

Manawatū District Plan
Proposed Plan Change H(a):
Historic Heritage – Wider Manawatū
District

Section 32 Report

September 2022

CONTENTS

PART I – DISTRICT PLAN REVIEW..... 1

1.0 Scope of Plan Change H(a): Historic Heritage 1

2.0 Proposed Amendments to The District Plan 2

Part II – ASSESSMENT REPORT..... 6

3.0 Introduction..... 6

4.0 Purpose of Proposed Plan Change H(a)..... 6

5.0 Operative District Plan Review 6

6.0 Statutory and Legislative Framework for the Review 6

6.1 Resource Management Act 1991 6

7.0 National Direction 10

7.1 National Policy Statements..... 10

7.2 National Environmental Standards..... 11

7.3 Heritage Orders 11

7.4 National Planning Standards 12

7.5 Heritage New Zealand Pouhere Taonga (HNZPT) Act 2014 13

7.6 Other National Guidance..... 15

7.7 Natural and Built Environment Act..... 15

8.0 Regional Direction 15

9.0 Iwi Management Plans 17

10.0 Local Direction 17

10.1 Long Term Plan 2021-2031..... 17

10.2 Community Facilities Strategy 17

10.3 Reserve Management Plans 18

11.0 Technical Advice and Input 20

11.1 Technical Advice 20

11.2 Category C Ranking..... 21

11.3 Recommendations from Technical Advice 22

11.4 Recommended Changes to the Schedule..... 22

12.0 Operative District Plan Framework..... 23

12.1 Chapter 4 Historic Heritage 23

12.2 Chapter 3D Earthworks..... 25

12.3 Chapter 3E Signs 25

12.4 Chapter Rule A: General 26

13.0 Plan Change Development 27

13.1 Chronology..... 27

13.2 Clause 3 Consultation – PCH(a) Historic Heritage 29

Part III: STATUTORY EVALUATION 32

14.0 Scale and Significance 32

15.0 Consideration of Options to Proposal 34

16.0 Evaluation of Objective 35

17.0 Section 32(1)(b) Evaluation of Provisions (Policies, Rules and Other Methods)..... 35

18.0 Conclusion 61

Appendices 62

Appendix 1 – Proposed Plan Change H(a) Historic Heritage – Wider Manawatū District 63

Appendix 2 – Schedule 4b: Significant Historic Built Heritage – Wider Manawatu District 64

Appendix 3 – Recommendations for Historic Heritage Schedule (Tables 1-3);	65
Assessment Criteria (Policy 1.1) for Historic Heritage (Table 4);.....	65
Letter from Mr Ian Bowman.....	65
Appendix 4 – Historic Heritage Reports	66

PART I – DISTRICT PLAN REVIEW

1.0 Scope of Plan Change H(a): Historic Heritage

Proposed Plan Change H(a): Historic Heritage (PCH(a)) is a review of the heritage items listed in Appendix 1E – Buildings and Objects with Heritage Value excluding Marae Buildings. The heritage items in Appendix 1E subject to PCH(a) are collated under the following headings:

- Commercial buildings – Other Townships
- Houses
- Rural Houses and Buildings
- Objects and Memorials
- Churches and Community buildings

As part of PCH(a) additional heritage items have been identified through the technical reports and are also recommended to be included in PCH(a).

Appendix 1E contains heritage items which are located outside of the Feilding Town Centre (FTC), with the exception of two items (one memorial and one object located in the FTC). The heritage buildings located within the FTC were reviewed as part of Plan Change 46: Feilding Town Centre in 2013/14 (with the exception of objects and memorials), and are not subject to PCH(a).

PCH(a) proposes some additions to the existing provisions in Chapter 4: Historic Heritage that only apply to those heritage items under review. PCH(a) does not review any of the heritage items that were reviewed as part of Plan Change 46. For clarity, the heritage items already listed in Schedule 4a of Chapter 4: Historic Heritage are not the subject of this plan change.

Appendix 1E also includes a list containing three Marae Buildings which are not part of PCH(a). These buildings will be reviewed as part of a future plan change in the District Plan Review alongside other tangata whenua matters.

PCH(a) follows the approach in the operative District Plan where there are two categories for protection:

- ‘A’ for nationally significant items, and
- ‘B’ for regionally and locally significant items.

This two-tier ranking approach was inserted by Plan Change 46 in 2014. The Category C ranking was removed at this time due to that system creating confusion for plan users where buildings were identified as having heritage significance but were not protected through the policies and rules in the District Plan. However the Category C items not subject to Plan Change 46 remained in Appendix 1E, and these items are now subject to PCH(a). Analysis of the two-tier ranking classification is not within the scope of PCH(a).

PCH(a) proposes the addition of a new *‘Schedule 4b – Significant Historic Built Heritage – Wider Manawatū District’* which contains:

- 72 heritage items to be rolled over from Appendix 1E
- 18 new historic heritage items to be added

As part of the review of Appendix 1E, 21 heritage items are proposed to be removed and not carried over to the new schedule.

The heritage reports which have been prepared and provisions in Chapter 4 address the management of ‘significant historic built heritage’. This is focused on the ‘building’, rather than the wider site or setting. The heritage reports which have been prepared for each building do not assess ‘settings’

associated with the heritage items and this issue has also not been consulted on as part of Clause 3 consultation. Amendments to the rules to reflect settings of heritage buildings are therefore outside the scope of this plan change.

In the timeframe of progressing PCH(a) through the notification and hearing process, it is likely that the chapter will be moved to a new format to properly align with the National Planning Standards. The existing District Plan is currently being reformatted into the new structure at the same time as the processing of this plan change.

2.0 Proposed Amendments to The District Plan

The following changes to the District Plan are proposed as part of PCH(a): Historic Heritage which is attached as **Appendix 1: Proposed Plan Change H(a) Historic Heritage – Wider Manawatū District**:

1. With the exception of Marae Buildings, delete the following items in *Appendix 1E – Buildings and Objects with Heritage Value*:
 - Other Townships
 - Houses
 - Rural Houses and Buildings
 - Objects and Memorials
 - Churches and Community Buildings
2. Insert a new schedule of historic heritage items into Chapter 4: Historic Heritage entitled: *Schedule 4b – Significant Historic Built Heritage – Wider Manawatū District*, (refer to **Appendix 2: Schedule 4b**) as per the recommendations in **Appendix 3: Recommendations For Historic Heritage Schedule**.
3. The following additions to Chapter 4: Historic Heritage:
 - a. Addition of new policies and associated rules for the following matters:
 1. External alterations to non-contributing parts of heritage buildings
 2. Relocation of heritage items
 - b. Addition of new rules for:
 1. Permitted: minor external alterations to heritage items in Historic Heritage Schedule 4b
 2. Permitted: signage in Historic Heritage Schedule 4b
 3. Permitted: external alterations to non-contributing parts of a heritage building
 4. Restricted discretionary: external additions and alterations
 5. Restricted discretionary: relocation on the same site for Category B items
 6. Restricted discretionary: where standards are not met
 7. Discretionary: for Category B where activity not provided for
 - c. Addition of the following new Standards:
 1. Signage on heritage items – clarity to refer to Rules 3E.4.1 and 3E.4.2
 2. External alterations to non-contributing parts of heritage buildings

- d. Addition of a Guidance Note for Standard 2 Demolition: regarding encouragement to take photographs of the heritage item subject to partial or complete demolition.
4. Amend the Planning Maps to insert symbols for proposed heritage items, and remove the existing symbols for historic heritage items that are not being recommended for protection (see **Appendix 3: Recommendations for Historic Heritage Schedule**).
5. Addition of two new definitions into Chapter 2: Definitions as follows:
 - a. **Attachment** means, in relation to heritage items listed in Schedule 4b, part or all of any structure, pipe, equipment or cable that is externally fixed to the building or item to perform a particular function and includes, but is not limited to:
 - Customer connections, relating to radio communication or telecommunication lines; wastewater or stormwater treatment or disposal; and/or water, gas or electricity
 - Fire alarm panels
 - Sprinkler inlets
 - Air conditioning units
 - Heat pumps
 - Solar panels and solar water heaters
 - Water heating systems.
 - b. **Non-contributing building:** For heritage items listed in Schedule 4b, non-contributing parts of a heritage building are those parts of a building which may have been added to the main heritage building at a later time than original construction of the main building and are not constructed in the same style, finishes or materials as the original building, and includes lean-to's.
6. Insert explanatory information about Historic Heritage Schedule 4b including the availability of an inventory of complete heritage reports to be available on request.
7. Remove references to Category C in the **Explanation** listed after Policy 2.5 and update Explanation.
8. Amendments to align Chapter 4 Historic Heritage with National Planning Standards, including the removal of Issues, renumbering and re-formatting.

Consequential amendments

While preparing PCH(a) and Plan Change H(b) Notable Trees (PCH(b)) it has been identified that the term 'Heritage Places' in Chapter 4 was not updated when *Schedule 4a Significant Historic Built Heritage – Feilding Town Centre* was added to the District Plan as part of Plan Change 46. Consequential changes are recommended in this plan change to correct cross referencing to Schedule 4a to assist plan users.

Amendments to the following clauses insert reference to Schedules 4a and 4b and are considered consequential amendments to the District Plan as they are a cross reference. These consequential amendments recognise the sectional review focus of the wider District Plan Review process.

Consequential amendments that are required to be made as part of PCH(a) are as follows:

Note: Text in grey highlight is subject to PCH(b), which is proposing consequential amendments to some of the same rules as PCH(a). Plan Change H(b) Notable Trees is being notified at the same time as PCH(a).

1. **Update of Chapter 4 terms:** Update information throughout Chapter 4 Historic Heritage, including replacement of ‘appendices’ with ‘schedules’; insert full name of Heritage New Zealand Pouhere Taonga (HNZPT); clarify which rules apply to Historic Heritage Schedule 4a;
2. **Chapter 3D – Earthworks:** Update reference in Policy 1.2: “To restrict earthworks within the area of items scheduled in Appendix 1A (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), ~~1D (Trees with Heritage Value)~~, 1E (Buildings and Objects with Heritage Value), 1F (Sites with Heritage Value), Historic Heritage Schedule 4b (Wider Manawatū District), and the Notable Trees Schedule.”
3. **In Chapter Rule A1 General**, make the following consequential changes to update name of schedule:

A1.3.2 Reservation of Control – Controlled Activity Subdivision Applications

- A) The matters in respect of which **Council** has reserved its control are:
- xii) Impact of subdivision upon future management of **natural areas, and heritage places, and items listed in Historic Heritage Schedules 4a, 4b and the Notable Trees Schedule.**

...

A1.2 Information Requirements For Resource Consent Applications and Designations

A1.2.2 Land Use Consent Applications

- d) An assessment of the actual or potential effects on the environment of the activity, including adverse effects, benefits and cumulative effects, particularly:
- Any effect on heritage places, items listed in Historic Heritage Schedules 4a, 4b and the Notable Trees Schedule, natural areas or other places of special value to present and future generations.

...

A1.2.3 Subdivision Consent Applications

A) All applications shall be in the proper form and should include:

- ii) Plans drawn to scale, legible and capable of being readily copied. The plans must show, as appropriate:
 - o) Any heritage places and items listed in Historic Heritage Schedules 4a, 4b and the Notable Trees Schedule identified by the Plan

...

A1.3.4 Assessment of Discretionary Activity Applications

A) In assessing discretionary activities Council will have regard to matters including the following:

- xiv) The effect of the proposal on the heritage values and preservation of any place or object listed in Appendices 1A to 1F, Appendices 1A, 1B, 1E, 1F, and items listed in Historic Heritage Schedules 4a, 4b and the Notable Trees Schedule or upon the heritage significance of any **natural area** in terms of the criteria in Appendix 1I.

4. **Chapter 3E Signs:** The following consequential amendment is required to Chapter 3E Signs to assist plan users:

Insert after 3E.4 Rules:

Advice Note: Chapter 4: Historic Heritage includes Rule HH-R10 and HH-S5 for the assessment of signage on significant historic built heritage, and this standard refers to compliance with Rules 3E.4.1 and 3E.4.2. Policy HH-P9 which sits in the Historic Heritage Chapter provides an additional policy for the assessment of signs on significant historic built heritage.

5. **Chapter 3G Relocated Buildings:** The following consequential amendment is needed to Chapter 3G Relocated Buildings to assist plan users:

The relocation of significant historic built heritage scheduled in Schedule 4a, Schedule 4b and Appendix 1E (Buildings and Objects with Heritage Value) is a separate matter not addressed through this chapter. Consideration of these buildings is required under the provisions of Chapter 4 – Historic Heritage.

Part II – ASSESSMENT REPORT

3.0 Introduction

The Manawatū District Council (the Council) has prepared Plan Change H(a): Historic Heritage (PCH(a)) to the Operative Manawatū District Plan (the Operative Plan) for notification under the provisions of the Resource Management Act 1991 (the Act). This report has been prepared in accordance with section 32(5) of the Act. It represents a summary of the evaluation of alternatives, costs and benefits undertaken by the Council in respect to the proposed District Plan provisions as required under section 32(1). In summary, the Council must establish that the plan change is the most appropriate way to achieve the purpose of the Act including that the proposed changes are the most appropriate means available to achieve Council's objectives – when compared against alternative methods available, including doing nothing.

4.0 Purpose of Proposed Plan Change H(a)

The purpose of PCH(a) is to enable the Council to better fulfil its obligations under the Act by providing a review and update of the heritage schedule for historic heritage items that are located outside of the Feilding Town Centre (FTC), including Appendix 1E – Buildings and Objects with Heritage Value.

The purpose of PC H(a) is to review Appendix 1E and include the necessary amendments to Chapter 4: Historic Heritage, including a new heritage schedule into the District Plan.

5.0 Operative District Plan Review

The current District Plan became operative in December 2002. Section 79 of the Act requires Council to commence a review of its District Plan every 10 years. The Act allows Council to review the District Plan in full or in sections. The Council has decided to undertake the review of the District Plan in sections (i.e. a sectional district plan review). The reason for this approach is to lessen the administrative burden of reviewing the entire District Plan within the statutory timeframes. This approach enables the public to make comment on a topic-specific basis. Council is very conscious of the need to maintain a holistic view of the future to ensure that research and consultation for related components of the District Plan still achieve a high level of integration. A key focus for the review process is ensuring local context, a high degree of alignment of regulatory provisions and ensuring that the context and scale of any rules are appropriate to manage the issues raised.

As referenced earlier, Council reviewed the heritage buildings that are located within the Feilding Town Centre (FTC) as part of Plan Change 46 in 2013/2014. Heritage buildings within the FTC were included in a new Schedule 4a, and a new planning framework for the protection of historic heritage was inserted into the District Plan (Chapter 4: Historic Heritage).

6.0 Statutory and Legislative Framework for the Review

6.1 Resource Management Act 1991

Section 74 Matters to be considered by Territorial Authority

Section 74 of the Act requires the Council to prepare and change the District Plan in accordance with the following:

Section 74

- (1) A territorial authority must prepare and change its plan in accordance with-
- a) its functions under section 31; and
 - b) the provisions of Part 2; and
 - c) a direction given under section 25A(2); and
 - d) its obligation (if any) to prepare an evaluation report in accordance with section 32; and
 - e) its obligation to have particular regard to an evaluation report in accordance with section 32; and
 - (ea) a national policy statement, a New Zealand coastal policy statement, and a national planning standard; and
 - f) any regulations.
- (2) In addition to the requirements of section 75(3) and (4), when preparing or changing a district plan, a territorial authority shall have regard to—
- (a) any—
 - (i) proposed regional policy statement; or
 - (ii) proposed regional plan of its region in regard to any matter of regional significance or for which the regional council has primary responsibility under Part 4; and
 - (b) any—
 - (i) management plans and strategies prepared under other Acts; and
 - (ii) [Repealed]
 - (iia) relevant entry on the New Zealand Heritage List/Rārangī Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014; ...

to the extent that their content has a bearing on resource management issues of the district; and
 - (c) the extent to which the district plan needs to be consistent with the plans or proposed plans of adjacent territorial authorities.

Section 31 Functions of Territorial Authorities

The Council has statutory functions under section 31 of the Act, which include the establishment, implementation and review of objectives, policies and methods to achieve integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district.

Section 5 Purpose

The Council is given the functions under section 31 for the purpose of promoting the sustainable management of natural and physical resources, which is defined in section 5(2) of the Act as:

In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enable people and communities to provide for their social, economic, and cultural well-being and for their health and safety while –

- (a) *Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) *Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) *Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

In carrying out a s32 analysis, an evaluation is required of how the proposal achieves the purpose of s5(1).

Sections 6, 7 and 8 of the Act

In achieving this purpose, authorities need also to recognise and provide for the matters of national importance identified in section 6, have particular regard to other matters referred to in s7 and take into account the principles of the Treaty of Waitangi referred to in section 8.

The section 6 matter relevant to Plan Change H(a) is:

s6(f) The protection of historic heritage from inappropriate subdivision, use, and development.

RMA amendments in 2003 elevated heritage protection to a ‘matter of national significance’ in section 6 (originally in section 7), along with the insertion of an associated definition of historic heritage into the Act interpretation in section 2. With this amendment, the protection of historic heritage from “inappropriate subdivision, use, and development” became a matter of national importance instead of an “other matter”.

The section 7 matters relevant to PCH(a) are:

s7(a) kaitiakitanga

s7(aa) the ethic of stewardship

s7(c) requires that particular regard is given to the maintenance and enhancement of amenity values.

s7(f) Maintenance and enhancement of the quality of the environment

s7(g) Any finite characteristics of natural and physical resources

In achieving the purpose of the Act in relation to managing the use, development, and protection of natural and physical resources, under Section 8 of the Act, the Council is required to take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Given that PCH(a) excludes Marae Buildings, the heritage items assessed and recommended in this plan change are not representative of the requirements of section 8 of the Act. Further work will be done with iwi, hapū, and Māori in the District to identify any areas of particular mana whenua value. This will be the subject of a future plan change.

In relation to Historic Heritage, the above matters provide direction to the Council to identify and protect historic heritage in the District Plan through ensuring the heritage values are identified and considered during resource management decision-making processes. This involves including provisions in the District Plan to appropriately manage historic heritage and providing policy guidance on matters for proposed Schedule 4b where there is no policy guidance under the operative District Plan.

Section 72 Purpose of District Plans

The purpose of District Plans under section 72 of the Act is to assist territorial authorities to carry out their functions in order to achieve the purpose of the Act. Section 72(3) states:

In making a rule, the territorial authority shall have regard to the actual or potential effect on the environment of activities, including, in particular, any adverse effect.

Section 73 Preparation of District Plans requires: there must be at all times one district plan for each district prepared by the Council in a manner set out in the First Schedule of the Act.

Section 75 outlines the Contents of District Plans, which must include objectives, policies and rules. A district plan must also give effect to any national policy statement, New Zealand Coastal Policy Statement, national planning standard, and any regional policy statement. It must also not be inconsistent with a regional plan.

Section 76 outlines when and how the Council can include rules in the District Plan.

Section 32 Requirements for preparing and publishing evaluation reports

Section 32 stipulates the content and evaluation necessary prior to notification. The evaluation report focuses only on those parts of the District Plan where changes are being proposed.

Section 32 of the RMA –

- (1) *An evaluation report required under this Act must -*
 - (a) *examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and*
 - (b) *examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by -*
 - (i) *identifying other reasonably practicable options for achieving the objectives; and*
 - (ii) *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - (iii) *summarising the reasons for deciding on the provisions; and*
 - (c) *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.*
- (2) *An assessment under subsection (1)(b)(ii) must -*
 - (a) *identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for -*
 - (i) *economic growth that are anticipated to be provided or reduced; and*
 - (ii) *employment that are anticipated to be provided or reduced; and*
 - (b) *if practicable, quantify the benefits and costs referred to in paragraph (a); and*
 - (c) *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*
- [...]
- (5) *The person who must have particular regard to the evaluation report must make the report available for public inspection –*

- (a) *as soon as practicable after the proposal is made (in the case of a standard, regulation, national policy statement, or New Zealand coastal policy statement); or*
- (b) *at the same time as the proposal is notified.*
- (6) *In this section, –*
- objectives** *means, –*
- (a) *for a proposal that contains or states objectives, those objectives:*
- (b) *for all other proposals, the purpose of the proposal*
- proposal** *means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act*
- provisions** *means, –*
- (a) *for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change;*
- (b) *for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.*

PCH(a) has been prepared in accordance with these sections of the Act.

7.0 National Direction

7.1 National Policy Statements

The following National Policy Statements are effective under the Act:

- National Policy Statement for Electricity Transmission 2008
- New Zealand Coastal Policy Statement 2010 (NZCPS)
- National Policy Statement for Renewable Electricity Generation 2011
- National Policy Statement for Freshwater Management 2020
- National Policy Statement on Urban Development 2020
- National Policy Statement for Highly Productive Land (comes into effect on 17 October 2022)

The following National Policy Statements are proposed but not get gazetted:

- National Policy Statement for Indigenous Biodiversity (NPS-IB)

Of this list of National Policy Statements none are considered relevant to PCH(a). The New Zealand Coastal Policy Statement does contain direction for local authorities in relation to historic heritage, however none of the heritage items reviewed are within the coastal environment.

7.2 National Environmental Standards

The following National Environmental Standards (NES) are currently in force:

- NES for Air Quality 2004
- NES for Sources of Human Drinking Water 2007
- NES for Telecommunication Facilities 2016
- NES for Electricity Transmission Activities 2009
- NES for Assessing and Managing Contaminants in Soil to Protect Human Health 2011
- NES for Plantation Forestry 2017
- NES for Freshwater 2020
- NES for Marine Aquaculture 2020
- NES for Storing Tyres Outdoors 2021

The only National Environmental Standard that is relevant to the management of historic heritage is the NES for Telecommunication Facilities 2016 as follows:

NES	Relevant Clauses	Comment
National Environmental Standards for Telecommunication Facilities 2016 (NESTF)	<p>s46 Historic heritage values</p> <p>(1) This regulation applies to a regulated activity if it is carried out at a place identified in the relevant district plan or proposed district plan as being subject to historic heritage rules.</p> <p>(2) This regulation is complied with if the regulated activity is carried out in accordance with the historic heritage rules that apply to that place.</p> <p>(3) In this regulation, historic heritage rules means district rules about the protection of historic heritage values (however described).</p>	<p>These provisions in the NESTF allow district plans to impose controls for activities otherwise permitted under the NES if they have heritage values.</p> <p>In this instance PCH(a) seeks to enable small scale telecommunication infrastructure on heritage buildings where these are not visible from a road or public space.</p>

7.3 Heritage Orders

Section 187 of the Act enables heritage orders to be included in a district plan to protect the heritage qualities of a particular place or structure. A notice of requirement for a heritage order can be lodged by a Heritage Protection Authority to protect a particular heritage feature if it has special character or interest to the community. Heritage orders are always publicly notified and can be appealed. There are currently no heritage orders in the Manawatū District.

7.4 National Planning Standards

The National Planning Standards (NPStandards) require the following format and separate chapters to be drafted for Historic Heritage as follows:

Part 2 District Wide Matters

Historical and Cultural Values:

- Historical Heritage
- Notable Trees
- Sites and areas of significance to Māori

There must be separate chapters for historic heritage, notable trees, and sites and areas of significance to Māori, and the topics are being dealt with separately as part of the District Plan Review.

The NPStandards state that any schedules of items must be located within the relevant chapter or there may be a cross reference to an appendix.

In addition, the NPStandards states that if the following matters are addressed, they must be located in the historic heritage chapter:

- a. identification of historic heritage
- b. provisions to protect and manage historic heritage
- c. heritage orders
- d. schedule(s) of identified historic heritage and heritage orders. This may cross-reference an appendix.

The NPStandards also have a list of definitions which must be used within district plans. This includes the definition of 'historic heritage', which has the same meaning as in the Act.

historic heritage—

(a) *means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:*

(i) *archaeological:*

(ii) *architectural:*

(iii) *cultural:*

(iv) *historic:*

(v) *scientific:*

(vi) *technological; and*

(b) *includes—*

(i) *historic sites, structures, places, and areas; and*

(ii) *archaeological sites; and*

(iii) *sites of significance to Māori, including wāhi tapu; and*

- (iv) *surroundings associated with the natural and physical resources.*

The NPStandards also requires each schedule to include the following information for each site or item identified:

- a. unique identifier (created by the local authority)
- b. site identifier (eg, legal description, physical address, site name or description)
- c. site type (including description of values)
- d. map reference or link.

Local authorities must consider whether to include additional relevant information in schedules.

7.5 Heritage New Zealand Pouhere Taonga (HNZPT) Act 2014

HNZPT is the leading national historic heritage agency and its work, powers and functions are prescribed by the HNZPT Act 2014. The purpose of the HNZPT Act is “*to promote the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand.*” Section 13 of the HNZPT Act identifies functions for HNZPT including to identify, record, investigate, assess, list, protect, and conserve historic places, and to continue and maintain the NZ Heritage List/Rāranga Kōrero.

Section 74 of the HNZPT Act enables HNZPT to make recommendations to the Council as to the appropriate measures for the Council to take for conserving and protecting historic areas. Local authorities must have particular regard to a recommendation received from HNZPT, as appropriate. In making a recommendation, HNZPT, as appropriate, must recognise the interests of an owner, as far as they are known, in a historic area.

Section 74(2)(b)(11a) of the (Resource Management) Act requires that when preparing or changing a district plan, a territorial authority shall have regard to any relevant entry on the New Zealand Heritage List/Rārangi Kōrero required by the Heritage New Zealand Pouhere Taonga Act 2014.

Heritage New Zealand Pouhere Taonga NZ Heritage List/Raronga Korero

The New Zealand Heritage List/Rārangi Kōrero (the List) identifies New Zealand's significant and valued historical and cultural heritage places. The List is a non-regulatory source of information about historic places, historic areas, wāhi tūpuna, wāhi tapu and wāhi tapu areas for the purposes of the Act.

The five parts to the List include: Historic Places, Historic Areas, Wāhi Tūpuna, Wāhi Tapu and Wāhi Tapu Areas. Given the scope of PCH(a), Historic Places are relevant to this plan change.

Historic Places are split into:

- Category 1 historic places that are of special or outstanding historical or cultural significance or value; or
- Category 2 historic places that are of historical or cultural significance or value.

The List does not equal automatic protection or create regulatory consequences or legal obligations on property owners. However, it can provide heritage funding opportunities such as the National Heritage Preservation Incentive Fund, and can lead to heritage properties being considered for inclusion in district plan heritage schedules.

The Council is required to notify HNZPT if an application for a project information memorandum or building consent is lodged in relation to a heritage item on the List. HNZPT is then able to provide heritage advice to the applicant and Council. The Council is required to identify on a Land Information Memorandum (LIM) if a property includes a heritage item from the List.

The Council is sent a quarterly update from HNZPT of buildings listed on the List. The Council has a legal obligation to make this list publicly available. This information is displayed at the reception area of the Council.

There are 30 heritage items on the List within the wider Manawatū District (this excludes items that are located within the Feilding Town Centre).

The following items are listed as **Category 1** in the New Zealand Heritage List/Rārangi Kōrero:

- St John the Evangelist Church (Anglican), Camden Street, Feilding
- Highden, 220 Greens Road, Awahuri
- Pukemarama, Rosina Road, Tangimoana
- Hangar No.2 and Hangar No.3 RNZAF Base Ohakea, Kororareka Avenue, RNZAF Base Ohakea, Ohakea
- Tane Hemp Company Limited Suspension Bridge and Flaxmill Remains (note that the remains are under Horowhenua District Council's jurisdiction), SH 56

The following items are listed as **Category 2** in the New Zealand Heritage List/Rārangi Kōrero:

- St Mary's Church (Anglican), Beaconsfield
- St Thomas' Church (Anglican), Sanson
- Halcombe Hotel
- Halcombe Post Office (former)
- St Michael and All Angels (Anglican), Stanway
- Halcombe World War One and Two Memorial, Halcombe
- Mountfort House, 52 East Street, Feilding
- 15 Beattie Street, Feilding
- 13 Beattie Street, Feilding
- 11 Beattie Street, Feilding
- 9 Beattie Street, Feilding
- Mahoe, 171 South Street, Feilding
- Feilding War Memorial, Manchester Square
- Pioneer Cottage, 28 Camden Street, Feilding
- House, 1592 Rongotea Road, Rongotea
- (Klue) House, 277 Kaimatarau Road, Rongotea
- (Voss) House, SH 56/Karere Road
- Former BNZ building, 11 Douglas Square, Rongotea
- St Simon and St Jude Church (Anglican), 9-11 Ouse Street, Rongotea

- Awatea, 69 Pharazyn Street, Feilding
- St Josephs Church, Te Hiri Marae, Kakariki, Feilding
- St Pauls Church, Kimbolton Road, Cheltenham
- Sheep Pavilion and Rostrum, Rata Street, Feilding
- Broxt Cottage, 185 West Street, Feilding
- Okahupokia Pā, Otara Road, Ohingaiti (this site is likely to be considered as part of a future plan change when Marae in Appendix 1E are reviewed).

As part of reviewing Appendix 1E, the Council has reviewed the HNZPT List in relation to the Manawatū District historic heritage items which are not currently included on the List have been assessed and recommended for inclusion in the District Plan Historic Heritage Schedule 4b. This includes Category 1 items: Highden, RNZAF Base Ohakea Hangar No.2 and Hangar No.3, and Category 2 items: the Sheep Pavilion and Rostrum, Manfeild Park; the West Home at 1592 Rongotea Road. There are no HNZPT listed items which are proposed for removal as part of PCH(a).

Guidance from Heritage New Zealand Pouhere Taonga

The general framework for protecting historic heritage in the Manawatū District was prepared as part of Plan Change 46 in 2013/14 and an earlier guidance document from the New Zealand Historic Places Trust “*Sustainable Management of Historic Heritage Guide No. 3 District Plans*” 2007 provided guidance for the preparation of that plan change.

HNZPT has recently released a new guide: ‘*Guide to the Management of Historic Heritage: District Plans, April 2022*’ which is a high level and non-statutory guidance document. The revised guidance document was released after the technical reporting on the heritage items had been completed. However the guidance has been referred to in preparing the new provisions proposed as part of PCH(a).

7.6 Other National Guidance

ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Values (ICOMOS New Zealand Charter 2010)

The International Council of Monuments and Sites (ICOMOS) New Zealand Charter sets out principles to guide the conservation of places of cultural heritage value in New Zealand. It also intends to guide all those involved in conservation work, including property owners, heritage practitioners and local authorities. The principles of ICOMOS have been used as guidance in the drafting of plan change provisions.

7.7 Natural and Built Environment Act

The Natural and Built Environment Act (NBA) is proposed to replace the Resource Management Act in 2023. PCH(a) has been prepared under the Resource Management Act and a review against the NBA will occur once that legislation is enacted. Therefore no consideration has been given to the NBA in the preparation of PCH(a).

8.0 Regional Direction

Regional Policy Statement – Horizons Regional Council One Plan

Horizons Regional Council's One Plan combines the Regional Policy Statement and Regional Plan into one document. The Regional Policy Statement is contained in Part 1 and the Regional Plan is in Part 2. Chapter 6 of the Regional Policy Statement is relevant to PCH(a) as that sets out the resource management issues, objectives and policies for Indigenous Biological Diversity, Landscape and Historic Heritage.

The following table sets out the relevant objectives and policies of the One Plan.

Regional Policy Statement/Plan	Relevant Section
Objective 6-3 Historic Heritage	Protect historic heritage from activities that would significantly reduce heritage qualities.
6.4.3 Historic Heritage: Policy 6-11: Historic Heritage	The Regional Coastal Plan and district plans must, without limiting the responsibilities of local authorities to address historic heritage under the RMA, include provisions to protect from inappropriate subdivision, use and development historic heritage of national significance, which may include places of special or outstanding heritage value registered as Category 1 historic places, wāhi tapu, and wāhi tapu areas under the Historic Places Act 1993 and give due consideration to the implementation of a management framework for other places of historic heritage.
Policy 6-12: Historic heritage identification	<ul style="list-style-type: none"> a. Territorial Authorities must develop and maintain a schedule of known historic heritage for their district to be included in their district plan b. The Regional Council must develop and maintain a schedule of known historic heritage for the coastal marine area to be included in the Regional Coastal Plan. c. Historic heritage schedules must include a statement of the qualities that contribute to each site.
Method 6-7 District Planning – Natural Features, Landscapes, Historic Heritage and Indigenous Biological Diversity	The Regional Council will formally seek changes to district plans if necessary to ensure provisions are in place to provide an appropriate level of protection to natural features, landscapes, historic heritage and indigenous biological diversity.
Method 6-10 Proactive Identification of Historic Heritage	<p>The aim of this method is to determine an approach to provide for the proactive identification of historic heritage resources within the Region and should be read in conjunction with Method 8-4.</p> <p>The approach may include the development of a Region-wide database or list of areas with a high potential for containing unidentified historic heritage site and structures, amendments or variations to existing regional or Territorial Authority plans, or agreed partnerships for funding and carrying out surveys.</p>

In preparing PCH(a) consideration was given to the direction in the One Plan for Historic Heritage. A schedule is proposed that identifies the items of historic heritage outside the FTC as required by Policy 6-12, including a statement of the qualities and values that contribute to the item having historic heritage values.

9.0 Iwi Management Plans

While not specifically related to PCH(a), there are currently Iwi Management Plans in preparation, and one plan has been lodged with Horizons Regional Council: the Rangitīkei Catchment Strategy and Action Plan, by Ngā Puna Rau o Rangitīkei (NPRR), of which Ngāti Hauti is part of.

A copy of Draft PCH(a) has been sent to mana whenua of the Manawatū District. At the time of preparing PCH(a) and the associated Section 32 Report, no specific information has been received from iwi or hapū on this plan change.

10.0 Local Direction

10.1 Long Term Plan 2021-2031

Council's Long Term Plan 2021-2031 (LTP), also known as the 10 Year Plan, outlines the Council's plans for the next 10 years regarding funding its ongoing programmes and capital works projects. The following priorities are relevant to PCH(a):

A future planned together

We work with all parts of our community to plan for a future everyone can enjoy.

An environment to be proud of:

We protect and care for the Manawatū District's natural and physical resources.

A prosperous, resilient economy

We aim to make the Manawatū District a great place to live, to visit and to do business.

Historic heritage creates a sense of place, encourages a sense of belonging and is a fundamental link between generations. The identification and protection of historic heritage buildings, objects and memorials in the Manawatū District helps people and the community to recognise and celebrate the district's history, including farming history and world war involvement. PCH(a) seeks to ensure that there is a planning framework in place which appropriately manages the district's historic heritage, which helps to achieve the above LTP outcomes.

10.2 Community Facilities Strategy

The Community Facilities Strategy (2021-2031) provides the strategic direction for Council over the next 30+ years for those facilities the Council manages. The Strategy provides a clear vision for the future of the community facilities and a roadmap on how to get there. A small number of proposed heritage buildings are current community facilities. The following issues have been identified in the Strategy in relation the management of community halls and community centres/libraries which are identified as historic heritage items:

Community Facility	Key Issues and Opportunities
Community Halls: Halcombe Hall; Oroua Downs Hall ¹	Most facilities are aging.

¹ Oroua Downs Memorial Hall is not currently listed in Appendix 1E and is proposed to be added to the Historic Heritage Schedule 4b.

Community Facility	Key Issues and Opportunities
	Historical significance to be acknowledged
Community Centre and Libraries: Rongotea Community Centre; Kimbolton Library	Most facilities are not fit-for-purpose, either too small or single-use buildings.

PCH(a) recognises the heritage significance of these community facilities through providing a framework in which to identify and protect the heritage values of these buildings.

10.3 Reserve Management Plans

The Council has prepared several Reserve Management Plans (RMPs) in accordance with the Reserves Act 1977 which establishes the framework for management and development of the district's reserves. Management of cultural heritage is covered in some of the RMPs, including the following:

- The Reserve Management General Policy (2020) includes the following policy:

Historical, cultural and archaeological sites *“As far as practicable, sites, structures, trees or other vegetation or areas on reserves which are identified as having historic or cultural heritage value will be protected, preserved and maintained.”*
- **Kowhai Park RMP** – identified the old Tote building, and this building was included as a Category A item in *Schedule 4a Feilding Town Centre* as part of Plan Change 46 ‘Feilding Town Centre’²;
- **Sports Parks RMP:**
 - Kimbolton Domain Memorial Gates: *“The domain is accessed from Kimbolton Road through gates erected in the 1950s to commemorate Kimbolton community members who were killed during World War Two”* (page 20);
 - Kimbolton Library: *“The library is in a cottage listed as a Category C building of heritage value in the District Plan. The cottage was gifted to the Kiwitea County Council Library Committee in 1950 and is managed by the Council alongside the Kimbolton Community Committee”* (page 21).

There are no relevant policies for these specific heritage items in the Sports Parks RMP. The provisions in PCH(a) will enable the protection of the heritage significance of these items.

- **District Wide RPM** – includes all different types of reserves. Existing and proposed heritage items are included on a number of these reserves. The following heritage items included in Plan Change H(a) are listed in the District Wide RMP:
 - **Beaconsfield Recreation Reserve (Old Beaconsfield School):** *“Beaconsfield School came under Council ownership after the school was closed. The reserve is a pleasant environment with the former schoolroom (the school building has a category C heritage value in the District Plan), shelter sheds, a tennis court, toilet and a barbecue and maintained by the community. The reserve has attractive mature trees, including a large totara at the entrance and a*

² The old Tote Building (Feilding Totalisator) is included in the operative *Schedule 4a Significant Historic Built Heritage – Feilding Town Centre* and is not within the scope of PCH(a). Reference here is for completeness.

weeping elm. The grounds are grazed. A moderate renewal programme is anticipated over the next ten years.” (Page 26). Relevant RPM Policies:

- Continue to support the community in maintaining the reserve and its facilities
 - Promote use of the reserve in partnership with the Beaconsfield community.
- **Cheltenham Memorial Reserve (Cheltenham War Memorial):** *“The reserve is a small park at the cross roads of Kimbolton Road and State Highway 54. The land was owned by the Catholic Wellington Diocesan and has been subdivided and set aside as a community park under Council ownership. The Cheltenham war memorial has been moved to the site and the park has amenity planting, picnic tables for travellers, and plans for public toilets and a community playground.”* (Page 28). Relevant RMP Policies:
- Protect the park as public open space by declaring it reserve and classifying Recreation Reserve under the Reserves Act 1977.
 - Work with the Cheltenham community in management and development of the reserve.
 - Maintain the reserve to a standard that reflects its role and prominent village location.
- **Douglas Square, Rongotea (Rongotea War Memorial; Taikorea War Memorial):** *“Douglas Square in the centre of Rongotea establishes the identity and character of the township. It has a number of features of interest to the community and visitors - the Rongotea War Memorial (listed in the District Plan with a C category heritage), the matai stump marking the first church service in the town, the town clock, a range of specimen trees, amenity planting and seats commemorating specific events.”* (Page 30). Relevant RPM Policies:
- Maintain the square to a standard that reflects its role and central location.
 - Liaise with the local community in management of the square.
 - Establish guidelines for the square’s management and maintenance.
- **Makino Park (Makino Footbridge):** *“Makino Park is in the civic precinct with the Council administration building, carparks, the aquatic centre, mini golf, pond, Makino Stream and stream planting, playground with play equipment, bridge connection to the library and grassed areas with specimen trees. A path along Makino Stream from the bridge connects to Makino Bridge Reserve across Manchester Street.”* (Page 41). Relevant RMP Policies:
- Consider changing the name of Makino Park to Mangakino Park, the original name of the stream now known as ‘Makino’.
 - Develop the park to reflect its civic role.
- **Mt Stewart Centennial Memorial Reserve:** *“The reserve is a 135 metre hill (known as Whakaari) and trig station on State Highway 3, 6 km south-east of Sanson. It was named after early surveyor John Tiffin Stewart, who chose the site for the station. A plaque on the rock by the Trig Station is dedicated to him. It is listed in the District Plan as having heritage value with a C category. A time capsule was buried and a plinth with a 360° directional sign was erected for the 1990 Sesqui celebrations”* (Page 48). Relevant RMP Policies:
- Continue to maintain the reserve to a standard that reflects its Historic Reserve status.
- **Rangiwahia Recreation Reserve - Rangiwahia War Memorial:** *“The reserve has a large grazed area that was the former rugby ground, tennis court, toilets, children’s playground, picnic tables, tennis court and war memorial. Land was set aside for the hall in 1958 which is used for community events and for hire. The war memorial is listed in the District Plan with a C category heritage value.”* (Page 55). Relevant RPM Policies:

- Support the community in: Promoting, managing and maintaining the hall for community use and for social events; Encouraging visitors and promoting the reserve for camping including camping for cyclists; Improving the amenity of the reserve.
- **Rewa Old School Reserve – Rewa War Memorial:** *“This former school is used for a variety of community activities and maintained by the community with Council support. As with many similar facilities, community participation in its maintenance varies as the immediate community changes. The reserve has an attractive road frontage with white picket fence, memorial, path and garden with totara, lemonwood and rimu among the mature trees...”* (Page 56) Relevant RMP Policies:
 - Support the Rewa community in reserve use and development.
 - Continue to support the Rewa community in maintaining the reserve.
 - Renew facilities as required. This includes play equipment, swimming pool and tennis court.

The District Wide RPM includes the following objective for cultural heritage: *“Maintain, conserve and interpret cultural heritage sites on reserves.”* The RMPs policies identified above highlight the need to work with the community for managing these reserves. The identification of these heritage items in the District Plan through PCH(a) will enable their heritage significance to be identified and protected.

11.0 Technical Advice and Input

11.1 Technical Advice

In considering and preparing PCH(a), the Council has commissioned the following heritage experts to review and assess the existing heritage items in Appendix 1E (excluding Marae). Recommendations have been made based on these reports for the protection and listing of heritage items in the District:

- **Ian Bowman, Architect and Conservator**, provided a review of the items in Appendix 1E (excluding Marae Buildings). Mr Bowman has reviewed each entry and either recommended for the item to be included for protection in the new schedule, or removed from the schedule and therefore the District Plan. Mr Bowman has also recommended the inclusion of new items to the schedule. Mr Bowman’s recommendations are provided in **Appendix 3: Recommendations For Historic Heritage Schedule**.
- **Val Burr, Local Historian**, has researched several historic heritage items and her work has accompanied Mr Bowman’s heritage assessment, feeding into the heritage assessment in terms of ‘historical’ and ‘cultural’ values of several heritage items.

Manawatu District Plan Review: Historic Heritage Issues and Options Report: 2019

As part of developing PCH(a) the Council prepared an issues and options report (*Manawatū District Plan Review: Issues and Options Report: 2019*) which identified issues to be addressed, types and numbers of consent applications for heritage buildings, and options for progressing the heritage review. The overall conclusions of this report in relation to the District Plan were:

- Assessment of HNZPT List entries for inclusion on the District Plan heritage schedule.
- Consider if policy and/or rule amendments are required for the protection of historic heritage outside of the FTC.
- Remove reference to Category C protection status in the District Plan.

- To consider the impact of subdivision on historic heritage.
- To ensure that the heritage review captures a wide range of historic heritage in the District, including other significant historic heritage that has been identified, war memorials, and other objects/buildings that may have been identified through public consultation.
- The inclusion of additional information on the heritage schedule to provide more detail about heritage items.
- Identification of specific elements of buildings and objects through photographs or maps in appendices to the heritage schedule, to provide further detail.
- To continue to monitor effects of signage on heritage buildings and ensure appropriate rules are in place for outside of the FTC.
- Funding for historic heritage projects needs to be considered by the Council, for projects that are privately owned, non-earthquake prone, and not listed on the HNZPT list.
- To consider amendments to the District Plan to address Council's role in raising public awareness and the provision of information.
- To continue to monitor the effectiveness of the Feilding Town Centre Design Guide.
- Effective and targeted early consultation is needed with landowners in 2020.
- To update the text in Chapter 4: Historic Heritage [e.g. replace any old reference to Historic Places Act].
- A review of the draft reports by Ian Bowman and Val Burr are required before consultation on the plan change is undertaken.

11.2 Category C Ranking

Appendix 1E contains a significant number of Category C items which were part of the operative District Plan (2002). In 2014, Plan Change 46 inserted a new planning framework for managing historic heritage in Chapter 4 of the District Plan. That plan change removed the previous three-tier protection framework (Categories A, B, C) and replaced it with a two-tier protection framework (Categories A and B). *Schedule 4a – Significant Historic Built Heritage - Feilding Town Centre* was inserted in to the District Plan, which lists 42 heritage buildings located within the FTC as either Category A or B.

This new framework was inserted to recognise that the Category C items were not adequately protected under the previous provisions, and that a new framework with Category A for nationally significant items and Category B for regionally and locally significant items was a more efficient and effective way in which to achieve the Act. As a result of Plan Change 46, the rules relating to Category C items were removed, however, the remaining items listed in Appendix 1E remained on the list, including those ranked as Category C. These Appendix 1E items were to be reviewed as part of a subsequent plan change, the purpose of which is PCH(a).

The operative provisions for Category C items (prior to being removed as part of Plan Change 46) were not comprehensive for protecting historic heritage, where a controlled activity consent was required when a Category C item was proposed for relocation to another site. If the item was proposed to be demolished, then the only requirement was for a photographic record to be provided to the Council at least one month prior to the demolition. There were no other relevant provisions for Category C.

11.3 Recommendations from Technical Advice

As a result of the work completed by Mr Bowman and Ms Burr, each item that is to be included in the District Plan Schedule 4b as a result of PCH(a) has a specific and detailed report. The reports each identify the historic values, with photographic records, and outline why the items have been recommended for protection in the District Plan as either Category A, B, or a recommendation for removal from the District Plan. The heritage reports for each item are included as **Appendix 4: Historic Heritage Reports**.

The heritage items were assessed against the values outlined in the operative District Plan Chapter 4 Policy 1.1. The values are contained in **Appendix 3: Table 4: Assessment Criteria**.

Table 1 below provides a summary of changes to the heritage items in Appendix 1E (excluding Marae), including the additions proposed for Schedule 4b:

Table 1: Category Changes Recommended to Heritage Items

Changes Proposed for Categories from Appendix 1E to Schedule 4b (number of entries on the list)	Number
Recommend Category C to B ³	58
Recommend Remain Category B	11
Recommend Remain Category A	1
Recommend Category C to A	1
Recommend Category B to A	1
Recommend to be added to District Plan Schedule 4b: Category A	2
Recommend to be added to District Plan Schedule 4b: Category B	16
Recommend to be removed from District Plan (Categories B and C)	21

11.4 Recommended Changes to the Schedule

As outlined above, each item on Appendix 1E (excluding Marae) has been assessed and a recommendation has been made about its protection status, whether it is included in Schedule 4b as Category A, B or removed from the list altogether.

Table 1 above identifies 21 items on Appendix 1E to be removed from the District Plan. The reasons for these recommendations include:

- Item no longer exists (has burnt down or has been demolished).
- Item has been relocated outside of Manawatū District.
- Item is now located within the Palmerston North City Council jurisdiction due to a Local Government boundary adjustment.
- Item has been assessed as having insufficient heritage values and does not meet the criteria outlined in District Plan Chapter 4, Policy 1.1.

³ One of these entries constitutes four houses (9, 11, 13, 15 Beattie Street, Feilding). There is also an entry in Appendix 1E for the Feilding Courthouse, however this item was reviewed as part of Plan Change 46 and is now included in operative Schedule 4a so is not subject to PCH(a).

Table 1 above also identifies 18 new items that are recommended to be included in Schedule 4b. The reasons for these recommendations include:

- Items are listed on the New Zealand Heritage List/Rārangī Kōrero and have been assessed as having appropriate heritage values under existing Chapter 4, Policy 1.1.
- Item has been identified through a resource consent application for subdivision and recommended as part of a consent condition and advice note to be considered for inclusion to the District Plan heritage schedule.
- A number of war memorials around the District have been recommended to be included which recognises the 100 year anniversary for World War 1, and also the opportunity for these new memorials to be added to the schedule and have the same level of protection as the war memorials which are currently included in Appendix 1E.

The development of PCH(a) has been prepared in consideration of the above recommendations for the Historic Heritage Chapter.

12.0 Operative District Plan Framework

12.1 Chapter 4 Historic Heritage

PCH(a) is limited to the identification and protection of significant historic built heritage outside of the FTC, with the exception of one memorial and one object which were not reviewed as part of Plan Change 46. The historic heritage buildings that are located within the FTC were included in Schedule 4a of the District Plan as part of the earlier Plan Change 46 and are not within the scope of this plan change.

The following relevant objective related to historic heritage is included in Chapter 4:

Objective 1 HV 1) *To protect significant historic built heritage that represents the history of the Manawatū District, from inappropriate subdivision, use and development.*

The Historic Heritage Chapter contains policies and rules (with the exception of signage) which cover the following matters:

- Identification of Significant Historic Built Heritage according to listed heritage values (Policy 1.1)
- Identification of two categories (A and B) for the protection of Significant Historic Built Heritage
- Continued use and modification for reuse of Historic Heritage
- Seismic Strengthening of Historic Heritage
- Demolition of Historic Heritage
- Retention of building facades
- Balancing protection of Historic Heritage with other resource management issues and public safety concerns
- External additions and alterations
- Signage policy

The rule classification contains a number of permitted rules with standards, which fall to discretionary if not met, e.g.

- Maintenance and minor repair

- Partial or complete demolition where work is necessary to make site safe after accidental fire, flooding or earthquake event
- Seismic strengthening of built heritage
- Feilding Saleyards

Additions and alterations to the interior of built heritage is a permitted activity and does not require a resource consent.

The following activities are discretionary:

- External additions and alterations to Category B built heritage
- Partial or complete demolition of any Category B built heritage
- Relocation of Category A and B buildings on the same site, and relocation of Category B buildings to another site.

The following activities are non-complying:

- Partial or complete demolition of any Category A built heritage
- Relocation of any Category A built heritage to another site
- External additions and alterations to Category A built heritage
- Any activity that is not specifically provided for.

As mentioned earlier, the previous District Plan framework included three categories for heritage protection: A, B and C. Plan Change 46 removed Category C status from the District Plan planning framework, and inserted a two-tier ranking of Categories A and B. Appendix 1E however was not reviewed as part of Plan Change 46 which left a large number of Category C items still listed in the District Plan.

The following definitions relevant to historic heritage are currently included in the operative District Plan:

Additions and Alterations:

Means the change to a building, structure, or memorial that alters its size and/or volume or results in changes to the finishes or materials. Additions and alterations specifically exclude "maintenance and minor repair" and "seismic strengthening" as defined by this Plan.

Maintenance and Minor Repair:

In relation to significant historic built heritage, means the repair of materials by patching, piecing in, splicing and consolidating existing materials. It includes replacement of minor components such as individual bricks, cut-stone, timber sections, tiles and slates where these have been damaged beyond reasonable repair or are missing. Original replacement material should be sourced where possible otherwise, the replacement must be of the same or similar material, colour, texture, form and design as the original it replaces. The number of components replaced must be substantially less than existing.

Significant Historic Built Heritage:

Means any building (identified as Category A or B), or memorial, or object that is listed in a schedule in the District Plan due to its historic heritage value.

12.2 Chapter 3D Earthworks

District Plan provisions for earthworks in Chapter 3 of the District Plan are as follows:

3D.3 Objectives and Policies

Objective 1:

To ensure earthworks do not result in adverse effects on the visual amenity, landscape, or historic heritage values of the area.

Policy 1.2

To restrict earthworks within the area of items scheduled in Appendix 1A (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), 1D (Trees with Heritage Value), 1E (Buildings and Objects with Heritage Value) and 1F (Sites with Heritage Value).

3D.4.2 Standards for Permitted Activities

The Permitted Activities specified above must comply with the following standards:

- e. *Earthworks must not be undertaken within any area identified in Appendix 1A (Wetlands, Lakes, Rivers and their Margins), 1B (Significant Areas of Indigenous Forest/Vegetation (excluding Reserves), 1D (Trees with Heritage Value) and 1F (Sites with Heritage Value).*

This permitted activity list does not include Appendix 1E because that appendix is limited to 'built' heritage, however, there are several permitted activity standards which control the effects of earthworks on a site, e.g.

- Control of sediment run-off;
- Dust and sedimentation control measures;
- Setback requirements near Oroua River, Kiwitea Stream, Makino Stream;
- No blocking of stormwater or overland flow paths.
- Earthwork volumes: volume per site, maximum area exposed; setback from site boundary; extent of ground level change.

PAGE
25

If earthworks are undertaken on a site that contains a historic heritage item and the permitted activity standards are not met, there is guidance provided by 3D.3 Earthworks Objective 1 and Policy 1.2 listed above to ensure that earthworks do not result in adverse effects on the historic heritage values of the area.

Note that there are consequential amendments proposed to update Earthworks Policy 1.2 to include reference to Historic Heritage Schedules 4a and 4b.

12.3 Chapter 3E Signs

Chapter 4 contains the following policy for signage:

- Policy 1.9** *To ensure that any signage located on significant historic built heritage is of a size, location, colour and style that is compatible with the character of the heritage item and does not detract from, compete with or dominate the heritage values for which the heritage item is significant.*

The rules for signs are included in the District Wide Chapter 3E Signs. Rule 3E 4.2 (b) contains the following standards for signs:

- i) *One sign may be displayed per site. This includes any sign that is freestanding, or is written on or affixed to a building.*
- ii) *Signs must relate to the predominant activity on a site, or be associated with an activity otherwise permitted by this Plan or Resource Consent has been granted.*
- iii) *A sign may be LED, backlit or spot lit but must not be flashing, animated, trivision, or contain revolving lights or lasers.*
- iv) *Any sign that is LED, backlit or spot lit must not result in light spill into any adjoining property zoned Residential.*
- v) *No sign may be painted or located on a building roof.*
- vi) *Signs must not obstruct the clarity of official signs.*
- vii) *Signs must not create an obstruction or cause safety concerns for road users.*
- viii) *Signs must also comply with any permitted activity conditions of the zone in which it is located in.*
- ix) *The maximum sign face area of any sign must not exceed 0.6m², except that signs within the Inner and Outer Business Zones and Industrial Zone must not exceed a maximum sign face area of 3m².*

Guidance Note: The Inner and Outer Business Zones, Manfeild Park Zone and the Special Development Zone have additional signage provisions contained in the relevant zone chapters.

In summary, there must only be one sign displayed per site, the sign must not exceed 0.6m², and it is to be limited to the predominant activity on the site, or be related to an activity which is permitted by the District Plan or to which resource consent has been granted, as well as standards relating to the type of sign permitted. If such standards are not met, a discretionary resource consent is required.

Because the relevant policy for signs associated with heritage items is contained in Chapter 4 and the relevant rules are outlined in Chapter 3E, PCH(a) proposes a rule and standard to be inserted in Chapter 4 which requires compliance with the above rules.

12.4 Chapter Rule A: General

The following provisions that are currently included in the District Plan are relevant to the consideration of heritage places in subdivision and land use proposals:

A1.3.2 Reservation of Control – Controlled Activity Subdivision Applications

- A) The matters in respect of which **Council** has reserved its control are:
 - xii) Impact of subdivision upon future management of **natural areas** and **heritage places**.

...

A1.2 Information Requirements For Resource Consent Applications and Designations

A1.2.2 Land Use Consent Applications

d) **An assessment of the actual or potential effects on the environment of the activity, including adverse effects, benefits and cumulative effects, particularly:**

- Any effect on heritage places, natural areas or other places of special value to present and future generations.

...

A1.2.3 Subdivision Consent Applications

A) **All applications shall be in the proper form and should include:**

- ii) Plans drawn to scale, legible and capable of being readily copied. The plans must show, as appropriate:
 - o) Any heritage places identified by the Plan

...

A1.2.5 Further Information

B) **If any significant adverse effect may result from a proposal, the Council may commission a report, with the report brief prepared in consultation with the applicant, for purposes which include:**

- iv) Providing information on matters such as heritage values, amenity or cultural considerations.

...

A1.3.4 Assessment of Discretionary Activity Applications

A) In assessing discretionary activities Council will have regard to matters including the following:

- xiv) The effect of the proposal on the heritage values and preservation of any place or object listed in Appendices 1A to 1F, or upon the heritage significance of any **natural area** in terms of the criteria in Appendix 1I.
- xxvi) In relation to Rural and Flood Channel zone subdivisions in the coastal area under Rule C1.3.1 a. iii):
 - b) Potential impacts upon the natural character and landscape values of the coastal area, including the ecological value of the Rangitikei River estuary, and upon any heritage places.

13.0 Plan Change Development

13.1 Chronology

The following outlines the key milestones in preparing Plan Change H(a) Historic Heritage:

Date	Activity
2014-2015	Commenced first stage of the review of heritage items outside of the FTC. Ian Bowman undertook many site visits and started preparing reports for

	heritage items included in Appendix 1E. Some additional items of heritage significance were identified from the HNZPT List, from a subdivision consent process, and identification of war memorials not already protected.
2015-2016	Most preparatory work for heritage review put on hold as Council reprioritised the District Plan work programme.
2017-2019	Ian Bowman continued the review of heritage items located outside of the FTC (i.e. those items which had not yet been reviewed).
2018-2019	Val Burr was contracted to research the history of some heritage items where Ian Bowman identified a need for further historical information about the items.
2019	Manawatu District Plan Review: Issues and Options Report: 2019 (Historic Heritage) prepared.
March 2020	Update to Council on approach to the heritage review: to protect key heritage items.
2020-2021	Review of information contained in draft heritage reports; identification of any gaps / inconsistencies.
September 2021	Letters sent to owners of historic heritage listed in Appendix 1E(excluding Marae) informing them of the upcoming heritage review.
7 October 2021	Update to Council of Plan Change H outlining the approach and heritage items included as part of the review.
April-June 2021	Finalising heritage reports ready for Clause 3 consultation.
December 2021 – February 2022	Clause 3 consultation initiated with heritage item owners: heritage reports prepared by Ian Bowman, fact sheet and feedback from sent to heritage item owners to seek feedback on report information, recommendations, District Plan provisions. Feedback that was received has been summarised in Section 11.2 below.
2021-22	Discussions with NZ Defence Force to identify appropriate approach and heritage items for protection in relation to Ohakea Airforce Base.
March-September 2022	Preparation of Proposed Plan Change H(a), following feedback received.
September 2022	Plan Change H(b) sent to iwi and hapu for comment.
September 2022	Finalisation of PCH(a) Historic Heritage, including Section 32 Report.

13.2 Clause 3 Consultation – PCH(a) Historic Heritage

Clause 3 of the First Schedule of the Act specifies the people who must be consulted in the preparation of a plan, including plan changes. The provisions relevant to this plan change are:

3 Consultation

- (1) *During the preparation of a proposed policy statement or plan, the local authority concerned shall consult—*
 - (a) *the Minister for the Environment; and*
 - (b) *those other Ministers of the Crown who may be affected by the policy statement or plan; and*
 - (c) *local authorities who may be so affected; and*
 - (d) *the tangata whenua of the area who may be so affected, through iwi authorities; and*
 - (e) *any customary marine title group in the area.*
- (2) *A local authority may consult anyone else during the preparation of a proposed policy statement or plan.*
- ...
- (4) *In consulting persons for the purposes of subclause (2), a local authority must undertake the consultation in accordance with section 82 of the Local Government Act 2002.*

4A Further pre-notification requirements concerning iwi authorities

- (1) *Before notifying a proposed policy statement or plan, a local authority must—*
 - (a) *provide a copy of the relevant draft proposed policy statement or plan to the iwi authorities consulted under clause 3(1)(d); and*
 - (b) *have particular regard to any advice received on a draft proposed policy statement or plan from those iwi authorities.*
- (2) *When a local authority provides a copy of the relevant draft proposed policy statement or plan in accordance with subclause (1), it must allow adequate time and opportunity for the iwi authorities to consider the draft and provide advice on it.*

As part of Clause 3 consultation, heritage item owners were sent the draft heritage reports for their buildings/objects/memorials and a summary of the provisions in the Historic Heritage chapter. The Historic Heritage chapter and proposed recommendations for the schedule were also sent to HNZPT, the Ministry for the Environment and Ministry for Culture and Heritage for feedback.

Clause 4A Consultation

Clause 4A of Schedule 1 of the Act sets out the requirements for local authorities to consult with iwi authorities before notifying a proposed plan and to have particular regard to any advice received from those iwi authorities. Draft PCH(a) Historic Heritage was sent to representatives of iwi authorities and hapu. At the time of preparing this report no feedback had been received.

Key Issues Raised From Consultation

Table 2 below outlines the key themes relevant to PCH(a) and provides comments in terms of how the plan change has addressed these comments.

Table 2: Key Themes from Consultation and Comments

Key Themes	Comment
<p>Oppose protection where:</p> <ul style="list-style-type: none"> Heritage values are low Category B is too restrictive given the low heritage values of the property Concerns about loss of property rights and privacy Newer lean-to's/parts to the building which do not have heritage significance are included in the protection Building is functional and repairs need to be made immediately without the need for resource consent. 	<p>Where feedback has been received, some heritage items have been reassessed and recommendations made accordingly in Appendix 2: Recommendations for Historic Heritage Schedule.</p> <p>PCH(a) includes a new permitted activity rule to cover minor alterations to non-contributing buildings, which are those parts of a heritage building which do not contain the same heritage values as the main building (e.g. lean-to's). A definition of 'non-contributing building' is provided for clarity. Where alterations propose changes to the footprint or height, a restricted discretionary resource consent would be required.</p> <p>The existing minor repair and maintenance rule provides for repairs and maintenance to be made as a permitted activity, subject to the use of same or similar material.</p>
<p>Support for protection of a number of items</p> <p>Comfortable with Category B requirements.</p>	<p>Support noted and where relevant, heritage items have been reassessed and recommendations made accordingly.</p>
<p>New Zealand Defence Force (NZDF): Supports approach to discuss RNZAF heritage area.</p>	<p>NZDF have discussed with the Council the approach of applying a Heritage Area over parts of the Ohakea Airbase, instead of individually identifying some buildings. This approach is currently being developed by NZDF and discussions continue. For this plan change, Hangar No.2 and Hangar No.3 at the RNZAF Base Ohakea are recommended for protection as Category A, in alignment with HNZPT Category 1 status. In the event a heritage area is favoured, a new plan change process is required to identify the area within the District Plan.</p>
<p>Opposition to discretionary consent status, support for standards</p>	<p>A new restricted discretionary rule for alterations and additions is now proposed for Category B buildings listed in Schedule 4b. This rule status will give more certainty to heritage item owners when planning additions or alterations to their buildings. This category status is also in alignment with HNZPT's advice in their guidelines: '<i>Guide to the Management of Historic Heritage: District Plans April 2022</i>'.</p>
<p>21st century planet-saving and healthy homes technologies for category B buildings</p>	<p>In relation to this matter, the plan change proposes a new permitted activity rule which enables minor external alterations to heritage items listed in Schedule 4b where they are not visible from a road or public space. This includes utilities such as air conditioning units, heat pumps, solar water panels, solar water heaters and water</p>

	heating systems. This amendment recognises the need for houses and buildings used for people to be healthy.
Request clarification for relocation	<p>A new policy is proposed guiding relocation of heritage items in Schedule 4b as there is currently no policy under the operative District Plan.</p> <p>A new restricted discretionary rule is proposed for relocation of Category B items where it is on the same site. The existing discretionary rule is considered appropriate for relocation of items to another site.</p> <p>A cross reference is also proposed to the Relocated Buildings Chapter (3G).</p>
<p>Clarification of the site or just building.</p> <p>Suggestion to broaden the scope of issues, objectives and policies to reflect that heritage is sites and settings, not just buildings.</p>	<p>The plan change focuses on 'built' heritage, which is consistent with the approach of the existing provisions (inserted through Plan Change 46). The heritage assessments for each heritage item have been undertaken with a focus on the 'built' heritage, not the setting. On that basis it is not considered appropriate to include blanket settings provisions as the setting for each heritage item may be different.</p>
Could include subdivision of a site containing a heritage item as discretionary	<p>The existing subdivision provisions will be used until a review of the subdivision provisions is undertaken as part of the District Plan Review.</p> <p>This is consistent with the approach taken for Plan Change 46, where the following comments were made:</p> <p><i>"Subdivision will be addressed as a separate chapter of the District Plan. Full consideration of the status of subdivision for sites containing heritage items will be given at the time this section is reviewed and redrafted. This chapter will then be publicly notified and the submitter has the opportunity to make submissions on the provisions."</i></p> <p>The wider settings of a site have not been assessed as part of Plan Change H(a). Therefore no changes to the subdivision provisions are recommended.</p>
Interiors of Category A should be considered.	Interiors have not been assessed as part of the heritage reports. This follows the approach in the operative District Plan which is to not protect interiors of buildings.
Seismic Strengthening: visual effects should be considered as well as physical obstruction.	<p>The existing permitted activity standards for seismic strengthening require that such work does not result in structural alterations to the external appearance of the building and result in any existing openings (doors and/or windows" being obstructed. This existing rule covers the external appearance of the item. Works which do not meet these standards currently fall to discretionary activity status. However the plan change proposes a new restricted discretionary rule for where these standards are not met for Category B items in Schedule 4b to reflect the support for more certainty than discretion, and also the</p>

	fact that a number of these items have come from the Category C listing where there has been very limited protection, or are new additions to the schedule.
Support for the range of heritage values listed in Policy 1.1	Noted
Insert rules for signs	The plan change proposes a permitted activity rule and standard for signs on heritage items, which cross references to the Signs Chapter 3E in the District Plan. There is already a signs policy for heritage included in Chapter 4. A cross reference is also proposed to the Signs Chapter to signal that there is a relevant policy in Chapter 4.
Consider minor exemption for minor alterations such as customer connections for telecommunication infrastructure	The plan change includes a new permitted activity rule which enables minor external alterations to items listed in Schedule 4b where they are not visible from a road or public space. The utilities proposed to be covered include customer connections, relating to radio communication or telecommunication lines; wastewater or stormwater treatment or disposal; and/or water, gas or electricity.
Suggests boosting standards for maintenance and repair: <ul style="list-style-type: none"> i. Repair work must be kept to the minimum amount necessary ii. Heritage fabric is not damaged when undertaking the maintenance or repair by using protective materials where necessary. 	The operative provisions provide standards and a definition about what maintenance and minor repair requires. It is considered that such work would be kept to the minimum amount necessary due to cost and efficiency reasons.

Part III: STATUTORY EVALUATION

14.0 Scale and Significance

The level of detail undertaken for the evaluation of the Proposed District Plan provisions has been determined by an assessment of the scale and significance of the implementation of these provisions. The scale and significance assessment considers the environmental, economic, social and cultural effects of the provisions. In making this assessment regard has been had to the following, namely whether the provisions:

	Low	Low-moderate	Moderate	Moderate-high	High
Degree of change from the Operative Plan	✓				

Effects on matters of national importance (s6 RMA)		✓			
Scale of effects – geographically (local, district wide, regional, national)	✓				
Scale of effects on people (how many will be affected – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)	✓				
Scale of effects on those with particular interests e.g. Tangata Whenua....	✓				
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents.	✓				
Does it involve effects addressed by other standards/commonly accepted best practice	✓				
Likelihood of increased costs or restrictions on individuals, businesses or communities.		✓			

The greatest changes from the Operative District Plan provisions include:

- Insertion of a new schedule (Schedule 4b) into the District Plan which includes new heritage items as well as new classifications as either Category A or B bringing the heritage items into alignment with the existing District Plan framework (Categories B or A) for the protection of significant historic built heritage for the wider Manawatū;
- Inclusion of policies, rules, standards and definitions for certain activities including relocation on the same site, external alterations to non-contributing buildings, signage, and external minor alterations;

- The provision of more certainty and guidance to District Plan users, including the proposed restricted discretionary categories for some activities, rather than full discretionary status.

There is only a reasonably small number of heritage items that are under consideration for this plan change which results in a reasonably limited number of people being affected by the plan change.

The overall scale and significance of this proposal has therefore been assessed as being low to moderate. This means that this evaluation report needs to contain a low to moderate level of detail and analysis including:

- A planning analysis of the approach to the identification of historic heritage;
- Preparation of and reference to technical reports and assessments;
- Engagement with landowners and other key stakeholders, and consideration of their feedback.

The greatest change from the operative District Plan provisions is the shift of a number of heritage items from Category C to Category B, one Category C item to Category A, and one Category B item to Category A, as a result of the removal of the Category C status from the District Plan. However, there is also the proposed addition of some new permitted activities to enable heritage owners to undertake necessary works where the heritage values are not negatively impacted.

15.0 Consideration of Options to Proposal

While not required by the Act, the following paragraph provides a brief assessment of the alternatives to the proposed plan change.

The most realistic alternative to the plan change is the status quo, with the existing Appendix 1E retained and existing provisions applying to those items. The proposed plan change enables a review of the heritage schedule, which has removed the Category C status for protection. This has resulted in the movement of a large number of heritage items which were Category C to be moved to Category B (and one to Category A), which provides greater protection than what was provided for under the status quo. It is noted that the rules providing for Category C buildings were removed in Plan Change 46 meaning that there was greater confusion for those owners of Category C buildings in the operative District Plan. However, the proposed amendments provide certain activities to be permitted or restricted discretionary, to provide more guidance on some issues.

There are also a number of heritage items that are proposed to be removed Appendix 1E as they no longer retain the values that identified them previously as having historic heritage value. Without PCH(a) these items would be subject to additional restrictions, which is not considered appropriate.

Appendix 1E (excluding Marae) is out of date and does not align with the general planning framework for historic heritage in Chapter 4. The status quo provisions are also not reflective of a number of issues that have been raised in consultation, including enabling works to non-contributing buildings, minor external alterations, and the provision of more certainty for heritage owners if a resource consent is required.

For these reasons, PCH(a) is the preferred option to achieve the purpose of the Act.

16.0 Evaluation of Objective

This section of the report evaluates the existing objectives for the Historic Heritage Chapter as to whether it is still the most appropriate to achieve the purpose of the Act. No new objective is proposed as part of PCH(a).

For the purposes of this evaluation the following criteria form the basis for assessing the appropriateness of the existing objective:

Relevance:	Achieves purpose and principles of RMA Addresses a resource management issue Assists Council to carry out its statutory function Within the scope of higher level documents
Feasibility:	Acceptable level of uncertainty and risk Realistically able to be achieved
Acceptability:	Consistent with identified Iwi and community outcomes Will not result in unjustifiably high costs on the community or parts of the community.

Given there are no changes proposed to any of the existing objectives in Chapter 4, nor any additional objectives proposed, this assessment of the Objective is limited. In preparing the plan change the existing provisions have been assessed as still relevant, feasible and acceptable for managing historic heritage.

The assessment completed at the time the objectives were introduced to the District Plan through Plan Change 46 in 2013/14 remains relevant and appropriate. The objectives are considered to reflect the importance of protecting historic heritage in the district and are consistent with the direction in the One Plan. The heritage items included in Appendix 1E and the new additions to the schedule which form Schedule 4b are all 'built heritage' and listed as Category B or A, which are within the definition of 'significant historic built heritage'. Therefore the current objective is still relevant for PCH(a) to achieve the purpose of the Act. There is no other evidence to suggest that the current objectives are not achieving the purpose of the Act.

Overall the existing objectives are considered to be the most appropriate way to achieve the purpose of the Act.

17.0 Section 32(1)(b) Evaluation of Provisions (Policies, Rules and Other Methods)

This section of the report evaluates whether the provisions are the most appropriate way to achieve the objectives by identifying other reasonably practicable options, assessing the efficiency and effectiveness of the provisions in achieving the objective, and summarising the reasons for deciding on the provisions.

The assessment must identify and assess the benefits and costs of environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions, including opportunities for economic growth and employment. Given the assessment in Section 12 of the scale and significance of the proposed provisions, specific quantification of the benefits and costs in this report is not considered necessary and instead, the assessment below identifies generally where any additional cost(s) may lie.

Provisions have been bundled where they are expected to work together to achieve the objective and have been assessed as a package, rather than a detailed analysis of every provision. How this section is approached in terms of level of detail depends on what extent the options are departing from the Operative District Plan and the Scale and Significance of the proposed changes.

Note that this assessment only considers the provisions which are part of PCH(a) and not the existing provisions for historic heritage which are already included in the District Plan and were subject to assessment under Plan Change 46.

The following tables provide this assessment:

Objective			
HH-01 To protect significant historic built heritage that represents the history of the Manawatu District, from inappropriate subdivision, use and development.			
Proposed approach to provisions	Costs	Benefits	Risk of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Provision package summary:</p> <p><u>Non Contributing Buildings</u></p> <p>Policy</p> <p>HH-P10</p> <p>Non Contributing parts of heritage buildings</p> <p>Rules:</p> <p>HH-R11</p> <p>HH-R16</p> <p>Standards:</p> <p>NT – S1</p> <p>Definition:</p> <p>Non-</p>	<p><i>Environmental</i></p> <p>There are no significant environmental costs identified for the proposed provisions for non-contributing parts of heritage buildings.</p> <p><i>Economic</i></p> <p>There will be some administrative costs incurred by applicants and the Council for processing restricted discretionary consents on non-contributing parts of heritage buildings. This is because some of these buildings were Category C heritage items and are now recommended to become Category B. Category C buildings had no specific rules relating activities on them under the operative District Plan. However, alterations which do not change the height and footprint of a non-contributing part of a heritage building are proposed to be permitted activities, which reduces the need for a consent.</p> <p><i>Social</i></p>	<p><i>Environmental</i></p> <p>The proposed consent framework enables minor alterations within the existing footprint (e.g. changes to cladding and windows) to non-contributing parts of a heritage building to be a permitted activity. Where there are changes to the footprint or height of a non-contributing part of a heritage building, such changes have the potential to impact on the existing heritage values. These provisions assist with ensuring that the heritage values continue to be protected.</p> <p>A number of heritage houses in the district have had lean-to's added at a later date which do not always carry the same heritage significance as the original heritage building. These provisions will enable these houses and heritage values to be more effectively managed.</p> <p>When considering the operative provisions, the proposed provisions provide a clearer framework to manage</p>	<p>Preparation of the proposed plan change has identified that a number of heritage buildings in the District contain modern additions such as lean to's, which have been built at a later time and in a different style to the existing heritage building. These additions are referred to as non-contributing parts of a heritage building and do not contain the same heritage significance. The key works on those parts of a building that may affect heritage values on the main building have been identified as an extension to the footprint or change in height of the existing non-contributing part. Where there are changes proposed which are unlikely to affect the heritage values, a permitted activity pathway is considered to be appropriate.</p> <p>There is sufficient information to support these provisions and enable minor changes to occur on those non-</p>

Contributing Building	<p>There is unlikely to be social costs as a result of these provisions.</p> <p>Cultural</p> <p>There is unlikely to be cultural costs as a result of these provisions as the proposed provisions provide a clearer path for ensuring the protection of heritage values.</p>	<p>alterations to non-contributing parts of a heritage building. There is also a specific policy proposed to provide more certainty to plan users and heritage owners where changes to non-contributing parts of a heritage building are likely to have an impact on the heritage values of the heritage building.</p> <p>Economic</p> <p>This rule enables works that are proposed to non-contributing parts of a heritage building to be a permitted activity, reducing administrative costs for building owners and the Council. These works would usually require a discretionary consent under the existing additions / alterations rules without differentiating the more minor changes where there is unlikely to be impacts on heritage values.</p> <p>Where changes to the footprint and height of the non-contributing building are proposed, a proposed restricted discretionary consent narrows the matters of discretion to where there has been non-compliance with the rule, rather than the requirement of a more comprehensive discretionary consent application.</p> <p>Social</p>	contributing sections of the listed heritage buildings.
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		<p>Under the current provisions, minor changes to non-contributing buildings requires a discretionary resource consent. Where changes are proposed to increase height or footprint of non-contributing parts of a building a restricted discretionary consent is required to ensure the heritage values are not compromised by the change. These changes are therefore more enabling for heritage owners to manage their buildings and therefore their social wellbeing when considering the non-contributing parts of buildings.</p> <p>These provisions provide greater certainty for heritage item owners with regard to process, matters to be considered and likelihood of approval for those instances where a consent is required.</p> <p>A new definition is proposed which provides clarity to heritage owners about what a non-contributing part of a heritage building is.</p> <p>Cultural</p> <p>The proposed provisions are likely to be more effective in protecting heritage values as they provide a clearer framework by allowing some minor changes without the need for consent.</p>	
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		This results in the protection of the contributing parts of heritage buildings for longer term protection.	
Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objective given they will provide increased environmental, social and cultural benefits as outlined above. The inclusion of a policy, rules, standard and definition for alterations to non-contributing parts of a heritage building provides more certainty to plan users than the current provisions about the type of works that might have an impact on the heritage values of the main heritage item. A number of buildings listed in Schedule 4b contain more recent additions (including lean-to's) which, in many cases, do not carry the same heritage significance of the main part of the building. However when these areas are altered in terms of height or footprint, the changes have the potential to negatively impact on the heritage values. The suite of provisions enable heritage owners to make minor changes to non-contributing parts of heritage buildings, such as to windows and cladding, as permitted activities and seek to provide more guidance for plan users. The consent required for larger changes, such as an increase in footprint of a lean-to, is appropriate as these changes could affect the heritage values. Assessing the larger changes on a case by case basis is considered appropriate and an effective way to protect the historic heritage of the District.</p> <p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objective given the benefits identified above, including the permitted activity pathway for alterations to non-contributing parts of a heritage building which are unlikely to have an impact on the heritage values of the main building. This enables a greater level of flexibility for landowners than the current plan approach.</p> <p>There are no apparent significant opportunities for economic growth or employment as a result of the proposed provisions, given the nature of the topic.</p>		
Overall Evaluation	<p>The proposed provisions are the most appropriate way to achieve the objective HH-O1 because:</p> <ul style="list-style-type: none"> • The proposed focus on permitting minor changes, while focussing consent on those changes to a structure that have the potential for more significant impacts on the heritage values of the item is a pragmatic approach. The approach ensures that those activities with greatest effects on heritage items is assessed on a case by case basis. • The plan change is efficient in terms of reducing consenting costs for minor works which are unlikely to affect the heritage values. 		

	<ul style="list-style-type: none"> The plan change provisions provide greater clarity and certainty for heritage owners and District Plan users than the operative District Plan provisions, which would require consent for any alterations.
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Objective			
HH-01 To protect significant historic built heritage that represents the history of the Manawatu District, from inappropriate subdivision, use and development.			
Proposed approach to provisions	Costs	Benefits	Risk of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Provision package summary:</p> <p>Relocation of heritage items</p> <p>Policy HH – P11</p> <p>Rule: HH – R15</p> <p>Summary:</p> <p>For relocation on same site: PC H(a) inserts new rule for Category B</p>	<p>Environmental</p> <p>There are no significant environmental costs identified for the proposed provisions relating to the relocation of heritage items.</p> <p>Economic</p> <p>There will be some administrative costs incurred by applicants and the Council for the processing of consents for the relocation of heritage buildings, particularly in relation to the existing Category C heritage items, which all but one move to Category B and one to Category A (Opiki Toll Bridge). One Category B item (Pukemarama) moves from B to A, which results in changes to the consent categories for relocation.</p> <p>For relocation of a heritage item within the same site, PCH(a) includes a restricted</p>	<p>Environmental</p> <p>The proposed consent framework enables the relocation of Category B heritage items in Schedule 4b within the same site to be assessed as a restricted discretionary consent. Matters of discretion cover: necessity due to threats from natural hazards, opportunities to enhance the values; and measures to minimise the risk of damage to the item.</p> <p>The proposed policy provides greater guidance and clarity about when it is appropriate to relocate a heritage item listed in Schedule 4b as there is no policy related to relocation in the operative District Plan. The policy is consistent with the ICOMOS guidance in that imminent danger to natural hazards is an important consideration in the assessment of a relocation proposal. The policy also requires that the relocation protects the heritage values, and in</p>	<p>There is a much wider range of heritage items within the wider Manawatū District as compared to the FTC, and there is greater potential for these heritage items (e.g. houses, churches, memorials, objects or other buildings) to be relocated either within the original site or to another site, as compared to the typical Edwardian commercial buildings within the FTC. Therefore, there is certain and sufficient information about the type of heritage items that are subject to Plan Change H(a) in terms of the potential for their relocation at some time in the future.</p> <p>As discussed earlier in the report, Council’s heritage expert has</p>

<p>(restricted discretionary);</p> <p>No changes for Category A (discretionary);</p> <p>For relocation to another site:</p> <p>No changes for:</p> <p>Category B (discretionary);</p> <p>Category A (non-complying)</p>	<p>discretionary activity for Category B buildings. While this increases the costs for existing Category C items moving to Category B (as a consent is now required), the issues of most concern to the historic heritage values are narrowed by the matters of discretion as the operative provisions would require a discretionary consent instead.</p> <p>For relocation of heritage items to another site, the existing rule in the District Plan will apply. While this is not a change in consent category, the activity status is still considered appropriate as in many cases the location of the heritage item is important to the history of the District. This will be a change from the existing Category C items which are proposed to move to Category B.</p> <p>Where relocation of an item is proposed to another site, the proposed policy requires a comprehensive alternatives assessment to be undertaken by a heritage expert to determine that the relocation is the only practicable option. There has been only one resource consent for the relocation of a Category C building, and this was prior to 2014 (Apiti Post Office) when the controlled activity rules applied. While there will be an extra cost for applicants, including costs for existing Category C item owners, the likelihood of relocation is considered to be</p>	<p>the case of relocation to another site, requires a comprehensive alternatives assessment to be completed to demonstrate that relocation is the only practicable option.</p> <p>The differentiation of rule status for relocation within a site compared to relocation to another site reflects the fact that a heritage item is more likely to retain its heritage values when it is contained within the original site, rather than being removed from that site and taken to a new site which is less likely to be reflective of the significance of the heritage item. There is also the potential for the historic values to be damaged through relocation.</p> <p>These provisions assist with ensuring that the heritage values continue to be protected where the relocation of a heritage item is proposed, and where there are threats to the survival of the heritage item at its current location.</p> <p>Economic</p> <p>The proposed provisions provide a clearer path of restricted discretionary activity status for Category B items within Schedule 4b, where matters of discretion are identified. For existing Category B items, this new rule will provide greater clarity about the matters which need to be addressed for relocation of an item within the same site.</p> <p>The proposed provisions provide a more effective and efficient approach to managing</p>	<p>provided recommendations about the level of heritage significance and recommended either Category B or A for the existing Appendix 1E (excluding Marae) built heritage items and the removal of items where there are insufficient heritage values or the item no longer exists. There is therefore sufficient information to determine the level of protection and therefore the activity status for when a heritage item is proposed to be relocated as compared to under the current provisions and heritage schedule.</p> <p>The removal of the Category C rule framework under Plan Change 46 has created inconsistency and confusion. The proposed changes seek to provide clarity for plan users.</p> <p>Understanding the types of heritage items under consideration and their associated values forms the basis for the proposed relocation provisions. This level of detail for Appendix 1E items was not available under the current provisions.</p>
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	<p>small based on the fact that only one consent since 2002 has been obtained for the relocation of a heritage item. The potential impacts or damage to the historic values of the heritage item from the relocation should be assessed on a case by case basis as proposed.</p> <p>Social</p> <p>For existing Category C items which are recommended to be scheduled as Category B or A, there will be some changes to the requirements for a resource consent where relocation is proposed. However, given the small number of heritage items under consideration, and that only one consent has been received for relocation since 2002, the social costs are considered to be minor.</p> <p>Cultural</p> <p>There is unlikely to be cultural costs as a result of these provisions as the proposed provisions provide a clearer path for ensuring the protection of heritage values where heritage items are proposed to be relocated.</p>	<p>heritage compared to the existing provisions (which do not distinguish between within a site or moving to a new site), as relocation within a site compared to relocation to another site is differentiated in the rule framework. This is anticipated to be reflected in the future costs of consenting.</p> <p>Social</p> <p>A specific policy and enhanced rule framework is provided to assess the relocation of heritage items within Schedule 4b which can help achieve social well-being through enabling that historic heritage remains for future generations to enjoy, learn from and identify with.</p> <p>Prior to Plan Change 46, the relocation to another site of a Category C item was a controlled activity, and relocation within the same site was a permitted activity. While a resource consent was required where the item was proposed to be relocation to another site the Council had to grant the consent, subject to conditions. The Category C rules were removed as part of Plan Change 46, which left a gap for how the relocation of Category C buildings to another site was to be treated. The removal of these rules (amongst the other Category C rules) has caused confusion to plan users when processing consents or enquiries about Category C buildings.</p> <p>While noting that Category C status is proposed to be removed from the plan for the reasons</p>	<p>On that basis, Council has sufficient information in which to act. The risk of not acting in relation to the relocation of heritage items is for confusion and uncertainty to remain for those owners of the heritage items. This is not considered appropriate when Council has the information to make the changes as proposed.</p>
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		<p>outlined in section 9.2 of this report, the proposed provisions provide a clearer framework to assess the relocation of a heritage item.</p> <p>These provisions provide greater certainty for heritage item owners with regard to process, matters to be considered and likelihood of approval.</p> <p>Cultural</p> <p>The proposed provisions are likely to be more effective in protecting heritage values as they provide a clearer framework for protecting heritage values where the relocation of a heritage item is proposed.</p>	
<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objective given they will provide increased environmental, social and cultural benefits as outlined above. The inclusion of a specific policy to assist in assessing relocation proposals, and a new restricted discretionary rule to differentiate relocation within a site from relocation to another site for Schedule 4b Category B items, provides more certainty to plan users than the current provisions about which matters need to be assessed in relocation proposals. Where a heritage item is proposed for relocation to another site it is considered appropriate that a comprehensive alternatives assessment is completed by a suitably qualified heritage expert to determine that the relocation is the only practicable option. This policy also requires that the heritage values and significance of the heritage item is protected in relocation proposals. These provisions are effective in the ensuring the protection of heritage values and therefore the achievement of Section 6(f) of the Act.</p> <p>The provisions are more effective than the operative District Plan provisions (which had been removed for Category C buildings) for enabling the protection of significant historic built heritage in the wider Manawatū. Through the assessment completed under this plan change there is greater clarity of the heritage values of each item and how these would be assessed under the proposed provisions. This is a more effective approach to managing the historic heritage values when considering the relocation of those items in the future.</p>		

	<p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objective given the benefits identified above, in particular the requirement of a comprehensive alternatives assessment for relocation to another site, and the restricted discretionary rule which outlines certain matters of discretion for relocation within the same site. There is additional certainty provided for the owners of heritage items compared with the operative District Plan. With a clearer process identified under PCH(a) greater efficiencies are anticipated when managing the effects of relocation on heritage items.</p> <p>There are no apparent significant opportunities for economic growth or employment as a result of the proposed provisions, given the nature of the topic.</p>
<p>Overall Evaluation</p>	<p>The proposed provisions are the most appropriate way to achieve the objective HH-O1 because:</p> <ul style="list-style-type: none"> • The different rule framework for relocating heritage items in Schedule 4b within the same site or to a new site provides additional clarity for owners of heritage items. The matters of discretion to be considered for the relocation of a heritage item within the same site are narrow. This provides certainty to plan users compared with the operative District Plan provisions. • The plan change is efficient in terms of narrowing the consenting framework for relocation on the same site, and require addition information and assessment when heritage items are to be relocated to a new site. This is considered efficient and effective when considering the likely impacts on the historic values identified for the heritage items. • Managing the effects from the relocation of heritage items as proposed is an appropriate way to achieve protection of the listed heritage items in Schedule 4b and is consistent with the direction from section 6(f) of the Act. • The plan change provisions provide greater clarity and certainty for District Plan users than the operative District Plan provisions.

Proposed approach to provisions	Costs	Benefits	Risk of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Provision package summary:</p>	<p><i>Environmental</i></p> <p>There are no significant environmental costs identified for the proposed provisions relating</p>	<p><i>Environmental</i></p> <p>The proposed permitted activity rule enables alterations for potentially larger</p>	<p>As a result of identifying the heritage items in Schedule 4b there is now a greater range of heritage items within the wider</p>

<p>External additions and alterations to heritage items in Schedule 4b</p> <p>Policy: HH-P8 (operative)</p> <p>HH-R9 Permitted</p> <p>HH-R14 Restricted Discretionary</p> <p>Definition: Attachment</p>	<p>to external additions and alterations of heritage items.</p> <p>Economic</p> <p>The proposed rule enables minor external alterations of attachments (excluding signage) to a Schedule 4b heritage building to be assessed as a permitted activity. Where the alterations are visible from a road or public space or have a greater scale than the permitted activity rule allows then a restricted discretionary consent is required (HH-R14). Under the operative District Plan provisions any external additions and alterations of any scale of Category B buildings require a discretionary activity consent and for Category A buildings, a non-complying activity consent is required. While there will be changes to the type of consent required for items new to the schedule and with a new category, the proposed changes (HH-R9 and HH—R14) reduces the administrative costs for heritage owners and the Council, particularly when minor additions are proposed.</p> <p>For existing Category C items which are recommended to become Category B as part of the plan change, there will be additional administrative costs for heritage owners and the Council in processing a restricted discretionary consent for these works where they do not meet HH-R9, or are proposing additions/alterations. However, the number of</p>	<p>attachments such as heat pumps and solar panels onto Schedule 4b heritage items as a permitted activity, where they are not visible from a road or public space. This rule enables buildings to effectively keep up-to-date with technology, meet healthy homes standards, and enable other essential equipment such as small scale customer connections for telecommunication and infrastructure. These matters are important for ensuring the longevity and desirability of use of heritage buildings for future generations, while ensuring the heritage values are protected.</p> <p>Where attachments / equipment cannot be located out of visibility from a road or public space, a restricted discretionary consent is proposed for both Category B and A items, with matters of discretion relating to how the works retain the existing heritage values and the reversibility of the works.</p> <p>The addition of security alarms and security lighting are identified in this rule as a permitted activity anywhere on a heritage building due to their necessity and small scale when considering the heritage items as a whole. This provides clarity for heritage owners about the type of alterations that are permitted without the need for consent. There are cost savings as a result of this</p>	<p>Manawatū District as compared to the FTC. There is a need for these heritage items (particularly houses, churches and other community buildings) to be kept up to date with infrastructure, technology and healthy living standards. There is certain and specific site specific historic heritage information about the type of heritage items that are subject to PCH(a) in terms of their needs to be desirable buildings into the future.</p> <p>As discussed earlier in the report, Council’s heritage expert has provided recommendations about the level of heritage significance and recommended either Category B or A for the existing Appendix 1E (excluding Marae) items and removal of items where there are insufficient heritage values or the item no longer exists. There is therefore sufficient information to determine the level of protection and the activity status for when minor alterations to a heritage item are proposed, as compared to the operative District Plan provisions which do not enable minor alterations as proposed in</p>
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	<p>heritage items and the extent to which these rules will apply is likely to be small.</p> <p>There will also be changes to the activity status for the small number of new Category A items where external additions or alterations are a non-complying activity.</p> <p>While there will be new consent requirements for new Category B and A items in comparison to the operative provisions, the permitted activity pathway for minor alterations will reduce the need for consent for these works.</p> <p>Social</p> <p>For existing Category C items or new items which are recommended to be included in Schedule 4b, or where there are changes proposed to the category, there will be some changes where a resource consent would be required where attachments are not located away from a road or public space, and also where additions or alterations are proposed to the item. However, given the small number of heritage items under consideration, the social costs are likely to be minor.</p> <p>Cultural</p> <p>There is unlikely to be cultural costs as a result of these provisions as the proposed provisions provide a permitted pathway in enabling heritage items to keep up-to-date with technology and healthy buildings. Where changes (external additions/alterations) are</p>	<p>proposed rule compared with the existing alterations and additions rule in Chapter 4.</p> <p>Where a resource consent is required, the policy guidance is provided by existing HH-P8 for external additions and alterations which is appropriate for larger changes to heritage items. This allows the changes to be assessed in terms of the historic values of the heritage items.</p> <p>The proposed rules provide clarity about the type of attachments that can be added, and where to be located, without impacting on the heritage values of the heritage item. There are no similar rules in the operative District Plan to provide that clarity and guidance.</p> <p>A restricted discretionary activity status for external additions and alterations to Category B items provides more clarity for heritage owners than a discretionary consent, which is important for owners of existing Category C heritage items and new heritage items, where there has been no parallel rules under the operative provisions.</p> <p>These provisions assist with ensuring that the heritage values continue to be protected while the buildings are kept up to date with technology and innovations.</p> <p>Economic</p>	<p>PCH(a), or where external alterations or additions are proposed to Category B heritage items.</p> <p>Understanding the types of heritage items under consideration and associated values forms the basis for the proposed provisions. This information has enabled the assessment about the types of works that are likely to be required to heritage items, and where works can occur to heritage items as a permitted activity. This level of detail for the previous schedule (Appendix 1E) items was not available under the operative provisions.</p>
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	<p>proposed to items, a restricted discretionary consent would be required which enables the consideration and protection of heritage values.</p>	<p>A discretionary resource consent would be required under the operative District Plan provisions for external additions and alterations to Category B items, as well as works including solar panels, heat pumps, and air conditioning units, whether or not they are located away from a road or public space. The proposed provisions therefore provide a more efficient pathway for heritage building owners to keep their buildings up-to-date with technology and modern ways of living. This equates to additional cost savings under PCH(a) in relation to minor external alterations.</p> <p>The proposed restricted discretionary rule for Category B items for more than minor external additions and alterations (HH-R14) provides more certainty for heritage owners than the existing discretionary status for such works, which has been a matter identified through consultation.</p> <p>Social</p> <p>A permitted activity rule is proposed to enable heritage buildings to keep up-to-date with technology, modern living and healthy homes, which can help achieve social well-being through enabling that historic heritage remains for future generations to enjoy, learn from and identify with.</p>	
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		<p>When considering the operative provisions, the proposed provisions provide a more effective and efficient framework to enable the longevity and desirability of use for heritage items listed in Schedule 4b.</p> <p>The operative provisions for Category B buildings require a discretionary activity consent for any additions and alterations. The proposed provisions seek to provide more certainty by including a restricted discretionary activity with clear matters of discretion. This is important for those owners of current Category C items that are moving to Category B, some of whom have indicated that they are opposed to the Council holding too much discretion. The restricted discretionary status still enables the protection of heritage values while narrowing those matters that can be considered in the consent process.</p> <p>These provisions for external alteration and additions provide greater certainty for heritage item owners with regard to process, matters to be considered and likelihood of approval for those instances where a consent is required.</p> <p>Cultural</p> <p>The proposed provisions are likely to be more effective in protecting heritage values as they provide a clearer more efficient</p>	
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		framework for managing heritage items into the future.	
Effectiveness and Efficiency	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objective given they will provide increased environmental, social and cultural benefits as outlined above. The inclusion of a permitted activity rule for Category B and A items (Schedule 4b) to enable heritage items to keep up-to-date with technology, infrastructure requirements and healthy homes matters provides more certainty to plan users than the provisions in the operative District Plan (which require consent for any alteration or addition). Where minor external alterations are proposed that will be visible from a road or public space, a restricted discretionary consent is proposed which considers the reversibility of the works, the retention of heritage values. The proposed attachment definition provides additional clarity to plan users about the types of alterations which are subject to the rules. The proposed provisions which enable minor external alterations to heritage items is an effective means to ensure modern conveniences that allow people to live in healthy heritage homes. This is an effective approach to ensure the heritage items continue to be used and maintained in the future.</p> <p>The inclusion of a new restricted discretionary activity status for external additions and alterations provides more certainty to Category B (Schedule 4b) building owners than the current discretionary rule provisions. These provisions are effective in the ensuring the protection of heritage values and therefore the achievement of Section 6(f) of the Act.</p> <p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objective given the benefits identified above, in particular the permitted activity pathway for minor external alterations to both Category A and B items to enable heritage items to be kept up-to-date with technology, infrastructure requirements and healthy living. Having external alterations and additions defaulting to the restricted discretionary status provides additional clarity and therefore efficiency for those matters of most concern in relation to the external changes of Category B heritage items in Schedule 4b.</p> <p>There are no apparent significant opportunities for economic growth or employment as a result of the proposed provisions, given the nature of the topic.</p>		
Overall Evaluation	<p>The proposed provisions are the most appropriate way to achieve the objective HH-O1 because:</p> <ul style="list-style-type: none"> The different rule framework for minor additions to Category A and B heritage items in Schedule 4b enables heritage owners to add modern conveniences to their homes, thereby ensuring the ongoing use of these items. This provides certainty to plan users compared with the operative District Plan provisions which require consent for any external alteration. 		

	<ul style="list-style-type: none"> The plan change is efficient in terms of narrowing the consenting framework for those larger alterations and additions to Category B heritage items when compared with the operative provisions. This is consistent with the feedback from owners and reflects the scale of change that could impact on the historic values identified for the heritage item. This is considered an efficient and effective approach for those items listed in Schedule 4b. The plan change provisions provide greater clarity and certainty for District Plan users than the operative District Plan provisions.
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Proposed approach to provisions	Costs	Benefits	Risk of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>Provision package summary:</p> <p>Default rules:</p> <p>HH-P10 (proposed)</p> <p>HH – R16</p> <p>Restricted Discretionary (Where compliance not achieved with HH-S1, HH-S3, HH-S6 for Category B; HH-S1 and HH-</p>	<p>Environmental</p> <p>There are no significant environmental costs identified for the proposed default rules.</p> <p>Economic</p> <p>The provisions provide rules for activities to fall to when certain standards are not met. There are limited additional costs associated with the proposed rules particularly for Category C items which are being recommended as Category B which have not been subject to equivalent rules. However, the number of relevant heritage items and the extent to which these rules will apply is likely to be small.</p> <p>The proposed default rule for Category B where activities not provided for fall to discretionary is a change from the existing rule</p>	<p>Environmental</p> <p>The use of restricted discretionary status for activities which do not meet standards for maintenance and minor repair, seismic strengthening, and alterations to non-contributing buildings is an appropriate consent level, given that the heritage items are largely in use and that the heritage values are well known through the heritage assessments available. There is no change proposed to the activity status for Category A items which do not meet seismic strengthening (remains at discretionary).</p> <p>HH-30 is a default rule proposed for any activity not provided for in relation to Category B (Schedule 4b). Under the operative plan, the equivalent rule is non-</p>	<p>As discussed earlier in the report, Council’s heritage expert has provided recommendations about the level of heritage significance and recommended Category B, and in a few situations Category A, for the existing Appendix 1E items (and removal of items where there are insufficient heritage values or the item no longer exists). There is therefore sufficient information to determine the level of protection and the activity status for when proposed activities do not meet certain performance standards, or where a proposal is not provided for in the District Plan, as compared to under Appendix 1E</p>

<p>S6 for Category A).</p> <p>HH-R30</p> <p>Discretionary (Any activity not provided for - Category B)</p>	<p>of non-complying, resulting in very small changes to the requirement for consent for activities which are not provided for. Given the nature of the rule, it is unlikely to be triggered very often.</p> <p>Social</p> <p>For existing Category C items which are recommended to be included in Schedule 4b, there will be limited changes where certain permitted activity standards are not met and a restricted discretionary resource consent would be required. Where an activity is not already provided for in Chapter 4, a discretionary consent would be required. This is a change for items which have not had protection, however this rule would seldom be triggered.</p> <p>Given the small number of heritage items under consideration, the social costs are likely to be minor. While there are costs with the restricted discretionary activity classification, the proposed rule does narrow the matters of most concern which provides some certainty to heritage owners.</p> <p>Cultural</p> <p>There is unlikely to be cultural costs as a result of these provisions as the proposed provisions provide an appropriate pathway for the assessment of activities which do not meet certain standards, or where a proposed activity</p>	<p>complying activity status. A change from non-complying to discretionary activity status for activities already not provided for in relation to Category B heritage items is appropriate as specific assessments have been undertaken for each item with a level of information that often hasn't been available before. This rule is not likely to be triggered very often.</p> <p>The proposed restricted discretionary rule contains the matter of discretion: the degree of non-compliance with the particular performance standards that the works fail to meet in relation to the relevant heritage values listed in Schedule 4b. This narrows the assessment and therefore provides greater clarity and certainty for plan users, while ensuring the protection of heritage buildings for future generations.</p> <p>Existing policies which were assessed as part of Plan Change 46 provide additional policy guidance for non-compliance with standards relating to maintenance and minor repair and seismic strengthening (existing HH-P3, HH-P4, HH-P8). There is no evidence to suggest that these policies are no longer appropriate. Proposed policy HH-P10 enables changes to non-contributing parts of heritage buildings where those changes do not impact negatively on the heritage values of the heritage building. As assessed earlier, this policy provides</p>	<p>where there is a lack of information about the heritage significance and values.</p> <p>Understanding the types of heritage items under consideration and associated values forms the basis for the proposed provisions. This level of detail for the previous schedule items (Appendix 1E) was not available under the current provisions.</p>
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	<p>is not already provided for in relation to Category B items (Schedule 4b), to ensure the protection of heritage values for Category B and Category A items in Schedule 4b.</p>	<p>certainty to plan users and heritage owners where changes are proposed to parts of heritage buildings which do not contain the same heritage values as the main heritage building.</p> <p>The restricted discretionary activity status in proposed HH-R16 provides more certainty for applicants than a discretionary consent, which recognises that the existing Category C owners and owners of new items have had no parallel rules for such works under the operative provisions.</p> <p>HH-R30 enables any activity to a Category B item that hasn't already been provided for in the rule framework to be considered as a discretionary activity instead of non-complying. This recognises the fact that as a result of the heritage assessments being undertaken which have provided information about the heritage values, there is now more certainty about the heritage items and what they are used for. On that basis it is appropriate to have activities that are not provided for as a discretionary activity.</p> <p><i>Economic</i></p> <p>Where certain works do not meet standards for maintenance and minor repair, seismic strengthening, and changes to non-contributing buildings, a restricted discretionary consent will result in less</p>	
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		<p>administrative costs due to the limited matters of discretion, as compared to a wider discretionary consent application which would be required under the existing District Plan provisions. There are no changes proposed for non-compliance to seismic strengthening standards for Category A items, which recognises the heritage significance of these small number of items.</p> <p>Social</p> <p>Providing more guidance to heritage owners through the requirement of a restricted discretionary rule for where certain standards are not met can help achieve social well-being through ensuring that historic heritage remains for future generations to enjoy, learn from and identify with.</p> <p>These provisions provide greater certainty for heritage item owners with regard to process, matters to be considered and likelihood of approval for those instances where a consent is required.</p> <p>Cultural</p> <p>The proposed provisions are likely to be more effective in protecting heritage values as they provide a clearer more efficient framework for managing heritage items into the future.</p>	
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<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed provisions are the most effective method of meeting the objective given they will provide increased environmental, social and cultural benefits as outlined above.</p> <p>The inclusion of a new restricted discretionary activity status for where proposed works to Schedule 4b items do not meet standards relating to maintenance and minor repair (Category A and B), seismic strengthening (Category B), external alterations to non-contributing parts of heritage buildings (Category A and B), provides more clarity and certainty to heritage owners of those items listed in Schedule 4b than the current discretionary rule.</p> <p>The proposed discretionary rule for Category B items (Schedule 4b) to cover activities that are not already provided for, enables a wide assessment of matters that haven't been already considered by the rule framework. Given that the heritage values have been assessed and known, a discretionary activity status is appropriate (as compared to the existing non-complying activity status). These provisions are effective in the ensuring the protection of heritage values and therefore the achievement of Section 6(f) of the Act.</p> <p>Efficiency</p> <p>The proposed provisions are the most efficient method of meeting the objective given the benefits identified above, in particular the addition of a restricted discretionary rule for non-compliance with certain standards, and also a discretionary activity rule to assess activities not already provided for in relation to Category B heritage items (Schedule 4b). With the proposed permitted activity rules, the number of consents likely to be triggered is anticipated to be low.</p> <p>There are no apparent significant opportunities for economic growth or employment as a result of the proposed provisions, given the nature of the topic.</p>
<p>Overall Evaluation</p>	<p>The proposed provisions are the most appropriate way to achieve the objective HH-O1 because:</p> <ul style="list-style-type: none"> • Collectively the provisions will ensure that the heritage items included in Schedule 4b represent the history of the Manawatu District and are recognised and protected through the proposed rules where the proposal activities could have an impact on the historic values identified. • Proposed HH-P10 provides clear direction and guidance for assessing works proposed to non-contributing parts of significant historic built heritage. Existing policies (HH-P3, HH-P4, HH-P8) already in the District Plan, and therefore not subject to this plan change, are relevant to the assessment of maintenance and minor repair and seismic strengthening; • The rule framework enables certain activities that do not meet performance standards to default to a restricted discretionary status (Maintenance/minor repair (Category A and B), Seismic Strengthening (Category B) and changes to non-contributing buildings (Category A and B). This means that heritage owners have clarity for what is relevant and important when considering

these changes to the heritage items. The proposed approach also reflects feedback from heritage owners during the preparation of PCH(a) regarding the need for more certainty. Collectively the rules will ensure that heritage values identified for each item included in Schedule 4b are protected.

- The plan change provisions provide greater clarity and certainty for District Plan users than the operative District Plan provisions, which do not enable adequate protection of a number of heritage items included on Appendix 1E as there have not been comprehensive rules for Category C items in the District Plan, or for the new additions proposed to the schedule.

Objective			
HH-01 To protect significant historic built heritage that represents the history of the Manawatu District, from inappropriate subdivision, use and development.			
Proposed approach to provisions	Costs	Benefits	Risk of Acting/ Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
Provision package summary: Schedule 4b	<p>Environmental</p> <p>There are no significant environmental costs identified for the inclusion of Schedule 4b to the District Plan.</p> <p>Economic</p> <p>There will be some administrative costs incurred by applicants and the Council for processing of consents for works to heritage items where new permitted activity rules cannot be met, particularly in relation to the existing Category C heritage items and the proposed new items, as there were no specific rules relating to these items under</p>	<p>Environmental</p> <p>The items on the schedule have been assessed by Council’s heritage expert and the schedule is now up-to-date with either a Category A or B classification, which aligns with the plan provisions for either Category A or B within the FTC. The reasons for removing Category C ranking has been outlined in Section 9.2 of this report, which identified that the heritage items were not provided an appropriate level of protection under the existing provisions. This alignment was not possible under the operative plan as provisions for Category C items were removed from the planning</p>	<p>The approach to reviewing Appendix 1E has involved a specific assessment of all items on the existing heritage list in Appendix 1E (excluding Marae Buildings). The assessments were completed by a heritage expert and in some cases with the help of a local historian. Each item on the list has been assessed in terms of the values identified in existing Chapter 4, Policy 1.1, including Physical, Historic and Cultural values, giving a comprehensive heritage</p>

	<p>the operative provisions. However, the plan change proposes permitted activity rules which provide more clarity and reduce the need for consent particularly for small scale activities such as solar panels attached to a building where not visible from a road.</p> <p>There are four proposed Category A items (two new items, one existing Category C, one existing Category B), however these changes reflect the significance of the heritage items as identified in their respective heritage reports.</p> <p>Social</p> <p>For existing Category C items and new items proposed in Schedule 4b, there will be some changes where a resource consent will be required under the proposed provisions. However, the new permitted activity rules reduce the need for consent for certain activities, and proposed restricted discretionary provisions provide matters of discretion and a narrower consent focus than what has been provided for under the existing provisions. Given the small number of heritage items under consideration, the social costs are likely to be minor.</p> <p>There are four items that are recommended for Category A ranking (Pukemarama, Highden, RNZAF Hangars, Opiki Toll Bridge) which will be subject to discretionary status for some activities, and non-complying for</p>	<p>framework despite a significant number of heritage items still categorised as Category C outside the FTC.</p> <p>Existing Policy 1.2 in the District Plan define Category A as an item with values of national significance, and Category B as having values of regional or local significance.</p> <p>Each item on Schedule 4b has been assessed by Council's heritage expert which ensures that the list of heritage items is relevant and up-to-date and consistent with the approach for the FTC on when a building is a category A or B heritage item.</p> <p>The inclusion of Schedule 4b ensures that the heritage values are protected by identifying the heritage values for each item and classifying each item as either Category B or A. The information on the schedule is much more comprehensive than the operative schedule in Appendix 1E, and is consistent with the direction contained in the Horizons Regional Council One Plan and the National Planning Standards.</p> <p>When considering the operative provisions, proposed Schedule 4b in conjunction with the proposed provisions provides a significantly more relevant and effective framework for managing historic heritage values outside of the FTC and ensuring historic heritage is protected in the wider Manawatū District.</p>	<p>assessment. Where there were insufficient values already known, including where the item was no longer standing, an assessment was not required.</p> <p>The heritage assessments completed for each item provide a level of information that does not currently exist for the heritage items listed in the operative District Plan. Understanding this information forms the basis for this plan change and the content of Schedule 4b.</p> <p>A more effective approach to managing heritage values in the wider Manawatū District is reflected in the plan change where there is an updated heritage schedule with provisions which relate to all items on the schedule.</p> <p>Under the operative provisions, there were a significant number of heritage items which were listed as Category C from the previous framework, but the applicable rules had been removed under Plan Change 46. The assessments have shown that the heritage items have significant heritage values</p>
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	<p>other activities. Given the nature of the Opiki Toll Bridge, the likelihood for the need for a consent will be low. There are also certain permitted activities for Category A items which enable essential works to occur without the need for consent, but for other activities (e.g. seismic strengthening, relocation, alterations / additions, demolition) a more thorough assessment would be needed for Category A items, given the heritage significance of these items.</p> <p>Cultural</p> <p>There is unlikely to be cultural costs as a result of these provisions as the proposed provisions provide a more appropriate framework for the protection of significant historic built heritage values.</p>	<p>Economic</p> <p>Proposed Schedule 4b provides a more effective and fairer approach to managing heritage values in the wider district compared to the existing provisions, as the proposed schedule is up-to-date and reflects the current status and quality of the listed heritage items. The provisions which apply to the schedule are more effective and fairer for heritage owners as outlined in the tables above. Permitted activity rules also reduces the administrative costs for heritage owners and the Council for small scale activities as a result of the items being included in the Schedule.</p> <p>Social</p> <p>The schedule provides a greater level of information about heritage values for each item which has not been provided under the operative heritage schedule in Appendix 1E.</p> <p>The assessment and identification of heritage values for each of the heritage items on Schedule 4b can help achieve social well-being through enabling awareness and knowledge about historic heritage, ensuring that heritage remains for future generations to enjoy, learn from and identify with.</p> <p>These provisions provide greater certainty for heritage item owners than what is currently in the operative provisions, with regard to process, matters to be considered and</p>	<p>and reflect Category B status or in limited cases – Category A status.</p> <p>Council’s heritage expert has also undertaken heritage assessments of 18 new heritage items and recommended these to be included in Schedule 4b. The reasons for these additions include:</p> <ul style="list-style-type: none"> • Memorials: to reflect anniversary of WW1, and alignment with other memorials in the District • Assessment and inclusion of items that are listed by HNZPT but have not been included in the District Plan. <p>The plan change proposes the removal of 21 items from Appendix 1E for the following reasons:</p> <ul style="list-style-type: none"> • the Council’s heritage expert has assessed the heritage values as being low • items have been relocated out of the district • items have been demolished or burnt down • items are now within the jurisdiction of Palmerston
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		<p>likelihood of approval for those instances where a consent is required.</p> <p>Cultural</p> <p>The addition of Schedule 4b is a more effective approach in protecting heritage values as the schedule and proposed provisions are aligned and provide a clearer and more relevant framework for managing heritage items into the future.</p>	<p>North City Council after a local government boundary readjustment.</p> <p>Given that a review of all items in Appendix 1E has been undertaken, including heritage assessments undertaken on items which are recommended to be listed in Schedule 4b, there is sufficient information and certainty to support these provisions compared to what was under the operative provisions.</p>
<p>Effectiveness and Efficiency</p>	<p>Effectiveness</p> <p>The proposed schedule is the most effective method of meeting the objective given it will provide increased environmental, social and cultural benefits as outlined above. The inclusion of Schedule 4b into the District Plan (and removal of those parts of Appendix 1E excluding Marae) enables the District Plan to have an improved and more effective approach to managing heritage items in the District. As discussed above, the heritage items on the schedule have been assessed by Council’s heritage expert as holding significant heritage values which meet either Category A (nationally significant) or B (regionally significant) classifications. This is a more effective planning framework for protecting heritage values as the previous Category C classification did not contain effective rules for managing significant historic built heritage. The proposed schedule provides more certainty than Appendix 1E about the heritage items including the values important to each item.</p> <p>Efficiency</p> <p>The proposed provisions are the most effective method of meeting the objective given the benefits identified above, as the categories (A and B) on the schedule align with the provisions in the District Plan. Removing those heritage items where the historic value has been lost is also appropriate.</p> <p>There are no apparent significant opportunities for economic growth or employment as a result of the proposed provisions, given the nature of the topic.</p>		

Overall Evaluation for proposed provisions including Schedule 4b	<p>The proposed schedule is the most appropriate way to achieve objective HH-O1 because:</p> <ul style="list-style-type: none">• The heritage items included in proposed Schedule 4b represent the history of the Manawatū District following a comprehensive review of all built heritage items listed in Appendix 1E (excluding Marae), including new heritage items that have previously not be identified in the District Plan. The identification of the heritage items in the schedule and on the planning maps will enable plan users to have clarity for where the heritage items are, and the reasons for their inclusion in the District Plan.• The format of the schedule is consistent with the direction of the One Plan and the National planning Standards, ensuring regional and national consistency.
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Overall, the proposed provisions are the most appropriate way to achieve the objective HH-O1 because:

- Collectively the provisions will ensure that the heritage items included in Schedule 4b represent the history of the Manawatū District and are recognised and protected through provisions and identification in the schedule and on the planning maps.
- The proposed two policies provide clear direction and guidance for assessing works proposed for significant historic built heritage.
- The rule framework enables appropriate activities to occur as permitted activities, including minor external alterations, certain changes to non-contributing parts of heritage buildings, a clearer rule for signage which cross references to the Signs Chapter, while ensuring that the heritage values are protected. The new rule framework enables minor activities to occur on heritage items that would not otherwise be possible under the existing provisions of the District Plan (in the event the schedule was updated without any changes to the rules). The rule framework also provides new restricted discretionary rules for additions and alterations and relocation of Category B buildings within the same site, to provide more certainty for heritage owners while ensuring that heritage values are protected.
- The plan change is efficient in terms of reducing consenting costs for minor works which are unlikely to affect the heritage values. Where consents are required, specific guidance is provided through the matters of discretion or the new policies introduced.
- The plan change provisions provide greater clarity and certainty for District Plan users than the operative District Plan provisions, which do not enable the protection of a number of heritage items included on Appendix 1E. The plan change has realigned the heritage items with the comprehensive planning framework that was included as part of Plan Change 46 in 2014.

18.0 Conclusion

This evaluation has been undertaken in accordance with Section 32 of the Act in order to identify the need, benefits and costs arising from PCH(a) and the appropriateness of the proposal having regard to its effectiveness and efficiency in relation to other options in achieving the purpose of the Act. The evaluation demonstrates that PCH(a) is the most appropriate option for the following reasons:

- PCH(a) is not inconsistent with higher order documents including national policy statements, environmental standards and regulations, Horizons One Plan, and gives effect to the National Planning Standards;
- PCH(a) is the most effective and efficient way to achieve the purpose of the Act through enabling people and the community to provide for their well-beings and for their health and safety. It therefore enables the Council to better fulfil its obligations under the Act.
- The plan change removes a substantive part of the existing heritage schedule (Appendix 1E) in the District Plan and proposes a new Schedule 4b for significant historic built heritage in the wider Manawatū District. The schedule is more representative of Manawatū District's history with the addition of new items and removal of those items which have insufficient heritage values or are now no longer there. Including the specific historic values for each heritage item listed also provides clarity for plan users in relation to what matters about each item.

Appendices

Appendix 1 – Proposed Plan Change H(a) Historic Heritage – Wider Manawatu District

Appendix 2 – Schedule 4b: Significant Historic Built Heritage – Wider Manawatu District

Appendix 3 – Recommendations for Historic Heritage Schedule (Tables 1-3);
Assessment Criteria (Policy 1.1) for Historic Heritage (Table 4);
Letter from Mr Ian Bowman

Appendix 4 – Historic Heritage Reports

Appendix 1 – Proposed Plan Change H(a) Historic Heritage – Wider Manawatū District

Appendix 2 – Schedule 4b: Significant Historic Built Heritage – Wider Manawatu District

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Appendix 4 – Historic Heritage Reports