



HERITAGE NEW ZEALAND
POUHERE TAONGA

Tairangahia a tua whakarere;
Tatakihia nga reanga o amuri ake nei
Honouring the past; Inspiring the future

10 May 2021

File: 33002-083

Environment and City Planning
Porirua City Council
PO Box 50218
Porirua

dpreview@pcc.govt.nz

Dear Sir or Madam

FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED DISTRICT PLAN


- 1. This is a further submission on a number of submissions in support or opposition to the Proposed Porirua District Plan**
- 2. Heritage New Zealand Pouhere Taonga has an interest in the proposed plan that is greater than the general public:**

Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage. Heritage New Zealand is New Zealand's lead agency for heritage protection.

- 3. The submissions that Heritage New Zealand opposes and supports are detailed in the attached table (Attachment 1).**
- 4. The reasons for Heritage New Zealand's further submissions are detailed in Attachment 1.**
- 5. Heritage New Zealand seeks the decisions as described in the table in Attachment 1.**
- 6. Heritage New Zealand wishes to be heard in support of its further submission.**

7. If others make a similar submission, Heritage New Zealand will consider presenting a joint case with them at a hearing.

Yours sincerely



Jamie Jacobs
Kaiwhakahaere Matua / Director Takiwā o Te Pūtahi a Māui /Central Region
Heritage New Zealand Pouhere Taonga

Attachment:

1. Heritage New Zealand Pouhere Taonga Further Submission Table on Proposed Porirua District Plan.

Address for service

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**Attachment 1
Further Submission of Heritage New Zealand Pouhere Taonga to Porirua Proposed District Plan**

Underline = include and ~~Strikethrough~~ = delete

Provision number	Submitter name, number, point number & content	Heritage NZ support or oppose	Reasons	Relief sought by Heritage New Zealand
General	Kāinga Ora 81.1 Proposed High Density Residential Zone	O	<p>The proposed High Density Residential Zone has potential adverse effects on historic heritage values, including on scheduled heritage in Plimmerton and Porirua.</p> <p>While recognising that the NPS-UD requires intensification in the proximity of City Centres and Mass Rapid Transit (MRT) stops, there needs to be more public consultation on how this looks in Porirua. This would be best done separately from the further submission process.</p> <p>Regarding intensification near MRT stops the Draft Wellington Regional Public Transport Plan states that there are plans to upgrade the Kāpiti Line to make it ‘quick, frequent, reliable and high-capacity’ (and thereby fit the definition of MRT in the NPS-UD), and that Metlink will work with Territorial Authorities to define which individual train stations are access points to rapid transit. ‘These access points will be at stations where there is already significant urban development’.¹</p> <p>In our submission Pukerua Bay, Plimmerton, Mana, and Paremata should not be zoned High Density.</p>	Keep residential zoning as notified.
Zoning/ Maps	Kāinga Ora 81.18 Extend the area zoned MRZ	O	<p>The submission requests substantial increase in the areas zoned Medium Density Residential, including large parts of Plimmerton, nearly all of Titahi Bay, and large parts of Whitby and Porirua East.</p> <p>This change would potentially significantly affect the heritage values of places like the Austrian state housing area of Titahi</p>	Retain extent of MRZ as notified

¹ Draft Wellington Regional Public Transport Plan 2021-2031 (February 2021) page 67

			Bay and the cluster of heritage buildings in Huanui/Arawhata Street. There needs to be more public consultation on the appropriate amount of further intensification in Porirua, which would be best done separately from the further submission process.	
LCZ-S1	Kāinga Ora 81.719 Change height limit from 12m to 16m	O	The submission to change the height standard for the Local Centres Zone would potentially cause adverse effects on heritage values for places such as St Andrews Church in Plimmerton	Retain height standard as notified
Definitions (new)	House Movers section of the NZ Heavy Haulage Association 167.1 New definitions of relocation, removal and resiting	S	HNZPT is not opposed to the intent of this submission; however it is important to understand how these proposed definitions would interact with the heritage provisions. There are policies and rules in the HH chapter which refer to relocation and repositioning (which is equivalent to re-siting).	Only adopt new definitions if there is a good fit with heritage provisions
Definitions <i>alteration</i>	Kāinga Ora 81.30 Delete definition of alteration	S	Alteration is an important concept for heritage provisions; however the PDP includes a definition of 'Heritage Alteration' therefore with regards to heritage matters a definition of 'alteration' is not necessary	Delete definition
Definitions <i>heritage alteration</i>	Powerco Ltd 83.4 Amend heritage alteration definition to exclude maintenance and repair or upgrading of infrastructure	O	It may be appropriate to amend the definition to allow for repair and maintenance of infrastructure within certain prescribed limits. However upgrading has the potential for adverse effects on heritage and should not be included in the list of excluded activities	Maintenance and repair of infrastructure could be included in the items excluded from the definition; however upgrading should not be part of this exclusion
Definitions <i>Heritage values</i>	Kāinga Ora 81.79 More clarity of 'surroundings' and 'representativeness' Amend definition of heritage values and or	S	The term 'surroundings' would be better replaced with 'settings' which is a defined term in the PDP. Representativeness is a term understood by heritage professionals, and a lengthy explanation or definition is in our view not necessary. 'And' can be changed to 'or' as all the values listed need to be considered, but not all need apply to every place.	e. Surroundings <u>settings</u> f. rarity; and or
Definitions	Kāinga Ora 81.100	O	The definition of maintenance as notified specifically relates	Retain definition as notified

<i>maintenance</i>	Amend definition of maintenance to <u>heritage</u> maintenance		to both heritage items and SCHED6 places The submission is correct that maintenance is used throughout the plan. However the notified definition states 'means in relation to a heritage item' and 'in relation to a site or area listed in SCHED6'. Changing it to <u>heritage</u> maintenance would not necessarily cover use of the term in relation to SCHED6	
Definitions <i>Minor earthworks</i>	PCC 11.2 Delete minor earthworks definition	S	HH-P5 and HH-R4 refers to 'small-scale earthworks' which is similar to the concept of 'minor earthworks', but the definition is not referred to in the PDP	Delete definition
Definition <i>overlay</i>	Kāinga Ora 81.121 Delete overlay definition	O	The term 'overlay' is used throughout the plan e.g. INF-P8 and INF-R4. If the definition were to be deleted each reference to overlay would need to refer in full to all the spatially identified sites and areas.	Retain definition as notified
Definition <i>repair</i>	Kāinga Ora 81.139 Amend repair – to <u>heritage</u> repair	S	While the definition as notified includes the words 'in relation to a heritage item' and therefore doesn't apply to every reference to 'repair' in the PDP, it may be better to amend the definition so that is similar to the way 'heritage alteration' and 'heritage restoration' are defined. There may be the need for consequential amendments to the wording of some HH policies and rules.	Amend definition as requested
HCH-01	Powerco Ltd 83.18 Add 'where practicable' to objective	O	Adding the words 'where practicable' would unnecessarily dilute the intention of this objective	Retain objective as notified
HCH-01	Greater Wellington Regional Council 137.11 Special qualities and <u>significant historic heritage</u>	S	The suggested amendment better reflects Policy 21 of the RPS and is more precise	Amend as requested
HCH-01	Te Rūnanga o Toa Rangatira 264.94 Add <u>enhanced</u> to objective	S	HNZPT is supportive of an objective to enhance historic and cultural heritage. <u>And</u> would be a better conjunction in this phrase than <i>or</i> .	Amend objective: '... sense of place and identity are protected, and maintained, <u>and enhanced</u> .'

INF-05	Waka Kotahi 82.40 Delete part of objective (clauses 1-3)	O	INF-05 addresses all potential effects, while at the same time highlighting important aspects to be considered. The emphasis provided by clauses 1 to 3 should be retained.	Retain as notified
INF-05	Spark NZ Trading Ltd, Chorus NZ Ltd, Vodafone NZ Ltd 51.35 Add 'recognising the functional need and operational need of infrastructure' and delete clauses 1 to 3	O	INF-05 addresses all potential effects, while at the same time highlighting important aspects to be considered. The emphasis provided by clauses 1 to 3 should be retained. Adding a clause recognising the functional and operational need of infrastructure is not necessary, as the benefits of infrastructure are already recognised in INF-01 and other provisions	Retain as notified
INF-P4	Powerco Ltd 83.31 Add 'where practicable' to clauses 1 and 3	O	Adding the words 'where practicable' would unnecessarily dilute the intention of this policy	Retain as notified
HH general	Greater Wellington Regional Council 137.42 Cross reference HH chapter with SASM chapter	S	There is merit in including cross references between the HH and SASM chapters	Amend as suggested by GWRC
HH Introduction	Te Rūnanga o Toa Rangatira 264.106 Amend so that the chapter appropriately reflects Māori historic heritage	S	Similarly to GWRC submission point 137.42 Māori historic heritage should be explicitly recognised here	Amend as suggested (or similar)
HH Introduction	Te Rūnanga o Toa Rangatira 264.107 Include that Te Rūnanga be informed in the event of any discovery	S	HNZPT is supportive of the intention of this submission, although we have submitted that the reference to the archaeological authority process be removed from this section and included in an appendix to the plan	Amend as suggested, while shifting the paragraphs to a plan appendix.
HH Introduction	Kāinga Ora 81.424 Delete reference to AA process	O	HNZPT submits that these paragraphs best fit within an appendix to the PDP	Place these paragraphs in an appendix with appropriate cross-referencing

HH-P14	Fire and Emergency NZ 119.39 Amend to provide for partial demolition in the case of an emergency	S [partial]	HNZPT has submitted that demolition is defined to include partial demolition. This would have the same effect as the first part of this submission. The intention to allow for partial demolition in the case of an emergency is appreciated, and it is reasonable for the policy to provide this sort of emergency situation.	Amend policy as suggested, except do not add the words 'partial demolition' if the HNZPT submission on the definition of 'demolition' is accepted.
HH new rule	PCC 11.38 Add new rule to provide for alterations, demolition, etc to buildings within heritage settings which are not identified in the schedules as a heritage item	O	HNZPT acknowledges that this has been picked up as a gap in the notified provisions. However the new rule as submitted could result in unexpected adverse effects on historic heritage values. There may be cases where there is an accessory building which is not identified as a heritage item in the schedule, but which nonetheless contributes to the heritage values of the site and setting. Major alterations, additions, or demolition of such a building would adversely affect the heritage values of the site.	Insert a new restricted discretionary activity rule: alterations, additions, repositioning, relocation, and demolition of any structure or building located within the heritage setting of a heritage item listed in SCHED2 or SCHED3 Matters of discretion: HH-P11
SUB-R10	Kāinga Ora 81.461 Add non-notification clause	O	Subdivision of sites containing historic heritage items should be subject to the standard RMA notification provisions. Alternatively, a notification clause could be added stating that Heritage New Zealand Pouhere Taonga is considered to be an affected person for the purposes of this rule.	Retain rule as notified
SUB-R11	Kāinga Ora 81.462 Add non-notification clause	O	Subdivision of sites and areas of significance to Māori should be subject to the standard RMA notification provisions. Alternatively, a notification clause could be added stating that Te Rūnanga o Toa Rangatira and Heritage New Zealand Pouhere Taonga are considered to be affected persons for the purposes of this rule.	Retain rule as notified
SCHED 2	Kāinga Ora 81.891 Delete reference to Group A and add 'that have outstanding national or regional significance'	S [partial]	HNZPT supports the use of two heritage schedules, and the related differentiation of district plan rules. Referring to Group A and Group B is a convenient shorthand, although it may also be beneficial to include the words 'that have outstanding national or regional significance' in the introduction to SCHED2	Retain reference to Group A, and also include the words 'that have outstanding national or regional significance' in the introduction
SCHED 3	Kāinga Ora 81.892 Delete reference to Group B and add 'that	S	HNZPT supports the use of two heritage schedules, and the related differentiation of district plan rules. Referring to Group A and Group B is a convenient shorthand, although it	Retain reference to Group B, and also include the words 'that have outstanding national, regional or local significance' in

	have national, regional or local significance'		may also be beneficial to include the words 'that have outstanding national, regional or local significance' in the introduction to SCHED3	the introduction
SCHED 3	He Ara Pukerua 6.1 Add WWII 'Road Block' to schedule	S	Heritage New Zealand Pouhere Taonga supports the addition of this place to SCHED3, subject to the place meeting the values listed in HH-P1.	Undertake assessment of this place and if appropriate add item to schedule 3
General	Heather Phillips and Donald Love 79.10 Add NZ Wars memorial at Battle Hill to District Plan schedule	O	Battle Hill is already included in the District Plan in SASM003. The statement of significance in this entry includes reference to both Māori and British forces. It may be appropriate to include a comment in the SASM003 entry that 'within the site there is a war memorial erected in 1922 to commemorate British soldiers who died in the August 1846 battle'	Do not add the memorial as a discreet item, but consider including reference to the feature within the statement of significance for SASM003.
SCHED 4	Te Rūnanga o Toa Rangatira 264.79 Add 15 items to schedule 4	S	Heritage New Zealand Pouhere Taonga supports the addition of places to SCHED 4, subject to each place meeting the values listed in HH-P1	Work with Te Rūnanga o Toa Rangatira to assess these places and where appropriate add to schedule 4
SCHED 4 HHS005	Heather Phillips and Donald Love 79.9 Delete 'coach' from feature name and description	S	The submission is correct in that the Rārangi Kōrero / List entry is named 'Old Belmont to Pauatahanui Road', however 'Old Coach Road' is also recognised an alternative and commonly used name	Amend feature name and description as requested. In the statement of significance it may be appropriate to include reference to 'Belmont Coach Road' as an alternative name
SCHED 6	Te Rūnanga o Toa Rangatira 264.80 Add 48 sites to Schedule 6	S	Heritage New Zealand Pouhere Taonga supports the addition of places to SCHED 6	Work with Te Rūnanga o Toa Rangatira to add these places to schedule 6 along with appropriate statements of significance and spatial identification