



HERITAGE NEW ZEALAND
POUHERE TAONGA

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

File ref: 33002-082

7 April 2025

Planning Team
Hutt City Council
Private Bag 31912
Lower Hutt 5040

Email: district.plan@huttcity.govt.nz

Dear Sir or Madam


SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED DISTRICT PLAN

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

- 1. This is a submission on the Proposed District Plan for Hutt City.**
- 2. Heritage New Zealand Pouhere Taonga could not gain an advantage in trade competition through this submission.**
- 3. The specific provisions of the proposed plan that the HNZPT submission relates to are detailed in the attached table (Attachment 1).**
- 4. The reasons for the HNZPT submission are detailed in Attachment 1.**
- 5. HNZPT seeks the decisions as described in the table in Attachment 1.**
- 6. HNZPT wishes to be heard in support of its submission.**

- 7. If others make a similar submission, HNZPT will consider presenting a joint case with them at a hearing.**

Yours sincerely



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

Attachment:

1. Heritage New Zealand Pouhere Taonga Submission Table on Hutt City Proposed District Plan.

Address for service

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Attachment 1 Submission of Heritage New Zealand Pouhere Taonga on Hutt City Proposed District Plan <u>Underline</u> = include and Strikethrough = delete				
Point	Proposed Plan Provision	Support/ Oppose	Reason for Submission	Relief sought by HNZPT
Part 1 - Definitions				
Definitions	Contributing building	Support	HNZPT supports the definition of contributing building.	Retain definition.
	Heritage building	Support	HNZPT supports the definition of heritage building.	Retain definition.
	Heritage structure	Support	HNZPT supports the definition of heritage structure.	Retain definition.
	Historic heritage	Support	HNZPT supports the definition of historic heritage which has the same meaning as section 2 of the RMA.	Retain definition.
	Archaeological site	Support	HNZPT supports the definition of archaeological site which has the same meaning as HNZPT Act 2014.	Retain definition.
	Alteration	Support	HNZPT supports the definition of alteration.	Retain definition.

	New definition: Maintenance	Oppose	The word <i>maintenance</i> has a common, widely understood meaning, but also a more specific meaning in relation to heritage policies and rules. A definition would be useful.	New definition: <u>Maintenance (of a heritage building or item): means regular and ongoing protective care of a place to prevent deterioration and to retain its values. Maintenance excludes alterations and additions.</u>
	New definition: Demolition and Partial Demolition	Oppose	<p>The heritage chapter includes policies and rules on demolition and partial demolition. It would be beneficial to include a definition of both these terms.</p> <p>Defining these terms would also have implications to other plan chapters, in particular rules in the commercial and mixed use zones.</p>	<p>Insert new definition:</p> <p><u>Total Demolition:</u> <u>means to completely destroy or demolish.</u></p> <p><u>Partial Demolition:</u> <u>alterations to demolish, destroy or remove part of any building or structure.</u></p> <p>Consequential amendments as required to provisions for demolition and partial demolition.</p>

	New definition: Repair	Oppose	The word repair has a common, widely understood meaning, but also a more specific meaning in relation to heritage policies and rules. A definition would be useful.	New definition: <u>Repair (of a heritage building or item): means to make good decayed or damaged fabric using identical, closely similar, or otherwise appropriate material.</u>
Part 1 – Tangata Whenua				
	General – whole chapter	Support	HNZPT supports the chapter on Tangata Whenua, including the recognition of Hapū and Iwi of mana whenua in Lower Hutt. HNZPT acknowledges the proposed district plan is being completed following iwi consultation. HNZPT recommends full and complete consultation with mana whenua, in all aspects regarding whenua, awa, and Te Moana, as well as the identification of Wāhi Tapu/ Wāhi Taonga.	Retain chapter, subject to any amendments requested by mana whenua during iwi consultation.
Part 2 – Strategic Direction				
	UDSD-O2	Support	HNZPT supports this objective, in particular clause (h) which recognises the city's historic heritage.	Retain objective.
	UDSD-O8	Support	HNZPT supports this objective that seeks to maintain and enhance a city-wide network of open spaces valued for, among other things, cultural and heritage values.	Retain objective.

Part 2 – REG – Renewable Electricity Generation				
	REG-P2	Support	HNZPT supports this policy for consideration of the adverse effects of renewable electricity generation activities, in particular clause 9, consideration of values of specified overlays.	Retain policy.
	REG-P4	Support	HNZPT supports this policy, which provides for community-scale and commercial-scale renewable electricity activities whilst recognising that there may be potential adverse effects on historic heritage, among other matters.	Retain policy.
	REG-P10	Support	HNZPT supports this policy to provide for new or upgraded renewable electricity generation activities in sites and areas of significance to Māori, and heritage areas and sites containing heritage buildings or heritage structures.	Retain policy.
	REG-R2 and REG-R3	Support	HNZPT supports the permitted activity status of these activities, noting that the rules from other chapters also apply to these activities and will consider adverse effects on historic heritage values where appropriate.	Retain provisions.
	REG-R4	Support	HNZPT supports a restricted discretionary activity for REG-R4-3(i) and (ii).	Retain rule.
	REG-R6	Support	HNZPT supports a restricted discretionary activity for REG-R6-3(i) and (ii).	Retain rule.

	REG-R7	Support	HNZPT supports a restricted discretionary activity for REG-R7-b(v) and (vi).	Retain rule.
Part 2 – INF – Infrastructure				
	INF-P5	Support	HNZPT supports this policy to avoid, remedy or mitigate adverse effects of infrastructure. HNZPT particularly supports the effects on identified features and values within any specified overlay.	Retain policy.
	INF-P6	Support	HNZPT supports this policy for consideration of the adverse effects of infrastructure. HNZPT supports consideration of the adverse effects of infrastructure located in a specified overlay.	Retain policy.
	INF-P13	Support	HNZPT supports this policy, which provides for new or upgraded infrastructure in SASM and heritage sites, where significant adverse effects on the values of these places are avoided, remedied, or mitigated.	Retain policy.
	INF-Rules	Support	HNZPT supports the suite of rules which recognise the presence of historic heritage, and the inclusion of a different activity status for infrastructure activities within heritage areas and on sites containing scheduled heritage.	Retain INF rules.
	INF – Assessment matters for Restricted Discretionary Activities	Support	HNZPT supports these assessment matters for restricted discretionary activities. HNZPT particularly supports assessment matter number 10.	Retain assessment matters.

Part 2 - Historic Heritage				
	Historic Heritage Introduction – Responsibilities of Heritage New Zealand Pouhere Taonga	Support	<p>HNZPT supports the section under Responsibilities of Heritage New Zealand Pouhere Taonga, particularly the reference to archaeological sites and archaeological authority process in relation to HNZPT Act 2014.</p> <p>HNZPT also supports the section on New Zealand Heritage List/Rārangi Kōrero noting the reference link to HNZPT website and the inclusion of the requirements under Section 74 of the RMA.</p>	Retain introduction.
	HH-P1	Support	<p>HNZPT supports the identification of significant historic heritage.</p> <p>The criteria are brief but are based on the more detailed provisions of Policy 21 of the Regional Policy Statement. It may be helpful to refer to this connection, as has been done in the Porirua PDP and Wellington PDP.</p>	<p>Retain policy, and add the following note: <u>Advice Note: The values listed in HH-P1 are derived from the criteria set out in Policy 21 of the Wellington Regional Council's Regional Policy Statement for the Wellington Region.</u></p>
	HH-P2	Support	HNZPT supports the policy relating to the identification of historic areas and contributing buildings.	Retain policy.
	HH-P3	Support	HNZPT supports the policy to enable repair and maintenance to historic heritage buildings and structures.	Retain policy.

	HH-P4	Support	HNZPT supports the policy for continued use and adaptive reuse of historic heritage buildings.	Retain policy.
	HH-P5	Support (partial)	HNZPT supports the policy for healthy and energy efficient heritage buildings. For clarity, there should be reference to provision of healthy and energy efficient heritage building whether listed in Schedule 1 or 2.	Retain policy and add the following Provide for alterations to heritage buildings <u>and buildings in heritage areas</u> that improve their energy efficiency or the health of the interior environment, where significant historic heritage values are protected.
	HH-P6	Support	HNZPT supports the policy for seismic strengthening, fire safety and accessibility.	Retain policy.
	HH-P7	Support	HNZPT supports Policy HH-P7 particularly in respect of continued use or adaptive reuse, which contributes positively to historic heritage values of a place.	Retain policy.
	HH-P8 and HH-P9	Support	HNZPT supports policy HH-P8 in respect of relocation of heritage buildings and other structures within the site extent; With some additional considerations provided for in HH-P9 where the proposed relocation is outside the site extent.	Retain policies.

	HH-P10	Support	HNZPT supports the policy relating to new buildings and heritage structures on the site of a historic heritage building or heritage structures.	Retain policy.
	HH-P11	Support (partial)	HNZPT supports the policy relating to demolition of buildings and structures. HNZPT supports Clause (b) that it is demonstrated that there are no reasonable alternatives to demolition.	Retain HH-P11
	HH-P12	Oppose (partial)	<p>Contributing buildings within heritage areas have been assessed as buildings which contribute to the significant historic heritage values of the area.</p> <p>Demolition of these buildings should be discouraged except in special circumstances.</p> <p>For the avoidance of doubt, the word 'and' should be added at the end of clause b(i) so that the development of new buildings cannot be viewed as sufficient grounds for demolition of a contributing building.</p>	<p>Amend HH-P12:</p> <p>Only allow the total demolition of contributing buildings or structures in heritage areas where:</p> <p>a. Total demolition:</p> <ul style="list-style-type: none"> i. Is for the purpose of developing new buildings and structures on the site that contribute to the continued use of the site, <u>and</u> ii. Avoids significant adverse effects ...

	HH-P13	Support	HNZPT supports this policy regarding non-contributing buildings in heritage areas.	Retain policy.
	HH-P14	Support	HNZPT supports the policy to provide for new buildings and structures in heritage areas.	Retain policy.
	HH-R1	Support	HNZPT supports permitted activity for maintenance and repair to heritage buildings in heritage areas.	Retain rule.
	HH-R2	Support	HNZPT supports permitted activity for alterations and additions to heritage buildings and structures in heritage areas that are scheduled.	Retain rule.
	HH-R3	Support	HNZPT supports a restricted discretionary activity for partial demolition of heritage buildings, where compliance is not achieved with Rule HH-R3.1.	Retain rule.
	HH-R4	Support	HNZPT supports this rule for the relocation of buildings.	Retain rule.
	HH-R5	Support	HNZPT supports the permitted activity status for demolition of non-contributing building, and a non-complying activity status for demolition of heritage building or heritage structure.	Retain rule.
	HH-R6 and HH-R7	Support	HNZPT supports these rules for new buildings and structures on identified heritage sites and heritage areas.	Retain rule.

	HH-S1	Support	HNZPT supports these standards for building height and setback within heritage areas.	Retain standards.
	HH-S2	Support	HNZPT supports HH-S2 for height in relation to boundary in heritage areas.	Retain standard.
	HH-S3	Support	HNZPT supports HH-S3 in relation to setbacks in heritage areas.	Retain standard.
Part 2 – Sites and Areas of Significance to Māori				
	SASM-O1 to SASM-O4	Support	HNZPT is supportive of these objectives and promotes active participation of mana whenua in decision making.	Retain SASM-O1 to SASM-O4 subject to mana whenua feedback.
	SASM-P1 to SASM-P9	Support	HNZPT is supportive of these policies in relation to Sites and Areas of Significance to Māori.	Retain SASM-P1 to SASM-P9 subject to mana whenua feedback.
	SASM-R1 to SASM-R5	Support	HNZPT is supportive of these rules in relation to Sites and Areas of Significance to Māori.	Retain SASM-R1 to SASM-R5 subject to mana whenua feedback.

	SASM-S1	Support (partial)	HNZPT is supportive of the Accidental Discovery Protocol in SASM-S1, however, some amendments are suggested to better reflect the archaeological authority application process.	<p>Amend SASM-S1 as follows:</p> <p>Where kōiwi or other artefacts are unearthed during works, those undertaking the works must:</p> <p>Immediately cease works,</p> <p>Inform the relevant iwi authority,</p> <p>In the case of kōiwi, inform the New Zealand Police, and</p> <p>Inform Heritage New Zealand Pouhere Taonga, apply for an appropriate archaeological authority, and once granted commence works in compliance with the archaeological authority</p> <p><u>Obtain an assessment by a qualified archaeologist to determine whether an archaeological authority under Heritage New Zealand Pouhere Taonga Act 2014 is required.</u></p>
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Part 2 – Subdivision				
	SUB-O2	Support	HNZPT supports this objective, in particular clause 4, which provides for and protects identified values.	Retain objective.
	SUB-P15	Support	HNZPT supports this policy relating to subdivision of land containing a site or area of significance to Māori.	Retain policy.
	SUB-P16	Support	HNZPT supports this policy relating to subdivision of land containing heritage buildings and structures.	Retain policy.
	SUB-P17	Support	HNZPT supports this policy relating to subdivision of land within heritage areas.	Retain policy.
	SUB-R6	Support	HNZPT supports this rule for to subdivision of land containing a site or area of significance to Māori.	Retain rule.
	SUB-R7	Support	HNZPT supports this rule relating to subdivision of land containing heritage buildings and heritage areas.	Retain rule.
Part 2 - Earthworks				
	Earthworks introduction – other relevant legislation and planning documents	Support	HNZPT supports the sentence referring to the potential need for an archaeological authority.	Retain clause.

	EW-O1	Support	HNZPT supports EW-O1, particularly point 4 to minimise adverse effects on cultural and historic heritage values.	Retain objective.
	EW-P9	Support	HNZPT support this policy which recognises the potential effects of earthworks on heritage values.	Retain policy.
	EW-P10	Support	HNZPT support this policy which recognises the potential effects of earthworks on sites and Areas of Significance to Māori.	Retain policy subject to any feedback from mana whenua.
	EW-R9	Support	HNZPT supports this rule addressing earthworks on the site of heritage items and within heritage areas.	Retain rule.
	EW-R10	Support	HNZPT support this rule addressing earthworks on Sites and Areas of Significance to Māori.	Retain rule subject to any feedback from mana whenua.
	EW-S8 and EW-S9	Support	HNZPT supports the presence of standards for earthworks on the site of heritage buildings and sites and areas of significance to Māori.	Retain standards EW-S8 and EW-S9.
Part 2 – SIGNS				
	SIGN-P5	Support	HNZPT supports the policy for signs on heritage buildings or heritage structures or in heritage areas.	Retain policy.
	SIGN-R4	Support	HNZPT supports this rule controlling signs on heritage buildings and within heritage areas.	Retain rule.
Part 3 – City Centre Zone				

	CCZ-PREC2	Support	HNZPT recognises that the CCZ chapter acknowledges the historic character of the civic area and includes a cross-reference to the historic heritage chapter.	Retain provision.
Part 3 – Metropolitan Centre Zone				
	General MCZ Introduction	Support	<p>A significant portion of the MCZ corresponds with the Jackson Street Heritage Area.</p> <p>The introduction to the MCZ chapter appropriately refers to the heritage values of Jackson Street.</p>	Retain introduction.
	MCZ-PREC1	Support	HNZPT supports the Transition Precinct at either end of the Jackson Street Heritage Precinct, as development immediately abutting the heritage precinct has the potential to adversely impact on heritage values.	Retain provision.
	MCZ-PREC1-O1	Support	HNZPT supports this objective to provide for development which recognises the heritage values of the Jackson Street Heritage Precinct and the industrial heritage of western Pito One.	Retain objective.
	MCZ-PREC1-P1	Support	HNZPT supports this policy for character values of Jackson Street Character Transition Precinct.	Retain policy.

	MCZ-P8 and MCZ-P9	Support	<p>HNZPT supports the urban design outcomes particularly to manage the form and scale of development near the Jackson Street Heritage Area to protect the significant historic heritage values of that area.</p> <p>The policy includes the statement that Council will publish design guidance with examples of ways these outcomes can be achieved. While it is acknowledged that the guidance does not form part of the District Plan, it would be beneficial for stakeholders to have the opportunity to provide input into the design guides.</p>	<p>Retain policy.</p> <p>Provide opportunity for stakeholder input into development of design guides for Jackson Street.</p>
Part 4 – Schedule 1 – Heritage Buildings and Structures				
	Heritage Buildings and Structures	Support	HNZPT supports the overall content of this schedule and supports the cross-reference to the New Zealand Heritage List / Rārangī Kōrero numbers and category.	Retain content of the schedule.
	H007 - 43 Adelaide Street, Petone, List Number: 3592	Support (partial)	43 Adelaide Street, Petone, List Number: 3592 should be noted as a Category 2 place (not Category 1) in the New Zealand Heritage List / Rārangī Kōrero.	<p>Amend as follows:</p> <p>List Number: 3592</p> <p>Historic Place Category 1</p> <p><u>Historic Place Category 2</u></p>
	H050A - Vogel House 73-75 Woburn Road, Woburn	Support (partial)	The address and legal description for Vogel House was changed on 09 December 2024, when new titles were issued.	<p>Amend as follows:</p> <p>73-75 Woburn Road, Woburn</p> <p>Lot 1 DP 22396 <u>Lot 2 DP 600122</u></p>

	H050B - Vogel House Gatehouse 73-75 Woburn Road, Woburn	Support (partial)	The address and legal description for Vogel House Gatehouse was changed on 09 December 2024, when new titles were issued.	Amend as follows: 73-75 Woburn Road, Woburn Lot 1 DP 22396 <u>Lot 1 DP 600122</u>
	H143 - Morton Dam	Support (partial)	Morton Dam is listed in the New Zealand Heritage List / Rārangī Kōrero as Historic Place Category 2 with list number 1836.	Include the following: <u>List Number: 1836, Historic Place Category 2.</u>
	Old Belmont to Pauatahanui Road	Oppose	<p>The Old Belmont to Pauatahanui Road is scheduled in the Operative District Plan (Sites of Significance to European Culture in Chapter 14E, Items 25 and 26).</p> <p>This heritage place (New Zealand Heritage List number 7711, Category 2) is missing from the Proposed District Plan schedules.</p> <p>The Old Belmont to Pauatahanui Road (Belmont Coach Road) is included in the Porirua PDP (appeals version) in Schedule 4 (historic heritage sites), which are equivalent to the historic heritage areas in the Proposed Hutt City District Plan.</p>	Include Old Belmont to Pauatahanui Road in the appropriate schedule. It may fit best in the heritage area schedule.
Part 4 – Schedule 2 – Heritage Areas				

	Jackson Street Historic Area – extent and Contributing Buildings	Oppose	<p>HNZPT provided evidence for Plan Change 56 on Jackson Street Heritage Precinct. The Hutt City Proposed District Plan is not consistent with the recommendation of the hearing panel. HNZPT recommends amending the extent to add the properties 354, 358, 360, 362, and 364 Jackson Street, and include these (with the exception of #354) as contributing buildings to the Historic Area.</p> <p>The revised extent is illustrated below.</p> 	Amend the extent of Jackson Street Historic Area to include the properties 354, 358, 360, 362, and 364 Jackson Street, and include these (with the exception of #354) as contributing buildings to the Historic Area.
	HA06 - Matiu/Somes Island Heritage Area	Support	<p>HNZPT acknowledges the inclusion of Matiu/Somes Island entry in the Heritage Areas Schedule and the additional information on contributing buildings or structures.</p>	Retain information on Matiu/Somes Island in the schedule of Heritage Area and on the Proposed District Plan maps.

Part 4 - SCHED6 - Sites and Areas of Significance to Māori				
	SCHED6 areas and sites	Support	HNZPT supports the sites and areas included in SCHED6 subject to any feedback from mana whenua.	Retain schedule subject to any feedback from mana whenua.