

## Appendix A

### Submission of Heritage New Zealand Pouhere Taonga to the Waitomo District Council Proposed District Plan

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Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
All of Plan  Incentives and bonus provision for heritage within the Plan	Support, support in part	<p>NZHPT supports the range of incentive provisions throughout the proposed Plan, such as permitted activities related to scheduled items. While HNZPT seeks clarification or amendments on some aspects of these permitted activities as part of this submission, HNZPT supports the permitted activities as a method to ensure the longevity of heritage items.</p> <p>HNZPT supports that the proposed Plan also includes bonus lot provisions for subdivision that provides access to land locked Māori land. This assists the Plan to meet the provisions of the RMA in particular 6€ "<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga.</i>"</p> <p>HNZPT also supports, in part, the subdivision provisions designed for the protection of scheduled items. HNZPT seeks clarification, as part of the response to the subdivision section, regarding some of the matters of discretion as they relate to heritage values.</p>	Subject to amendments sought elsewhere in this submission, HNZPT seeks that the permitted activities related to schedules, the bonus lot subdivision rules and the subdivision provisions for the protection of scheduled items, are retained.
<b>Part 1-Introduction and General</b>			
Interpretation 9.Definitions: maintenance and/or minor modification (of a	Support in part	<p>HNZPT supports in part only the following definition;  <i>" means, in relation to any site listed in SCHED2 - significant archaeological sites, the following activities:</i>  <i>(a) Vegetation management except for plantation forestry; and</i>  <i>(b) Fencing; and</i></p>	That the definition of maintenance and/or minor modification (of a significant archaeological site listed in SCHED2 Significant Archaeological Sites) is retained and amended as follows:

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significant archaeological site listed in SCHED2 Significant Archaeological Sites		<p><i>(c) Removal of a building or structure not identified in SCHED2; and</i>  <i>(d) Placement of approved or permitted signs; and</i>  <i>(e) Any work required to stabilize a site; and</i>  <i>(f) Any maintenance associated with an existing track.”</i></p> <p>In so far as the definition is a permitted activity in the rules related to significant archaeological sites and HNZPT considers that activity “( e ) Any work required to stabilise a site” has the potential to cause adverse effects to a significant archaeological site and therefore should not be included as part of this definition.</p>	<p>“ means, in relation to any site listed in SCHED2 - significant archaeological sites, the following activities:  <i>(a) Vegetation management except for plantation forestry; and</i>  <i>(b) Fencing; and</i>  <i>(c) Removal of a building or structure not identified in SCHED2; and</i>  <i>(d) Placement of approved or permitted signs; and</i>  <del><i>(e) Any work required to stabilize a site; and</i></del>  <i>(f) Any maintenance associated with an existing track.</i></p>
<b>PART 2-District Wide Matters-Strategic Direction</b>			
District-wide matters SD-010	Support	<p>HNZPT supports objective SD-010;  <i>“The buildings, structures, sites, areas, ecosystems, natural landscapes and features identified as having special qualities and values and which contribute to the district’s sense of place and identity, are protected”.</i></p> <p>as this objective will ensure the consideration of historic heritage as contained within Schedule 1-Heritage buildings and Structures, Schedule 2-Significant archaeological sites, Schedule 3-Site and Areas of Significance to Māori and Schedule 4-Sites and Areas of Significance to Maori-Wahi Tapu Sites, Schedule 5-Sites and Areas of Significance to Māori-Cultural Alert Layers. This will assist</p>	HNZPT seeks that objective SD-010 is retained.

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		ensure that the Plan meets s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu And other taonga"</i> and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> of the RMA.	
District-wide matters SD-013	Support	HNZPT supports objective SD-013; <i>"The district's communities have access to a diverse and connected network of open spaces which offer a range of recreational experiences while protecting the values of scheduled sites, features and overlays,"</i> as this will assist to ensure that opportunities to appreciate and learn from historic heritage items and places, within a public setting are retained and also managed in such a way that the items and places are protected into the future.	HNZPT seeks that objective SD-013 is retained.
Urban form and development SD-024	Support	HNZPT supports objective SD-024; <i>"Promote liveable, sustainable urban environments by incorporating low impact design solutions and matauranga Māori principles in the planning and construction of developments"</i> . This will ensure that the Plan include matauranga Māori principles into the urban domain <i>and</i> assist the Plan to meet the requirements of s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> .	HNZPT seeks that objective SD-024 is retained.
<b>Part 2-District Wide Matters-Energy, Infrastructure and Transport</b>			
17. Energy ENGY-P1	Support in part	HNZPT supports ENGY-P1; <i>"Enable the ongoing operation, maintenance, repair and minor upgrade of existing renewable electricity generation activities within the district, providing</i>	That ENGY-P1 is retained and amended as follows; <i>Enable the ongoing operation, maintenance, repair and minor upgrade of existing renewable electricity</i>

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		<p><i>significant adverse effects on the environment are avoided, remedied or mitigated.</i>" HNZPT is concerned that for the larger scale energy operation that the avoidance of adverse effects on historic heritage has not been recognised in the same way it has been for the small-scale electricity generation projects as identified in P2. HNZPT is aware from experience that works related to existing energy facilities can still have the potential to cause adverse effects on historic heritage. HNZPT seeks that the policy is amended to resolve this concern.</p>	<p><i>generation activities within the district, providing significant adverse effects on the environment, <u>including on the values of overlays and scheduled sites and features</u>, are avoided, remedied or mitigated."</i></p>
17. Energy ENGY-P2	Support in part	<p>HNZPT supports in part ENGY-P2;  <i>"In all zones and precincts, recognise the benefits of small-scale electricity generation in a form that is commensurate with the function, nature and scale of the anticipated activities, while managing the values of overlays and scheduled sites and features."</i>                      as HNZPT agrees that the effects of these activities need to be managed with regards the values of scheduled sites and features in order to preserve their values, and they also need to be protected, and HNZPT seeks an amendment to that affect. This amended wording will assist to give effect to s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> of the RMA.</p>	<p>That ENGY-P2 is retained and amended as follows;  <i>"In all zones and precincts, recognise the benefits of small-scale electricity generation in a form that is commensurate with the function, nature and scale of the anticipated activities, while <u>protecting and managing</u> the values of overlays and scheduled sites and features,"</i></p>
17. Energy ENGY-P4	Support	<p>HNZPT supports ENGY-P4;  <i>"Manage the development of new renewable electricity generation activities including community scale renewable electricity generation activities,</i></p>	<p>That ENGY-P4 is retained.</p>

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		<p><i>recognising that developments will be of varying scale with different benefits and levels of effects. Matters to consider include:</i></p> <ol style="list-style-type: none"> <li><i>1. The benefits of the activity, recognising that benefits may offset anticipated changes in amenity; and</i></li> <li><i>2. Any functional or operational needs or constraints; and</i></li> <li><i>3. The scale, intensity duration or frequency of the activity's effects including at the time of construction; and</i></li> <li><i>4. Adverse amenity, visual, traffic generation, safety, light overspill, shadow, earthworks, glare and noise effects; and</i></li> <li><i>5. Adequate separation distances from existing and consented sensitive activities to ensure conflict between activities, adverse effects and reverse sensitivity effects are minimised; and</i></li> <li><i>6. Effects on scheduled sites, features or overlays. In doing so, recognise large scale activities will be more appropriate within the industrial, rural production, and general rural zones."</i></li> </ol> <p>As this policy considers the effects on scheduled sites, features or overlays, which include historic heritage.</p>	
17. Energy ENGY-P5	Support in part	<p>HNZPT supports ENGY-P5;  <i>"Allow activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation, however, they must be avoided within:</i></p>	<p>That ENGY-P5 is retained and amended as follows;  <i>"Allow activities associated with the investigation, identification and assessment of potential sites and energy sources for renewable electricity generation,</i></p>

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		<p>1. An identified outstanding natural landscape or an outstanding natural feature; or 2. An area of outstanding natural character or high/very high natural character; or</p> <p>3. The site or surroundings of a heritage building or structure; or</p> <p>4. A significant archaeological site; or</p> <p>5. A site or area of significance to Māori; or</p> <p>6. A significant natural area.”</p> <p>as this policy seeks to avoid the locating of renewable energy generation in all scheduled historic heritage sites. However, HNZPT considers that the surrounding or Sites or areas of significance to Māori and surroundings or archaeological sites should also be included. Consideration in the rules has been given to works in the surroundings of such sites. This approach will ensure the retention of important historic heritage values.</p>	<p>however, they must be avoided within:</p> <p>1. An identified outstanding natural landscape or an outstanding natural feature; or 2. An area of outstanding natural character or high/very high natural character; or</p> <p>3. The site or surroundings of a heritage building or structure; or</p> <p>4. A significant archaeological site <u>and its surroundings</u>; or</p> <p>5. A site or area of significance to Māori <u>and its surroundings</u>; or</p> <p>6. A significant natural area.”</p>
17.Energy ENGY-P6	Support	<p>HNZPT supports ENGY-P6;</p> <p><i>“Recognise that increasing levels of renewable electricity generation activities may alter existing visual amenity values, but the level of adverse visual effects may not be appropriate in some overlays, scheduled sites and features.”</i></p> <p>as it acknowledges the vulnerability of schedules sites and features and their reduced ability to accommodate change. Changes to such sites and features can result in the permanent loss of their important historic heritage values.</p>	That ENGY-P6 is retained.

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<p>Rules Note Note: Where Heritage Buildings and Structures are referred to it means the site or surroundings (of any building or structure listed in SCHED1)</p>	<p>Support in part</p>	<p>HNZPT is concerned at the following Note;  <i>“Note: Where Heritage Buildings and Structures are referred to it means the site or surroundings (of any building or structure listed in SCHED1)”</i></p> <p>and its relationship with the rules in the Energy section when they refer to buildings and structures listed in SCHED1, in particular the rules related to solar panels.</p> <p>While this note says that reference to Heritage buildings and structures means the site and surrounds only, there are several rules in this chapter that refer to items attached to Heritage buildings and structures, for example R4- Solar Panels attached to existing buildings.</p> <p>Therefore, it is not clear if the rules that relate to new items in the sites or surrounding of items in SCHED 1 contained within the historic heritage chapter, are also applicable to the activities proposed within this chapter for example solar panels.</p> <p>HNZPT seeks that greater clarity is provided regarding the relationship between the Energy chapter and the historic heritage chapter and the assessment of solar panels, both attached to heritage building or located in their surroundings.</p>	<p>That the note <i>“Where Heritage Buildings and Structures are referred to it means the site or surroundings (of any building or structure listed in SCHED1)”</i>, is amended to more clearly relate to the proposed rule framework, which relates to the scheduled buildings and the sites and surroundings.</p>

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ENGY-R4 Solar panels attached to existing buildings.	Support	<p>HNZPT supports ENGY-R4 in so far as it is a restricted discretionary activity if the solar panel is attached to a scheduled (heritage) building or structure. This activity status and associated assessment criteria will ensure the retention of heritage values.</p> <p>HNZPT is also concerned that this rule makes the panels a permitted activity in all the precincts, which would include the Railway Cottage precinct and the Te Maika Precinct. HNZPT considers that there should be some levels of assessment for this precinct around the solar panels, given the potential impact on character/heritage values.</p>	That this rule, activity status for solar panels on a scheduled building or structure is retained.
ENGY-R5 Free standing Solar Panels up to and including 6m <sup>2</sup> in area per site.	Support	<p>HNZPT supports the restricted discretionary activity ENGY-R5;</p> <p><i>“Where the activity is RDIS, the matters over which discretion is restricted are:</i></p> <p><i>(a) The location and size of the panels;</i></p> <p><i>(b) Actual or potential effects on the values associated with any overlay or scheduled site or feature”.</i></p> <p>as these panels do have the potential to cause adverse effects on a scheduled sites and features.</p>	That the restricted discretionary activity ENGY-R5 in relation to Heritage buildings and structures, sites or areas of significance to Māori and significant archaeological sites and the associated matters over which discretion are restricted is retained.
ENGY-R6. Freestanding solar panels greater than 6m <sup>2</sup>	Support	<p>HNZPT supports the restricted discretionary activity ENGY-R5;</p> <p><i>“Where the activity is RDIS, the matters over which discretion is restricted are:</i></p> <p><i>(a) The extent and effect of non-compliance with any relevant rule or standard and any relevant matters of discretion in the infringed rule(s); and</i></p>	That the restricted discretionary activity ENGY-R6 in relation to Heritage buildings and structures, sites or areas of significance to Māori and significant



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and up to 25m <sup>2</sup> in area.		<p><i>(b) The location and size of the panels; and</i></p> <p><i>(c) Actual or potential effects on the values associated with any overlay or scheduled site or feature.”</i></p> <p>as these panels do have the potential to cause adverse effects on a scheduled sites and features.</p>	archaeological sites and the associated matters over which discretion are restricted is retained.
ENGY-R7. Micro hydro generation with an output of up to and including 5kW of electricity per site.	Support in part	<p>While HNZPT supports that this activity is restricted discretionary when located in a site or area of significance to Māori or an archaeological site, HNZPT is concerned at the permitted activity and performance standards for ENGY-R7; <i>“PER: Outstanding natural landscapes, heritage buildings and structures. RDIS: Outstanding natural features, sites and areas of significance to Māori, significant archaeological sites, outstanding natural character</i></p> <p><i>Where:</i></p> <ol style="list-style-type: none"> <li><i>1. Where located within or partly within a significant natural area, the rules for indigenous vegetation clearance contained in the ecosystems and indigenous biodiversity chapter are complied with; and</i></li> <li><i>2. The maximum total gross floor area of all structures must not exceed 2 m<sup>2</sup>.</i></li> <li><i>3. The performance standards in ENGY-R21 and ENGY-R22 are complied with.”</i></li> </ol> <p>as this permitted activity could affect historic heritage values. HNZPT considers that any activity related to this rule should be assessed or referred back directly to the historic heritage rule framework.</p>	That ENGY-R7 is retained and amended such that permitted activities relating to heritage structures and buildings and their sites and surroundings are assessed as a restricted discretionary activity.

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<p>ENGY-R8. Mini hydro generation with an output of more than 5kW and up to 20kW of electricity per site</p>	<p>Support</p>	<p>HNZPT supports the discretionary activity status of <i>“Mini hydro generation with an output of more than 5kW and up to 20kW of electricity”</i>: when they locate within or on <i>“Heritage buildings and structures, sites and areas of significance to Māori, significant archaeological sites, outstanding natural character”</i></p> <p>HNZPT considers that the discretionary activity status will provide a suitable level of assessment to ensure that impacts on the Heritage buildings and structures, sites and areas of significance to Māori, and significant archaeological sites are minimised.</p>	<p>That the discretionary activity status of <i>“Mini hydro generation with an output of more than 5kW and up to 20kW of electricity per site”</i> locating within or on: <i>“Heritage buildings and structures, sites and areas of significance to Māori, significant archaeological sites, outstanding natural character”</i> is retained.</p>
<p>ENGY-R9. One wind turbine with a rated capacity of up to and including 5kW per site, except for the industrial, general rural, rural production zones &amp; PREC3 where the maximum is two</p>	<p>Support</p>	<p>HNZPT supports the discretionary activity status of <i>“One wind turbine with a rated capacity of up to and including 5kW per site, except for the industrial, general rural, rural production zones &amp; PREC3 where the maximum is two wind turbines with a rated capacity of up to and including 5kW each per holding”</i> when they locate within or on <i>“Heritage buildings and structures, sites and areas of significance to Māori, significant archaeological sites, outstanding natural character”</i></p> <p>HNZPT considers that the discretionary activity status will provide a suitable level of assessment to ensure that impacts on the Heritage buildings and structures, sites and areas of significance to Māori, and significant archaeological sites are minimised.</p>	<p>That the discretionary activity status of <i>“One wind turbine with a rated capacity of up to and including 5kW per site, except for the industrial, general rural, rural production zones &amp; PREC3 where the maximum is two wind turbines with a rated capacity of up to and including 5kW each per holding”</i> locating within or on: <i>“Heritage buildings and structures, sites and areas of significance to Māori, significant archaeological sites, outstanding natural character”</i> is retained.</p>

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wind turbines with a rated capacity of up to and including 5kW each per holding			
ENGY-R10. Renewable energy exploration activities	Support	<p>HNZPT supports ENGY-R10 and the non-complying activity status of this rule when “Renewable energy exploration activities” locate in the following locations: <i>Outstanding natural landscapes, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.</i>”</p> <p>This rule and its activity status aligns with the policies that seeks to avoid the locating of certain activities within these important sites. This approach will ensure the retention of important historic heritage values.</p>	HNZPT seeks that the non-complying activity status of ENGY-R10, in relation to the location of “Renewable energy exploration activities”, within “Outstanding natural landscapes, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.” is retained.
ENGY-R11. New Renewable electricity generation activities including Community scale	Support	<p>HNZPT supports ENGY-R11 and the non-complying activity status of this rule when “ New Renewable electricity generation activities including Community scale renewable energy activities not provided for elsewhere in Table 1 ” locate in the following locations, “<i>Outstanding natural features, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.</i>”</p>	HNZPT seeks that the non-complying activity status of ENGY-R11, in relation to the location of “ New Renewable electricity generation activities including Community scale renewable energy activities not provided for elsewhere in Table 1” within “ <i>Outstanding natural landscapes, outstanding natural character, heritage buildings and structures, sites or areas of</i>

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renewable energy activities not provided for elsewhere in Table 1		This rule and its activity status aligns with the policies that seeks to avoid the locating of certain activities within these important sites. This approach will ensure the retention of important historic heritage values.	<i>significance to Māori, significant archaeological sites.</i> ” is retained.
ENGY-R12. Biogas produced by anaerobic fermentation of waste.	Support	<p>HNZPT supports ENGY-R12 and the non-complying activity status of this rule when <i>“Biogas produced by anaerobic fermentation of waste”</i> locate in the following locations, <i>“Outstanding natural features, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.”</i></p> <p>This rule and its activity status aligns with the policies that seeks to avoid the locating of certain activities within these important sites. This approach will ensure the retention of important historic heritage values.</p>	HNZPT seeks that the non-complying activity status of ENGY-R12 in relation to the <i>“Biogas produced by anaerobic fermentation of waste”</i> locating in <i>“Outstanding natural features, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.”</i> is retained.
ENGY-R13. Co-generation plants and waste to energy plants	Support	HNZPT supports ENGY-R13 and the non-complying activity status of this rule when <i>“Co-generation plants and waste to energy plants”</i> locate in the following locations, <i>“Outstanding Natural Landscapes, Outstanding Natural Features, Outstanding Natural Character, Heritage buildings and structures, sites or areas of significance to Māori and significant archaeological sites.”</i>	HNZPT seeks that the non-complying activity status of ENGY-R13 in relation to the <i>“Co-generation plants and waste to energy plants”</i> locating in <i>“Outstanding natural features, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.”</i> is retained.

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		This rule and its activity status aligns with the policies that seeks to avoid the locating of certain activities within these important sites. This approach will ensure the retention of important historic heritage values.	
ENGY-R14. Coal Fired Electricity generation and Energy generated from non-renewable sources not listed in Table 1	Support	<p>HNZPT supports ENGY-R14 and the non-complying activity status of this rule for <i>“Coal Fired Electricity generation and Energy generated from non-renewable sources not listed in Table 1”</i> locating in the following locations, <i>“Outstanding Natural Landscapes, Outstanding Natural Features, Outstanding Natural Character, Heritage buildings and structures, sites or areas of significance to Māori and significant archaeological sites.”</i></p> <p>This rule and its activity status aligns with the policies that seeks to avoid the locating of certain activities within these important sites. This approach will ensure the retention of important historic heritage values.</p>	HNZPT seeks that the non-complying activity status of ENGY-R14 in relation to the <i>“Coal Fired Electricity generation and Energy generated from non-renewable sources not listed in Table 1”</i> locating in <i>“Outstanding natural features, outstanding natural character, heritage buildings and structures, sites or areas of significance to Māori, significant archaeological sites.”</i> is retained.
ENGY-R18. Earthworks associated with an energy activity	Support	<p>HNZPT supports ENGY-R18: <i>“3. In Significant Natural Areas, Significant Archaeological Sites, Heritage buildings, and structures and Sites and Area of Significance to Māori, earthworks associated with an energy activity are Discretionary activities.”</i></p> <p>as this will allow a robust level of assessment and ensure that the values of these important sites are retained at the time of the works.</p>	That ENGY-R18.3-Discretionary activity is retained.
ENGY-R19.	Oppose	HNZPT is concerned that the permitted activity rules appear to allow a wind turbine on a scheduled site or feature or in the setting or surrounds as a	HNZPT cannot support this permitted activity approach and seeks that such an activity is a restricted

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One wind turbine per site outside of the industrial, general rural, rural production zones & PREC3		<p>permitted activity, given the matters of assessment for a restricted discretionary activity that where the permitted standards are exceeded:  “(h) Matters over which discretion is restricted:  (h) Actual or potential effects on the values associated with any overlay or scheduled site or feature.</p> <p>HNZPT cannot support this approach and seeks that such an activity is a restricted discretionary activity to better enable the management of effects scheduled site or feature or the setting and surrounds.</p>	discretionary activity to better enable the management of effects on scheduled sites or features or the setting and surrounds.
ENGY-R20 Up to 2 wind turbines per holding within the industrial, general rural, rural production zones and PREC3	Oppose	<p>HNZPT is concerned that the permitted activity rules appear to allow several wind turbines on a scheduled site or feature or in the setting or surrounds as a permitted activity, given the matters of assessment for a restricted discretionary activity that where the permitted standards are exceeded:  “Matters over which discretion is restricted:  (h) Actual or potential effects on the values associated with any overlay or scheduled site or feature.</p> <p>HNZPT cannot support this approach and seeks that such an activity is a restricted discretionary activity to better enable the management of effects scheduled site or feature or the setting and surrounds.</p>	HNZPT cannot support this permitted activity approach and seeks that such an activity is a restricted discretionary activity to better enable the management of effects on scheduled sites or features or the setting and surrounds.
Note	Oppose in part	While HNZPT supports a reference in this chapter to the Historic Heritage chapter, there would be benefit in this note being located at the front of the	That the note at the end of the rules section is relocated to the front of the chapter under the heading

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Where the buildings is listed in SCHED1- Heritage Buildings and Structure, also see the historic heritage chapter		chapter under the heading Rules (page 6 of 23), with the existing note related to Heritage sites and surroundings. Additional clarification has to also be provided regarding which rules are applicable to the heritage building and structure and their sites and surrounds	rules and clarity provided regarding the rule's framework for energy activities on and around heritage buildings and structures.
<b>Part 2 District Wide Matters-19 Network Utilities</b>			
Minor Utilities Policy - NU-P3	Support	<p>HNZPT supports NU-P3;  <i>Enable minor utility structures for any network utility in all locations except for significant archaeological sites, sites and areas of significance to Māori, outstanding natural features, on or within the sites or surroundings of scheduled heritage buildings or structures.</i></p> <p>This policy will assist the Plan to give effect to s6(e) "<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>", and 6 (f) "<i>the protection of historic heritage from inappropriate subdivision, use and development</i>" of the RMA.</p>	That NU-P3 is retained
Hazards, overlays and scheduled features NU-P11	Support	<p>HNZPT supports Policy NU-P11;  <i>"Ensure consideration of the values, qualities and characteristics of overlays, scheduled sites and features when proposing new infrastructure or undertaking significant upgrades to existing infrastructure."</i></p>	That Policy NU-P11 is retained

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		As this policy will assist the Plan to give effect to s6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga", and 6 (f) "the protection of historic heritage from inappropriate subdivision, use and development" of the RMA.	
Hazards, overlays and scheduled features NU-P12	Oppose	<p>HNZPT opposes Policy NU-P12;</p> <p><i>"Provide for regionally significant infrastructure within overlays, scheduled sites and features where:</i></p> <ol style="list-style-type: none"> <li><i>1. There is a demonstrated functional or operational need for the infrastructure to be located within the overlay, scheduled site or feature; and</i></li> <li><i>2. It is demonstrated through an options assessment that locating within the overlay, scheduled site or feature is the best practicable option, having particular regard to the financial implications, social, cultural and environmental effects of the preferred option, compared to alternative options."</i> <p>as the policy, unlike the National Grid Policy Nu-P21, has not sought avoidance as the first consideration when developing a proposal. The consideration of the avoidance of historic heritage which is finite resource would be appropriate when assessing a matter of national importance.</p> </li></ol>	<p>That NU-P12 is amended as follows;</p> <p><i>"Provide for regionally significant infrastructure <u>by within overlays, scheduled sites and features where:</u></i></p> <ol style="list-style-type: none"> <li><i><u>1. Seeking to avoid adverse effects on areas identified in SCHED1 - heritage buildings and structures, SCHED2 - significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori, SCHED6 - significant natural areas, and SCHED8 - outstanding natural features; and</u></i></li> <li><i><u>2, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection;</u></i></li> <li><i><u>3. There is a demonstrated functional or operational need for the infrastructure to be located within the overlay, scheduled site or feature; and</u></i></li> <li><i><u>4. It is demonstrated through an options assessment that locating within the overlay, scheduled site or feature is the best practicable option, having particular</u></i></li> </ol>



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			<i>regard to the financial implications, social, cultural and environmental effects of the preferred option, compared to alternative options."</i>
National Grid NU-P21	Support	HNZPT supports NU-P21; <i>"Provide for the upgrading of the national grid by:</i> <ol style="list-style-type: none"> <li><i>1. Seeking to avoid adverse effects on areas identified in SCHED1 - heritage buildings and structures, SCHED2 - significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori, SCHED6 - significant natural areas, and SCHED8 - outstanding natural features; and</i></li> <li><i>2. When considering major upgrades, have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection; and</i></li> <li><i>3. Recognising the constraints arising from the operational needs and functional needs of the national grid, when considering measures to avoid, remedy or mitigate any adverse effects; and</i></li> <li><i>4. Recognising the potential benefits of upgrades to the national grid to people and communities; and</i></li> <li><i>5. Where appropriate, substantial upgrades should be used as an opportunity to reduce existing effects of the national grid."</i></li> </ol>	That NU-P21 is retained

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		as this policy will assist the Plan to give effect to s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i> , and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development”</i> of the RMA at the time of upgrading.	
National Grid NU-P22	Support	<p>HNZPT supports NU-P22;</p> <p><i>“Provide for the development of the national grid:</i></p> <ol style="list-style-type: none"> <li><i>1. In urban zoned areas, development should minimise adverse effects on urban amenity and should avoid material adverse effects on the commercial zone, areas of high recreational or amenity value and existing sensitive activities; and</i></li> <li><i>2. Seek to avoid the adverse effects of the national grid within overlays, scheduled sites and features; and</i></li> <li><i>3. Where the national grid has a functional need or operational need to locate within the coastal environment, manage adverse effects by:</i> <ol style="list-style-type: none"> <li><i>(i) Seeking to avoid adverse effects on areas identified in SCHED6 - significant natural areas, SCHED7 - outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character; and</i></li> <li><i>(ii) Where it is not practicable to avoid adverse effects on the values of the areas in identified in SCHED6 - significant natural areas, SCHED7 - outstanding natural landscapes, SCHED8 - outstanding natural features, and SCHED10 – areas of outstanding natural character because of the functional needs or operational</i></li> </ol> </li> </ol>	That NU-P22 is retained.

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		<p><i>needs of the national grid, remedy or mitigate adverse effects on those values; and</i></p> <p><i>(iii) Seeking to avoid significant adverse effects on:</i></p> <p><i>i. SCHED11 – areas of high/very high natural character, SCHED9 – landscapes of high amenity value and SCHED12 – karst overlay; and</i></p> <p><i>ii. SCHED1 - heritage buildings and structures, SCHED2 - significant archaeological sites, SCHED3 and SCHED 4 - sites of significance to Māori; and</i></p> <p><i>iii. indigenous biodiversity values that meet the criteria in Policy 11(b) of the NZCPS 2010; and</i></p> <p><i>iv. Avoiding, remedying or mitigating other adverse effects to the extent practicable; and</i></p> <p><i>4. When considering the adverse effects in respect of NU-P22.1 - NU-P22.3 above;</i></p> <p><i>(i) Have regard to the extent to which adverse effects have been avoided, remedied or mitigated by the route, site and method selection and techniques and measures proposed; and</i></p> <p><i>(ii) Consider the constraints arising from the operational needs and or functional needs of the national grid, when considering measures to avoid, remedy or mitigate any adverse effects.</i></p>	

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		<p>5. <i>Other than policies relating to the coastal environment, in the event of any conflict with any other policies within the plan, NU P20, NU-P21 and NU-P22 take precedence.</i></p> <p>as this policy will assist the Plan to give effect to s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i>, and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> of the RMA at the time of national grid development.</p>	
Notes Activity Table 1 notes	Oppose in part	<p>HNZPT seeks clarity regarding the following note;  <i>"Where Heritage Buildings and Structures are referred to it means the site or surroundings (of any building or structure listed in SCHED1)</i>            as HNZPT assumes that the note should be advising that the site and surroundings are <b>also</b> to be considered at the time of works, as this will provide for the retention of heritage values.</p>	<p>That the note is amended to read;  <i>"Note: Where Heritage Buildings and Structures are referred to, it <u>also</u> means the site or surroundings (of any building or structure listed in SCHED1)"</i></p>
NU-R2 National Environmental Standards for Telecommunication Facilities (NESTF) 2016	Support	<p>HNZPT supports the discretionary activity for works in the following;  <i>"Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites"</i>, as this will assist the Plan to give effect to give effect to s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i>, and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> of the RMA.</p>	<p>That the discretionary activity status is retained.</p>

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NU-R3 Operation, maintenance and removal of existing network utilities and existing ancillary access tracks	Support	HNZPT supports the restricted discretionary activity status and assessment criteria of NU-R3 for activities in the following; <i>“Outstanding natural features, sites and areas of significance to Māori and significant archaeological sites for the removal of existing underground network utilities only”</i> , as this will assist the Plan to give effect to give effect to s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i> , and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development”</i> of the RMA.	That NU-R3 is retained.
NU-R4 New and extended or upgraded access tracks	Support	HNZPT supports the discretionary activity status of works in the following; <i>“Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites”</i> , as this will assist the Plan to give effect to give effect to s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i> , and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development”</i> of the RMA.	That NU-R4 is retained.
NU-R6 New customer connections	Oppose	HNZPT cannot support the permitted activity of new customer connection when the permitted standard includes; <i>“PER activities must: 1. Comply with all the provisions in NU - Table 2; and 2. Not include a new tower; and 3. Not exceed three new additional poles, except in the general rural zone where there is no limitation on the number of poles.”</i> as HNZPT considers that this could have adverse impacts on <i>“heritage buildings and structures, sites and areas of significance to Māori and significant</i>	HNZPT seeks that the permitted activity for NU-R6 is amended to a restricted discretionary activity.

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		<i>archaeological sites,</i> " in addition to the associated performance having the potential for adverse effects on heritage.	
NU-R7 New minor utility structures, including energy storage batteries, and telecommunication cabinets that are not regulated by NESTF	Support	HNZPT supports NU-R7; <i>New minor utility structures, including energy storage batteries, and telecommunication cabinets that are not regulated by NESTF,</i> as a restricted discretionary activity, with associated matters of discretion in the following; "Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites" as this will assist the Plan to give effect to give effect to s6(e) " <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> " and 6 (f) " <i>the protection of historic heritage from inappropriate subdivision, use and development</i> " of the RMA.	That NU-R7 is retained.
NU-R9 New public walkways and cycleways	Oppose	HNZPT cannot support the permitted activity status of NU-R9, that "new public walkways and cycleways" are a permitted activity in the following: " <i>Heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites.</i> "  This will not assist the plan to provide for s6(e) " <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> " and 6 (f) " <i>the protection of historic heritage from inappropriate subdivision, use and development</i> "	That New public walkways and cycleways in the following is amended to a discretionary activity for the following locations; Heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites

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NU-R10 New Stock underpass	Support	HNZPT supports the discretionary activity status of NU-R10, where it is located in “Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites”, as this will assist the plan to provide for s6(e) “ <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> ”, and 6 (f) “ <i>the protection of historic heritage from inappropriate subdivision, use and development</i> ”	That NU-R10 is retained.
NU-R11 Electricity generators and self-contained power units for the supply of a network utility	Oppose	That NU-R11; “ <i>Electricity generators and self-contained power units for the supply of a network utility</i> ”, is amended to a restricted discretionary activity, when located in a heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites, and suitable assessment criteria included to assess these important matters.  These amendments will assist the plan to provide for s6(e) “ <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> ”, and 6 (f) “ <i>the protection of historic heritage from inappropriate subdivision, use and development</i> ”	That NU-R11 is amended to a restricted discretionary activity, with associated suitable assessment criteria.
NU-R12 Temporary network utilities	Support	HNZPT supports the discretionary activity status of temporary network utilities, in Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites” as this will assist the plan to provide for s6(e) “ <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other</i>	That NU-R12 is retained

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		<i>taonga”, and 6 (f) “the protection of historic heritage from inappropriate subdivision, use and development”</i>	
NU-R14 Upgrading including realignment of existing underground network utilities	Support	HNZPT supports the restricted discretionary activity status of <i>“Upgrading including realignment of existing underground network utilities, as this will assist the plan to provide for s6(e) “the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”, and 6 (f) “the protection of historic heritage from inappropriate subdivision, use and development”</i>	That NU-R14 is retained
NU-R15 New underground network utilities, except for gas pipelines where the gauge pressure exceeds 2,000 kilopascals	Support	HNZPT supports the restricted discretionary activity status of New underground network utilities, except for gas pipelines where the gauge pressure exceeds 2,000 kilopascals, in <i>“Sites and areas of significance to Māori, significant archaeological sites” as this will assist the plan to provide for s6(e) “the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”, and 6 (f) “the protection of historic heritage from inappropriate subdivision, use and development”</i>	That NU-R15 is retained.
NU-R16	Support	HNZPT supports the discretionary activity status of <i>“New underground gas pipelines exceeding 2000 kilopascals”</i> , when located on <i>“Outstanding natural</i>	That NU-R16 is retained.



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New underground gas pipelines exceeding 2000 kilopascals		<i>features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites</i> as this will assist the plan to provide for s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> , and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i>	
NU-R17 Upgrading of existing above ground network utilities	Supports	HNZPT supports the discretionary activity status for <i>"Upgrading of existing above ground network utilities"</i> when located in <i>"Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites"</i> as this will assist the plan to provide for s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> , and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> .	That NU-R17 is retained.
NU-R18 New above ground pipes	Support	HNZPT supports the discretionary activity status for <i>"New above ground pipes"</i> , when they are located in <i>" Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites"</i> as this will assist the plan to provide for s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> , and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> .	That NU-R18 is retained.

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NU-R19 New overhead lines and associated poles or towers	Support	HNZPT supports the discretionary activity status when “ <i>new overhead lines and associated poles or towers</i> ” are located in “ <i>Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites</i> ” as this will assist the plan to provide for s6(e) “ <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> ”, and 6 (f) “ <i>the protection of historic heritage from inappropriate subdivision, use and development</i> ”.	That NU-R19 is retained
NU-R20 New substations, ground mounted transformers, compressor/scra per stations, gas regulation valves and/or take off stations and ancillary energy storage batteries	Support	HNZPT supports the discretionary activity status when “ <i>New substations, ground mounted transformers, compressor/scraper stations, gas regulation valves and/or take off stations and ancillary energy storage batteries</i> ” are located in “ <i>Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites</i> ” as this will assist the plan to provide for s6(e) “ <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i> ”, and 6 (f) “ <i>the protection of historic heritage from inappropriate subdivision, use and development</i> ”.	That NU-R20 is retained
NU-R21 New telecommunicati	Support	HNZPT supports the discretionary activity of “ <i>New telecommunication poles and new antennas attached to poles that are not a regulated activity under the NESTF</i> ” when they are located in “ <i>Outstanding natural features, heritage</i>	That NU-R21 is retained

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on poles and new antennas attached to poles that are not a regulated activity under the NESTF		<i>buildings and structures, sites and areas of significance to Māori and significant archaeological sites “ as this will assist the plan to provide for s6(e) ” the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”, and 6 (f) “the protection of historic heritage from inappropriate subdivision, use and development”.</i>	
NU-R23 Sensing and environmental monitoring equipment including air quality and meteorological equipment	Support	HNZPT supports the discretionary activity status of “ <i>Sensing and environmental monitoring equipment including air quality and meteorological equipment</i> ” when they are located in <i>Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites “ as this will assist the plan to provide for s6(e) ” the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”, and 6 (f) “the protection of historic heritage from inappropriate subdivision, use and development”.</i>	That NU-R23 is retained
NU-R24 Stormwater detention/retention ponds and artificial wetlands	Support	HNZPT supports the discretionary activity status of “ <i>Stormwater detention/retention ponds and artificial wetlands</i> ” when they are located in <i>Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites “ as this will assist the plan to provide for s6(e) ” the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”,</i>	That NU-R24 is retained.

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		and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development”</i> .	
NU-R25 Water, wastewater and stormwater pumping stations, water reservoirs, and water treatment plants that do not meet the definition of a minor utility structure	Support	HNZPT supports the discretionary activity status of <i>“Water, waste water and stormwater pumping stations, water reservoirs, and water treatment plants that do not meet the definition of a minor utility structure”</i> when they are located in <i>“Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites “</i> as this will assist the plan to provide for s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i> , and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development”</i> .	That NU-R25 is retained
NU-26 Wastewater treatment and storage, excluding	Oppose in part	HNZPT supports in part only the non-complying activity <i>“Wastewater treatment and storage, excluding domestic scale septic tanks”</i> when located in <i>“Outstanding natural features, heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites”</i> .	That NU-R25 is retained and amended to <b>include</b> domestic scale septic tanks

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domestic scale septic tanks		HNZPT considers that a domestic scale septic tank can destroy any of the above features and should also be assessed as a non-complying activity. This will ensure that the plan provides for s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i> , and 6 (f) <i>"the protection of historic heritage from inappropriate subdivision, use and development"</i> .	
NU-R27 Operation, maintenance, repair and road widening of existing public roads, state highways and service lanes (including but not limited to traffic lights, roundabouts, islands and guard rails).	Oppose in part	HNZPT has concerned at the permitted activity status of this activity, which potentially may impact on unrecorded archaeological sites. Many existing roading networks were developed at a time when insufficient regard was given to the potential for archaeological values. HNZPT considers that there would be benefit in an advice note, as found in NU-R16, advising of the possible need for an archaeological authority.	That an advice note is included as part of the Nu-R27 activity, as follows; <u><i>"Note: An archaeological Authority may be required from Heritage New Zealand Pouhere Taonga"</i></u>

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<p>NU-R28 The construction of new public roads, state highways, service lanes and any road widening outside of the road reserve or designation</p>	<p>Support in part</p>	<p>HNZPT supports in part the activity of <i>“the construction of new public roads, state highways, service lanes and any road widening outside of the road reserve or designation”</i> being a discretionary activity when located in Heritage buildings and structures, outstanding natural features Category A, C and D, and a non-complying activity when located in Sites and areas of significance to Māori, significant archaeological sites, outstanding natural features Category B, E.</p> <p>HNZPT considers that it is reasonably likely that the <i>“construction of new public roads, state highways, service lanes and any road widening outside of the road reserve or designation”</i> if located in a heritage building or structure, would completely destroy it, therefore considers that this activity should also be assessed as a non-complying activity.</p> <p>This amendment will assist the plan to provide for s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i>, and 6 (f) <i>“the protection of historic heritage from inappropriate subdivision, use and development.”</i></p>	<p>That NU-R28 is retained and amended such that <i>“ the construction of new public roads, state highways, service lanes and any road widening outside of the road reserve or designation”</i>, in a Heritage buildings and structures, is also a non-complying activity.</p>
<p>NU-R30 New network utilities not otherwise</p>	<p>Support in part</p>	<p>HNZPT supports in part the activity of <i>“New network utilities not otherwise provided for in Table 1”</i> being a discretionary activity when located in Heritage buildings and structures, outstanding natural features Category A, C and D, and a non-complying activity when located in Sites and areas of significance to Māori, significant archaeological sites, outstanding natural features Category B, E.</p>	<p>That NU-R30 is retained and amended such that <i>“ New network utilities not otherwise provided for in Table 1 ”</i>, in a Heritage buildings and structures, is also a non-complying activity.</p>

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provided for in Table 1		<p>However, HNZPT considers that it is reasonably likely that the “<i>New network utilities not otherwise provided for in Table 1</i>” if located in a heritage building or structure, would completely destroy it, therefore considers that this activity should also be assessed as a non-complying activity.</p> <p>This amendment will assist the plan to provide for s6(e) “<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>”, and 6 (f) “<i>the protection of historic heritage from inappropriate subdivision, use and development</i>”.</p>	
NU-R33 Earthworks	Oppose in part	<p>HNZPT is concerned at the restricted discretionary activity status for earthworks in “<i>Sites and areas of significance to Māori and significant archaeological sites</i>”, as earthworks have the potential destroy these types of sites. HNZPT considers that discretionary activity status is appropriate, and this would assist the plan to provide for s6(e) “<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>”, and 6 (f) “<i>the protection of historic heritage from inappropriate subdivision, use and development</i>”.</p>	That NU-R33 is amended to a discretionary activity for earthworks in Sites and areas of significance to Māori and significant archaeological sites
NU-R34 Creation of new entrances into	Support	<p>HNZPT supports the discretionary activity status of; Nu-R34 “<i>Creation of new entrances into caves, structures within caves or other modifications to cave features</i>”,</p>	That NU-R34/NU-R35 is retained.

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<p>caves, structures within caves or other modifications to cave features            NU-R35            Any earthworks or clearance of vegetation (other than plant pest species or wilding pines) within a 20 m radius of an entry or opening into any cave or sinkhole            NU-R36            Any fill or rubbish placement into any cave or sinkhole OR within a 20 m</p>		<p>NU-35 Any earthworks or clearance of vegetation (other than plant pest species or wilding pines) within a 20 m radius of an entry or opening into any cave or sinkhole,            NU-R36            Any fill or rubbish placement into any cave or sinkhole OR within a 20 m radius of an entry or opening into any cave or sinkhole located within Heritage buildings and structures, sites and areas of significance to Māori and significant archaeological sites, as this activity status would assist the plan to provide for s6(e) "<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>", and 6 (f) "<i>the protection of historic heritage from inappropriate subdivision, use and development</i>"</p>	



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radius of an entry or opening into any cave or sinkhole			
<b>Part 2-District Wide Matters-24-Historic Heritage</b>			
HH-01	Support in part	<p>HNZPT supports in part objective HH-01;  <i>"The contribution that historic heritage makes to Waitomo district and its communities is conserved for future generations."</i></p> <p>HNZPT consider that while the word "<i>conserved</i>" does include the notion of protection, that it would provide greater clarity for the readers of the plan to include the words "<i>and protected</i>". This will assist to give effect to s6 (e) "<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>" and 6 (f) "<i>the protection of historic heritage from inappropriate subdivision, use and development</i>" of the RMA.</p>	<p>That HH-01 is retained, subject to the following amendment:  <i>"The contribution that historic heritage makes to Waitomo district and its communities is conserved <u>and protected</u> for future generations."</i></p>
<b>Heritage Buildings and Structures</b> HH-P1		<p>HNZPT supports policy HH-P1;</p> <p><i>"Identify and schedule historic heritage buildings and structures having regard to the following matters:</i></p> <ol style="list-style-type: none"> <li><i>1. Historical values; and</i></li> <li><i>2. Importance to the community; and</i></li> <li><i>3. Architecture and construction features; and</i></li> </ol>	<p>That HH-P1 is retained</p>

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		<p>4. <i>Setting and context; and</i>                      5. <i>Rarity, representativeness and integrity; and</i>                      6. <i>Scientific qualities; and</i>                      7. <i>Technological qualities.</i>"</p> <p>relating to the provision of guidance on which matters to consider when identifying and scheduling historic heritage items. These matters will ensure that a wide range of buildings and structures can be considered, thus ensuring that the schedules include a representative view of the historic heritage of the district.</p>	
HH-P2	Support	<p>HNZPT supports policy HH-P2;  <i>"Promote the restoration and reuse of heritage buildings and structures to assist in retaining historic heritage for future generations."</i>                      as this will assist to ensure the support for the adaptive reuse of buildings. Not only does appropriate adaptive reuse ensure the longevity of the building or structure, but it also ensures the sustainable reuse of a heritage building.</p>	That HH-P2 is retained.
HH-P3	Support	<p>HNZPT supports policy HH-P3;  <i>"Retain the relationship between heritage buildings and structures, and their sites and surroundings, including the view of the identified heritage building or structure from public places".</i></p>	That HH-P3 is retained

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		<p>as this policy acknowledges the importance of the setting to a heritage building or structure and the contribution that a setting makes to the heritage values. Acknowledgement of the setting of the heritage building or structure can ensure that the building or structure is not dominated at the time of other development on the same site.</p>	
HH-P4	Support in part	<p>HNZPT supports policy HH-P4;  <i>“Recognise benefits from earthquake strengthening, fire protection and accessibility upgrades whilst ensuring the appearance including views of and through windows, and external heritage features and values of the buildings and structures are not unduly compromised. Designs which consider complementary materials and detailing and do not screen architectural features are preferred.”</i></p> <p>However, while HNZPT is supportive of such works taking place to enable the ongoing safety and accessibility of the buildings, HNZPT does consider that these works do need to ensure that they do not compromise the heritage values of the place or structure. Therefore, HNZPT seeks that the policy is amended, with the removal of the word <i>“unduly.”</i> The use of this word in the policy serves to dilute the meaning of the policy.</p> <p>HNZPT can offer advice and information in methods to ensure that these types of works have the least effect on heritage values.</p>	<p>HNZPT seeks the retention of HH-P4, subject to the following amendment:</p> <p><i>“Recognise benefits from earthquake strengthening, fire protection and accessibility upgrades whilst ensuring the appearance including views of and through windows, and external heritage features and values of the buildings and structures are not <del>unduly</del> compromised. Designs which consider complementary materials and detailing and do not screen architectural features are preferred.”</i></p>

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HH-P5	Support in part	<p>HNZPT supports policy HH-P5;  <i>“Provide for additions and external alterations to buildings and structures where they are:</i></p> <ol style="list-style-type: none"> <li><i>1. Consistent with the scale, detailing, style, materials and character of the heritage item; and</i></li> <li><i>2. Retain cultural and heritage values; and</i></li> <li><i>3. Do not unduly compromise the site or surroundings of the building or structure including the contribution the building or structure makes to the streetscape;</i></li> </ol> <p><i>Whilst recognising the benefits gained from the addition or alteration to the improved functionality and/or liveability of the building or structure.</i></p> <p>However, while HNZPT is supportive of such works taking place to accommodate the needs of an owner or occupier, HNZPT does consider that these works do need to ensure that they do not compromise the heritage values of the place or structure or the setting or surrounds. Therefore, HNZPT seeks that the policy is amended, with the removal of the word <i>“unduly”</i>. The use of this word in the policy serves to dilutes the meaning of the policy.</p> <p>HNZPT can offer advice and information in methods to ensure that these types of works have the least effect on heritage values.</p>	<p>HNZPT seeks the retention of HH-P5 subject to the following amendments:  <i>“Provide for additions and external alterations to buildings and structures where they are:</i></p> <ol style="list-style-type: none"> <li><i>1. Consistent with the scale, detailing, style, materials and character of the heritage item; and</i></li> <li><i>2. Retain cultural and heritage values; and</i></li> <li><i>3. Does not <del>unduly</del> compromise the site or surroundings of the building or structure including the contribution the building or structure makes to the streetscape;</i></li> </ol> <p><i>Whilst recognising the benefits gained from the addition or alteration to the improved functionality and/or liveability of the building or structure.</i></p>
HH-P6	Support	HNZPT supports policy HH-P6;	That HH-P6 is retained.

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		<p><i>“Recognise and provide for signs in a manner that does not compromise the heritage values of the buildings and structures. Signs should not cover or partially cover architectural features and should complement the values of the heritage building or structure.”</i></p> <p>as this policy ensures the retention of heritage values.</p>	
HH-P7	Support in part	<p>HNZPT supports in part only policy HH-P7;  <i>“Enable interpretive signs that explain the stories and significance of the building or structure to the community and district, providing such signs do not compromise the values of the scheduled building or structure.”</i></p> <p>as HNZPT considers that the policy should provide additional direction for the users of the plan at the time of considering signage. Signage, including interpretative signs, has the potential to cause adverse effects on scheduled buildings or structure. Such signage should be of a size and scale commensurate to the context, setting and place in which it will be located. The policy needs to be amended to reflect this concern.</p>	<p>That HH-P7 is retained subject to the following amendments:  <i>“Enable interpretive signs that explain the stories and significance of the building or structure to the community and district, providing such signs <u>are not attached to a building and do not compromise the values of the scheduled building or structure by being of a size and scale commensurate to the context, setting and place.</u>”</i></p>
HH-P8	Support	<p>HNZPT supports policy HH-P8;  <i>“Ensure temporary signs are not affixed to buildings or structures given the limited life of the sign and the risk of repeated damage to the building or structure”.</i></p>	That HH-P8 is retained

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		Signage and the fixing of signage to heritage buildings and structures has the potential to detract from the values of these items. HNZPT supports the recognition that temporary signage should not be attached to heritage buildings or structures.	
HH-P9	Support in part	<p>HNZPT supports in part policy HH-P9;  <i>“Ensure new or relocated buildings or structures located within the site or surroundings of a building or structure are of similar materials and detailing and do not obscure windows and architectural features. New or relocated buildings should be of a smaller scale, located to the rear of any building or structure.”</i></p> <p>This policy, together with the performance standards related to new buildings at the rear of a heritage building have assumed that there will be no adverse effects to the heritage buildings or structures from the placement of additional buildings to the rear of a heritage place or structure. This may not be the case even with the placement of small buildings. HNZPT proposes a case-by-case assessment through the use of a restricted activity consent status and new assessment criteria.</p>	<p>That HH-P9 is retained subject to the following amendments:</p> <p><i>“Ensure new or relocated buildings or structures located within the site or surroundings of a building or structure are of similar materials and detailing and do not obscure windows and architectural features. New or relocated buildings should be of a smaller scale. <del>located to the rear of any building or structure.</del>”</i></p>
HH-P10	Support in part	<p>HNZPT supports in part HH-P10;</p> <p><i>“The site or surroundings (as applicable) of any heritage building or structure must be protected to the extent that it contributes to the heritage values.”</i></p>	<p>That HH-P10 is retained and amended as follows:  <i>“The site or surroundings (as applicable) of any heritage building or structure must be protected to the extent that it contributes to the heritage values <u>of the heritage place.</u>”</i></p>

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		<p>as it is not clear from this policy if the importance the “setting or surrounds” is being recognised for its own heritage values, or only being recognised in so far as it contributes to the values of the building, when in fact it is a part of the overall heritage values of a place. The addition of new buildings has to be carefully considered, not only for their compatibility with the existing heritage buildings on site, but their impacts on loss of setting. In some instances, it may not be appropriate for additional buildings to be placed on site, as significant public views of the historic heritage item cannot be maintained or the impact on the setting for which the site is known is too great.</p>	
HH-P11	Support	<p>HNZPT supports HH-P11;  <i>“Manage the repositioning of a building or structure on a site so that the building or structure maintains a relationship with adjoining public spaces including roads, and the setting of the building or structure is not unduly compromised.”</i></p> <p>Relocation within the existing setting should usually be preferred over relocation off-site. However, it is important to acknowledge that even relocating within the site reduces understanding of site development and can damage other heritage values. The importance of the earlier position of a structure and its relationship with other heritage features should be respected.</p>	That HH-P11 is retained.

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HH-12	Support in part	<p>HNZPT welcomes the addition to this policy of the consideration of alternatives prior to relocation in HH-P12;</p> <p><i>“Buildings or structures should not be relocated unless:</i></p> <ol style="list-style-type: none"> <li><i>1. Alternatives to relocation have been investigated, and</i></li> <li><i>2. There is significant community benefit, and the building is restored; and/or</i></li> <li><i>3. The building or structure has fallen into significant disrepair and will be restored on its new site because restoration is not economic on its existing site; and/or</i></li> <li><i>4. Relocation of the building or structure allows for improved longevity or structural safety; and</i></li> <li><i>5. Relocation of buildings and structures within the same community occurs where possible. “</i></li> </ol> <p>However, HNZPT considers that some amendments are still required to the policy. HNZPT considers that there can be adverse effects to heritage values from relocation of a heritage building or structure. Relocation beyond the heritage setting significantly erodes heritage values and should only be considered in extraordinary circumstances where any other alternatives to relocation have been explored, where the building can stay in the same</p>	<p>HNZPT seeks the retention of HH-12, subject to the following amendments:</p> <p><i>“Buildings or structures should not be relocated unless:</i></p> <ol style="list-style-type: none"> <li><i>1. Alternatives to relocation have been investigated, and</i></li> <li><i>2. There is significant community benefit, and the building is restored; and/or</i></li> <li><i>3. The building or structure has fallen into significant disrepair and will be restored on its new site because restoration is not economic on its existing site; and/or</i></li> <li><i>4 Relocation of the building or structure allows for improved longevity or structural safety; and</i></li> <li><i>4. Relocation of buildings and structures within the same community, and <del>occurs where possible.</del> “</i></li> <li><i><u>5. Development post relocation will be completed in a reasonable timeframe.”</u></i></li> </ol>



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		community and development post relocation will be completed within a reasonable timeframe. Amendments are required to recognise these aspects.	
HH-P13	Support	<p>HNZPT supports HH-P13;</p> <p><i>“Protect buildings and structures from demolition unless:</i></p> <ol style="list-style-type: none"> <li><i>1. The condition of an item poses an untenable risk to human life, and</i></li> <li><i>2. All reasonable alternatives have been investigated and considered, including restoration, reuse or relocation, and these alternatives have been found to be impracticable and uneconomic.”</i> <p>HNZPT considers that demolition is an activity of last resort and should only be undertaken if there are no other alternatives as this results in the permanent loss of heritage values.</p> </li></ol>	That HH-P13 is retained.
<p><b>Significant archaeological sites</b> HH-P14</p>	Support	<p>HNZPT supports HH-P14;</p> <p><i>‘Retain significant archaeological sites for future generations to help promote understanding of New Zealand’s history’.</i></p> <p>The retention of significant archaeology retains not only the intrinsic values of the individual sites selected for the Plan schedule, it also contributes to the ongoing understanding of New Zealand history.</p>	That HH-P14 is retained
HH-P15	Support	<p>HNZPT supports HH-P15;</p> <p><i>‘Protect significant archaeological sites by ensuring they are not destroyed, and by requiring activities, particularly earthworks, on the site or adjoining the site to avoid adverse effects on the archaeological values of the site.’</i></p>	That HH-5 is retained

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		HNZPT support the management of activities in and around these significant archaeological sites to ensure the retention of their important values.	
HH-P16	Support	<p>HNZPT supports HH-P16;  <i>“Signs are only anticipated where they are official signs, or where interpretive information is displayed about the site, and the design of the sign does not compromise the values associated with the significant archaeological site.”</i></p> <p>as the policy seeks that signage does not compromise the values associated with a significant archaeological site.</p>	That HH-P16 is retained
HH-P17	Oppose	<p>HNZPT supports HH-P17;</p> <p><i>“Ensure activities on or adjoining significant archaeological sites avoid adverse effects on the site in the first instance, and where avoidance is not possible, remedy or mitigate adverse effects, having regard to:</i></p> <ol style="list-style-type: none"> <li><i>1. Protecting the cultural, and archaeological values present and their setting; and</i></li> <li><i>2. Reducing the potential to lose or damage cultural and archaeological values; and</i></li> <li><i>3. Providing the ability to interpret the place and its relationship with other scheduled features; and</i></li> <li><i>4. The site's sensitivity to change or capacity to accommodate change without compromising any cultural and archaeological values; and</i></li> </ol>	<p>That HH-P17 is amended as follows:</p> <p><i>Ensure activities on or adjoining significant archaeological sites avoid adverse effects on the site. <del>#</del></i>  <del><i>the first instance, and where avoidance is not possible, remedy or mitigate adverse effects, having regard to:</i></del></p> <ol style="list-style-type: none"> <li><del><i>1. Protecting the cultural, and archaeological values present and their setting; and</i></del></li> <li><del><i>2. Reducing the potential to lose or damage cultural and archaeological values; and</i></del></li> <li><del><i>3. Providing the ability to interpret the place and its relationship with other scheduled features; and</i></del></li> </ol>

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		<p><i>5. Any opportunities to enhance interpretation of the significant archaeological site."</i></p> <p>HNZPT considers that this policy does not support the non-complying activity status that has been included in the activity table at HH-R16 for the destruction of an archaeological site. The non-complying activity status is a high threshold, which is appropriate for the destruction of a significant site.</p>	<p><i>4. The site's sensitivity to change or capacity to accommodate change without compromising any cultural and archaeological values; and</i></p> <p><i>5. Any opportunities to enhance interpretation of the significant archaeological site."</i></p>
HH-R1 Permitted activity	Support	HNZPT supports the permitted activity status of " <i>Exterior repair and maintenance</i> ". The permitted activity status encourages building owners to undertake these important works that will assist ensure the longevity of the buildings.	That the permitted activity HH-R1 is retained
HH-R2 Permitted activity	Support in part	<p>HNZPT supports HH-R2;  <i>"Internal alterations, including earthquake strengthening, fire protection and accessibility upgrades."</i></p> <p>As the permitted activity status encourages building owners to undertake these important works that will ensure the longevity of the buildings. However, when reading the suite of rules, it becomes apparent that this permitted activity status is contingent on the proposed works not obstructing view of and through windows. HNZPT considers that for clarity this wording should be included into this rule.</p>	<p>That the permitted activity HH-R2 is retained, subject to the following amendment:  <i>"Internal alterations, including earthquake strengthening, fire protection and accessibility upgrades that do not obstruct views of and through windows ."</i></p>
HH-R3 Controlled activity	Oppose	HNZPT is concerned regarding the controlled activity status of HH-R3;	That the controlled activity status is amended to a restricted discretionary activity with appropriate matters to which restrict discretion.

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		<p><i>“External alterations for earthquake strengthening fire protection and accessibility upgrades OR Internal alterations for earthquake strengthening, fire protection and accessibility upgrades that obstruct views of and through windows.”</i></p> <p>Earthquake strengthening works, while providing for the safety and protection of building users, have the potential to significantly detract from the heritage values of buildings. HNZPT considers that a restricted discretionary activity status will enable the proposal to be declined should the impacts on heritage values be too significant.</p>	
HH-R4 Controlled activity	Support	<p>HNZPT supports the controlled activity status of HH-R4; <i>“Restoration of a building or structure”</i> as this assessment ensures that the values of the Structure or building are retained.</p>	That the controlled activity status and associated matters of control are retained.
HH-R5 Cat1- discretionary activity Cat2-Restricted discretionary	Support in part	<p>HNZPT supports HH-R5 External alterations not provided for in HH-R1-HH-R4, Cat 1-Discretionary activity and Cat 2-Restricted discretionary for alterations as HNZPT considers that most alterations have the potential to affect heritage values. HNZPT supports alterations to scheduled historic heritage if heritage values are appropriately protected and maintained and recognises that they may be required to adapt historic heritage to new uses. Alterations required for adaptive re-use can be the catalyst for urban renewal, provided the heritage values are appropriately protected and maintained.</p>	<p>That HH-R5 and the Cat 1-Discretionary activity Cat 2- Restricted discretionary and matters over which discretion should be reserved are retained subject to the following amendment to the Cat 2, Activity status, matters over which discretion is reserved:</p> <p><i>“(a) Effects on the heritage values of the structure including whether the alteration or addition is compatible with the scale, form, proportions and</i></p>

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		<p>With regard the matters over which discretion is reserved, HNZPT considers that there is an additional matter that should be included, that of the reversibility of the proposed change. There may be grounds for an alteration to be approved if its construction methodology allows it to be easily reversed at some time in the future.</p>	<p><i>materials of the structure, and whether any architectural features will be removed or obscured; and</i>  <i>(aa) the extent to which the proposed addition or alteration is reversible, and</i>  <i>(b) Effects on the views of the scheduled structure from public spaces; and</i>  <i>(c) The benefits obtained from the addition or alteration including increasing the sustainability, functionality and/or liveability of the structure; and</i>  <i>(d) The degree to which the structure has already been modified; and</i>  <i>(e) Risks to the structure during the works; and</i>  <i>(f) The outcome of any assessments or advice from a suitably qualified and experienced heritage expert; and</i>  <i>(g) The outcomes of consultation with HNZPT.</i></p>
<p>HH-R6            Cat 1- Discretionary activity            Cat 2-Restricted discretionary</p>	<p>Support in part</p>	<p>HNZPT supports the Cat 1-Discretionary activity Cat 2-Restricted discretionary of;</p> <p><i>“ Additions to a building or structure”</i></p> <p>as HNZPT considers that most additions have the potential to affect heritage values. HNZPT supports additions to scheduled historic heritage if heritage values are appropriately protected and maintained and recognises that they may be</p>	<p>That HH-R6 and the Cat 1-Discretionary activity Cat 2- Restricted discretionary and matters over which discretion should be reserved are retained subject to the following amendment to the Cat 2, Activity status, matters over which discretion is reserved:</p>

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		<p>required to adapt historic heritage to new uses. Additions required for adaptive re-use can be the catalyst for urban renewal, provided the heritage values are appropriately protected and maintained.</p> <p>With regard the matters over discretion is reserved, HNZPT considers that there is an additional matter that should be included, that of the reversibility. There may be grounds for an addition to be approved if its construction methodology allows it to be easily reversed at some time in the future.</p>	<p><i>“(a) Effects on the heritage values of the structure including whether the alteration or addition is compatible with the scale, form, proportions and materials of the structure, and whether any architectural features will be removed or obscured; and (aa) the extent to which the proposed alteration or addition is reversible, and (b) Effects on the views of the scheduled structure from public spaces; and (c) The benefits obtained from the addition or alteration including increasing the sustainability, functionality and/or liveability of the structure; and (d) The degree to which the structure has already been modified; and (e) Risks to the structure during the works; and (f) The outcome of any assessments or advice from a suitably qualified and experienced heritage expert; and (g) The outcomes of consultation with HNZPT.</i></p>
HH-R7 Cat 1- Discretionary activity	Support	<p>HNZPT is supportive of the discretionary-Cat 1/Restricted discretionary -Cat 2 activity status and related RD assessment criteria of;</p> <p><i>“Relocation of a building or structure within the same site OR</i></p>	<p>That HH-R7 and the <i>discretionary activity status-Cat 1/Restricted discretionary activity status -Cat 2 and the associated matters over which discretion are restricted</i> are retained.</p>

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Cat 2-Restricted discretionary		<p><i>Repositioning a building or structure within the same surroundings (general rural zone, PREC3 Aerodrome Precinct and open space zone)</i>"</p> <p>as this assessment status recognises that there can be adverse effects from the repositioning of a heritage building or structure within its site. While repositioning is preferred over relocation off site, even relocating within the site reduces understanding of site development and can damage other heritage values. The importance of the earlier position of a structure and its relationship with other heritage features should be respected.</p>	
HH-R8 Cat 1-Non-complying activity Cat 2-Discretionary activity	Support	<p>HNZPT is supportive of the non-complying activity status for Cat 1 and the discretionary activity status for Cat 2 of;</p> <p><i>"Relocation of a building or structure."</i></p> <p>as this assessment status recognises that there can be adverse effects to heritage values from relocation of a heritage building or structure. Relocation beyond the heritage setting significantly erodes heritage values and should only be considered in extraordinary circumstances where any other alternatives to relocation have been explored and development post relocation will be completed within a reasonable timeframe.</p>	That HH-R8 and non-complying activity status for Cat 1 and the discretionary activity status for Cat 2 are retained.

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HH-R9 Cat 1 & 2 Non-complying	Support	<p>HNZPT supports the non-complying activity status for the activity of;  <i>“Demolition, including partial demolition of a building or structure”</i>                      HNZPT considers that this activity status for the destruction of a significant site will assist to ensure that they are retained.</p>	<p>That HH-R9 and the non-complying activity status is retained.</p>
<p><b>Sites and surrounding of heritage buildings and structures</b>                      HH-R10                      Permitted activity subject to performance standards                      Cat 1 &amp; 2</p>	Oppose	<p>HNZPT cannot support the permitted activity status of HH-R10;  <i>“Any new building, new transportable building, or second hand relocated building located within the same site</i>  <i>OR any new building, new transportable building, or second hand relocated building located within the same surroundings (general rural zone, PREC3 Aerodrome Precinct, and open space zone) subject to performance standards, as follows:</i>  <i>The new or relocated structure is located to the rear of any building or structure listed in SCHED1 and is not visible from a public place; and</i>  <i>From the 20 October 2022 only one new or relocated structure is permitted per site or surroundings (in the general rural zone) and it must be no more than 15m<sup>2</sup> and no more than 3m high.”</i></p> <p>as the performance standards have assumed that there will be no adverse effects to the heritage building or structure from the placement of additional buildings to the rear of a heritage place or structure. This may not be the case even with the placement of small buildings. HNZPT proposes a case-by-case</p>	<p>That HH-R10 is amended to a restricted discretionary activity as follows:  <i>“Any new building, new transportable building, or second hand relocated building located within the same site</i>  <i>OR any new building, new transportable building, or second hand relocated building located within the same surroundings (general rural zone, PREC3 Aerodrome Precinct, and open space zone).”</i></p> <p><u>Matters over which discretion is restricted</u></p> <p><u>(a) Effects on the heritage values, context and the extent of setting of the historic heritage item;</u>  <u>(b) Location, design, size, materials and finish;</u>  <u>(c) Landscaping; and</u>  <u>(d) The relationship of the historic heritage item with its extent of setting.”</u></p>



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		assessment through the use of a restricted activity consent status and new assessment criteria.	<del>)subject to performance standards, as follows: The new or relocated structure is located to the rear of any building or structure listed in SCHED1 and is not visible from a public place; and From the date of notification only one new or relocated structure is permitted per site or surroundings)in the general rural zone and it must be no more than 15m<sup>2</sup> and no more than 3m high</del>
<b>Significant archaeological sites</b> HH-R11 Permitted activity	Oppose in part	HNZPT opposes in part the permitted activity of; <i>"Maintenance and/or minor modification"</i> as this permitted activity has the potential for adverse effects on significant archaeological sites.	That the activity is amended as per the matters sought under the definition's discussion in this submission.
HH-R12 Restricted discretionary activity	Support	HNZPT supports the restricted discretionary activity; <i>"External additions to existing structures or buildings"</i> . As this level of assessment will ensure the retention of archaeological values.	That the restricted discretionary activity status and assessment criteria of <i>" External additions to existing structures or buildings "</i> is retained.
HH-R13	Support	HNZPT supports the discretionary activity status of the activity; <i>"Earthworks"</i>	That the discretionary activity status of <i>"Earthworks "</i> is retained.

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Discretionary Activity		As this level of assessment will ensure the retention of archaeological values	
HH-R14 Discretionary Activity	Support	HNZP supports the discretionary activity status of the activity; "Erection of a new building or structure" As this level of assessment will ensure the retention of archaeological values.	That the discretionary activity status of " <i>Erection of a new building or structure</i> " is retained.
HH-R15 Discretionary Activity	Support	HNZP supports the discretionary activity status of the activity; "Relocation or removal of a new building or structure" As this level of assessment will ensure the retention of archaeological values.	That the discretionary activity status of " <i>Relocation or removal of a new building or structure</i> " is retained.
HH-R16 Non-Complying Activity	Support	HNZPT support the activity status of the non-complying activity; "Destruction of a significant archaeological site."  HNZPT considers that this activity status for the destruction of a significant site will assist to ensure that they are retained.	That HH-R16 and the non-complying activity status is retained.
HH-R17 Non-complying Activity	Support	HNZPT support the activity status of the non-complying activity: "Plantation forestry" HNZPT considers that this activity status for plantation forestry within a significant archaeological site will assist to ensure that they are retained.	That HH-R17 and the non-complying activity status is retained.
Sites and Surroundings of significant archaeological sites		HNZPT appreciates that these rules for works within 25m of a mapped archaeological site has been separated out from signage provisions. This is helpful for the user of the plan, however HNZPT is concerned that these rules; <i>HH-R18-Erection of a new building or structure within 25 m of the mapped extent of a significant archaeological site</i>	That a note advising of the possible need for an archaeological authority is placed in the header of the .

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<p>Restricted discretionary activity HH-R18 HH-R19 And assessment criteria</p>		<p><i>HH-R19-Relocation of a building or structure within 25m of the mapped extent of a significant archaeological site</i> <i>Matters over which discretion is restricted:</i> <i>(a) The location of the structure on the site; and</i> <i>(b) The effects on the values of the significant archaeological site; and</i> <i>(c) Outcomes from consultation with mana whenua and HNZPT.</i> should contain clear advice to the reader that while works require a resource consent in the district plan, they may require an archaeological authority as well. This is important as HNZPT is unclear regarding whether the extents have been fully mapped as part of the DP processes. HNZPT seeks that a note to that affect is placed at the beginning of the section for these rules.</p>	
<p>Signs on heritage buildings &amp; structures or on significant archaeological sites HH-R20-Official signs HH-R21 Interpretative signs</p>	<p>Support in part</p>	<p>Overall HNZPT pleased that the signage rules related to archaeological sites and heritage buildings &amp; structures have been separated out from the rules related to buildings in the sites and surroundings of archaeological sites.</p> <p>HNZPT supports the restricted discretionary activity status of these signs when they are located on any building or structure listed in SCHED1 or located on a significant archaeological site. This assessment will assist to retain the heritage and archaeological values of these scheduled items.</p> <p>However, HNZPT considers that there should be clear advice to the reader that while signs in a significant archaeological site may be permitted in the district</p>	<p>That the restricted discretionary activity status of HH-R20, HHR21 and HH-R22 for signs located on any building or structure listed in SCHED1 or located on a significant archaeological site is retained.</p> <p>That a note advising of the possible need for an archaeological authority is placed in the header of this portion of the activity table.</p>

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HH-R22 Temporary signs		plan, they may require an archaeological authority. HNZPT seeks that a note to that affect is placed at the beginning of the section “Signs on heritage structures and buildings and archaeological sites”	
Advice notes Heritage New Zealand Pouhere Taonga Activities may also require an authority from Heritage New Zealand Pouhere Taonga (HNZPT)	Support in part	HNZPT supports the advice note, advising that; <i>“Activities may also require an authority from Heritage New Zealand Pouhere taonga (HNZPT)”</i> However, HNZPT considers that there would be benefit in placing the advice note under the heading related to activities in archaeological sites, rather than at the end of the chapter. This would better assist users of the plan to be aware of their additional obligations under the HNZPTA 2014.	That the advice note is retained, and its location amended to be placed under each of the headings related to archaeological activities.
Advice Notes Accidental Discovery Protocol	Support in part	HNZPT supports the inclusion of an Accidental Discovery Protocol;  <i>“Accidental discovery protocol In the event that an unidentified archaeological site or a wāhi tapu site is located during works, the following applies:</i> <ul style="list-style-type: none"> <li>• <i>Work must cease immediately at that place and within 20m around the site;</i></li> <li>• <i>Heritage New Zealand Regional Archaeologist must be notified and apply for the appropriate authority if required;</i></li> <li>• <i>Notify the appropriate iwi groups or kaitiaki representative of the discovery and ensure site access to enable appropriate cultural procedures and tikanga to be</i></li> </ul>	That the Accidental Discovery Protocol is retained and amended as follows; <ul style="list-style-type: none"> <li>• <i><u>The Heritage New Zealand Regional Archaeologist must be notified and an application made apply</u> for the appropriate authority if required;</i></li> </ul>

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		<p><i>undertaken, as long as all statutory requirements under legislation are met (New Zealand Pouhere Taonga Act 2014);</i></p> <ul style="list-style-type: none"> <li>• <i>If human remains (koiwi) are uncovered then the Heritage New Zealand Regional Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative must be notified. Remains are not to be moved until such time as iwi and Heritage New Zealand have responded;</i></li> <li>• <i>Works affecting the archaeological site and any human remains (koiwi) must not resume until appropriate authority and protocols are completed. If the protocol is not adhered to then Heritage New Zealand can take out prosecution proceedings under the New Zealand Pouhere Taonga Act 2014”</i></li> </ul> <p>The inclusion of the Accidental Discovery Protocol assists the reader to be aware of their obligations under the HNZPTA 2014 and avoid adverse effects on archaeology, however the second bullet point needs to be amended as it is not clear who should apply for the authority if required.</p>	
<b>Part 2-District Wide Matters-25-Sites and Areas of Significance to Māori</b>			
SASM-01	Support in part	<p>HNZPT supports objective SASM-01;  <i>“Sites and areas of significance to Māori and wāhi tapu sites are recognised, scheduled and protected from inappropriate activities.”</i></p> <p>As this gives effect to the RMA- s6(e) <i>”the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”.</i></p>	That SASM-01 is retained.

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		<p>At this time HNZPT remains concerned regarding the lack of full mapping for some of the HNZPT listed Wahi Tapu sites in the plan. This will result in diminished recognition and the ability to protect the values of these sites in an ongoing manner, resulting in potential adverse effects on the important cultural values of these sites for which these sites were originally listed. Sites that have been developed still retain important cultural values and this should be recognised as part of the mapping process.</p>	
SASM-02	Support	<p>HNZPT supports objective SASM-02;  <i>“Recognise and provide for the ongoing relationship mana whenua have with sites and areas of significance to Māori and wāhi tapu sites.”</i>            As this gives effect to the RMA- s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga.”</i></p> <p>As with the comment related to SASM-02 HNZPT remains concerned that several HNZPT are not fully mapped in the Plan, and this will result in diminished recognition and the ability to protect the values of these sites in an ongoing manner, resulting in adverse effects on the important cultural values of these sites for which these sites were originally listed.</p>	That SASM-02 is retained.
SASM-03	Support	<p>HNZPT supports objective SASM-03;  <i>“Ensure the relationship of mana whenua with their ancestral lands, water, sites, wāhi tapu and other taonga is protected and provided for within sites and areas</i></p>	That SASM-02 is retained.

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		<p><i>of significance to Māori, wāhi tapu sites and sites identified as part of the cultural alert layer."</i></p> <p>HNZPT is supportive of the information in the beginning of the chapter (page 2 of 14) that they will look to undertake cultural impact assessments for some of the cultural alert layers.</p>	
SASM-04	Support	<p>HNZPT supports objective SASM-04;  <i>"Continue to consult and collaborate with mana whenua to identify and schedule new sites and areas of significance to Māori."</i>                      As this gives effect to the RMA- s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga."</i></p>	That SASM-04 is retained.
SASM-P1	Support	<p>HNZPT supports objectives SASM-P1:  <i>"Continue to work with mana whenua to map and schedule additional sites and areas of significance to Māori."</i>                      As this gives effect to the RMA- s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga"</i>.</p>	That SASM-P1 is retained.
SASM-P2	Support	HNZPT supports SASM-P2:	That SASM-P2 is retained.

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		<p><i>“Within strict limits, enable identified activities including maintenance and restoration of scheduled sites, animal grazing, cultivation, and minor land disturbance for specified activities.”</i></p> <p>As this policy enables specified minor activities to occur as of right while retaining the values of these important sites.</p>	
SASM-P3	Support	<p>HNZPT supports SASM-P3:  <i>“Signs are only anticipated where they are official, interpretive or temporary signs and the design of the sign does not compromise the values associated with the site and/or its scheduled feature.”</i></p> <p>as this will enable some signage, if required, so long as the values of the SASM or Wahi tapu are not compromised.</p>	That SASM-P3 is retained.
SASM-P4	Support	<p>HNZPT supports SASM-P4:  <i>“Recognise that where existing residential activities are located within a scheduled site, that limited development is possible, but only where the site’s cultural heritage values are not compromised.”</i></p> <p>as this will enable some limited development to occur when it is related to existing development on site, however only to the extent that it does not compromise the values of the SASM or wahi tapu.</p>	That SASM-P4 is retained.
SASM-P5	Support	HNZPT supports SASM-P5:	That SASM-P5 is retained.



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		<p><i>“Provide flexibility when considering the development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land located within a scheduled site by:</i></p> <ol style="list-style-type: none"> <li><i>1. Evaluating the extent to which the development enables and actively sustains the relationship of mana whenua with their ancestral lands and the exercise of kaitiakitanga; and</i></li> <li><i>2. Evaluating the extent to which the development enables mana whenua to manage their own lands and resources for the benefit of mana whenua; and</i></li> <li><i>3. Evaluating the extent to which the development achieves positive economic, social and cultural benefits for mana whenua now and into the future”.</i> <p>As this will enable development to occur that provides for the needs of mana whenua.</p> </li></ol>	
SASM-P6	Support	<p>HNZPT supports SASM-P6:  <i>“Enable mana whenua to sustainably develop and use sites and areas of significance to Māori and wāhi tapu sites in accordance with their cultural preferences and aspirations by allowing marae complex and papakāinga housing developments.”</i>                      as this encourages the provision of marae and papakāinga housing for mana whenua.</p>	That SASM-P6 is retained.
SASM-P7	Support	HNZPT supports SASM-P7	That SASM-P7 is retained.

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		<p><i>"Earthworks must be managed to avoid adverse effects on the values of scheduled sites."</i></p> <p>as it is important to avoid adverse effects on these important sites in order to retain their values.</p>	
SASM-P8	Support	<p>HNZPT supports SASM-P8:</p> <p><i>"Except as provided for in SASM-P6, where there are no existing buildings located within a scheduled site, only allow built development where it can be demonstrated the site's values are permanently protected, having regard to:</i></p> <ol style="list-style-type: none"> <li><i>1. Outcomes articulated through consultation with mana whenua through an assessment of environmental effects, cultural impact assessment, or iwi planning documents; and</i></li> <li><i>2. How protection of the scheduled site's values including provision for tikanga Māori, kaitiakitanga, and mātauranga Māori have been provided for; and</i></li> <li><i>3. Any practical mechanisms proposed to maintain or enhance the ability of mana whenua to access and use the site for karakia, monitoring, Māori cultural and customary uses and ahi kā roa; and</i></li> <li><i>4. Whether there are alternative methods, locations, or designs that would avoid or reduce the effects on the values of the scheduled site; and</i></li> </ol>	That SASM-P8 is retained.

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		<p><i>5. Whether there is the potential to enhance the values of the scheduled site and the relationship mana whenua have with the site, commensurate with the scale and nature of the proposal.”</i></p> <p>As this policy support appropriate development only, which will ensure the retention of these important values.</p>	
SASM-P9	Support	<p>HNZPT supports SASM-P9:  <i>“Waitomo District Council will work with landowners to manage, maintain and preserve scheduled sites by:</i></p> <ol style="list-style-type: none"> <li><i>1. Increasing community awareness, understanding and appreciation of the presence of, and importance of, scheduled sites; and</i></li> <li><i>2. Encouraging landowners to engage with mana whenua and/or marae and develop positive working relationships in respect of the ongoing management and protection of scheduled sites; and</i></li> <li><i>3. In consultation and collaboration with mana whenua, promoting the use of mātauranga Māori, tikanga Māori and kaitiakitanga to manage, maintain and preserve scheduled sites; and</i></li> <li><i>4. Where possible, providing assistance to landowners to preserve, maintain and enhance scheduled sites. “</i> <p>Particularly as many scheduled sites are not within mana whenua ownership, therefore it is important to ensure that landowners are assisted in recognising and caring for these important sites.</p> </li></ol>	That SASM-P9 is retained.
SASM-P10	Support	HNZPT supports SASM-P10:	That SASM-P10 is retained

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		<p><i>"Promote the provision or development of access for mana whenua to scheduled sites, through mechanisms such as:</i></p> <ol style="list-style-type: none"> <li><i>1. Formal arrangements, including co-management, joint management or relationship agreements, easements and land covenants, or private access agreements; and</i></li> <li><i>2. The use of benefit lots to encourage the provision of access to landlocked land parcels; and</i></li> <li><i>3. Informal arrangements or understandings between landowners and mana whenua and/or marae."</i></li> </ol> <p>in particular the use of benefit lots as a method to gain access to land locked site. The use of this incentive method is important as it will assist to enable the relationship of mana whenua with their ancestral lands.</p>	
SASM-P11	Support	<p>HNZPT supports SASM-P11:</p> <p><i>"Investigate opportunities for Māori and by Māori, which facilitate improved management of scheduled sites, including the transfer of powers to mana whenua to manage cultural heritage resources."</i></p> <p>As this policy gives effect to the RMA- s6(e) <i>"the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga."</i></p>	That SASM-P11 is retained.

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SASM-P12	Oppose in part	<p>HNZPT opposes in part SASM-P12:  <i>"In the event a resource consent is triggered within the cultural alert layer, ensure that any proposed activity is appropriately assessed, and any resulting development is managed in a way that retains and protects the cultural heritage values of the site."</i></p> <p>as this will assist to ensure the retention of cultural values at the time of development through a resource consent within the cultural alert layer, however HNZPT has concerns regarding the possible cumulative impacts on the cultural alert layer. HNZPT seeks an amendment to reflect this concern and how it could be managed to minimise adverse effects on these important areas.</p>	<p>That SASM-P12 is retained and amended as follows:  <i>"In the event a resource consent is triggered within the cultural alert layer, ensure that any proposed activity is appropriately assessed, and any resulting development is managed in a way that retains and protects the cultural heritage values of the site, <u>including the monitoring of cumulative effects on the cultural alert layer to ensure the appropriate regulatory approach is being utilised.</u>"</i></p>
SASM-R1 Permitted Activity	Support	<p>HNZPT supports SASM-R1 and its permitted activity status :  <i>"Earthworks Associated with Burials"</i></p> <p>As this activity status allows this important activity to take place without undue delay.</p>	<p>That SASM-R1 is retained</p>
SASM-R2 Permitted Activity	Support in part	<p>HNZPT has some concerns about the permitted activity:  <i>"Maintenance of sites"</i>, which relies on the defined term "Maintenance", a part of which is relevant to SASM sites as follows:</p> <p><i>"Other features - works that will restore or keep the feature in a sound condition including stabilisation of the asset by conservation treatments and <b>land</b> stabilising supervised by a suitably qualified and experienced archaeologist and in collaboration with mana whenua as required.</i></p>	<p>That the nature and scale of the proposed permitted activities are reviewed to ensure that such activities cannot cause any adverse effects on these important sites.</p>

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		<p>HNZPT is concerned that the nature and scale of the works enabled by the permitted activity and seeks that they are reduced to ensure that there are no adverse effects on these important sites.</p>	
SASM-R3 Permitted Activity	Support	<p>HNZPT supports the permitted activity of:  <i>“Internal alterations to existing buildings”</i></p> <p>as this facilitates works to buildings that may be located within a SASM to be undertaken without the need for a resource consent.</p>	That SASM-R3 is retained.
SASM-R4 Permitted Activity	Oppose in part	<p>HNZPT opposes SASM-R4:  <i>“External alterations to existing buildings”</i>            and the associated performance standards:  <i>Permitted where:</i></p> <ol style="list-style-type: none"> <li>1. <i>From 20 October 2022 any addition or extension to any building must not exceed 40 m<sup>2</sup>, at any one time or in total cumulatively per scheduled site; and</i></li> <li>2. <i>For residential activities only, from the 20 October 2022 the maximum area of any new deck must be no more than 20 m<sup>2</sup> and there must be no more than one new deck constructed per scheduled site from this date.</i></li> </ol> <p>HNZPT is supportive of some external additions being undertaken, however is concerned at the scale of those suggested as a permitted activity. HNZPT is also mindful that some scheduled sites could be over multiple lots or ownership and would like to understand how the council intend to monitor this activity to</p>	<p>That SASM-R4 is amended to a restricted discretionary activity as follows:  <i>“External alterations to existing buildings”</i>            and the associated performance standards:  <i>Permitted where:</i></p> <ol style="list-style-type: none"> <li>1. <i>From (date notification of the Plan) any addition or extension to any building must not exceed 40 m<sup>2</sup>, at any one time or in total cumulatively per scheduled site; and</i></li> <li>2. <i>For residential activities only, from (date of the notification of the Plan) the maximum area of any new deck must be no more than 20 m<sup>2</sup> and there must be no more than one new deck constructed per scheduled site from this date.</i></li> </ol>

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		ensure compliance with this rule. HNZPT seeks that the rule is amended to the extent that external alterations to buildings are assessed as restricted discretionary activity.	<p><u>“Restricted discretionary activity:</u>  <u>“External alterations to existing buildings</u></p> <p><u>Matters over which discretion are reserved :</u>  <u>As per existing for SASM-R4-Restricted discretionary activity.”</u></p>
SASM-R5 Permitted Activity	Oppose	<p>HNZPT is opposed to the permitted activity:  <i>“Accessory buildings including shipping containers where foundations are required.</i>  <i>From 20 October 2022 the maximum gross floor area of any new accessory building (including pergola) must not exceed 20 m<sup>2</sup> and there must be no more than one new accessory building per scheduled site from this date.”</i>                      as this activity has the potential to cause adverse effects. In addition, HNZPT would like to understand how this activity will be monitored with regard only one shipping container per scheduled site, when a scheduled site may cover a number of independently owned lots.</p>	That SASM-R5 is amended to a restricted discretionary activity.
SASM-R6 Permitted Activity	Oppose in part	<p>HNZPT opposes in part SASM-R6  <i>“Demolition or removal of structures”</i>                      As this activity can potentially require earthworks, which HNZPT notes from reviewing rule SASM-R6, such earthworks are permitted.</p>	That SASM-R6 is retained as a permitted activity subject to the following amendment: <i>“Demolition or removal of structures <u>that do not require earthworks.”</u></i>

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		HNZPT would support a permitted activity for “ <i>Demolition or removal of structures</i> ” if the activity did not need earthworks as this would assist to ensure that the potential for adverse effects to occur is minimised.	
SASM-R7 Permitted Activity	Oppose in part	<p>HNZPT is concerned at the wide range of permitted activity levels earthworks in SASM-R7:</p> <p>“ <i>Minor Earthworks</i>” where:</p> <ol style="list-style-type: none"> <li>1. <i>The earthworks are associated with the permitted activities in SASM-R4 and R5 and no more than 5 m<sup>3</sup> of soil is disturbed; and/or</i></li> <li>2. <i>The earthworks are for demolition or removal of a building and no more than 5 m<sup>3</sup> of soil is disturbed; and/or</i></li> <li>3. <i>The earthworks are for maintaining or upgrading existing fences on the same alignment; and/or</i></li> <li>4. <i>The earthworks are for maintenance of existing driveways and existing farm tracks on the same alignment; and/or</i></li> <li>5. <i>The activity is grazing of livestock; and/or</i></li> <li>6. <i>The activity is cultivation; and/or</i></li> <li>7. <i>The activity is domestic gardening including the planting of ornamental trees and vegetable gardens in association with a residential activity; and/or</i></li> <li>8. <i>The earthworks are for conservation riparian planting within 15 m of any water body; and/or</i></li> </ol>	That the activities that are part of SASM-R7 are merged with SASM-R8 to be assessed as a Restricted discretionary activity.



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		<p>9. <i>The earthworks are for stock exclusion fencing within 15 m of any water body; and/or</i>            10. <i>The earthworks are for wetland restoration where no more than 5 m<sup>3</sup> of soil is disturbed. “</i></p> <p>and considers that these activities should be assessed through a consent process as a restricted discretionary as they have the potential for adverse effects on these important sites. These activities itemised in SASM-R7 should be merged with earthworks for any other purpose-SASM-R8.</p>	
SASM-R8 Restricted Discretionary Activity	Support	<p>HNZPT supports the restricted discretionary activity SASMR:8  <i>“Earthworks for any other purpose”</i></p> <p>And the associated matters of discretion.            It is appropriate that any earthworks beyond those identified as permitted should be assessed for the impacts on the values of SASM and Wahi Tapu.</p>	That SASM-R8, as a restricted discretionary activity and the associated matters over which discretion are restricted, are retained.
SASM-R9 Restricted Discretionary Activity	Support	<p>HNZPT supports the restricted discretionary activity status of SASM-R9:  <i>“Repositioning a building within a scheduled site”</i></p> <p>As the repositioning of a building on a SASM or Wahi tapu site will most likely have effects that need to be managed to ensure that there are no adverse effects.</p>	That the Restricted Discretionary Activity SASM-R9 is retained.

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SASM-R10 Permitted Activity	Support	<p>HNZPT supports the permitted activity of:  <i>Marae Complex or Papakainga Housing development</i>                      As this enables the plan to give effect to the RMA- s6(e) "<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wahi tapu and other taonga.</i>"</p>	That the permitted activity status of SASM-R10 is retained.
SASM-R11 Non-complying Activity	Support in part	<p>HNZPT supports the non-complying activity status of SASM-R11:  <i>"Destruction or demolition of an item or feature on a scheduled site"</i>                      However, HNZPT is unclear how the items or features are identified and if the areas between the items and features are protected. HNZPT considers that clarity needs to be provided on this aspect, to ensure that the values of the SASM or wahi tapu site are retained.</p>	That SASM-R11 and the non-complying activity status is retained subject to clarification relating to the items or features with the entire scheduled site and the extent to which it is all protected.
SASM-R12 Non-complying Activity	Support	<p>HNZPT supports the non-complying activity status of SASM-R12:  <i>"Any other new or relocated building on a scheduled site"</i>                       HNZPT considers that this activity status for "<i>Any other new or relocated building</i> within a SASM or Wahi tapu site allows a rigorous level of assessment and will assist to ensure that they are retained.</p>	That SASM-R12 and the non-complying activity status is retained.
SASM-R13 Non-complying Activity	Support	<p>HNZPT supports SASM-R13 and the non-complying activity status of:  <i>"Plantation forestry"</i></p>	That SASM-R13 and the non-complying activity status is retained.

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		HNZPT considers that this activity status for plantation forestry within a SASM or Wahi Tapu site allows a rigorous level of assessment and will assist to ensure that they are retained.	
<b>Signs on sites of Significance</b> SASM-R14 Official Signs Permitted Activity	Oppose in part	HNZPT is concerned that <i>“Official signs”</i> is a permitted activity. While an official sign may be required in a SASM, and the proposed size of permitted signage is small even a small sign could detract from the values of the site as the performance standards have no provisions in them that relate cultural or heritage values such as placement of the sign.	That the permitted activity status performance standards are amended to include performance standards that provide for the retention of cultural value. In the event that this cannot be adequately addressed, any interpretative signage should be assessed as a restricted discretionary activity.
SASM-R15 Interpretative signs Permitted Activity	Oppose in part	HNZPT is concerned <i>“Interpretative signs”</i> is a permitted activity. While interpretation can be of benefit to a SASM site, and the proposed size of permitted signage is small even a small sign could detract from the values of the site as the performance standards have no provisions in them that relate cultural or heritage values such as placement of the sign.	That the permitted activity status performance standards are amended to include performance standards that provide for the retention of cultural value. In the event that this cannot be adequately addressed, any interpretative signage should be assessed as a restricted discretionary activity.
SASM-R16 Temporary Signs Permitted Activity	Oppose in part	While HNZPT can understand the inclination to make <i>“Temporary Signs”</i> a permitted activity, HNZPT is concerned that ongoing installation of this permitted activity signage could result in overall damage to these important sites.	That the activity status of temporary signs is amended to a restricted discretionary activity, or that a permitted activity sign can only be temporary if there is no ground disturbance.
SASM-R17 Footpath signs including	Support	HNZPT supports the permitted activity status of: <i>“Footpath signs including sandwich boards and teardrop flags”</i>	That the permitted activity of <i>“SASM-R17 Footpath signs including sandwich boards and teardrop signs”</i> , is retained.

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sandwich boards and teardrop signs Permitted Activity		As these are likely to have very little effect on the values of SASM and Wahi Tapu sites.	
SASM-R18 Signs-that are not located on the same site as the activity they advertise or do not relate to the activity carried out on a site. Discretionary Activity	Support	<p>HNZPT supports the discretionary activity status of:  <i>“Signs (other than temporary signs) that are not located on the same site as the activity they advertise or signs that do not relate to the activity carried out on the site”</i></p> <p>As HNZPT does not support the locating of unrelated signage on the site as this detracts from the values of the site/s.</p>	That “SASM-R18 Signs-that are not located on the same site as the activity they advertise or do not relate to the activity carried out on a site.” is retained.
SASM-R19 Signs not otherwise listed in a SASM-Table 1	Support	HNZPT support the discretionary activity status of this activity as this will assist to ensure the retention of cultural values	That “SASM-R19 Signs-not otherwise listed in SASM Table 1is retained.

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SASM-R20-23 Performance standards	Oppose	HNZPT has raised a number of concerns in the proceeding submission points and seeks that these are addressed through additional amendments to these performance standards, to ensure that there are no adverse effects on these important sites.	That the SASM-R20-R23 are reworked to directly address matters
SASM-R24 Cultural alert layer requirements	Support in part	HNZPT welcomes the assessment of activities in the Cultural alert layers in the instance that a resource consent is triggered to assist to ensure that the values of the landscape area retained. HNZPT considers that it will be important to monitor the activities that occur within the cultural landscape as a future rule change may be required to minimise adverse effects in these landscapes.	That SASM-R24 Cultural alert layer requirements are retained
Advice notes- Heritage New Zealand Pouhere Taonga	Support	HNZPT supports the inclusion of the advice note indicating the possible need for a HNZPT archaeological authority for the works identified within this chapter.	That the advice note is retained
Advice notes- Accidental Discovery Protocol	Support	HNZPT supports the inclusion of the advice note containing accidental discovery protocol.	That the accidental discovery protocol advice note is retained.
Advice notes- Significant Archaeological sites	Support	HNZPT supports the inclusion of an advice note reminding reader of the requirements related to significant archaeological sites within the plan.	That the Significant archaeological advice note is retained.

#### Part 2-District Wide Matters-29-Subdivision

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Objective SUB-O4.	Support	The NZHPT supports subdivision objective SUB-O4 : <i>“Subdivision protects or enhances overlays, scheduled sites and features and results in development that respects the physical, cultural, historical and natural context of the site. Some subdivision proposals may not be possible if the identified values cannot be appropriately protected.”</i>	That objective SUB-O4 is retained.
SUB-P1	Support	HNZPT supports subdivision policy SUB-P1:  <i>“Ensure safe, connected and accessible residential neighbourhoods are created and maintained by supporting subdivision that: ..... 9. Incorporates mātauranga Māori principles into the design of the subdivision; and 10. Provides opportunities for mana whenua’s relationship with ancestral lands, water, sites, wāhi tapu and other taonga to be maintained or strengthened; and ..... As this will assist to provide for RMA- s6(e) “the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga.”</i>	That policy SUB-P1 is retained
Natural Systems SUB-P21 SUB-P24	Support in part	HNZPT supports the following subdivision policies; SUB-P21 <i>“Manage the actual and potential effects on overlays, scheduled sites and features and archaeological sites by ensuring the location, layout and design of</i>	That Policies SUB-21 and SUB-P24 are retained and the subheading “Natural Systems” is amended as follows:  “Natural Systems and <u>Historic Heritage</u> ”

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		<p><i>subdivision including building platforms, earthworks, infrastructure and accessways, protect the identified values"</i>            SUB-P24  <i>"Encourage subdivision which permanently retains and protects scheduled sites and features and archaeological sites within one allotment."</i></p> <p>As this provides for the protection of identified values. However HNZPT considers that the heading of the section will not lead the reader to identifying these policies and seeks that the subheading is amended include the wording "and historic heritage</p>	
SUB-P26	Support	<p>HNZPT supports Policy SUB-P26 related to benefit lot provisions as follows:  <i>SUB-P26. Enable subdivision in the general rural zone in identified circumstances where this:</i></p> <ol style="list-style-type: none"> <li>1. <i>Allows permanent legal and physical access to landlocked Maori freehold land or urupā; or</i></li> </ol> <p>As this will assist to provide for RMA- s6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga."</p>	That Policy SUB-P26 is retained.
SUB-R2 Boundary adjustments	Support	<p>HNZPT supports the following assessment criteria:  <i>(c) Effects on any scheduled site or feature, archaeological site, water body or area of indigenous vegetation; "</i></p>	That the assessment criteria ( c ) are retained.

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		This assessment criteria, related to the subdivision rules for the creation of new lots, gives effect to the policies of the draft plan related to the protection and retention of historic heritage and historic heritage values.	
SUB-R3 Subdivision of land exclusively for the protection of scheduled sites and features	Support	HNZPT supports the restricted discretionary activity and assessment criteria related to the subdivision of land exclusively for the protection of scheduled sites and features as this will assist the plan to provide for RMA- s6(e) " <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)</i> " the protection of historic heritage from inappropriate subdivision, use and development" of the RMA.	That SUB-R3, the activity status, rule and assessment criteria are retained.
SUB-R4. Subdivision of land for the purpose of public works, network utilities or reserves.	Support	HNZPT supports the following assessment criteria:  <i>(d) Effects on any scheduled site or feature, archaeological site, water body or area of indigenous vegetation; "</i>  This assessment criteria, related to the subdivision rules for the creation of new lots, gives effect to the policies of the draft plan related to the protection and retention of historic heritage and historic heritage values.	That the assessment criteria ( d ) are retained.
SUB-R7-Benefit lots in the General Zone	Support	HNZPT supports the matters of discretion for R7-19 for benefit lots in so far as they assess the effects on; <i>( c ) Effects on any scheduled site or feature, archaeological site, water body or area of indigenous vegetation;</i>	That SUB-R7-matters of discretion; <i>( c ) Effects on any scheduled site or feature, archaeological site, water body or area of indigenous vegetation;</i>



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Matters of assessment		as this will assist the plan to provide for RMA- s6(e) " <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)</i> " the <i>protection of historic heritage from inappropriate subdivision, use and development</i> ".	is retained.
SUB-R11 Subdivision of land containing a scheduled site or feature or located in a hazard area or coastal hazards area.	Supports	HNZPT supports the discretionary activity status of the activity SUB-R11; Subdivision of land containing a scheduled site or feature or located in a hazard area or coastal hazards area, in so far as it related to historic heritage as this will assist the plan to give effect to RMA- s6(e) " <i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)</i> " the <i>protection of historic heritage from inappropriate subdivision, use and development</i> ".	That SUB-R11 is retained.
SUB-R25. Location of benefit lots in the general rural zone	Support	HNZPT supports SUB-R25, relating to the location of benefit lots in the general rural zone, and that they must not be located on a site which contains a scheduled item. This will ensure the retention and preservation of Historic heritage, cultural and archaeological values.	That SUB-R25 is retained.
For SUB-R1.1 to R1.20, Subdivision to create allotments	Support	HNZPT supports the following assessment criteria;  <i>(c) Effects on any scheduled site or feature, archaeological site, water body or area of indigenous vegetation; "</i>	That the assessment criteria ( c ) are retained.

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in all zones-the matters over which discretion is restricted:		This assessment criteria, related to the subdivision rules for the creation of new lots, gives effect to the policies of the draft plan related to the protection and retention of historic heritage and historic heritage values.	
<b>Part 2-General District Wide Matters. 32 Coastal Environment</b>			
CE-P5	Support	HNZPT supports CE-P5; <i>“Controlling activities in the coastal environment which would result in outcomes such as:</i> <ol style="list-style-type: none"> <li>1. An increased threat from animal and plant pests; and/or</li> <li>2. An increase in noise, visual and physical disturbance adversely affecting indigenous species; and/or</li> <li>3. Adverse effects on the cultural values and spiritual relationships of mana whenua.”</li> </ol> As this policy assists the plan provide for s6(e) <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)“ the protection of historic heritage from inappropriate subdivision, use and development.”</i>	That CE-P5 is retained
CE-P8	Support	HNZPT supports CE-P8; <i>“Provide flexibility when considering the development of land returned under Te Tiriti o Waitangi settlements and multiple owned Māori land located in areas of outstanding, high and very high natural character by:</i>	That CE-P8 is retained

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		<p>1. Evaluating the extent to which the development enables the relationship of mana whenua with their ancestral lands and the exercise of kaitiakitanga; and</p> <p>2. Evaluating the extent to which positive economic, social and cultural benefits are achieved for mana whenua now and into the future; and</p> <p>3. Taking into account the requirement to avoid adverse effects on the values and character of areas of outstanding, high and very high natural character.</p> <p>As this policy assists the plan provide for s6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)" the protection of historic heritage from inappropriate subdivision, use and development."</p>	
CE-P9	Support	<p>HNZPT supports Policy CE-P9;</p> <p><i>"Provide for the appropriate use of natural resources, including land and water, within areas of outstanding, high and very high natural character by: 1. Providing for Māori cultural and customary uses of natural resources; and</i></p> <p><i>2. Allowing for limited vegetation removal for the purposes of conservation activities; and</i></p> <p><i>3. Allowing for limited vegetation removal for scientific purposes; and</i></p> <p><i>4. Allowing for limited earthworks and vegetation removal for the purposes of track maintenance and establishment of fence lines".</i></p> <p>As this policy assists the plan provide for s6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu</p>	That Policy CE-P9

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		<i>and other taonga, and 6 (f) the protection of historic heritage from inappropriate subdivision, use and development."</i>	
<b>Part 2-General District Wide Matters. 33 Earthworks</b>			
General District Wide Matters, 33.Earthworks, EW-01.	Support	<p>HNZPT supports Objective;  <i>"EW-01. Earthworks are undertaken in a safe and efficient manner that minimises adverse effects on people, property and the environment"</i>  <i>s6(e) "the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f) the protection of historic heritage from inappropriate subdivision, use and development"</i>.</p> <p>As this policy acknowledges the importance of undertaking earthworks in a manner that minimises the effects of earthworks and this will include on historic heritage Places and sites.</p>	That objective EW-01 is retained
General District Wide Matters, 33.Earthworks, EW-P3	Support	<p>HNZPT supports policy;  <i>"EW-P3. Manage the adverse effects of earthworks through appropriate development design, mitigation measures and rehabilitation."</i></p>	That policy EW-P3 is retained
General District Wide Matters, 33.Earthworks, EW-R2 Permitted activity	Support	<p>HNZPT supports the permitted activity at EW-R2;  <i>Earthworks for internments in a burial ground, cemetery or urupa (within the burial plot for that interment)</i></p> <p>As this enables this important activity to occur as of right.</p>	That the permitted activity, EW-R6, <i>"Earthworks for internments in a burial ground, cemetery or urupa (within the burial plot for that interment)"</i> is retained.

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Volume of earthworks EW-R6	Support	<p>HNZPT supports the assessment criteria (J) for earthworks beyond the permitted levels;</p> <p>Effects on sites and areas of significance to Māori and sites of historic heritage where the earthworks are adjoining, or on the same holding as these sites”</p> <p>RMA- s6(e) <i>”the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga, and 6 (f)” the protection of historic heritage from inappropriate subdivision, use and development”.</i></p>	<p>That assessment criteria (f)</p> <p>Effects on sites and areas of significance to Māori and sites of historic heritage where the earthworks are adjoining, or on the same holding as these sites, is retained.</p>
<b>Part 3-Area Specific Matters</b>			
41. Residential Zone--Railway Cottage Cluster Precinct-PREC1	Support in part	<p>HNZPT supports in part the “Railway Cottage Cluster Precinct-PREC1”, in so far as this precinct recognises in part an important cluster of Railway Cottages at the northern entrance to Te Kuiti.</p> <p>HNZPT considers that there would be benefit in an improved recognition process for the entire group of railway cottages in this location and considers that they should be scheduled as a historic heritage cluster for their important historic, cultural, and architectural values. HNZPT considers that these values are strengthened by their recognition as a grouping.</p> <p>HNZPT also considers that there would be benefit in enlarging the extent of the number of cottages recognised in the group as some of the cottages in the area have not been included. This may have been because some of the cottages have modifications, however HNZPT considers that even though changes may have</p>	<p>That the Railway Cottage Cluster Precinct-PREC1 is extended and amended to:</p> <p>the Railway Cottage historic area, and included into the SCHED1-Heritage Building and Structure, and</p> <p>the extent of the area is to be 37-55 Te Kumi Road and 38-68 Te Kumi Road.</p>

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		<p>been to some of the cottages that are not that sympathetic, inclusion within a historic area could mean that potential changes in the future would encourage reversing the unsympathetic changes in favour of more sensitive, in-keeping changes.</p> <p>HNZPT acknowledges that there are some places in this geographical area that are not railway cottages, however the historic area could cover the entire extent of where these cottages are located with the cottages identified and therefore the other places are (by implication) excluded from the historic area rules.</p> <p>HNZPT seeks that PREC1 is amended to an extended historic area to better recognise and preserve this important cluster of railway cottages.</p>	
54. Te Maika Precinct-PREC7	Support in part	<p>HNZPT supports in part only the recognition of the "Te Maika Precinct." This precinct is located within an area containing a significant number of archaeological sites, yet at the same time allows a wide range of development, some of it permitted, for example ancillary buildings up to 30m<sup>2</sup> GFA. While HNZPT acknowledges that for larger development, the rules (Prec7-R23-Site requirements 4(a) require;</p> <p><i>"Qualified archaeologist has provided written confirmation that the allotment does not contain an archaeological site or appropriate permission has been obtained from Heritage New Zealand";</i></p>	That the impact of proposed development levels on the overall archaeological values/landscape of the Te Maika precinct are reviewed to ensure impacts are reduced to a minimum. This may be assisted by a master planning or similar exercise.

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		<p>HNZPT is concerned regarding the potential overall impacts on this archaeological landscape from increased overall development and also the levels of development that do not require the above archaeological signoff as they are permitted activities and how these could impact on the archaeological landscape.</p> <p>HNZPT considers that there may be benefit in master planning in this location to limit the adverse effects.</p>	
<b>Schedules</b>			
239 Rora Street, Te Kuiti, Historic Railway Cottage (former)	Support	<p>HNZPT supports the proposed inclusion of this railway building, once part of the cluster of railway buildings at the northern end of Te Kuiti, that has been relocated within Te Kuiti to 239 Rora Street and is currently used as a Railway Cottage Museum.</p> <p>This type of cottage, built for staff of the railways, at a time of a short supply in housing stock, have been well documented for their significant historical, architectural social and educational values.</p> <p>HNZPT supports the inclusion into the SCHED1 of this well-preserved railway cottage as part of the significant history associated with the railway cottages in Te Kuiti.</p>	That the Historic Railway Cottage, at 239 Rora Street (HH13), is retained within SCHED1-Heritage Buildings and subject to the protective rule framework.

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Delete PREC1 and replace with Proposed New Items Railway Cottage Historic Area within Sched 1 Building and structures.	Support	<p>The cluster of railway cottages (Larger in number and area than that identified in PREC1) at the northern end of Te Kuiti presents a cohesive collection of this building type/s. While predominantly residential, some of the cottages have been adaptively reused as businesses. These cottages, built for staff of the railways by their employers, at a time of a short supply in housing stock, have been well documented for significant historical, architectural, social and educational values.</p> <p>HNZPT notes that the proposed plan does not appear to contain any additional cottages over that notified in the draft plan. However, HNZPT continues to consider that there would still be benefit in this extended collection recognised in the Plan having those values reinforced through being recognised as an historic area and the buildings placed as a group on SCHED1.</p>	That PREC1 is replaced with an historic heritage area and included into the SCHED1-Heritage Buildings and subject to the protective rule framework.
SCHED 1 Heritage Building and structures- HNZPT listed items	Support	<p>As part of the development of a proposed Plan, HNZPT always seeks that all HNZPT listed items are included in the heritage schedules of district plans to afford them the greatest level of protection possible.</p> <p>HNZPT is pleased that all the HNZPT listed built heritage items have been included into SCHED 1Heritage building and Structures, including the most recent listing, HH14-St Barnabas Church and Gates-HNZPT listing 9708.</p>	<p>HNZPT seeks that the HNZPT Listed items outlined below are retained within SCHED 1;</p> <p>HH01-Waiteti Viaduct-HNZPT listing 4175            HH02-Te Kuiti Railway Station-HNZPT listing 4450            HH04-Te Kuiti Airport Aero Club-HNZPT listing 4444            HH05-Te Kuiti Courthouse-HNZPT listing 4454            HH06-Zobel's Building-HNZPT listing 4449            HH08-Grand Central Lodge-HNZPT listing 4446            HH09-Te Kuiti Infant School-HNZPT listing 4443</p>



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### Submission of Heritage New Zealand Pouhere Taonga to the Waitomo District Council Proposed District Plan

(Strike: ~~ABC~~ =delete and underline: ABC = addition) WDC= Waitomo District Council

Draft Proposed Plan: Part & provision number	Support or Oppose	Reasons for submission	Relief sought
		<p>Their inclusion into to the proposed plan schedules will provide for their sustainable management and ongoing protection and their contribution to the historic heritage of the Waitomo District.</p>	<p>HH10-Gardiner’s Building-HNZPT listing 4452            HH11-Lorigans Building-HNZPT listing 4451            HH14-St Barnabas Church and Gates-HNZPT listing 9708            HH19-Waitomo Caves Hotel-HNZPT listing 4176            HH21-Boarding House-HNZPT listing 4267</p> <p>With the exception of the matters raised below under Extents.</p>
<p>SCHED 1 Heritage Building and structures- Scheduled Extents-HH05</p>	<p>Oppose in part</p>	<p>HNZPT opposes the scheduled extent of item HH05-Te Kuiti Courthouse, in so far as it is a reduced from the legal descriptions of the HNZPT listed place known “Courthouse”-listing # 4446.</p> <p>The HNZPT listing notes the importance of associated land, such as that identified by the legal descriptions referred to in the NZ Heritage List, as generally contributing to the values of a historic place, for example through historical association, use, landscape design and/or other physical features such as structures, plantings, or in-ground archaeological material, in addition to any factors linked with visual setting.</p> <p>HNZPT considers that the extent of the scheduled item should be amended to better reflect the HNZPT listing.</p>	<p>That the scheduled extent of item HH05- Te Kuiti Courthouse), is amended to reflect the HNZPT listing #4454 of the place known as “Courthouse.”</p>

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SCHED 1 Heritage Building and structures- Scheduled Extents-HH08	Oppose in part	<p>HNZPT opposes the scheduled extent of item HH08-Grand Central Lodge (Formerly known as the Hotel Grand Central), in so far as it is a reduced from the legal descriptions of the HNZPT listed place known as Grand Central Hotel (former)-listing # 4446.</p> <p>The HNZPT listing notes the importance of associated land, such as that identified by the legal descriptions referred to in the NZ Heritage List, as generally contributing to the values of a historic place, for example through historical association, use, landscape design and/or other physical features such as structures, plantings, or in-ground archaeological material, in addition to any factors linked with visual setting.</p> <p>HNZPT considers that the extent of the scheduled item should be amended to better reflect the HNZPT listing.</p>	That the scheduled extent of item HH08- Grand Central Lodge (Formerly known as the Hotel Grand Central), is amended to reflect the HNZPT listing #4446 of the place known as “Grand Central Hotel (former)”.
SCHED 1 Heritage Building and structures- Scheduled Extents- HH19	Oppose in part	<p>HNZPT opposes the scheduled extent of item HH18- Waitomo Caves Hotel, in so far as it is a reduced from the legal descriptions of the HNZPT listed place known as Waitomo Caves Hotel- listing # 4176.</p> <p>The HNZPT listing notes the importance of associated land – such as that identified by the legal descriptions referred to in the NZ Heritage List - as generally contributing to the values of a historic place, for example through historical association, use, landscape design and/or other physical features such as structures, plantings, or in-ground archaeological material, in addition to any factors linked with visual setting.</p>	That the scheduled extent of item HH19- Waitomo Caves Hotel, is amended to reflect the HNZPT listing #4176 of the place known as “Waitomo Caves Hotel.”

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		HNZPT considers that the extent of the scheduled item should be amended to better reflect the HNZPT listing.	
SCHED 1 Heritage Building and structures- Scheduled Extents- HH06/HH10/ HH11	Support	<p>HNZPT supports the recognition in SCHED 1 Heritage Building and structures, of the scheduled extents of the following items;</p> <p>HH06-Zobel's Building-built over an adjacent boundary            HH10-Gardiners Building (Former) built over into the road boundary            HH11-Lorigans Building (Former) built over into the road boundary.</p> <p>While these are bigger than those places recognised in the equivalent (HNZPT listings:</p> <p>Zobel's Building-HNZPT listing 4449            Gardiners Building (Former)-HNZPT listing 4452            Lorigans Building (Former)- HNZPT listing 4451</p> <p>HNZPT is supportive that the scheduled extent includes the entire footprint of the heritage building, as this will assist to ensure the retention of its heritage values.</p>	That the scheduled extents for items HH06/HH10/HH11 are retained.
SCHED 1 Heritage Building and structures Scheduled only	Support	HNZPT appreciates and supports the work that Waitomo District council have undertaken to include additional items into SCHED 1 Heritage Building and structures.	That the following items are retained within the schedule: HH03 & HH03A-Te Kuiti Cenotaph and War Memorial Arch HH07-Zobels Residence HH12-Not Known-building

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		<p>Their inclusion into to the proposed Plan schedules will provide for their sustainable management and ongoing protection and maintain their contribution to the historic heritage of the Waitomo District.</p>	<p>HH15-Aria Co-op Dairy Factory            HH16-Awakino War Memorial Archway, wall and community Hall façade            HH17-Awakino Post office and attached Post Masters House            HH18-Awakino Tunnel            HH20-Boarding house (Former)            HH22-Mokau Mine            HH23-Mokau Co-operative Dairy Factory            HH24-Piopio War Memorial Obelisk            HH25-Bill Glasgow’s Blacksmith Cottage            HH26-Bill Glasgow’s Blacksmith Shop            HH27-Bank of New Zealand            HH28-Piopio Co-op Dairy Factory Store (former)            HH29-St Mary’s Catholic Church            HH30-Benneydale Hall            HH31-Kopaki School and Grounds            HH32-Mapiu Store            HH33-Mapiu Hall            HH34-Mapiu War Memorial Gates            HH35-Waitanguru World War 1 Memorial            HH36-Whakatutumumu Mission Station</p>

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			HH37-Kinohaku Wall and Memorial Plaque HH38-Te Waitere Mission Station Monument.
SCHED2- Significance Archaeological sites	Support	<p>HNZPT supports in part the inventory of significant archaeological sites in SCHED2-Significance Archaeological sites in Schedule 2 and their associated protective rules framework.</p> <p>Site detail-general The sites selected do not appear to have been recently visited by an archaeologist. An archaeological inspection and condition assessment should be undertaken for these sites and the inventory forms and site records should be updated accordingly.</p> <p>Site detail- Motakiora Pa (S16/209) Features associated with the pa do appear to extend further west into the adjacent property (as per the description of the site).</p> <p>The full extent of Motakiora Pa (S16/209) should be included into the plan, not just the portion that is located within the reserve as shown on planning map 33. An archaeological survey should be undertaken by an archaeologist to map the extent of the site as part of this process to inform the extent of SAS05 shown in the Plan.</p>	<p>That the sites recognised within SCHED2-Significance Archaeological sites are retained subject to the following amendments:</p> <ul style="list-style-type: none"> <li>• Prior to final mapping for the Plan, an archaeological inspection and condition assessment, and should be undertaken for these sites and the inventory forms and site records updated accordingly.</li> <li>• Prior to final mapping for the plan, an archaeological survey should be undertaken by an archaeologist to map the extent of the site as part of this process to inform the extent of SAS05 shown in the Plan.</li> <li>• The inventory form should be updated to advise the specific archaeological features of the pa site and how the pa site is currently accessed/used by the public.</li> <li>• That consideration is given to the inclusion of the archaeological sites within the Te Kūiti Aerodrome and the Tainui domain, into the Plan schedule.</li> </ul>

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		The individual reserve schedules for Te Kūiti aerodrome and the Tainui Domain identify archaeological sites which are already within the Operative district plan. HNZPT is interested to know why these sites have not been included into the proposed plan and recommends that consideration is given to their review and if appropriate their inclusion into the Plan.	
SCHED3-Sites and Areas of Significance to Māori	Support	HNZPT supports the Sites and Areas of Significance to Māori, recognised in Schedule 3. This recognition and the associated protective rule framework will ensure that that the draft Plan enables <i>“the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i> and will assist to ensure their ongoing protection from <i>“inappropriate subdivision use and development”</i> , all of which are required by the RMA.	That the sites and areas recognised within SCHED3-Sites and Areas of Significance to Māori, are retained.
SCHED 4-Sites and Areas of Significance to Maori-Wahi Tapu And associated mapping	Support in part	As part of the development of a proposed Plan, HNZPT seeks that all HNZPT listed items are included in the heritage schedules of district plans to afford them the greatest level of protection possible.  HNZPT supports, in part only, how the HNZPT wahi tapu have been included into schedule 4 of the draft plan. HNZPT is very concerned that not all the HNZPT wahi tapu are correctly included into the schedule and therefore will not be mapped correctly and subject to the associated rule framework. This will not enable <i>“the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga”</i>	That the current recognition in SCHED 4 of the HNZPT Wahi Tapu within the Waitomo District Council area is amended to fully recognise the extent, as listed with HNZPT, of all the following HNZPT listings to enable these sites to be correctly mapped and subject to the protective rule framework:  Pehitawa-HNZPT Listing # 7332, Uekaha-HNZPT Listing #6713, Pa-HNZPT Listing # 6113,

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		<p>and will not ensure the sites ongoing protection from “<i>inappropriate subdivision use and development</i>”, all of which are required by the RMA.</p> <p>Of particular concern is the insufficient recognition of Pehitawa (HNZPT listing # 7332). HNZPT acknowledges the ongoing discussions related to this issue, the increased extent of Pehitawa from the draft plan version and looks forward to continuing dialogue around this important matter.</p> <p>HNZPT considers that it is important to recognise in any listing or scheduling in particular with sites and areas of significance to Māori, that often these sites are not discreet isolated places but a collection of places and also the spaces between the places that all capture the ancestral footprint. All of these sites/places have been listed by Heritage New Zealand as worthy of protection having been nominated by Mana Whenua and approved by the Māori Heritage Council.</p> <p>HNZPT also seeks the inclusion of Kākāmorua, Hangatiki ( proposed List no. 9859), currently notified and before consideration by the HNZPT Māori Heritage Council. Currently recognised in the proposed plan in Sched 3-Sites and Areas of Significance (SSM099-A), HNZPT would welcome the additional recognition of the site in Sched 4 as a HNZPT Wahi Tapu when the proposal is approved. HNZPT is hopeful this would be well before the Council hearing process.</p>	<p>Ruakuri-HNZPT Listing # 6721, Te Anaureure-HNZPT Listing 6722, Ngakuraho-HNZPT listing # 9788, Te Pua o Te Ata-HNZPT Listing # 7606, Pukeroa-HNZPT Listing # 9822, and Proposed Listing; Kākāmorua, Hangatiki (proposed List no. 9859)</p>

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SCHED5 Sites and Areas of Significance to Māori-Cultural Alert Layer	Support	<p>HNZPT supports the Cultural Alert Layer, recognised in Schedule 5.</p> <p>This recognition and the associated protective rule framework, in the event that a resource consent is triggered, will ensure that that the draft Plan enables “<i>the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu and other taonga</i>” and will assist to ensure their ongoing protection from “<i>inappropriate subdivision use and development</i>”, all of which are required by the RMA.</p>	That the Sites and Areas of Significance to Māori-Cultural Alert Layer recognised in Schedule 5 are retained.
<b>Appendices</b>			
Appendix 3 ICOMOS Charter NZ	Support	HNZPT support the inclusion of the ICOMOS charter into the draft Plan. Consideration of the ICOMOS Charter will assist to ensure that proposals are assessed and protected from inappropriate subdivision use and development.	That Appendix 3, the ICOMOS Charter is retained in the draft Plan.



