs to be within the context of communities being able to provide for on-going social, economic cultural and environmental wellbeing. In particular, provisions in this policy relating to working with local and central government could benefit from an acknowledgement of this balance.	Recognise the need for communities to provide for ongoing social, economic, cultural and environmental wellbeing. Also applies to working with central government	Noted - a discussion on sustainable management has been included on page 8
11	0	12	None	Fully support HNZPT working with Councils on promoting the conservation of significant historical and cultural heritage	Support	Noted/Retain
11	0	12	None	The need for two way communication between HNZPT and local authorities could also be stated in the Statutory Role of Advocacy general statement of policy under Objective 11 (page 24) .	Add the need for two way communication between HNZPT and local authorities	Noted - see policy 12.1
11	0	12	None	In general, supports the approach taken by HNZPT and also supports the continued development and elevation of heritage protection at a national wide level. However, concerned that there is still a strong reliance on local authorities to provide the mechanisms for any package of incentives and protection, both statutory and non-statutory for the retention of built heritage.	Address strong reliance on local authorities to provide the mechanisms for any package of incentives and protection, both statutory and non-statutory for the retention of built heritage.	Accepted in part - see new policy 3.4 on HNZPT incentive fund. However, statutory protection of built heritage is primarily through the RMA
11	0	12	Reliance on local groups or councils	We note the policies identify capacity issues (within local authorities) and we welcome the support of Heritage New Zealand.	Support policies about supporting local government	Noted/Retain

11	11.1	12	None	mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: We encourage local authorities to work with mana whenua in relation to heritage components of resource management plans at the pre-planning consultation stage.	Accept - see new policy 13.3
11	11.1	12	None	Objective 11 and Policies 11.1 and 11.2 – Council suggests rewording Policy 11.1 to read “We will work with local authorities to ensure that we are consulted on the heritage components of resource management plans at the pre-planning consultation stage.” This makes it clear who ‘we ’ is intended to be.	rewording Policy 11.1 to read “We will work with local authorities to ensure that we are consulted on the heritage components of resource management plans at the pre-planning consultation stage.” This makes it clear who ‘we ’ is intended to be.	Accepted in part - see reworded policy (now 12.1)

### Objective 12 – Promoting heritage protection in planning processes

12	0	13	None	The objective and policies are largely supported. Promotion needs to be accompanied by long-term support once provisions are picked up in RMA instruments. HNZPT support cannot stop at the point of items being listed in plans particularly for smaller local authorities who have limited or no specialist resource to deal with the implementation of RMA objectives, policies and rules. HNZPT play a vital role post listing in providing technical advice and guidance as well as being the watchdog for poor heritage outcomes. A stronger and clearer relationship is required between this Objective and Objective 2 around prioritisation for all Category 1 and 2 items and for those items listed in the RMA documents. Particularly smaller Local Authorities may not be inclined to adopt the promoted measures if they are left unsupported.	Make links with Objective 2 prioritisation clearer	Noted - guidance will make it clear the range of ongoing advice and support HNZPT will provide to councils
12	0	13	None	Supports the promotion of reducing the regulatory barriers to activities that improve survival of historical and cultural heritage	Support	Noted/Retain

				by the strengthening of structures for earthquake and installing of fire protection.		
12	0	13	None	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.	Support	Noted/Retain
12	0	13	None	Managing items of historical value can be a contentious issue within communities. Tension often arises over the economic, environmental and social implications of preserving heritage items between those who are supportive and those who object. These tensions become especially prevalent in the planning framework when it becomes a democratic and political process. The General Statement of Policy for Statutory Advocacy objectives is to promote heritage protection in planning processes, in particular objective 12. The policies discuss how heritage preservation can be promoted, encouraged and the use of education as a tool to ensure communities are aware of heritage values but often heritage values differentiate based on peoples personal values. Awareness of communities that object to heritage is vital in shaping these policies. Often heritage protection strategies sit outside of the statutory process and become a challenge for local government to place emphasis on when it is only a method or a guideline (e.g. heritage based design guidelines). Although this will always be a challenge for Heritage New Zealand, awareness that heritage can be objected to on various levels should be reflected in the policies.	Address situations where communities object to heritage and oppose its conservation	Noted - this is covered by policy 2.2
12	12.1		None	Bullet point 4	...repair, maintenance and reasonable alterations providing for ongoing use, including work to improve the <u>functionality, and</u> the resilience...	Reject - this is covered sufficiently by ongoing use
12	12.1	13	None	mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	[first bullet point] add: "...for heritage conservation and appropriately incorporate mana whenua views"	Noted - this is covered in sections 6 and 7, 13.2, and new policy 13.3

12	12.1	13	Early Engagement	<p>The objectives and policies have emphasised the significance of getting all stakeholders involved as early as possible in the processes associated with heritage management. The submitter is supportive of this approach as it ensures that everyone has the opportunity to be aware of their responsibilities and limits the obstacles that arise in processes associated with identifying, preserving and conserving heritage items. One comment we have is clarifying how early we should be involving HNZPT in the process. It is unclear from the general policies as to if it is as early as practical, whether it should be prior to the process officially beginning or as soon as the process begins. The General Statement for Policy: Statutory Advocacy discusses this in regards to working with the owners, relevant Iwi and local, regional and central government but this message could be stronger across all the objectives and policies to ensure that HNZPT can become involved as soon as practical for all matters, statutory or non-statutory. This would ensure relationships can be strengthened between organisations and key stakeholders and ensure that no one has the unfortunate situation of being ‘thrown a curve ball’ that could have significant implications. Although as a Council we already practice early involvement in directing heritage, or potential heritage property owners to HNZPT with initial enquiries, it is important that there is clarification across all of the policies as to when HNZPT should become involved and clearer outlines of what extent of involvement is required at the different stages of the processes.</p>	Clarify when HNZPT should be involved in planning process and the extent of involvement	Noted - the timing and extent of involvement varies on a case by case basis. This will be addressed in guidelines and updated guidance on RMA plans (forthcoming)
12	12.1	13	None	<p>With respect to Objective 5 of the New Zealand Heritage List/Rarangi Korero Policy, Historical and cultural heritage entered on the New Zealand Heritage List is conserved for the future, 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 . [Note - while this is specific to the NZ Heritage List policy, the issue is also covered in the Statutory Advocacy Policy Objective 12]</p>	Inclusion of Listed items on plan schedules should be by default (subject to TA having right of objection). Comment made on List policy but also relates to Advocacy policy	Reject - This would require a law change. However it is HNZPT policy to advocate for inclusion of List items in RMA plans

12	12.1	13	None	NZ Heritage List Policy 12.1 concerns inter alia advocating the inclusion of heritage which is included on the NZ Heritage List in regional and district plans. The explanation should include an acknowledgement that some listed items are included for reasons of historical happenstance but may have little heritage value and that HNZPT will use its discretion in such circumstances.	Acknowledge need for selectivity in promoting inclusion of poorly researched places onto schedules	Noted - all newly Listed places will have a full heritage assessment. This policy needs to be read in conjunction with 1.1 bullet 5, 2.2 and 12.2
12	12.1	13	None	Opus frequently prepares Heritage Inventories and District and Regional Plan policies for Local Authority clients. While it is acknowledged that that HNZPT have been systematically upgrading their Heritage List there are still a number of items that lack robust analysis. For local authorities to include these items a long-term commitment to upgrading and review of the list from HNZPT is required if Policy 12.1 is to be effective.	Commitment to upgrading the list if promoting scheduling is to be effective	Noted - all newly Listed places will have a full heritage assessment. This policy needs to be read in conjunction with 1.1 bullet 5, 2.2 and 12.2
12	12.1	13	None	Supports the notion that the work rules and activity respect the desire for the historical place to remain in ongoing use. In regard to school buildings and classrooms of heritage value, the submitter is strongly of the opinion that these should be maintained and repaired and kept in use or adaptive re-use, rather than closed for education purpose.	Support	Noted/Retain
12	12.1	13	None	Objective 12 and Policies 12.1- 12.6 – Reword introduction of Policy 12.1 to make it clear who ‘we ’ is intended to be.	Rewording introduction of Policy 12.1 to read ‘ We will advocate and work with local authorities in resource management planning documents including:...’.	Accepted in part - amended to "HNZPT advocates for..."
12	12.2	13	None	Policy 12.2 states that: "We specifically advocate for the recognition and protection of cultural heritage and sites... in RMA plans ...". There could usefully be a policy which promoted alignment across RMA plans of methodologies for heritage assessment	There could usefully be a policy which promoted alignment across RMA plans of methodologies for heritage assessment	Noted - this will be covered in revised guidance on RMA plans (forthcoming)
12	12.3	13	None	Auckland Airport supports the explicit recognition of the role of landowners and the impact that owning heritage sites and places can have.	support and retain	Noted/Retain
12	12.4	13	None	We strongly support the use of the word “encourage” in Policy	Support	Noted/Retain

				12.4.		
12	12.4	13	None	Housing New Zealand recognises that the vulnerability of heritage is an important issue however policies and rules promoted by HNZPT to local governments needs to be framed in such a way so as to recognise the challenge of balancing appropriate heritage protection alongside providing for communities social and economic wellbeing (e.g. quality and affordability of housing). This needs to be recognized amongst these policies	DELETE: to natural hazards, fire and neglect ADD: while providing for communities to provide for their social and economic wellbeing	Noted - a discussion on sustainable management has been included on page 8
12	12.4	13	None	The policy should also refer to building safety	AMEND TO We promote policies and rules that encourage owners of heritage structures to undertake work to reduce the vulnerability of historical and cultural heritage to natural hazards, fire and neglect and allow those who occupy heritage structures to be safe in and around them.	Accept (now 13.5)
12	12.5	13	None	Policy 12.5 is strongly supported. The HNZPT Guidance Series documents are well considered and useful. Continuation of this series provides valuable advice and direction.	Continue guidance series	Noted - the guidance on RMA plans is currently being revised and updated
12	12.5	13	None	Housing New Zealand recognises that heritage is an important element within New Zealand communities however guidance by HNZPT to local governments needs to acknowledge the challenge of balancing appropriate heritage protection alongside providing for communities social and economic wellbeing (e.g. quality and affordability of housing).	Amend to: We publish guidance on appropriate objectives, policies, methods and rules [to provide for a balance between] the protection of historical and cultural heritage [and the on-going social, economic, cultural and environmental wellbeing of communities], in consultation	'Noted - a discussion on sustainable management has been included on page 8
12	12.5	13	None	mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: "...in consultation with local authorities and mana whenua,..."	Accept - added new policy 13.3
12	12.6		None		...conservation of heritage, including establishing <u>adequate</u>	Reject - this is not a matter HNZPT has control over



					local heritage incentive funding schemes.	
12	12.6	13	Heritage vs economics and reasonable use	Housing New Zealand supports the participation of HNZPT in appropriate planning processes however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA	Recognise balance required by "sustainable management" under RMA	Noted - a discussion on sustainable management has been included on page 8
12	12.6	13	None	The policy should also recognise the provision of incentives by HNZ.	AMEND TO "We provide incentive funding and advocate for provisions in local authority annual plans and long term community plans that promote the preservation and conservation of heritage, including establishing local heritage incentive funding schemes. [See also Objective 3]"	Accept in part - see new policy 3.4 on HNZPT incentive fund

### Objective 13 – Promoting heritage protection in consenting processes

13	0	14	None	Objective 11 states: "HNZPT works collaboratively with local authorities to ensure that local planning processes provide for the identification, conservation and protection of historical and cultural heritage".	A new policy (similar to 11.1) could usefully state: "We work with local authorities to ensure that we are consulted on the heritage components of consent applications at the pre-planning consultation stage".	Accept- see policy 14.1
13	0	14	None	This Objective and associated policies sets too high a threshold that may not always be achievable in the particular circumstances.	Objective 13: HNZPT [DELETE achieves ADD promotes] the preservation, and conservation of historical and cultural heritage through participation in appropriate RMA and Building Act consenting processes.	Reject - although this is an aspirational objective, the intention is to set the bar high.
13	0	14	None	Encourages and supports HNZPT in its role as a promoter of	Recognise role of manawhenua in	Accept - see new policy 14.6

				heritage through the consenting process. Expects HNZPT will recognise the role of manawhenua in undertaking Heritage New Zealand's role as advocate for the protection of heritage with regards to consenting processes.	advocating for heritage protection in consenting processes.	
13	13.1	14	None	Policy 13.2 states: "We may submit in opposition to resource consent applications that result in the destruction of significant historical and cultural heritage places, sites or features, where there are reasonable alternatives". If there are no reasonable alternatives, it is acceptable that HNZPT would not submit in opposition. If, however, there are reasonable alternatives, there is an expectation that it may submit in support of those reasonable alternatives or would submit in opposition to the destructive alternatives.	If, however, there are reasonable alternatives, there is an expectation that it may submit in support of those reasonable alternatives or would submit in opposition to the destructive alternatives.	Noted - HNZPT encourages applicants to investigate alternatives for achieving their objectives for a place and failure to demonstrate that a destructive alternative is the only feasible option may be grounds for opposing a consent application. Support for proposals that are sensitive to heritage values is covered in 14.1
13	13.1	14	None		...preservation and cultivation of historical and cultural heritage including preservation of heritage fabric, where appropriate	Reject - this is already qualified by "appropriate conditions" and does not need further qualification
13	13.1	14	Adaptive reuse	New policy encouraging relaxation of planning provisions to facilitate the continued use of historical and cultural heritage to meet the changing needs of society	Add new policy allowing for adaptive reuse	Noted - see 14.1 bullet point 4.
13	13.1	14	None	Support Policy 13.1 [now 14.10] third bullet point regarding natural hazards though it would be useful to see a more specifically stated policy that supports earthquake strengthening where strengthening enables the retention of heritage buildings and structures.	Support	Noted/Retain - this bullet point is broader than just earthquake strengthening. See also 13.1 bullet point 5. More specific guidance will be provided in the revised guide to RMA plan provisions (forthcoming)
13	13.1	14	None	Supports the participation of HNZPT in appropriate planning processes however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA, particularly when advocating consent applications and consent conditions	AMEND TO: Advocating for appropriate conditions on resource consents and designations that provide for a balance between the protection, preservation and conservation of historical and cultural heritage	Noted - a discussion on sustainable management has been included on page 8

					including preservation of heritage fabric and the on-going social, economic, cultural and environmental wellbeing of communities <ul style="list-style-type: none"> <li>Supporting consent applications and notices of requirement that provide for a balance between reducing the vulnerability of historical and cultural heritage to natural hazards and the on-going social, economic, cultural and environmental wellbeing of communities (i.e. adding words around balance)</li> </ul>	
13	13.1	14	None	Objective 13 and Policies 13.1 -13.5.Suggests rewording introduction to Policy 13.1 to read 'We will work with local authorities to promote the identification, protection, preservation and conservation of historical and cultural heritage through:...'	rewording introduction to Policy 13.1 to read 'We will work with local authorities to promote the identification, protection, preservation and conservation of historical and cultural heritage through:...'	Accept
13	13.2	14	None	Supports the participation of HNZPT in appropriate planning processes however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA when submitting in opposition to resource consent applications	Recognise balance of "sustainable management" in RMA when submitting in opposition to resource consent application	Noted - a discussion on sustainable management has been included on page 8
13	13.2	14	None	Policy 13.2 sends a more appropriate and useful message that HNZPT will not support or condone the destruction of heritage.	Support	Noted/Retain
13	13.2	14	None	SECTION 13.2 : We note HNZPT may submit in opposition to resource consent applications "where there are reasonable alternatives". We support HNZPT having the ability to oppose applications and believe this should be the case regardless of what alternatives are available. We thus recommend this section be amended to remove the proviso "where there are reasonable alternatives".	Provide for flexibility to oppose applications regardless of alternatives available - remove "where there are reasonable alternatives"	Reject - this policy takes account of situations where there are no reasonable alternatives, such as irreparable damage by fire or natural hazard.

13	13.2		None		...of significant historical and cultural heritage places, sites or features, where there are reasonable <u>reasonably practicable and economically viable</u> alternatives.	Reject – “reasonable” covers this
13	13.3	14	None	Supports the provision of advice to TA’s and applicants by HNZPT however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA	Recognised balance implied by RMA sustainable management concept	Noted - a discussion on sustainable management has been included on page 8
13	13.4	14	None	The principles of the HNZPTA (section 4) include that the identification, protection, preservation and conservation of New Zealand’s historic and cultural heritage should take account of culture heritage value and involve the least possible alteration or loss of it. The policy’s use of the word “avoid” implies that change should be prevented from happening which seems inconsistent with the HNZPTA.	AMEND TO “We encourage all applicants for resource consents and building consents to take reasonably practical measures to achieve the least possible alteration or loss of archaeological sites, or parts of sites, as a result of proposed activities.”	Reject - this is about encouraging those planning developments to avoid archaeological sites
13	13.4		None		...building consents to take all <u>reasonably practicable</u> practical measures to avoid the modification or destruction...	Reject - "practical" is sufficient
13	13.4		None		...building consents to take all <u>reasonably practicable</u> practical measures to avoid the modification or destruction...	Reject - "practical" is sufficient
13	13.5	14	None	Supports the participation of HNZPT in appropriate planning processes however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA	avoided... ADD "or managed through"	Reject - this is about encouraging those planning developments to avoid archaeological sites
13	13.5		None		...on the heritage impacts of any proposals so that impacts can be avoided <u>or mitigated</u> by sensitive design.	Reject - in this context, we do mean "avoid"

## Objective 14 – Promoting awareness of archaeological authority requirements

14	0	15	Archaeology	<p>The policies relating to the administration of archaeological provisions and statutory advocacy should be reviewed so that they integrate. The statutory advocacy policies under the Objectives (12) Promoting heritage protection in planning processes, and (13) Promoting heritage protection in consenting processes refer to <i>inter alia</i> encouraging and promoting applicants and territorial authorities to avoid modification or destruction through design. There is no policy in the archaeological set about how the application, assessment and decision making on authorities leads to ensuring that RMA and HNZPTA Authority processes produces the best outcomes. In particular:</p> <ul style="list-style-type: none"> <li>• There should be a policy that gives clear guidance on when archaeological authority should be declined. For example, is it when the destruction or modification of significant values can be avoided by redesign of the proposal that impacts on them?</li> <li>• A policy should follow the recognition stated in the statutory advocacy section that the RMA provides the key protection mechanism; and state that when an application for an authority is being sought ahead of related RMA applications (which will consider the design and layout of an application including the potential to avoid destruction or reduce the amount of modification under the RMA), that matter will be taken into account in making decisions on Authority applications. Such a policy would also complement Statutory Advocacy Policy 14.5 concerning closely aligning the HNZPTA and RMA consenting requirements</li> </ul>	<p>Integrate policies about participating in RMA processes with similar policies in Archaeology policy and give guidance on when an authority should be declined</p>	<p>Accept in part - Objective 15 on archaeology and associated policies have been revised to better reflect the intention of the HNZPTA. The remainder of this submission point relates to the Archaeology Policy.</p>
14	0		Archaeology	<p>Wherever possible, policies should be drafted to ensure there is appropriate alignment between the archaeological site-related processes under the RMA and the HNZPTA. Particular areas where greater directional specificity would be helpful include the following:</p> <ul style="list-style-type: none"> <li>• Discourage the inclusion of recorded archaeological sites in district plan schedules where there is insufficient information regarding geographic location and/or site type. The inclusion of</li> </ul>	<p>Clarify policy re archaeology and overlap with RMA, particularly scheduling sites with little information, relationship with archaeological authority process and position on pre-1900 buildings</p>	<p>Accept in part- The policies supporting objective 15 have been revised to better reflect the requirement of the HNZPTA, e.g. 15.2, 15.7 &amp; 15.8. Policy 15.8 addresses the issue of consistency where there are dual consent requirements such as</p>

				<p>such sites in district plans undermines the integrity and value of historic heritage in terms of provision of a robust evidence-base for heritage protection.</p> <ul style="list-style-type: none"> <li>• To provide greater consistency, extend the policy to include a clear statement regarding HNZ's position on how the relationship between the archaeological authority and RMA consenting processes will be managed.</li> <li>• Provide greater clarity regarding HNZ's policy position on the demolition of pre-1900 buildings, and its associated roles in archaeological authority and resource consenting processes. For instance, possible role confusion could arise where HNZPT grants an authority to demolish a pre-1900 building but advocates for its retention in any corresponding consent process under the RMA.</li> </ul>		<p>may arise in the demolition of a pre-1900 building.</p>
14	0		Archaeology	<p>Insert an objective prior to the proposed Objective 8 OF ARCHAEOLOGY POLICY: District plan provisions compliment the role of the HNZPT in protecting archaeological sites. Insert a new policy after the objective: HNZPT will work with local government to identify, evaluate and implement effective and efficient district plan provisions given the protection afforded archaeological sites under Sub-part 2 of the HNZPTA.</p>	<p>Insert an objective: District plan provisions compliment the role of the HNZPT in protecting archaeological sites. Insert a new policy after the objective: HNZPT will work with local government to identify, evaluate and implement effective and efficient district plan provisions given the protection afforded archaeological sites under Sub-part 2 of the HNZPTA.</p>	<p>Accept - The policies on archaeology have been revamped to provide clearer guidance</p>
14	0		Archaeology	<p>Seeking amendments to the definition of "modification of archaeological sites" in the Policy to delete reference to "building demolition". The HNZPTA provides that an archaeological site is not to be modified or destroyed unless an archaeological authority is obtained. However, the HNZPTA provides that an archaeological authority is not required for building work on an archaeological site unless the whole of the building is demolished. Defining modification to include building demolition</p>	<p>delete reference to "building demolition" in definitions</p>	<p>Accept- definitions aligned with Archaeology Policy</p>

				is confusing and may conflict with the provisions of the Act.		
14	0		None	<p>Strongly support the promotion of awareness of the archaeological resource. A recent combined educational initiative in Christchurch between HNZPT, Opus and a client has led to an increased awareness in Christchurch contracting of the archaeological resource. We encourage HNZPT to work with the industry in this regard as there are opportunities for joint initiatives.</p> <p>We strongly support Policies 14.4 and 14.4 [14.5] around the alignment of the HNZPTA and RMA to minimise cost and increase efficiencies. HNZPT have the knowledge and technical expertise to manage the archaeological resource where many local authorities lack this skill. Avoidance of duplication streamlines the development process and reduces time and cost for developers and regulators.</p>	Support	Noted/Retain
14	0		None	These policies recognise and support an efficient and streamlined approach to the consenting process.	Retain 14.4-5	Noted/Retain
14	0		None	Under the Archaeological provisions of the NZHPTA there is a legal obligation for the HNZPT to advocate for archaeological sites. While this is commented on in the Archaeological Policy there is no clear link between the two documents. This document appears to focus more on advocacy relating to Listed sites with particular emphasis on Category 1 and 2 places and does not address other advocacy matters.	Address advocacy for archaeology	Noted - advocacy for archaeology focuses on building awareness and providing advice (15.1), identification in plans (15.2) and providing information on authority requirements (15.4 and 15.5)
14	14.1		Archaeology	mana whenua views should have a more clearly articulated role in decision-making in relation to properties within their rohe.	add: "...archaeological assessment, to consult with mana whenua as early as possible, and to plan..."	Accept (now 15.3)
14	14.2		Archaeology	<p>HNZPT "encourages applicants to undertake an archaeological assessment and to ... avoid sites, where possible". This policy appears to seek a level of protection that conflicts with what is enabled when an archaeological authority is held.</p> <p>Change "plan any development" to "consider options" and change "where possible" to "where reasonably practicable" on the basis that "where possible" does not consider the practicality</p>	AMEND "Where significant archaeological sites may be affected, we encourage applicants to undertake an archaeological assessment and consider options to avoid sites, where reasonably practicable and to achieve good practice in	Reject - this policy (now 15.3) has been updated to better reflect the intentions of the HNZPTA

				of achieving an outcome. Where alternatives to the damage or destruction of a significant archaeological site is not reasonably practicable, this policy should reflect the process of formally recording such sites.	formally recording such sites through the archaeological authority process.”	
14	14.3		Archaeology	Unclear on the meaning of 14.3 [now . We suggest the words “to for information to be” be inserted after “we advocate for...” so the section reads as follows: 14.3 Where there are no recorded archaeological sites directly affected by the proposal but there is the potential for archaeological sites to be present, we advocate for information in plans and for information to be provided to consent holders advising of the procedures to be followed in the event of an accidental discovery of an archaeological site.	clarify the meaning of policy 14.3	Accept in part - this policy (now 15.4) amended to reflect the requirement of the HNZPTA to obtain an archaeological authority if there are reasonable grounds to suspect the presence of an archaeological site, whereas 15.5 covers accidental discovery where there is no cause to suspect a site would be present.
14	14.4		Archaeology	Policy 14.4 concerns the overlap between archaeological provisions of the HNZPTA and the more general provisions of the RMA and then particularly advises against plan rules that require a resource consent for the sole reason that earthworks have or may disturb an archaeological site. This appears to reflect a HNZPT concern about provisions in the Proposed Auckland Unitary Plan.	review this draft policy following decisions from the Auckland Unitary Plan Hearing Panel which can be expected to provide some RMA guidance on the matter	Reject - this policy is about implementing government policy of avoiding regulatory overlap, by avoiding duplicate consenting requirements. It is not specifically about the PAUP.
14	14.4		Archaeology	Support the efficiency signalled in the commitment in Policies 14.4 and 14.5 of the draft Statutory Advocacy Policy of avoiding overlap between the respective provisions of the HNZPTA and RMA, and ensuring close alignment of consenting requirements and processes to reduce costs and time for all concerned	Support 14.4 and 14.5	Noted/Retain
14	14.4	15	Archaeology	HNZPT “advises against plan rules that require resource consent for the sole reason that earthworks has or may disturb an archaeological site”.  Support this policy as it will assist with avoiding overlap, duplication and inconsistencies between processes and controls applied by Territorial Authorities and HNZ.	Support	Noted/Retain
14	14.5	15	Archaeology	“HNZPT works with local authorities to avoid unnecessary overlap where both resource consents and an archaeological authority are required.”	Support	Noted/Retain



				Support this policy as it will assist with avoiding overlap, duplication and inconsistencies between processes and controls applied by Territorial Authorities and HNZ.		
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### Objective 15 – Representing historical and cultural heritage values in the development of government policy

15	0	16	Legislative context	This advocacy policy states: "HNZPT advocates for historical and cultural heritage in a variety of ways including ... where necessary becoming involved in the formal consent process". The New Zealand Heritage List includes "New Zealand's significant historical and cultural heritage" and there is an expectation that involvement in the formal consent process would be necessary for applications where there is the potential for significant adverse effects on items on Heritage New Zealand's List. Heritage New Zealand's commitment to satisfy this expectation should be made explicit or otherwise. HNZPT also advocates by providing "input to the development of government policy that has implications for historical and cultural heritage", and this could usefully include an aspirational goal to develop a National Policy Statement on Heritage.	Include an aspirational goal of developing a National Policy Statement on Heritage	Noted - not included as a policy, but is a long term consideration in HNZPT input to policy development
15	0	16	None	Support HNZPT in its objective to assist central government to develop policy proposals that provide for the protection, preservation and conservation of historical and cultural heritage and work to ensure that no unanticipated adverse effects on heritage result from policy initiatives. Expect that within this role HNZPT will work closely with government to monitor the development of legislation to ensure the ongoing protection of historical and cultural heritage.	HNZPT to work with government to monitor the development of legislation to ensure ongoing protection of historical and cultural heritage	Noted - not included as a policy, but is part of HNZPT input to policy development
15	0	16	None	HNZPT has identified that it needs to prioritise its work around the protection and conservation of significant heritage.	AMEND Add the word significant before the word historic or heritage in Objective 15 and each policy.	Reject - HNZPT's role is to advise government on the conservation of historic heritage overall - but this objective and policy should be read in conjunction with Objective 2

15	15.3	16	Financial assistance and costs	Policy 5.3 states: "We specifically advocate for the recognition and protection of cultural heritage and sites, in consultation with iwi and hapū, in the objectives, policies, and methods in RMA plans, including encouraging the development of schedules and appropriate rules to protect cultural heritage [see also Policy 5.2]". As commented in relation to Policy 5.2, the economic resilience of heritage requires a comprehensive understanding of the costs and benefits of heritage retention at both a site specific and macro-economic level, and the policy should direct Heritage New Zealand to provide central government with well-informed information on the economics of heritage.	Economic analysis of heritage retention to inform central government policy	Noted - HNZPT provides a range of information as input to government policy - see 16.2 and 16.3
15	15.3	16	None	Housing NZ supports the collaboration offered by HNZPT in fulfilling gaps in heritage information	Support	Noted/Retain
15	15.4	16	None	Supports the idea of the public sector setting an example in the sustainable management of its historic heritage however seeks that HNZPT recognise that this may not be possible in all instances especially within the context of the overall balance of sustainable management	Add "Where practicable"	Reject - the policy says we will encourage, although core department should have signed up to the Policy for Government Department's management of historic heritage and be implementing it.
15	15.5	16	Sustainable management	Supports participation by HNZPT in implementing other government policies and responses however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA within their input to policy development	Recognised balance implied by RMA sustainable management concept	Accept in part - added a discussion of sustainable management p. 8
15	15.1 & 15.2	16	Sustainable management	Supports the promotion of heritage in government policy and the provision of information on heritage in government policy, however seeks that HNZPT recognise the overall balance of sustainable management required under the RMA within their input to policy development	Recognised balance implied by RMA sustainable management concept	Accept in part - added a discussion of sustainable management p. 8
15	15.x		None	Was numbered as 14 but assume this relates to the section on government policy - formerly 15 and now 16	We encourage government to provide adequate funding to support owners of historical and cultural heritage.	Reject – outside scope of this policy which relates to what HNZPT can do.