



HERITAGE NEW ZEALAND  
POUHERE TAONGA

**Statement of General Policy:  
Management and Use of Historic  
Places Owned, Controlled or  
Vested in Heritage New Zealand  
Pouhere Taonga**

**Summary of Submissions**

30 October 2015

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## Public consultation process

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

This document summarises submissions, and HNZPT responses to suggestions by submitters, on the management and use of historic places owned, controlled or vested in HNZPT.

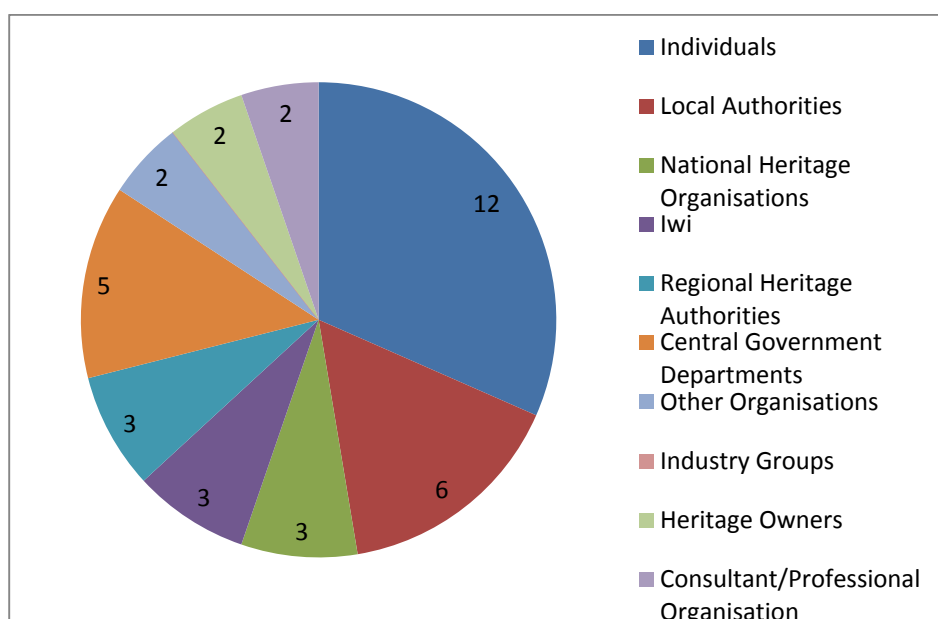
The other four statements of general policy consulted on address:

- the administration of the archaeological provisions under the HNZPTA
- 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.
- the statutory role of advocacy.

## Summary of Submissions Overview

### Submissions by Stakeholder

There were 38 out of a total of 71 submissions that were relevant to the Draft Statement of General Policy: Management and Use of Historic Places Owned, Controlled or Vested in Heritage New Zealand Pouhere Taonga (Draft Properties Policy). A total of 182 submission points were made. The number of submitters by stakeholder grouping is expressed in Figure 1 below.



**Figure 1: Number of Submitters by Stakeholder Grouping**

## Submissions by Objective

Almost a quarter of the submissions points made were general comments. The objectives attracting the highest number of submission points were Objectives 4, 5, 6 and 13. These are summarised in the table below:

Objective / Policy	Total	Percentage
General Comments	40	22%
Introduction/Glossary	10	5%
Objective 1	7	4%
Objective 2	7	4%
Objective 3	4	2%
Objective 4	21	12%
Objective 5	19	10%
Objective 6	16	9%
Objective 7	6	3%
Objective 8	5	3%
Objective 9	7	4%
Objective 10	8	4%
Objective 11	4	2%
Objective 12	2	1%
Objective 13 – Acquisition	17	9%
Objective 14 - Disposal	5	3%
Objective 15 - Agreements	4	2%
<b>Total Submissions</b>	<b>182</b>	<b>100%</b>

Note: Following notification of the Draft Properties Policy Objectives 13, 14 and 15 have been repositioned the final document as follows:

Objective 13 – Agreements transferring and interest in real property rights (renumbered to Objective 15)

Objective 14 – Acquisition (renumbered to Objective 13)

Objective 15 – Disposal (renumbered to Objective 14)

The Summary of Submission Points table notes the repositioned numbering in the heading but leaves the 'Policy no.' column relating to the policy number as in submission and the notified policy (submitters submission points have not been changed and refer to the Objectives as notified).

### General support / opposition

Out of the 38 separate submitters on the Draft Properties Policy, the majority (36) indicated **general support** for the policy. 28 submitters went on to comment on particular policies or objectives within the document. There were 2 submitters voicing **general opposition** to the policy.

A number of submissions addressed the style of the document, general clarifications and the glossary.

## **Key themes**

The following key submission themes have been identified:

### ***HNZPT lead by example***

A number of submissions noted that Heritage New Zealand Pouhere Taonga (HNZPT) should 'lead by example' in the protection and conservation of its properties and that works to HNZPT properties should be at least to the standard that is expected of private owners of heritage properties. It was submitted that HNZPT has the opportunity to 'show leadership' in a number of areas including adaptive reuse and upgrading of heritage properties, heritage best practice and the research and recording of information.

It was submitted that the language of the policy document could more strongly emphasise the commitment of HNZPT to be proactive in the protection and conservation of its properties and to comply with relevant rules and legislation. One submitter sought that HNZPT should manage its properties to the same standard as is required of private owners of heritage buildings and submitted that policies should be amended to ensure consistency between what applies to HNZPT and other land owners.

### ***Resourcing***

Several submitters were concerned about HNZPT's level of resourcing in being able to carry out its responsibilities in the care and management of its properties. One submitter commented that 'the policy has a theme throughout of scarcity of resources'. A number of submissions noted that the use of the term 'as resources allow' was not appropriate and suggested a strengthening of the wording of the policy generally to reflect HNZPT's role as a lead heritage agency.

### ***Risk management***

Submitters raised the issue of risk management in regard natural and human induced risk and the importance of having policy in place to identify, assess and mitigate potential risk to properties in HNZPT's care.

### ***Bi-cultural issues***

A number of submitters from, or on behalf of, iwi and hapū, felt that the language of the policy document could more strongly underline the commitment of HNZPT to notify and consult with iwi and hapū where Māori may have an interest in a historic place. Other submitters were supportive of the many policy statements specifically relating to Māori.

It was also submitted that HNZPT could potentially enter into co-management agreements and 'shared decision-making initiatives' regarding its properties that Māori have an interest in. With regard to disposal, if any wāhi tapu sites were to be considered, it was submitted that these should be offered back to the relevant iwi for ownership.

### ***Recording / Recording / Information and research***

Several submitters stressed the importance of good record keeping and research. One submitter noted the importance of undertaking 'appropriate research and evaluations to make informed decisions' and that this would allow HNZPT to 'make the best use of its limited resources.' Another submitter noted

that 'having good knowledge and the information about heritage in front of you is preferable to learning about the whenua/koorero as you go'.

A number of submissions noted the importance of making research and records on HNZPT's properties publicly available and the point was made that this would be to the benefit all New Zealanders.

### ***Plans***

Submitters sought clarity and direction regarding the policies relating to plans, including the difference between and function of the various types of plans, who would prepare and review them and the standards that a specific plan should meet.

### ***Acquisition***

While there was general support for the acquisition policy, it was clear that there was some confusion over the term 'acquisition' and its meaning in the context of the Draft Properties Policy, and how HNZPT would apply Objective 13. One submitter stated they would 'prefer to see a more ambitious and expansive policy regarding acquisition' while another noted that the policy does not identify that HNZPT will consult with the owners of historic places before acquiring places. Submitters asked that the policy be more explicit as to what type of properties HNZPT sought to acquire and that 'acquisition' be elevated within the general policy statement.

A number of submitters expressed the view that HNZPT 'should have the facility to buy back waahi tapu.'

## 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)

### All Policies

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y	Supports the intent of all policies	n/a	Noted	Noted/Retain
	Unclear	Although we already practice early involvement in directing heritage owners to HNZPT with initial enquiries, it is important that there is clarification across all policies as to when HNZPT should become involved and clearer outlines of what extent of involvement is required at the different stages of the process.	Unclear	Where significant change is proposed HNZPT will enter into early consultation with key stakeholders. New policy 6.5 to include iwi, stakeholders, councils etc.	Amended
	Unclear	Often heritage protection strategies sit outside of the statutory process and becomes a challenge for local government to place emphasis on when it is only a method or guideline. Although this will always be a challenge for HNZPT, awareness that heritage can be objected to on various levels should be reflected in the policies.	Unclear	Submission point better relates to Statutory Advocacy Policy.	No change
	Unclear	Many of the policies read as statements of what HNZPT does, or as objectives, rather than what HNZPT intends to do in the future to achieve the objectives.	Unclear	Noted	Review style and structure of policies.

	Y - with changes	General support for objectives and policies, suggest check to ensure consistency between wording in HNZPTA and policies.	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.	Noted	Review consistency with HNZPTA.
	Y - with changes	Throughout policies there is mention of Risk Management Plans with no guidance on what these are (except in Landmarks policies 14.5-14.8).	Unclear	Risk Management Plans are a statutory requirement for Landmark properties. Properties Policy considers risk management as part of Property Management Plans, Conservation Plans and Reserve Management Plans. Guidelines are not as applicable to Properties Policy as this is more specific than other policies.	No change
	Y	Support in principle the Objectives and Policies within this Policy	n/a	Noted	Noted/Retain
	Y with changes	Support objective 1-15 and all related policies. But policies seem to be geared to administrating rather than identifying heritage items and rules. There is a need to have good knowledge up front. This often results in sites/waahi tapu being destroyed because of lack of knowledge. Submit that HNZPT/Crown consider a proactive, preservation objective where sites are actively researched. Overall the policies lack this proactive approach. Also Maori input to processes is	Submit that HNZPT/Crown consider a proactive, preservation objective where sites are actively researched.	Addressed by Objective 10	No change



		meaningless when hapu/iwi are not resourced to upgrade their knowledge of their cultural landscape.			
Y - with changes		Clarification is required for a range of items where judgement and/or 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.	Clarification of terms	A Glossary has been provided as part of the Policy document where specific meaning is required. "Sufficient" used in definition of reconstruction - would be assessed by relevant experts. "Minor effects" and "Reasonable alternatives" not used.	No change
Unclear		Scope of the policy seems to be limited to historic places owned, leased and managed by HNZPT, and excludes decision-making by HNZPT in relation to buildings subject to covenants, MoU or heritage protection orders in favor of HNZPT.	Unclear	Properties Policy only covers HNZPT managed properties. Refer Advocacy Policy.	No change
Y - with changes		This submission requests that HNZPT enters into discussions with the submitter to discuss future co-management of the following sites: Rangiriri Battle site, Te Wheoro Redoubt, Meremere Paa Site (redoubt), Te Teoteo Paa (Whangamarino). That the future maintenance responsibilities of such sites should rest with Tangata Whenua and that the costs of the crown to maintain such sites should be transferred to the submitter to manage and coordinate amongst its respective Hapuu who seek similar responsibilities. HNZPT and its Senior Management will meet annually with the submitter to review and discuss the interests of the sites for which they have administrative	This submission requests that HNZPT enters into discussions with the submitter to discuss future co-management of the following sites: Rangiriri Battle site, Te Wheoro Redoubt, Meremere Paa Site (redoubt), Te Teoteo Paa (Whangamarino).	Policy anticipates potential transfer of management; refer new policy 1.10, revised policy 8.5 and policy 2.5 which address co-management options. Submission covers issues that are a separate process outside scope of Policy document. Refer Objectives 14 and 15.	Amended

		responsibilities. And on the 20th of November each year from 2015 into the future, HNZPT will attend a dawn ceremony of Karakia with Tangata Whenua and the public to acknowledge those who sacrificed their lives in Rangiriri. This gesture and acknowledgement is a demonstration by HNZPT that the principles of co-management go beyond just emails, hui and words suggesting commitment to strategic plans. An Education strategy is formulated and built into the NZ education curriculum in consultation with Whaanau, Hapuu, Iwi, Marae.			
	Y - with changes	Interpretation section should follow directly after Contents.	n/a	Relocated section to after the Introduction.	Amended
	Y - with changes	Words defined in the glossary would be highlighted in the documents to highlight words with specific meaning.	n/a	Agreed.	Glossary words bolded.
	Y - with changes	We believe that there is currently a negative connotation related to Maori Heritage issues especially those relating to Maori Archaeology. If the Policies dealing with Heritage was the same for all heritage then there would not be an 'us and them' mentality developed.	n/a	Policy recognises special relationship with Maori and provides opportunity to look specifically at Maori issues. While there is a Māori Heritage Values objective this is not the only place Māori heritage values are considered.	No change
	Y - with changes	Use of 'Heritage New Zealand Pouhere Taonga' name for entity as in the Act and not abbreviate to Heritage New Zealand.	n/a	Noted. HNZPT has been used across all General Policies for practical reasons.	Amended
	Y	In general agreement with the objectives and policies. Find the policy to be bureaucratic in nature, with little element of a strategic or	Unclear	Noted.	Review style and structure of policies.

		proactive approach but is comprehensive and essentially constitutes an updated version of the policy of the former NZHPT so provides a sound basis for day to day operation. It is unclear about the financial outcome arising from the current HNZPT ownership of 48 properties. The policy has a theme throughout of scarcity of resources. While some properties may provide a surplus, there are no doubt budgetary constraints.			
	Y - with changes	The HNZPTA refers to its Board as being a governance body which suggests to the submitter that the policy reflects a wish for tidy administration rather than a growth of activities. The introduction to the new policy speaks of leadership and direction from the Board, but the statutory suggestion is one of passive governance. Good management is certainly most important, but so is engendering a passion for and knowledge of the heritage sector.	Unclear	Noted	No change
	Y - with changes	The policy initially states that it deals only with management and use of properties. This would appear to exclude acquisition and correctly so, because Section 16(1) of the HNZPTA refers to policies for “management, administration, control and use”. It is another Section, 14(c) which empowers acquisition. The draft policy does have Sections dealing with acquisition and disposal of properties, but in that respect may go beyond the mandate of Section 16(1) in respect of the policy to be prepared. The submitter considers that the two aspects of acquisition and management are inextricably linked and that it is desirable that they not be placed in isolation.	Unclear	Policy provides for acquisition and HNZPT considers 'management' includes acquisition. Disposal and acquisition are discussed in the Introduction. Acquisition also addressed in Objective 14 (moved to Objective 13) and Disposal in Objective 15 (renumbered to objective 14).	No change

	Y - with changes	We note the statutory objectives of HNZPT include promotion, yet the policy would appear to do little to achieve this.	Unclear	Agree to add 'promote' to Objective 8 and Policy 8.5. HNZPT promotes properties to provide for appreciation. 'Appreciation' features throughout Policy.	Amended
	Y - with changes	Policy needs to focus on records, archaeological investigation and archiving. My experience on four of the properties demonstrates that there is often no detailed plan of the property, the works that have been done in the past have not been recorded, the works have not been monitored or investigated any exposed history of the building and the archives are not in a good state. It is important that HNZPT leads the way, and demonstrates what can be done in understanding the history of the place, its former occupants and the area as a whole.	Unclear	Refer Objectives 4, 9, 10, 11 which have been amended to better support policies addressing recording and research.	Various policies amended
	Y	General comments: HNZPT should lead by example with its approach to properties with the hope that this will filter down, and acknowledge the work HNZPT does in safe-guarding and making its historic places available to New Zealanders and visitors, noting the importance of HNZPT being sufficiently resourced. Note the numbering of the policy is out of order - objective 14 is ahead of 13	Unclear	Intention that best practice principles used at all sites reflected in Policy. Agree policies are incorrectly ordered.	Objectives 13, 14, 15 have been reordered.
	Unclear	Statements of General Policy lack clear statement of why they have been prepared and what they are seeking to achieve. As for similar material in DOC Conservation General policy p.8 and General Policy for National Parks p.9 General Policies are	Unclear	Policy introduction includes purpose and legislative context to explain why prepared. Property Management	No change

		generally framed as 'high level' statements, with little detail of how they will advance achievement of their objectives. If additional internal procedures are intended to be relied upon to supplement policies this should be clearly articulated, why and what their legal basis is and how they will be used to inform legislative/policy interpretation and associated decision making. If not greater detail is required.		Plans for each property contain detail on how properties are managed.	
	Y - with changes	Objectives and policies should be reviewed and if necessary redrafted to the following; Objectives should not restate legislative provisions but be a statement of what is to be achieved, where and when; To give effect to objectives, policies should include sufficient detail to clarify how policy will progress achievement of an objective, where it applies, what course of action is to be taken and when and, who it applies to.	Unclear	Noted	Review style and structure of policies
	Y - with changes	Directive wording of policies should be improved. Currently very 'wordy', could be made more user friendly through use of 'plain-English'.	Unclear	Noted	Review for plain English
	Y - with changes	Use correct referencing of ICOMOS Charter	Should be "ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value (ICOMOS New Zealand Charter 2010)".	Agreed	Amended
	Y - with changes	No discussion on appropriately qualified professionals except when carrying out repairs. Appropriate advice will be required in many areas of property acquisition and maintenance eg. interpretation.	Unclear	Noted. Policy generally revised to include for appropriately qualified experts.	Amended

	Y - with changes	The submitter is of the view that the health and safety of occupants, staff and visitors of historic places needs to be directly addressed. In reading this statement of policy, health and safety did not stand out as it might. It may be desirable to have a separate set of policies addressing this area. These policies may also cover earthquake strengthening/earthquake resilience.	Review this statement of policy to evaluate whether the health and safety of the occupants, staff and visitors of heritage places is adequately covered.	Agreed. Objective 5 and policy 5.11 revised to reflect submission.	Amended
	Y - with changes	The submitter is of the view that risk management needs to be directly addressed. In reading this statement of policy it is not clear what approach HNZPT takes to risk management: such as burglar systems, automatic sprinkler systems, building and content insurance, public liability insurance. These are important considerations for any building owner, particularly where public visitations are likely, or part of the business. It may be desirable to have a separate set of policies addressing this area.	Review this statement of policy to evaluate whether risk management is adequately covered.	Refer introduction Objective 4 and introduction to Objective 5. Risk management is addressed as part of Property Management Plans and Conservation Plans and will differ for each property.	Amended
	Y - with changes	The submitter recommends that HNZPT prepares an internal manual to provide some guidance and/or process for engaging with or recognising the correct iwi group/s to engage and the approach to balancing options.	n/a	HNZPT Maori Heritage Team provides guidance on iwi consultation/engagement.	No change
	Unclear	The General Policy documents are set at a high level and do not provide guidance for HNZPT staff, professionals or the lay person on how the Act 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.	Unclear	Further detailed information on each property is included in Property Management Plans. HNZPT guidance documents are currently being reviewed. Refer also policy 5.9	Amended

	Y - with changes	Some policies footnote the relevant passages of the Act, while some do not. We suggest that this is unnecessary and often seems to be merely repeating the Act rather than developing policy.	n/a	Where policy directly refers to the Act will be noted.	Review footnoting
	Y - with changes	Avoid repetition of the term 'Heritage New Zealand'	n/a	Noted. HNZPT has been used across all General Policies for practical reasons.	Amended
	Y - with changes	Many policies are restatement of the Act and therefore add little guidance on how HNZPT intends to administer the Act. There are differences in style and structure between policies, with some having explanation and others not, when they would benefit from having reasons and explanation. Generally the policies are repetitive, lengthy, lacking clarity, and some policies are worded as methods.	n/a	Noted	Review style and structure of policies.
	N	Provisions of this policy considerably weaker and provide HNZPT with more flexibility when compared to the policies that apply to places not owned by HNZPT.	Amend policies to ensure consistency between what applies to HNZPT and other land owners.	HNZPT aspires to best practice for heritage management. Document language has been strengthened.	Amended
	N	Limited resource and financial restraints are issues that are faced by many owners of heritage buildings.	Policies recognising limited resources and financial constraints should equally apply to private owners of heritage buildings, and be carried over into the other policies.	Policies generally strengthened to reflect intent that HNZPT will care for and manage its properties to the highest standard within available resources.	Amended
	N	As a matter of reciprocity and equity, these principles should be carried through into the HNZPT's other policies that apply to heritage in private ownership, who face the same struggles	Insert policies recognising the imbalance between the responsibilities and the resources available to carry	Policies generally strengthened to reflect intent that HNZPT will care for and manage its	Amended

		and pressures in the management of their buildings. The submitter 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 between a less functional and more expensive to maintain heritage building and a modern building that also has greater community use.	them out; the affordability and justification of ownership; and, that private owners will endeavour to protect historic places, where appropriate.	properties to the highest standard within available resources.	
	Unclear	The policies within this document lack the necessary level of detail on how HNZPT will manage or use the places which they own or manage.	Unclear	Policies are high level. Property Management Plans for each property contain detail on how properties will be managed.	No change
	Unclear	While there is a section on legislative requirements, we do not consider that the document adequately reflects the requirements of the Reserves Act (1977) and the Conservation Act (1987) critical legislation for land which is a Reserves Act reserve vested in or controlled and managed by HNZPT. In relation to the Reserves Act reserves, that would include material on the granting of concessions, classification, and management plans. Throughout the General Policy Document there is the reference to places being 'controlled and vested'. This needs to be corrected to state 'controlled or vested' as these are two different management regimes.	Unclear	Noted. Policy has been generally strengthened to address the requirements of the Reserves Act 1977 refer policies 3.2 (ii), 9.8, 14.1 (v), 15.1 -15.5	Amended
	Unclear	Where historic places are owned, leased, controlled, vested, or managed under other legislation, the policies should be written to	Unclear	Agreed. Policy has generally been strengthened to include	No change



		specifically meet the needs of each property management status. Currently the majority of the draft policy is general and fails to provide the guidance necessary for these individual management needs.		for management requirements under other legislation e.g. the Reserves Act 1977. Property Management Plans for each property contain detail on individual management needs.	
	Unclear	We would like to discuss in more detail the sections relating to Adaptation, Development and New Construction, Access and Use, Involvement with Communities of Interest and Agencies, Disposal, Acquisition and the Agreement for Transferring Real Property Rights, as these are directly related to the submitter's interest in the Conservation Act (1987) and Reserves Act (1977).	n/a	Noted.	No change

## Introduction and Glossary

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y - with changes	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	Awareness that heritage can be objected to on various levels and tensions arise should be reflected in the policies.	The policy relates solely to properties owned or managed by HNZPT. Therefore it does not seem appropriate within this policy to make reference to the contention that sometimes exists	No change

		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 HNZPT, awareness that heritage can be objected to on various levels should be reflected in the policies.		around conserving heritage places.	
	Y - with changes	Include 'protection', 'recognition', preservation', 'conservation', 'maintenance', 'restoration', 'safeguarding', 'promoting', 'adaption' in glossary	Add to glossary	Noted	Glossary expanded to include ICOMOS definitions.
	Y with changes	Include heritage impact assessment in the glossary	Add to glossary	Agreed.	Added to glossary.
	Y - with changes	We are unsure of the manner that HNZPT may have vested interests in historic places other than ownership interests.	Submission: Provide a glossary definition or textual explanation for the phrase 'vested' or 'vesting'.	Noted. Section on Reserves Act 1977 discussion 'vesting' added to Introduction.	Amended
	Y with changes	It would be beneficial to add the following terms to the glossary: collection item, conservation plan, property management plan, reserve management plan and pouwhenua	Add to glossary	Definitions of 'heritage collections' and 'pouwhenua' have been added to glossary. Property Management Plan, Conservation Plan and Reserve Management Plan to introduction of	Amended

				Objective 4.	
	Y - with changes	"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. Also iwi and hapu.	Add to glossary	Noted	Glossary expanded to include ICOMOS definitions.
	Y - with changes	Definition of historical and cultural heritage seemed to exclude movable heritage. This is not considered appropriate to the submitter and other parts of the heritage sector.	n/a	The HNZPTA addresses historic places and historic areas and does not cover movable heritage except for collection items and chattels.	No change
	N	The policy for HNZPT controlled historic places should be consistent with HNZPT's policies for advocacy and those applicable to non-HNZPT owned historic places. As set out in the Policy for Government Departments' Management of Historic Heritage 2004, a best practice approach is required from HNZPT (as a Crown entity) to "set an example to other owners of historic heritage". This policy seems weaker than those that apply to non-HNZPT controlled historic places and also does not reflect the advocacy policy. HNZPT should have the same obligations, or even a higher standard of care, in relation to historic places, as those controlled by other entities/individuals. As a matter of reciprocity and equity, these principles should be carried through into HNZPT's other policies that apply to heritage in private ownership.	In particular see page 5 para 4, page 5 para 6 and page 14 Policy 5.2	Noted. Policies generally strengthened to reflect intent that HNZPT will care for and manage its properties to the highest standard within available resources.	No change
	N	This paragraph as worded is inconsistent with the principles, objectives and policies of HNZPT's Policies and the Act. HNZPT should act in	Amend to: This policy does not apply to ownership, leasing or renting by HNZPT of property	Agreed. Paragraph relocated from Legislative Context to	Amended

		accordance with the Policy for all property that it owns, where the property is a historic place. It also conflicts with Policy 7.6, which provides that historic places owned and managed by HNZPT may be used for operational and administrative purposes. It also conflicts with Policy 15.4 of the General Statement of Statutory Advocacy that states that HNZPT will encourage the public sector to set an example in the sustainable management of its historic heritage. It should be explicit that this policy does not apply to all properties owned by HNZPT, only where the property is not a historic place.	that is not a historic place.	Purpose of the Policy to clarify. Refer para 2 page 5.	
	Unclear	Amendments better reflect the provisions of the Act.	p7, HNZPTA Purpose and Principles, (f) Insert as follows: ...other controlling bodies for the management, maintenance, and preservation of any historic place or historic area; or where appropriate wahi tupuna...etc;	Agreed.	Amended

## Objective 1 – Purpose and Principles

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y	Support this objective	n/a	Noted	Noted/Retain
	Y - with changes	Objective 1 and policies 1.5, 1.7 and 1.8	Review this statement of policy to evaluate whether risk management is adequately covered.	Agreed. Objective 1 covers principles directly from the Act at high level and does not exclude risk	Amended

				management. Refer Objective 4 for risk management and policy 5.11	
1.5	Y - with changes	Policy 1.5 refers to taking account of all relevant cultural values, information limitations may limit this intention	Amend by deleting the word 'all'	From HNZPTA, refer section 4 (b)(i) therefore retain 'all'.	No change
	Y - with changes	Wording 'Heritage New Zealand' could be removed and reworded to avoid repetition	Amend	Agreed. Has been replaced with 'HNZPT'.	Amended
1.5	Y - with changes	Policy 1.5	add: "Where values conflict, Maori values will take precedence in relation to places which are of particular significance to Maori."	Noted. The HNZPTA requires that HNZPT takes into account all relevant values.	No change
1.2	N	p9, Policy 1.2 "Will" is too strong, it is unlikely that HNZPT will actually own all historic places with significant values.	Delete and insert as follows: HNZPT will may own and manage historic places that have significant heritage...	Noted. 'Will' does not refer to 'all' historic places with significant values but recognises s.13 (f) of the HNZPTA.	No change
	N	p9, Insert new Policy, There is nowhere in the Policy that explicitly states that HNZPT will act in accordance with its other policies	Insert new Policy, as follows: HNZPT will comply with all other Heritage New Zealand Policies.	Noted. Refer 'Legislative Context' para 2.	No change

## Objective 2 – Māori Heritage Values

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y - with changes	I recommend that HNZPT complete a strategy in consultation with Iwi around the country that is aimed at allowing Tangata Whenua to "Reconnect"	That HNZPT complete a strategy in consultation with Iwi around the country that is	This is an operational matter for HNZPT and outside the scope of	No change

		with Waahi Tapu. Such a strategy and its primary objectives will be to allow Tangata Whenua to "Reconnect" weather the site is on "Private" property or of "Crown" property.	aimed at allowing Tangata Whenua to "Reconnect" with Waahi Tapu.	this policy.	
	Y - with changes	The submitter notes that there is no express mention of the Treaty of Waitangi or its principles under the heading of "Maori Heritage Values".	n/a	Treaty of Waitangi responsibilities referenced under Legislative Context para 3 and the principles used throughout the NZHPTA.	No change
	Y - with changes	Amend to include appreciation - to show there is a greater good to the proposed actions and to align this objective with Obj 1	Amend to "... and interpreted in an appropriate manner to enable their appreciation."	Agreed. Revised to 'with respect for Māori heritage values.'	Amended
	Y - with changes	Objective 2 and policies 2.1, 2.3, 2.4 and 2.5	Review this statement of policy to evaluate whether risk management is adequately covered.	Noted. Risk management addressed in Objective 4 and policy 5.11	Amended
	Y - with changes	New policy for shared decision-making initiatives in partnership with iwi/hapu and the Crown for managing Historic Places.	New policy acknowledging partnership facilitation as follows: 'HNZPT will actively engage with and foster capacity of iwi and hapu to participate in shared decision-making initiatives and partnerships in respect of Historic Places owned, controlled or vested by the Crown that are of interest to Maori.'	Noted. Policies 2.3 and 2.5 cover opportunities for this. New policy 1.10 to address co-management.	Amended
	Y	Supports inclusion of many policy statements	n/a	Noted	Noted/Retain

		specifically relating to Maori and that these are integrated into all objectives of HNZPT.			
	Y - with changes	Objective 2	add: "... appropriate manner as determined by the Maori Heritage Council."	Noted. Revised to 'with respect for Māori heritage values.'	Amended

## Objective 3 – Statutory Obligations

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y - with changes	Would like to see Iwi Environmental Management Plans included in the Objective	Add Iwi Environmental Management Plans to the Objective	Noted. Iwi Management Plans are recognised under the RMA which HNZPT will act in accordance with. Consultation on IMP's is an operational matter for HNZPT and is outside the scope of this policy.	No change
	Y - with changes	Question if this section is needed. Acting in accordance with statutory requirements and legislation should be assumed and therefore not require its own objective and policies	If mention of compliance with legislation and statutory obligations is necessary then suggest it is included in the introductory sections.	Noted. Objective is included to provide further specific information in regard to HNZPT's statutory obligations.	No change
	Unclear	We would like to see added to the policies clear procedures for reserves, to ensure that the responsibilities of HNZPT are fulfilled, and that where the Department/Minister of Conservation	n/a	Agreed. Policy has been generally strengthened to address the	Amended

		are to be involved in a decision-making process, that relationship is well managed. The provisions in the Reserves Act requiring approval for activities such as leases and disposals are important protections for the public, and need to be fully complied with.		requirements of the Reserves Act 1977 refer policies 3.2 (ii), 9.8, 14.1 (v), 15.1 - 15.5	
3.2	Unclear	Policy 3.2 The list should include the Conservation Act (1987) as some activities where management of historic places takes place on reserves vested or controlled by HNZPT may require a concession under this Act. It should also include the HNZPTA.	n/a	Agreed.	Amended

## Objective 4 - Plans

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y - with changes	This submission seeks to include a statement with respect to Iwi Environmental Management Plans 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."	Include statement: "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."	Noted. Iwi Management Plans (IMP) are recognised under the RMA, which HNZPT will act in accordance with, and can be used to inform the preparation and assessment of applications for resource consent. Consultation on IMPs is an operational matter for HNZPT and is outside the scope of	No change



				this policy.	
	Y - with changes	I am not entirely sure about the difference between the types of plans, check the definition and see if the differences can be made clearer.	Clarify. Plus multiple changes to grammar, smaller points etc. made in track changes on document	Agreed. Refer introduction to Objective 4.	Amended
	Y - with changes	Add, either here or later, a comment to the effect that "Any changes or repairs to the building fabric which expose part of the history of the building should be overseen by an archaeologist who is experienced in buildings archaeology and the results recorded and reported on. Any changes or modifications to the grounds should be overseen by an archaeologist and any historical information recorded and reported.	n/a	Noted. Policy 5.7 (v) add reference to archaeology processes.	Amended
	Y - with changes	All changes made should be recorded, especially those that were not identified in the original conservation plan.	n/a	Agreed. Refer amended policy 11.3.	Amended
	Y - with changes	Add point HNZPT will prepare, and update as necessary, guidelines to assist archaeologists and other heritage professionals in the requirements of Conservation Plans. It is assumed that the other types of plans will be prepared in-house, but if not then the guidelines need to be for all the types of plan, and when to use one or the other etc.	Amend/add	Noted. Introduction to Objective has been revised to include detail on various types of plans. HNZPT conservation plan guideline is currently being updated. Refer policy 4.16 for reserve management plans guidance.	Amended
4.2	Y - with changes	Policy 4.2 In regards to engineering heritage structures the submitter is unclear as to whether HNZPT has the in-house expertise to complete these plans. It would be best for HNZPT to engage external/independent heritage professionals to	Suggest alternative wording "HNZPT will commission an independent conservation plan from relevant experts before significant conservation work	Noted. Policy 4.1, 4.4, 4.10 and 4.13 have been amended to allow for commissioning of	Amended

		produce conservation plans. Also typographical error.	or development work is planned and carried out at a historic place owned or managed by HNZPT."	relevant plans.	
4.5	Y	Support Preparation of conservation plans in accordance with ICOMOS and HNZPT guidelines, regular updating and making public.	n/a	Noted	Noted/Retain
4.8	Y with changes	Policy 4.8 Suggest collections management plans are discussed under a separate heading as Property Management Plans, Conservation Plans and Reserve Management Plans are in section 4	n/a	Agreed	Amended
4.9	Y with changes	Policy 4.9 If this is a statutory obligation, it should not be 'as resources allow'	Amend to remove 'as resources allow' and advocate for increased funding if current resources are not sufficient	Agreed. Refer policy 4.13	Amended
	Y - with changes	No indication in policy on who should ideally be involved in the preparation of conservation plans	n/a	Noted. Refer amended policy 4.7. Note HNZPT revised conservation plan guidance currently being prepared.	Amended
	Y with changes	Set out the section of the Act under which Property Plans are required, as with 4.2 and 4.9	Amend	Property plans are not covered by HNZPTA but are useful for management purposes and therefore an operational matter.	No change
4.2	Y with changes	Minor grammar alteration to improve comprehension Policy 4.2	Amend to "... carried out at historic places owned or managed by..."	Agreed.	Amended
4.1	Y - with changes	Policy 4.1	New point: "Mana Whenua will be involved in preparation	Agreed. Refer new policy 4.2	Amended

			and review of plans relating to places of particular significance to them."		
4.1	N	Policy 4.1 This implicitly supports development of historic places owned by HNZPT, 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. Historic places in private ownership are able to be developed and the correct processes need to be entered into in regard to relevant legislation and statutory requirements etc. Refer Statutory Advocacy Policy Objective 8.	No change
	Unclear	This section does not specify the standards that a completed plan should meet. That may be provided through reference to particular standards (as policy 4.5 does), through a requirement that the plans will be completed by a person with particular qualifications, and/or by stating what the plan will achieve (e.g. that the plan must ensure that the intrinsic values of the property are retained).	n/a	Noted. Policy 4.1, 4.7 and 4.13 have been amended to include reference to relevant experts. HNZPT is currently updating its conservation plan guidance. Refer also policy 4.16	Amended
	Unclear	The status and roles of the various plans is not clear to us -the function of each one needs to be made specific.	n/a	Noted. Introduction to Objective 4 has been revised to include the function of the various plans.	Amended
	Unclear	This is one area of the document where we would like to work with you directly to help develop	n/a	Noted	Relevant policies amended

		effective policies.			
4.1	Unclear	Policy 4.1 The use of the term 'should identify the heritage values...' is very weak. We suggest replacing this with 'will identify ...'	n/a	Agreed	Amended
	Unclear	The policy should also recognise that there are likely to be conflicts between values (e.g. between historic values of a garden and bio-security interests of the community or biodiversity values of the land), and provide guidance on how those are to be resolved.	n/a	Agreed. Refer policies 5.6 and 5.7 to take account of a broader range of values.	Amended
4.9	Unclear	Policy 4.9 The Reserve Act 1977 has clear requirements for preparing management plans- they must be completed within 5 years of the reserve becoming your agency's responsibility. All your reserves should have management plans now, and any suggestion that the plans that are overdue will be completed as 'resources allow' is <i>ultra vires</i> the legislation.	n/a	Agreed. Refer revised policy 4.13 and 4.14.	Amended
4.1	Unclear	Policy 4.10 This policy restates the Act and does not add anything. The policy should provide clear guidance on what HNZPT want the reserve management plans to accomplish and how the values of the reserve will be managed. A management plan must address both the primary purposes of the reserve (i.e. historic heritage) and secondary purposes (e.g. biodiversity and recreation). All those purposes/values should be identified in the plan. The plan must also address significant activities, including when commercial activities would be appropriate, and what major development activities (e.g. building conservation work or provision of significant new visitor facilities)	n/a	Agreed. Refer revised policy 4.15	Amended

		are desired or inappropriate. The policy should also require management plans to determine how conflicts between values/purposes will be managed (if they exist).			
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## Objective 5 – Protection and Conservation

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
5.1	Y - with changes	Refers to Councils rather than district and regional plans	Change to 'relevant District Plan or Regional Policy statement or Regional Plan, as appropriate'	Agreed	Amended. Replace with 'relevant District Plan or Regional Plan'
5.1	Y - with changes	Policy 5.1 is set as 'promoting and advocating' for having listed places entered on the heritage schedules of local authorities and thus subject to RMA consents processes etc. As worded 'advocating ... as appropriate' this seems a bit lame for HNZPT's own properties and deserves strengthening.	n/a	Agreed. The 'as appropriate' relates to the Council but is not needed.	Amended. Deleted 'as appropriate'.
5.6	Y - with changes	Policy 5.6 guided by: should add archaeology in here, including the archaeology of the buildings and land.	n/a	Agree. Refer revised policy 5.7(v).	Amended.
5.6	Y - with changes	Policy 5.6 A detailed plan (including contours where relevant) of all properties should be prepared as part of property management and to enable the planning of any proposed works	n/a	Noted. A detailed site plan can form part of a property management plan and could be further developed in response to the requirements of any specific project.	No change

5.9	Y - with changes	Policy 5.9 Include archaeological values in "guided by the heritage values"	Amend	Noted. HNZPT considers that archaeological values would be identified as part of a Property Management Plan, Conservation Plan or Reserve Management Plan.	No change
	Y	Support the advocacy role of HNZPT and are available to support where appropriate	n/a	Noted	Noted/Retain
5.2	Y - with changes	Policy 5.2 Support provisions for hazards, however question scope of hazards and recommend definition be presented to clarify what hazards HNZPT intends considering.	Suggest the term 'protecting from hazards' is absolute and should be reworded to say "manage the protection of historic places from natural hazards."	Agreed. Amend to include for natural and man-made hazards and agree 'protection' may not be possible. Refer amended policy 5.2	Amended
	Y - with changes	Note importance of Health and Safety and the need to undertake critical works in a timely fashion.	Reword to make it clear that interventions will be undertaken as quickly as possible where the place is unsafe, regardless of impact on heritage values. Also refer to health and safety legislation and HNZPT's responsibilities under that legislation.	Agreed. Policy 5.11 revised to include for Health and Safety.	Amended
5.11	Unclear	The policy is silent regarding funding or resources required to manage and maintain properties acquired, and prioritisation of such funding. The policy (5.11) currently states that HNZPT will only carry out maintenance and repairs as resources allow – however, there is no discussion on funding	Unclear	Funding is an operational matter and allocated annually as part of business planning therefore not covered by this policy.	No change

		allocation to ensure that properties are appropriately maintained.			
5.6	Y - with changes	The submitter notes there is no discussion on use of appropriately qualified professionals except when carrying out repairs. Appropriate advice will be required in many areas of property acquisition and maintenance. The need for conservation plans is also noted, but there is no indication provided in the policy concerning who it is that should ideally be involved in their preparation.	Unclear	Agreed. Refer policy 5.7 (v) and also policies 4.1, 4.7 and 4.13 which have been amended to include reference to relevant experts. HNZPT is currently updating its conservation plan guidance.	Amended
5.3 and 5.6	Y - with changes	Objective 5 and policies 5.3 and 5.6 (vi)	Review this statement of policy to evaluate whether risk management is adequately covered.	Noted. Risk management has been addressed in the introduction to Objectives 4 and 5 and new policy 5.2	Amended
5.15	Y - with changes	Question wording of second sentence Policy 5.15, and ask if the setting no longer contributes to the heritage value of the place, why consider reconstructing it? Perhaps clarify.	Amend to "If the setting no longer contributes to the heritage value of the place, but there is value in its reconstruction, any reconstruction..."	Noted. Refer revised policy 5.14	Amended
5.2	Unclear	It should be clear that hazards include natural hazards and link for the need for earthquake strengthening.	Unclear	Agreed. Reference to earthquakes included in introduction and policy 5.2 has been revised.	Amended
5.11	Y - with changes	Policy 5.11 states 'as resources allow'. This policy should be added to or include a new policy that commits HNZPT to long term management planning including identification of costs and revenue to	n/a	Agreed. Refer revised policy 5.11	Amended

		maintain the assets that HNZPT owns and controls.			
5.13	Y - with changes	Policy 5.13 The imperative for contrasting style of addition should not be adopted as absolute.	n/a	Agreed. Policy 5.13 has been deleted.	Amended
5.2	Y - with changes	Policy 5.2	Amend as follows: ... including their heritage collections, curtilage grounds and setting.	Curtilage has a distinct meaning referencing enclosure/boundaries and is therefore appropriate	No change
5.13	Y - with changes	Policy 5.13, the policy is supported, however, it should also apply to non-HNZPT owned historic places.	n/a	Noted. Policy is specific to HNZPT managed properties therefore outside scope of policy. Refer Statutory Advocacy Policy. Note policy 5.13 has been deleted as better covered in the group of policies in this Objective.	No change
	Y - with changes	The adoption of the UNESCO Blue Shield project could be a suitable policy for site protection in specific locations and you may wish to consider this as a policy option.		Agreed. Blue Shield is worth investigating and it is considered that the general policy statement allows for this.	No change
5.1	Unclear	Policy 5.1 The properties HNZPT own and manage are already protected against direct impacts (e.g. demolition), or should be protected through covenant or reserve classification. In our view, there are therefore two protection actions that should be reflected in this policy: a. To ensure that the classification and protection status of the property are optimal for the ongoing protection and	Unclear	Noted. Refer new policy 5.16	Amended



		management of the property. b. To use RMA and other mechanisms to protect the context within which the property sits. For example, to prevent loss of surrounding historic values or to prevent neighboring activities damaging the property itself (e.g. by shading a historic garden, or causing vibration damage to a vulnerable structure).			
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## Objective 6 – Adaptation, Development and New Construction

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y	Support adaption, development and new construction as ways of conserving the value of historic places	n/a	Noted	Noted/Retain
	Y - with changes	Is a Heritage Impact Assessment defined anywhere – there is a multiplicity of terms floating around and these should be defined, preferably with any previous names listed – they should also be consistent with RMA	Heritage Impact Assessment definition consistent with RMA	Agreed. Definition of Heritage Impact Assessment has been added to glossary.	Amended
	Y	Support this objective, and believe it is important that HNZPT is enabled to make historic places accessible and relevant to current and future generations. In addition, this will ensure HNZPT's viability into the future	n/a	Noted	Noted/Retain
6.4	Y - with changes	Who does the "they" in 6.4 (i) to (iv) refer to?	Review to make it clear what is intended and improve the grammatical structure	Agreed	Amended
	Y - with changes	Reword first sentence of first paragraph	Amend to "... facilitated by it serving a useful purpose. Adaptation of a historic	Agreed. Opening sentence has been revised.	Amended

			building may arise from its continuing use or..."		
	Y - with changes	Objective 6 unclear	Amend to: 'Historic places owned or managed by HNZPT may be adapted for a compatible use, developed or involve new constructions. Any changes must contribute to the conservation and protection of the heritage values of the historic place.'	Agreed. Opening sentence has been revised.	Amended
6.3	Y - with changes	Policy 6.3 Change to add clarity	Amend to "In the case of a reserve, for which HNZPT is the administering body under the Reserves Act 1977, any proposed development or new construction requires the prior consent of the Minister of Conservation, and must be in accordance with section 58 Reserves Act 1977 in order to:..."	Noted. Policy 6.3 has been revised.	Amended
6.4	Y - with changes	Policy 6.4	New point: (vi) They are acceptable to mana whenua.	Agree in part. Refer new policy 6.5	Amended
6.4	Unclear	Policy 6.4 (iv) While contemporary and contrasting new constructions and developments may be appropriate, the design in each case should be determined on its individual merits. The public has enough intelligence to appreciate well-articulated detail that expresses the transition from old to new fabric without the need for subjective or absolute design prescriptions.	Unclear	Noted. This is intended as guidance rather than a subjective or absolute approach to adaption, development or new construction.	No change
	N	This section recognises the sustainable use of a	Insert provisions recognising it	Policy applies to	No change

		historic place through development, new constructions and adaption to serve a useful purpose. This should be carried over into policies for private owners of heritage buildings, particular the introduction, Objective 6, Policies 6.2 and 6.4.	can be beneficial and even necessary to facilitate the sustainable use of a historic place through development, new constructions and adaption enable the place to serve a useful purpose.	HNZPT properties where onus is on protection of heritage values and best practice as set out in the HNZPTA. Submission considered outside scope of Policy.	
6.2	Y - with changes	Policy 6.2 Make clear that there are other requirements other than approval of the Board.	Amend: New Zealand, .....in accordance with the applicable statutory requirements and HNZPT's policies, and subject....	Noted. Any proposal put to the Board will fulfil these requirements.	No change
6.4	Y - with changes	Policy 6.4 (iii)	Amend as follows: ... of historic place, its curtilage grounds or its setting ....	Curtilage has a distinct meaning referencing enclosure/boundaries and is therefore considered the appropriate term. Definition is included in the glossary.	No change
	N	New Policy required. Makes clear that HNZPT will obtain archaeological authority for work on own properties.	Insert new policy - HNZPT will comply with the provisions of the Act in relation to obtaining archaeological authorities for its historic places that are archaeological sites.	HNZPT will comply with all relevant legislation in this area. We note the potential for conflict of intent when HNZPT is applicant and decision maker for archaeological authorities. Refer policy 3.1	No change

	Unclear	It would make sense to create a separate section for properties that are vested in or controlled and managed by HNZPT under the Reserves Act or other arrangement, as any work on these sites are likely to require DOC or the controlling body as legal owner to sign off any adaptation, development or new construction. This is an example where the different management status of properties requires separate policies.	Unclear	Agreed. A list of the management status of HNZPT properties was included in Appendix 1. This list has been deleted from the policy and is now to be available on the HNZPT website. References to the Reserves Act 1977 have been strengthened throughout the Policy.	Amended
	Unclear	A policy for providing an independent review of plans to adapt, develop or undertake new construction would make this process more transparent.	n/a	Noted. HNZPT considers that the tests provided for under policy 6.4 are appropriate.	No change
6.4	Y - with changes	Policy 6.4 Needs to add a new line which states that adaptations must not be not inconsistent with the purpose for which the land is held. That is, if the land is a historic reserve then historic values are the purpose for which the land is held and therefore any use must not be to the detriment of these values.	n/a	Agreed. Refer revised policy 6.3	Amended

## Objective 7 – Access and Use

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Unclear	As far as management and use are concerned, the priority must be preservation. HNZPT is not primarily in the cultural tourism business, although as is acknowledged public access is important. Access is a subsidiary purpose and it is acknowledged that access and use can provide funding for conservation, but in the event of a conflict, preservation and conservation must prevail over access as a priority.	Unclear	Noted. Refer policy 7.3 which references conservation concerns.	No change
7.1	Y - with changes	Support objective but suggest section 7.1 be amended	Amend to include 'appreciation' to align with Objective 7.	Agreed. 7.1 amended to align with Objective 7.	Amended
	Y - with changes	Suggest heritage impact assessment be required before proposals to change the use of a historic place to help HNZPT make its assessment and to ensure use is compatible.	n/a	Agreed. Refer new policy 7.4	Amended
7.6	Y - with changes	Policy 7.6 (ii) The intent of this policy would benefit from explanation as it is not clear that heritage values can be diminished by original or long term use. However, heritage fabric may be worn over time. It is generally desirable, but not often possible for there to be continuity of historic use as an expression of heritage values.	Unclear	Agreed. Refer revised policy 7.6 (ii)	Amended
7.2	Y - with changes	Policy 7.2	add: Strategies to facilitate access and use will be guided by tikanga where relevant.	Noted. HNZPT considers this point is addressed by policy 2.4 and appropriately on a case by case basis	No change

				in property management plans.	
7.4	Y - with changes	Policy 7.4 (iii) There could usefully be greater policy provision made for emerging media. HNZPT could usefully strengthen this policy commitment to provide more permanent access to heritage places it owns and manages through some form of internet-based presence and/or interaction.	Unclear	Noted. HNZPT considers this issue is addressed in policy 7.1. Refer also policy 9.1	No change

## Objective 8 – Involvement with Communities of Interest and Agencies

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y	supports	n/a	Noted	Noted/Retain
8.3	Y - with changes	The submitter understands that volunteers work at many of the properties, and considers that many of these are likely to be former Regional Committee Members now aligned with the new organisation formed following Regional Committee disestablishment. Policies should seek to retain that vital volunteer support.	Unclear	Agree. HNZPT consider that this is addressed by policy 8.1 and 8.3	No change
8.3	Y	Support intention to develop effective relationships, and are keen to maintain relationship with HNZPT to ensure engineering heritage is appropriately conserved and protected.	n/a	Noted	Noted/Retain
	Y - with changes	Amend first sentence of first paragraph	Amend to "... connections to the historic places that it owns or manages"	Agreed.	Amended
8.5	Y - with changes	Policy 8.5	Amend: HNZPT "may negotiate ... with manawhenua or other	Agreed. Have included whanau, hāpu and iwi.	Amended

			relevant ..."		
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## Objective 9 – Interpretation at Historic Places

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
9.5	Unclear	That heritage trails are written from a balanced Māori and non Māori perspective	Ensure that Heritage trails are written from a balanced Māori and non Māori perspective	Policies recognise the relationship of Māori to historic places and support the use of traditional Māori knowledge and te reo Māori and that any interpretation is endorsed by the appropriate whanau, hapū and iwi. Refer policy 9.5	No change
9.5	Y	Supports that the use of traditional Maori knowledge and te reo in the interpretation of an historic place be developed in consultation with appropriate whanau, hapu and iwi.	n/a	Noted	Noted/Retain
	Y	Support intention to make heritage available in various means in both Maori and English where possible. It is vital heritage is relevant and accessible if it is to be conserved in the long term.	n/a	Noted	Noted/Retain
	Y - with changes	Amend first sentence of first paragraph	Amend to "... communicate to the range of visitors at these historic places."	Agreed.	Amended
	Y - with changes	Include commas	Amend to "... with historic places, may be acknowledged	Agreed.	Amended

			by means of markers, plaques or pouwhenua, only where..."		
9.2	Y - with changes	Policy 9.2	add: (v) reflect the dual heritage of Aotearoa New Zealand.	Noted. HNZPT considers this is addressed by 9.2 (ii) and (iii). Policy does not generally use term 'Aotearoa New Zealand'.	No change
9.3	Y	Policy 9.3 (i) This is to be commended and these links could usefully be made accessible on a digital platform and include all entries on the Heritage New Zealand List/Rarangi Korero.	n/a	Noted	Noted/Retain

## Objective 10 - Research

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
10.4	Y - with changes	Policy 10.4 what is meant by 'invasive'? Although I see that research will be guided by mana whenua I do have concerns about trampling our waahi tapu.	Clarify point	Agree. Refer revised policy 10.4	Amended
	Y - with changes	The submitter finds slightly unusual the wording of Objective 10 of the policy which appears to be a statement of a view rather than an attainable objective. It may simply be a matter of changing the word "supports" to "should support".	Unclear	Objective as worded relates to research on HNZPT properties and is a goal in its own right.	No change
10.6	Y - with changes	Policy 10.6 who is to do the publishing/promoting, should this be a requirement of the archaeological process, or done in-house?	Clarify point	Agree. Refer revised policy 10.6	Amended
	Y	Support intention to make evidence-based decisions, it is vital HNZPT undertakes appropriate	n/a	Noted	Noted/Retain



		research and evaluations to make informed decisions and to make the best use of its limited resources			
	Y - with changes	Suggest wording in 10.2 (ii) be amended to give HNZPT flexibility and reflect research opportunities undertaken by HNZPT or other organisations.	Amend 10.2 (ii) to "A research opportunity arises in the context of other activities, works or uses of HNZPT or other organisation(s)."	Agree in part. Consider Objective does not preclude research carried out by other organisations.	No change
	Y - with changes	Having good knowledge and the information about heritage in front of you is preferable to learning about the whenua/koorero as you go. This often results in sites/wahi tapu being destroyed because of lack of knowledge.	HNZPT/Crown consider a proactive, preservation objective where sites are actively researched.	Agreed. HNZPT works toward this end. Refer policies 10.1, 10.2 and 10.3	No change
10.3	Y - with changes	Objective and policy 10.3. While the submitter does not offer a specific submission on these objectives and policies it does recommend that HNZPT gives consideration to the preparation of an internal manual to provide some guidance and/or process for engaging with or recognising the correct iwi group/s to engage and the approach to balancing opinions.	HNZPT gives consideration to guidelines to assist engagement with iwi.	Noted. HNZPT Māori Heritage Advisors provide assistance with engagement with iwi.	No change
10.4	Y - with changes	Policy 10.4	add: "... conservation, where the benefits of conservation outweigh the loss."	Agreed. Refer revised policy 10.4	Amended

## Objective 11 – Information and Records

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	Y - with	The submitter finds slightly unusual the wording of	Unclear	Objective as worded	No change

	changes	Objective 11 of the policy which appears to be a statement of a view rather than an attainable objective. It may simply be a matter of changing the word “supports” to “should support”.		relates to information and records on HNZPT properties and is a goal in its own right.	
11.3 and 11.4	Y - with changes	It is important to create usable archives – those I have looked at are not, and the records held by HNZPT are not in the best order. Relates to 11.3 and 11.4. Advocate a push to improve.	n/a	Noted. HNZPT records and collects information relating to historic places it owns or manages on an ongoing basis this information is available on our files. We continue to look for ways to improve our records.	No change
9.5	Y - with changes	Given areas of collaboration we suggest another policy statement (suggest under 7 or 9 but probably better under 11) along the lines of:	New policy: 'HNZPT explores opportunities to provide historical context to historic places by utilising and leveraging the relevant documentary heritage available through other cultural heritage institutions.'	Agreed. Refer new policy 9.5	Amended
	Y - with changes	With reference to Objectives 11 and 12 to a 'suitable archive' and 'electronic Collection Management System' we suggest there may be a complementary List of heritage collections kept by HNZPT which could be made public to the benefit of all New Zealanders.	n/a	Noted. Collections are not currently publically available online. Collections managers or staff are available to answer queries regarding collections.	No change

## Objective 12 – Heritage Collections

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
12.2, 12.3 and 12.4	Y - with changes	Policy 12.2, 12.3, and 12.4 "Where resources allow" implies this is a discretionary activity, but believe this is a core role of HNZPT	Amend wording to reflect that these actions will be undertaken	Agreed. 'Where resources allow' has been replaced with 'will'. Language throughout the Policy has been strengthened.	Amended
12.5	Y - with changes	Question whether 12.5 should refer to collection items rather than collection item?	Amend to items	Agreed.	Amended

## Objective 13 - Agreements Transferring an Interest in Real Property Rights (note renumbered to Objective 15)

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
	N	That all resources and assets be vested in the local iwi whanau marae of a local and regional authority.	That all resources and assets be vested in the local iwi whanau marae of a local and regional authority.	Policy 15.4 allows HNZPT to enter into an agreement transferring real property rights for its properties where certain conditions are met	No change
	Unclear	This submission requests that HNZPT enters into discussions with the submitter to discuss future co-	This submission requests that HNZPT enters into discussions	Noted. Co-management	No change

		management of sites: Rangiriri Battle site, Te Wheoro Redoubt, Meremere Paa Site (redoubt), Te Teoteo Paa (Whangamarino). That the future maintenance responsibilities of such sites should rest with Tangata Whenua and that the costs of the crown to maintain such sites should be transferred to the submitter to manage and coordinate amongst its respective Hapuu who seek similar responsibilities. HNZPT and its Senior Management will meet annually with the submitter to review and discuss the interests of the sites for which they have administrative responsibilities. And on the 20th of November each year from 2015 into the future, HNZPT will attend a dawn ceremony of Karakia with Tangata Whenua and the public to acknowledge those who sacrificed their lives in Rangiriri. This gesture and acknowledgement is a demonstration by HNZPT that the principles of co-management go beyond just emails, hui and words suggesting commitment to strategic plans. An Education strategy is formulated and built into the NZ education curriculum in consultation with Whaanau, Hapuu, Iwi, Marae.	with the submitter to discuss future co-management of the following sites: Rangiriri Battlesite, Te Wheoro Redoubt, Meremere Paa Site (redoubt), Te Teoteo Paa (Whangamarino).	addressed in policies 1.10, 2.5 and 8.5.	
13.1	Y - with changes	Wording in section 13.1 (iii) should be amended for clarity	Amend to "The preparation of a Heritage Impact Assessment considering all the relevant values and options has been completed having regard to..."	Agreed. Refer revised policy 15 (iii)	Amended
13.1	Y - with changes	Policy 13.1	add: (iv) In the case of property of particular interest to mana whenua, they have agreed to the transfer."	Noted. Refer new policy 15.4	Amended

## Objective 14 – Acquisition (note renumbered to Objective 13)

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
14.2	Y	Policy 14.2 Support acquisition of land: where a site is of high value or significance on a national level HNZPT should have the facility to 'buy back' waahi tapu	n/a	Noted. Objective has been revised to clarify the intent of this objective which we accept was confusing as originally notified. Refer particularly the introduction to this Objective. Note HNZPT has no funding available for purchasing additional properties.	Amended
	Unclear	Does not identify that HNZPT will consult with the owners of historic places before acquiring those places.	Identify that HNZPT will consult with owners of interests in historic places before acquiring	Noted. Objective has been revised to clarify the intent of this objective which we accept was confusing as originally notified. Refer particularly the introduction to this Objective.	Amended
	Y - with changes	Support acquisition of land: where a site is of high value or of significance on a national level. HNZPT should have the facility to 'buy back' waahi tapu under the following conditions: a) the management of sites is so purchased under a co-management agreement, b) The maintenance of such sites	Unclear	Agree in part. Objective has been revised - refer above comments. Co-management has been addressed in policies	Amended

		prohibits future use of cattle and sheep as a maintenance strategy and that innovative options are sort between HNZPT and Tangata Whenua, c) any waahi tapu site that HNZPT considers is suitable for disposal should be 'offered back' to the relevant iwi for 'ownership'.		1.10 and 2.5. HNZPT will consider offering to iwi/hāpu any property it wishes to dispose of, refer new policy 14.2 (iv)	
	Unclear	The submitter queries whether there is likely to be publication by HNZPT in the future of a strategic plan dealing with properties. The submitter would like to know the HPT attitude towards more acquisitions. The policy suggests that acquisition is a last resort when at para 14.1(1) it describes acquisition as the only appropriate method to protect an historic place. The policy appears to contemplate a "frozen situation" as far as further acquisitions are concerned and if that is so, the policy should say that.	Would prefer to see a more ambitious and expansive policy regarding acquisition.	Policy is written to keep options open but clearly state criteria for acquisition. Note HNZPT has no funding available for purchasing additional properties.	Amended
	Unclear	There are opportunities with tax deductions, philanthropy, sponsorship etc. in the acquisitions area which can be considered. It is not seen as satisfactory to have this matter as a tail piece on the management policy as in most cases the properties need to pay their way.	Unclear	Noted. HNZPT seeks assistance from those interested in historic places to support conservation work. Refer new policy 1.9	Amended
	Unclear	HNZPT has the opportunity to show leadership with respect to adaptive reuse and upgrading of heritage properties. While this is unlikely to be appropriate with many of the current properties owned by HNZPT there should be consideration for the acquisition of new properties to educate the public on how heritage buildings can made relevant for modern life via modification based on best practice.	Unclear	Noted. Criteria for acquisition are defined in policy 13.1. Note HNZPT has no funding available for purchasing additional properties.	No change
	Unclear	There is also the issue of Government owned heritage buildings and the relationship of HNZPT	Unclear	Government owned heritage buildings are	No change

		with those Agencies. It would seem that properties are regarded as liabilities rather than as assets. The submitter accepts this may be the case unless they are: endowed; have an assured income; or are particularly significant properties that must be safeguarded and the policy covers these points or are upgraded using best practice to make them relevant to modern uses.		outside the scope of this Policy. Refer Policy for Government Departments' Management of Historic Heritage 2004.	
14.1	Y	Supports evidence based decisions.	n/a	Noted	Noted/Retain
14.1	Y with changes	Wish to see HNZPT adequately funded to carry out these important roles. For example, Management Policy, 14.1(v) regarding decisions to acquire an historic place has a criterion that funding be available into the long term to do so but this will be almost impossible to conclude as funding is dependent on long term central government support.	Unclear	Noted	No change
14.1	N	The submitter notes that the policy is silent regarding methods and tools on acquisition. In particular there is no reference to a thematic or research basis to assist in decision making; there is also no discussion on selection of buildings for ownership (e.g. spread of building types, locations), nor on the issue of the authenticity of properties acquired.	Unclear	Consider this is addressed in policy 13.1 which states the criteria for acquisition.	No change
14.1	Y - with changes	Policy 14.1 - The acquisition objective and policies seem to be inappropriately located within this general statement of policy. The acquisition objective should be elevated to be perhaps the first or second objective. The rationale is simply that to make better sense of objective 1 and the ensuing policies, the reader should understand what historic places HNZPT is interested in owning.	Review the structure of the 'Management and use of historic places owned or controlled or vested in HNZPT' general statement of policy with a view to elevating the acquisition objective and policies.	Noted. Acquisition is not a primary role of HNZPT and decisions on acquisition must meet strict criteria. NZHPT considers that this objective is appropriately located.	No change

14.1	Y - with changes	We consider the structure of policy 14.1 can be improved to make it easier to understand. There are five discrete criterion given, connected with the words 'or', 'or', 'and', and 'and'. If we read this correctly then, this means that criteria (iv) and (v) always apply, and that at least one criterion from (i) to (iii) must also apply. The use of 'or' in this listing of criteria makes it hard to understand, and it might be better to separate these out in some manner.	Submission: Review policy 14.1 to make it simpler and clearer - addressing the specific points and questions raised by the submitter in the preceding paragraphs.	Agreed	Amended
14.1	Y - with changes	Criteria (i) and (iv) seem to be covering a similar outcome but from opposing angles. Is it possible to rationalise these two criteria?	n/a	Agreed. Refer revised policy 13.1	Amended
14.1	Y - with changes	Criterion (i) has the phrase 'is the only appropriate method in the circumstances'. We are not sure of the legal implication of such a phrase, but it would appear to be quite restrictive in terms of application. Given the mechanics of heritage listing, we are unsure what circumstances would result in Heritage New Zealand's ownership being the only appropriate method of heritage protection. Might replacing the words 'only appropriate' with the word 'best' improve the practical application of this criterion?	Unclear	Agreed. Refer revised policy 13.1	Amended
14.1	Unclear	Criterion (ii) also seems to be inappropriately limiting because it implies that other than the historic place at question, there can be no other similar historic place available for public visitation. We also wonder whether the application of this criterion is made globally, nationally, regionally or locally. This question would have a significant bearing on the impact of this criterion.	Unclear	Noted. The policy point recognises that HNZPT is not the only provider of heritage experiences and that acquisition is reserved for the most significant heritage places.	No change



14.1	Y - with changes	Criterion (iii) might also be reworded to make it clearer who the subject is that is '... able to illustrate with credibility ...'	n/a	Agreed. Policy point modified to reflect submission.	Amended
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## Objective 15 – Disposal (note renumbered to Objective 14)

Policy no.	Support	Submission Point	Relief sought	HNZPT response	Revision to Policy
15.2 (iv)	Y - with changes	Waahi tapu sites that HNZPT consider as suitable for disposal should be offered back to the relevant iwi for ownership	n/a	Agree. Addressed in policy 14.1 (vi) and 14.2 (iv).	Amended
15.2 (iv)	Y - with changes	Objective does not specify that HNZPT will consult with owners of surrounding sites before disposing of historic places it owns.	Include requirement for HNZPT to consult with owners of surrounding sites, as this may identify opportunities for the historic place.	Noted. Addressed by policy 14.2 (iv)	No change
15.2 (v)	Unclear	The more extensive use of Covenants may be a method of management which enables the better use of scarce resources.	Unclear	Noted. Addressed in policy 14.2 (v)	No change
15.2 (iv)	Y - with changes	Policy 15.2 (iv)	add: "... stakeholders, having particular regard to the views of mana whenua."	Noted. Refer revised policy 14.2 (iv)	Amended
15.4	N	Policy 15.4 HNZPT currently has a respectable but not fully representative portfolio of the country's significant heritage assets. The organisation is responsible for multiple heritage outcomes, and it should not be obliged as a matter of policy to commit sale proceeds to property activities, but rather, that the decision should take into account all the organisation's priorities at the time of any disposal.	Unclear	Noted. HNZPT has limited funding available to manage its properties and considers that any funding gained from property disposal should rightly be allocated to the	No change

				management of other properties in the portfolio.	
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