

**Steph Skinner**

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**From:** no-reply@dxp.squiz.cloud  
**Sent:** Thursday, 15 December 2022 10:09 am  
**To:** districtplanreview  
**Subject:** Website: Proposed Plan Change H(a) Submission

CAUTION: This email originated from outside of MDC's network. Do not click links or open attachments unless you know the content is safe. If in doubt contact the MDC IT Team!

A Proposed Plan Change H(a): Historic Heritage submission form has been submitted on the Manawatu District Council website with the following details...

Full name: S.M and J.M O'Brien Family Trust  
 Physical address: 320 Kimbolton Road, Feilding.  
 Postal address: 320 Kimbolton Road, Feilding.  
 Phone:  
 Email: shane@colspec.co.nz  
 Organisation:  
 This submission is made on behalf of the above organisation: Yes  
 Could you gain an advantage in trade competition through this submission?: I could not  
 Are you directly affected by an effect of the subject matter of the submission that:: I am not  
 The specific provisions of the proposal that my submission relates to are as follows:: Refer to attached submission document that was emailed to public@mdc.govt.nz.  
 My submission is that:: S.M and J.M O'Brien Family Trust are opposed to the proposed wording of Policy HH-P11 as it is too limited and does not provide for the consideration of the relocation of heritage items to be balanced against other relevant resource management issues.  
 I/we seek the following decision from the Manawatu District Council:: Refer to attached submission document.  
 Withhold my contact details:  
 Would you like to speak to Council in support of your submission?: Yes  
 If others make a similar submission, would you consider presenting a joint case with them at the hearing?: Yes

# Proposed Plan Change H(a): Historic Heritage Submission

**The Property Group Limited**  
Auckland Office  
PO Box 104, Auckland 1140  
Level 14, 55 Shortland Street  
Auckland 1010

**To** Manawatū District Council  
**From** Holly McIntee – Senior Planner, The Property Group Limited  
**Date** 15 December 2022

## **SUBMISSION ON PROPOSED PLAN CHANGE H(a) Historic Heritage – MANAWATŪ DISTRICT COUNCIL**

**Under Clause 6 of the First Schedule, Resource Management Act 1991**

### **1. Introduction**

- 1.1 This submission is made on behalf of S.M and J.M O'Brien Family Trust on Manawatū District Council's Proposed Plan Change H(a) (PPC H(a)).
- 1.2 This submission relates to the Rule HH-28 and Policy HH-P11. Our client has an interest in the property at 320 Kimbolton Road, Feilding (Lot 3 DP 425710). Trustees of the S.M and J.M O'Brien Family Trust are the family descendants of the original owner and one time mayor, Mr William Alfred Sandilands. Ownership of this property has been retained in the family since construction.

### **2. Submission**

- 2.1 Manawatū District Council's PPC H(a) seeks to review historic heritage within the wider Manawatū District and change the District Plan's rules and policies.
- 2.2 The site, 320 Kimbolton Road, contains a Scheduled Historic Heritage Building that was constructed in 1894 (however the plaque that is located on the site indicates that the construction date was 1890). This building is currently categorised as 'C' under the operative Manawatū District Plan. It is proposed to change the category of this building to 'B' under PPC H(a). As such, the activity status for relocating a Category B building under PPC H(a) will be a Discretionary Activity under HH-R28.
- 2.3 Proposed Policy HH-P11 introduces directive policy language intended:
- *To restrict the relocation of a heritage item in Schedule 4b except where it can be demonstrated that:*
    - a) *The work is necessary to save the heritage item from imminent danger to natural hazards; or*
    - b) *The work will protect the heritage values and significance of the heritage item identified in Schedule 4b, and*

- c) *In the case of relocation to another site, a comprehensive alternatives assessment has been completed by a suitably qualified heritage expert and relocation is demonstrated to be the only practicable option.*

2.4 S.M and J.M O'Brien Family Trust are **opposed** to the proposed wording of Policy HH-P11 as it is too limited and does not provide for the consideration of the relocation of heritage items to be balanced against other relevant resource management issues.

### 3. Reasons for the Submission

3.1 Proposed Policy HH-P11 is opposed for the following reasons:

3.1.1 This Policy has poor alignment with other (existing and unaltered) District Plan policies, such as Policy HH-P7. This policy is outlined below:

#### Policy HH-P7

To balance the protection of significant historic heritage values with other resource management issues and public safety concerns and in making an assessment under this policy to have regard to, without limitation:

- a. Market conditions affecting the feasibility of adaptive reuse;
- b. The economics of a range of reasonably practicable options;
- c. The contribution that any replacement building might make to the vitality and vibrancy of the Feilding Town Centre.

3.1.2 Notably, Policy HH-P7 seeks to “balance” the protection of significant historic heritage values with other resource management issues, and the extent of these matters are “without limitation”.

3.1.3 By contrast, Policy HH-P11 is more limiting, with relocation only available where a), b) and c) of the policy are satisfied.

3.1.4 The concern with this approach is:

- (a) There is no balance with other relevant resource management issues.
- (b) As the proposed policy HH-P11 is directly applicable to relocation of a heritage building or item, it would take primacy over Policy HH-P7. As such, this new policy would therefore apply new, more onerous/restrictive provisions to the relocation of buildings than would apply to the (full) demolition of a heritage building. Applications to relocate heritage items would not be considered under Policy HH-P7.
- (c) The narrow nature of Policy HH-P11 would make full demolition or removal of a heritage item a more attractive option given the consenting pathway provided by the District Plan, in comparison to relocation. This is because of the wider scope for the considerations of such applications for full demolition under Policy HH-P7. We consider that this is an unintended consequence of the proposed policy framework.
- (d) The restrictive nature of Policy HH-P11 also restricts the application of Policy HH-P7 c) as relocation of the heritage listed building or object may no longer be viewed as a “*reasonably practicable option*” available. This is because its practicality of

obtaining resource consent is limited by the directive nature of Policy HH-P11 and the confined nature of which relocation may be provided for under Policy HH-P11.

- 3.1.5 The wording of 'imminent danger to natural hazards' is considered to be too limited, as it does not allow applicants to consider natural hazards that are likely to cause future danger (such as flood plains).

#### 4. Procedural Matters

4.1 S.M and J.M O'Brien Family Trust wish to be heard in support of this submission.

4.2 S.M and J.M O'Brien Family Trust do not seek or gain advantage in trade competition through this submission.

Prepared by



**Holly McIntee**

Senior Planner

Reviewed by



**Ryan O'Leary**

Planning Manager – Central Region



# Form 5 Submission on a Publicly Notified Plan Change under Clause 6 of the First Schedule to the Resource Management Act 1991

Send or deliver your submission to: Principal Planner  
Manawatu District Council  
Private Bag 10 001, Feilding 4743  
135 Manchester Street, Feilding 4702

For enquiries phone 06 323 0000 fax 06 323 0822 email [districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

To Manawatu District Council  
Submission on **Plan Change**  of the Manawatu District Council Plan

## Submitter details

Full name Ministry of Education Te Tāhuhu o Te Mātauranga ('the Ministry')  
C/- Beca Limited ATTN: Zach Chisam

Physical address  
85 Molesworth Street, Wellington 6011  
PO Box 3942, Wellington 6140

Postal address  
(if different from above)

Contact numbers  
Phone (day) Mobile Fax

Email address zach.chisam@beca.com

I **could / could not** [select one] gain an advantage in trade competition through this submission.

I **am / am not** [select one] directly affected by an effect of the subject matter of the submission that:

- a) Adversely affects the environment; and
- b) Does not relate to trade competition or the effect of trade competition.

\* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.



## Submission at the Hearing

- I/we **wish to** speak in support of my/our submission [select one]
- I/we **do not wish** to speak in support of my/our submission
- If others make a similar further submission I/we will consider presenting a joint case with them at the hearing

## Signature(s)

Of submitter(s) or person authorised to sign on behalf of submitter(s)



15 December 2022

.....

Signature

Date

.....

Signature

Date

## Important Information

1. The Council must receive this submission before the closing date and time for submissions on this Plan Change or Variation.
2. Please note that submissions are public. Your name and submission will be included in papers that are available to the media and the public. Your submission will only be used for the purpose of the Plan Change or Variation process.
3. Only those submitters who indicate they wish to speak at the hearing will be sent a copy of the planning report.

For office use only

- post       hand delivered

Received at the Council on .....  
date time



## FORM 5

### Submission on a publicly notified proposal for policy statement or plan, change or variation under Clause 6 of Schedule 1, Resource Management Act 1991.

To: Manawatū District Council

Name of submitter: Ministry of Education Te Tāhuhu o Te Mātauranga ('the Ministry')

Address for service: C/- Beca Ltd  
85 Molesworth Street  
Wellington 6011  
PO Box 3942, Wellington 6140

Attention: Zach Chisam

Phone: +64 4-460 1775

Email: [Zach.Chisam@beca.com](mailto:Zach.Chisam@beca.com)

**This is a submission on the Manawatū District Council's Proposed Plan Change H(a): Historic Heritage to the Manawatū District Plan (the Plan).**

#### Background:

Thank you for the opportunity to formally submit on Plan Change H(a): Historic Heritage ('PC(a)'). The Ministry of Education ('the Ministry') is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has the responsibility not only for all state schools owned by the Crown, but also those state schools that are not owned by the Crown, such as designated character schools and state integrated schools. For the Crown owned state schools this involves managing the existing property portfolio, upgrading, and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus state school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future education facilities and assets in the Manawatū District.

#### The Ministry's feedback is:

Manawatū District Council (the Council) is currently undertaking a review of historic heritage within the wider Manawatū District. PCH(a) is a review of the items listed in 'Appendix 1E – Buildings and Objects with Heritage Value'. Further to this, several new provisions and a new heritage schedule are proposed to 'Chapter 4: Historic Heritage' in the Plan. PCH(a) proposes the following:

- To roll over, and carry 72 heritage items from the Plan;
- Add 18 new historic heritage items; and
- Remove 21 heritage items from the Plan.



As part of PCH(a) Manawatū District Council are proposing to include six new historic heritage listings on the Ministry's school sites. The schools and item proposed to be listed as heritage are as follows:

- Waituna West School – School Building;
- Hiwinui School – Hiwinui War Memorial;
- Ōroua Downs School - War Memorial;
- Sanson School – Memorial Gates;
- Taonui School – Memorial Gates; and
- Halcombe Primary School – Halcombe School Memorial Gates.

**The reason for the Ministry's submission and the decision sought from council:**

The Minister of Education (the Minister) is a requiring authority as defined in Section 166 of the Resource Management Act 1991 (the Act). The Minister designates existing and proposed state school sites as an effective way of managing the Government's network of schools. Designated schools enable the Minister to respond to changes in the characteristics of the student school catchment and desires of the school community. All six schools listed above are designated.

The Ministry is neutral on the inclusion of the heritage items proposed on the six school sites. The schools and the Ministry value the heritage item on each site. However, Section 176 of the Act states that:

*"if a designation is included in a district plan, then–*

*(a) section 9(3) does not apply to a public work or project or work undertaken by a requiring authority under the designation"*

In summary, this means that an education designation will prevail over any rules or listing of historical heritage items in the Plan, provided the Minister is undertaking works in accordance with the designation purpose.

The Ministry acknowledges the purpose of PCH(a) aims to protect the heritage values of items identified across the district. However, the Ministry has a requirement to provide education spaces that can respond to changes in the surrounding student populations, including intensifying sites where there are increases in the school roll. Schools value and are interested in protecting heritage items and generally will provide for growth/ educational spaces whilst trying to protect these features.

Should you wish to discuss any aspect of this submission, please do not hesitate to contact the undersigned as a consultant to the Ministry.



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Zach Chisam

Planner – Beca Ltd

(Consultant to the Ministry of Education)

Date: 15 December 2022



HERITAGE NEW ZEALAND  
POUHERE TAONGA

3

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

File ref: 33002-077

15 December 2022

District Planning Team  
Manawatū District Council  
Private Bag 10001  
Fielding 4743

[districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

Dear Sir or Madam

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED PLAN CHANGE FOR  
MANAWATŪ DISTRICT PLAN**

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

- 1. This is a submission on the Proposed Plan Change H(a) for Historic Heritage for Manawatū District Council**
- 2. Heritage New Zealand Pouhere Taonga could not gain an advantage in trade competition through this submission.**
- 3. The specific provisions of the proposed plan that the Heritage New Zealand Pouhere Taonga submission relates to are detailed in the attached table (Attachment 1).**
- 4. The reasons for the Heritage New Zealand Pouhere Taonga submission are detailed in Attachment 1.**
- 5. Heritage New Zealand Pouhere Taonga seeks the decisions as described in the table in Attachment 1.**

6. Heritage New Zealand pouhere Taonga wishes to be heard in support of its submission.
7. If others make a similar submission, Heritage New Zealand pouhere Taonga will consider presenting a joint case with them at a hearing.

Yours sincerely



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

Attachment:

1. Heritage New Zealand Pouhere Taonga Submission Table on Manawatū District Plan Change H(a).

Address for service

Heritage New Zealand Pouhere Taonga  
Takiwā o Te Pūtahi a Māui  
PO Box 2629  
Wellington 6140  
Ph: 04 494 8325  
Contact person: Dean Raymond, Kaiwhakamāhare  
Email: [draymond@heritage.org.nz](mailto:draymond@heritage.org.nz)

**Attachment 1**

**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
<b>Interpretation</b>				
	Attachment	S	HNZPT supports the definition of attachment in relation to heritage items listed in Schedule 4b.	Retain definition.
	Non-contributing building	O	<p>While HNZPT understands the concept of ‘non-contributing’ parts of scheduled heritage buildings, the provisions as notified are problematic. The definition refers to <i>parts of a building which may have been added at a later time than the original construction of the main building</i>. This can lead to a situation where parts of a building, which may not be ‘original’ but nevertheless have high heritage value, being removed or adversely altered.</p> <p>The ICOMOS New Zealand Charter contains the following clauses which relate to this topic:</p> <p><i>Conservation recognises the evidence of time and the contributions of all periods. The conservation of a place should identify and respect all aspects of its cultural heritage value without unwarranted emphasis on any one value at the expense of others. The removal or obscuring of any physical evidence of any period or</i></p>	<p>Delete definition.</p> <p>Where it is clearly documented in the heritage inventory, amend the heritage schedule to specifically exclude non-contributing parts of the building. This can be recorded in the ‘extent of protection’ column of schedule 4b.</p>

**Attachment 1**  
**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: abc = delete Underline: abc = addition
			<p><i>activity should be minimised, and should be explicitly justified where it does occur.</i><sup>1</sup></p> <p>The approach in the ICOMOS charter encourages the valuing of differing periods of a building's history; many of these different periods, and building alterations, are crucial in telling the story of the place.</p> <p>In some cases there will clearly be parts of a building which are non-contributing. These particular parts can be identified specifically in the District Plan schedule, so that there is no ambiguity for plan users.</p> <p>Where there is a situation that part of a building may have a lesser degree of heritage value than the 'main' or original part, proposed alterations can be assessed as part of a resource consent process. This can be assisted by the introduction of a policy encouraging the removal of non-contributing parts of a scheduled heritage building.</p>	

<sup>1</sup> ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value, Revised 2010

**Attachment 1**

**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
<b>Historic Heritage Chapter</b>				
	Historic Heritage Introduction Issues	S	It is acknowledged that the removal of the 'issues' section is in line with the National Planning Standards.	Retain amendment as notified
	HH-P1 Cultural values	S	HNZPT supports the reference to the New Zealand Heritage List / Rārangī Kōrero in this policy.	Retain policy.
	HH-P10	S	HNZPT supports this policy differentiating contributing and non-contributing parts of a heritage building. However, the distinction of contributing and non-contributing needs to be clear and unambiguous – refer to the submission point on the definition of non-contributing building.	Retain policy HH-P10:
	HH-P11	S	HNZPT supports the policy to restrict the relocation of heritage items. This policy aligns with the HNZPT Guide to the Management of Historic Heritage: District Plans (April 2022).	Retain policy as notified.
	Explanation (after HH-P11)	S (partial)	HNZPT in general supports this explanation. However, as this explanation does not directly relate to HH-P11, it may be more appropriately located in the	Retain explanation, but locate in a more appropriate place in the heritage chapter.

**Attachment 1**

**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
			District Plan after HH-P1, or as part of the introduction to the heritage chapter.	
	Explanation (after HH-P15)	S	HNZPT supports the amendments to this explanation	Retain explanation.
	HH-R4	O (partial)	HNZPT supports HH-R4, but in line with other submission points, requests that the rule be amended to refer to HH-S1.	Amend HH-R4: <u>Where compliance with HH-S1 is not achieved. Activity status: Restricted Discretionary. Matters of discretion: Degree of non-compliance with the particular performance standards that the proposed works fails to meet in relation to the relevant heritage values listed in Schedule 4b.</u>
	HH-R6	S	HNZPT supports the amendment to HH-R6	Retain rule.
	HH-R7	O (partial)	HNZPT supports HH-R7, but in line with other submission points, requests that the rule be amended to refer to HH-S3.	Amend HH-R7: <u>Where compliance with HH-S3 is not achieved. Activity status: Restricted Discretionary. Matters of discretion: Degree of non-compliance with the particular performance standards that the proposed works fails to meet in relation to the relevant heritage values listed in Schedule 4b.</u>

**Attachment 1**  
**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
	HH-R9	S	HNZPT supports this rule providing for minor external alterations to heritage items.	Retain rule.
	HH-R10	S	HNZPT supports this rule, subject to the restrictions and recommended amendments in HH-S5.	Retain rule as notified.
	HH-R11	S	HNZPT supports this rule, subject to the comments made in the submission point on the definition of non-contributing buildings. The rule may still be appropriate; however in the absence of a definition it would apply to non-contributing parts specifically identified in the schedule.  In addition, the matters referred to in HH-R16 should be integrated into this rule.	Retain rule, subject to recommended changes, including the following: <u>Where compliance with HH-S6 is not achieved. Activity status: restricted discretionary. Matters of discretion: Degree of non-compliance with the particular performance standards that the proposed works fails to meet in relation to the relevant heritage values listed in Schedule 4b.</u>
	HH-R14	S	HNZPT supports this rule for external additions and alterations as a restricted discretionary activity.	Retain rule.
	HH-R15	S	HNZPT supports this rule providing for relocation on the same site of heritage item listed in Schedule 4 (b) as a restricted discretionary activity.	Retain rule.
	HH-R16	O (partial)	HNZPT supports the intent of HH-R16. However, this rule would be better integrated with the other rules for	Delete rule, but integrate provisions into HH-R4, HH-R7 and HH-R11.



**Attachment 1**  
**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
			which HH-S1, HH-S3 and HH-S6 are relevant (HH-R4, HH-R7 and HH-R11).	
	HH-R24	S	HNZPT supports a discretionary activity rule for external additions and alterations to any Category B significant historic built heritage listed in Schedule 4(a).	Retain rule.
	HH-R25	S	HNZPT supports the amendments to HH-R25	Retain as notified
	HH-R27	S	HNZPT supports a discretionary activity rule for relocation on the same site of Category A heritage item listed in Schedule 4b.	Retain rule.
	HH-R29	S	HNZPT supports the proposed amendments to HH-R29	Retain rule.
	HH-R30	S	HNZPT supports a discretionary activity for any activity not provided for in relation to Category B heritage items in Schedule 4b.	Retain rule.
	Standards HH-S2	S	HNZPT supports this standard for when buildings need to be demolished due to fire, earthquake, or other disaster.	Retain standard as notified.
	HH-S5	O (partial)	HH-S5 refers to Rules 3E.4.1 and 3E.4.2 relate to permitted activities. 3E.4.2 is the list of permitted activity standards, including that there be only one sign per site, and that the maximum sign size is 0.6m <sup>2</sup> . While	Include the following standard for signs on heritage buildings in schedule 4(a) and 4(b):

**Attachment 1**

**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
			these standards are generally appropriate, additional standards should be introduced for signs on heritage buildings. It is important that signs on heritage buildings do not obscure significant architectural features, and are not attached in a way that damages heritage fabric.	<u>Signs must not obscure significant architectural features, and must be attached to the building in a way that minimises damage to heritage fabric.</u>
	HH-S6	S	HNZPT supports that external alterations should not result in any change to the height and footprint of the non-contributing part of the building. However, as referred to in other submission points, there should be more clarity around the definition of a 'non-contributing' building.	Retain HH-S6

**Schedule 4b**

Schedule 4b – reference to non-contributing parts of buildings	O (partial)		The schedule includes comments on levels of authenticity, including 'high', 'moderate' and 'low'. Some of the places with 'low' authenticity because of changes over time may need to have the 'non-contributing' components specifically identified, either with a specific reference in the 'extent of protection' column, or by delineating the non-contributing parts on a plan or diagram. An example where this may be appropriate is 'The Pines'.	Amend schedule 4b to include explicit identification of non-contributing parts of buildings, either by a specific description, or by delineating the non-contributing parts on a plan or diagram.
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**Attachment 1**

**Submission of Heritage New Zealand Pouhere Taonga on Plan Change H Manawatū District Plan**

Point	Proposed Plan Provision	Support or oppose	Reasons for submission	Relief sought Strike: <del>abc</del> = delete Underline: <u>abc</u> = addition
	Additional item to be added to Schedule 4b – Okahupokia Pā	O (partial)	Okahupokia Pā, on the eastern bank of the Rangitikei River near Ōhingaiti, is included in the New Zealand Heritage List / Rārangī Kōrero: List No. 7611, as a Category 2 historic place. Subject to advice from mana whenua, it should be included in Schedule 4b, or within an alternative schedule of Sites of significance to Māori.	Include Okahupokia Pā in schedule 4(b) or other appropriate District Plan schedule.
	Additional item to be included in schedule 4(b) – Mangaweka Bridge	O (Partial)	Mangaweka Bridge, spanning the Rangitikei River at Mangaweka, is included in the Zealand Heritage List / Rārangī Kōrero (List No. 9746), as a Category 2 historic place. This structure should be included in Schedule 4b	Include the Mangaweka Bridge in schedule 4(b)
<b>Other Plan Chapters – Consequential Changes</b>				
	Consequential changes to other plan chapters, including information requirements, earthworks, subdivisions, signs, and relocated buildings	S	HNZPT supports the consequential changes identified as part of Plan Change H.	Retain amendments as notified.



New Zealand Defence Force  
Defence Estate and Infrastructure  
NZDF Headquarters  
Private Bag 39997  
Wellington 6045

## Submission on Manawatu District Council Plan Change H(a): Historic Heritage

*Clause 6 of First Schedule, Resource Management Act 1991*

**To:** Manawatu District Council  
**Address:** District Plan Review  
Private Bag 10-001  
Feilding 4743

**Email:** [districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

**Feedback by:** New Zealand Defence Force  
**Contact Person:** Lucy Edwards, Senior Statutory Planner

**Address for Service:** New Zealand Defence Force  
C/- Tonkin + Taylor  
PO Box 2083  
Wellington 6140

**Phone:**  
**Email:** [Lucy.Edwards@nzdf.mil.nz](mailto:Lucy.Edwards@nzdf.mil.nz)  
[AGifford@tonkintaylor.co.nz](mailto:AGifford@tonkintaylor.co.nz)

This is a submission on the Manawatu District Council (MDC) Proposed Plan Change H(a): Historic Heritage.

Within the Manawatu District, NZDF operates Base Ōhakea. Under the Proposed Plan Change, Hangers No. 2 and 3 at Base Ōhakea are identified as heritage buildings of national significance (Category A) for physical and historic heritage values, with the extent of protection relating to the building exteriors.

NZDF broadly supports the provisions in the Proposed Plan Change, subject to amendments as discussed in this feedback. A detailed submission is attached.

NZDF **could not** gain an advantage in trade competition through this submission.

NZDF **wishes to be heard** in support of this submission.

If others make a similar submission, **we will consider** presenting a joint case with them at the hearing.

A handwritten signature in black ink, appearing to read 'Lucy Edwards'.

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Person authorised to sign on behalf of New Zealand Defence Force

Date: 15/12/2022

Point	Provision	Support / Oppose / Amend	Reasons	Relief sought
1.	Proposed Schedule 4b, inclusion of RNZAF Hangars Nos. 2 and 3	Support in part	The buildings are identified as a Category 1 <sup>1</sup> listing by Heritage New Zealand Pouhere Taonga, and NZDF recognises that the inclusion of the buildings as a heritage feature within the Proposed Plan is consistent with this listing.  We note that No.2 hanger houses 42 squadron and No.3 hanger houses 5 squadron. This requires an amendment to Appendix 4 RB1-8 Rural Buildings.	Amend Appendix 4 RB1-8 Rural Buildings as follows:  Today number 2 hanger houses No. 3 42 Squadron of helicopters and number 3 hanger houses no. 75 5 Squadron of fixed wing aircraft.
2.	Policy HH-P10	Support	It is appropriate that the policy framework enables minor alterations to non-contributing parts of heritage buildings.	Retain as notified.
3.	Permitted Activity Rule HH-R9	Support	It is appropriate that minor external alterations of heritage buildings are a permitted activity, subject to compliance with standards.	Retain as notified.
4.	Permitted Activity Rule HH-R10	Support	It is appropriate that signage on heritage buildings is provided for as a permitted activity, subject to compliance with standards.	Retain as notified.
5.	Permitted Activity Rule HH-R11	Support	It is appropriate that minor external alterations to non-contributing parts of heritage buildings is provided for as a permitted activity, subject to compliance with standards.	Retain as notified.
6.	Standard HH-S5 - Signage on significant historic built heritage contained in Schedule 4(b)	Support	The proposed standard requires compliance with the existing permitted activity rule 3E.4.1 and standards 3E.4.2 within the operative District Plan. Consistency across Plan chapters is appropriate.	We note that the defined term 'non-contributing parts' should be in bold at all locations within the plan so the reader knows the term is defined.  Retain as notified.
7.	Standard HH-S6 - External Alterations to Non-Contributing Parts of Heritage Buildings in Schedule 4b	Support with amendments	The proposed standard is generally supported. However, as currently worded, no change in the height or footprint of non-contributing parts is permitted by the standard. Even a decrease in height or footprint would require a resource consent. We assume the intent is to prevent increases in height or footprint which could further visually detract from the heritage building. Therefore, we suggest the replacement of the word 'change' with 'increase'.	Amend Standard HH-S6 as follows:  <b>External Alterations to Non-Contributing Parts of Heritage Buildings in Schedule 4b must comply with the following standard:</b> <i>i. External alterations to non-contributing parts of a heritage building listed in Schedule 4b must not result in any change increase to the height and footprint of the non-contributing part of the building.</i>
8.	'Attachment' definition	Support	The definition is appropriate.	Retain as notified.
9.	'Non-contributing building' definition	Support	The definition is supported. A minor amendment is proposed to be consistent with the wording used in the rules and standards.	Amend definition as follows:  <b>"Non-contributing parts of heritage buildings: 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.</b>

<sup>1</sup> Category 1: historic places are of special or outstanding historical or cultural significance or value.

**From:** [no-reply@dxp.squiz.cloud](mailto:no-reply@dxp.squiz.cloud)  
**To:** [districtplanreview](#)  
**Subject:** Website: Proposed Plan Change H(a) Submission  
**Date:** Wednesday, 14 December 2022 9:35:18 pm

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A Proposed Plan Change H(a): Historic Heritage submission form has been submitted on the Manawatu District Council website with the following details...

Full name: Cindy Lilburn  
 Physical address: 24 Church Street Awapuni Palmerston North 4412  
 Postal address: As above  
 Phone:  
 Email: [cindy.lilburn@xtra.co.nz](mailto:cindy.lilburn@xtra.co.nz)  
 Organisation: Historic Places Manawatu-Horowhenua

This submission is made on behalf of the above organisation: Yes

Could you gain an advantage in trade competition through this submission?: I could not

Are you directly affected by an effect of the subject matter of the submission that:: I am

The specific provisions of the proposal that my submission relates to are as follows:: Manawatu District Plan Change H(a) Historic Heritage

Our committee has discussed the proposed changes to policies and proposed new heritage schedule. We wish to submit on the following POLICIES: Categories for heritage places: Historic Places Manawatu-

My submission is that::

Horowhenua support change to the categories which will reduce these from A, B and C to two categories, A and B only. Category C places only needed to be recorded before their demolition. We ask that the plan insert the proposed guidance note that a photographic record MUST, not just will be encouraged in the case of demolition of any historic place, Category A or B. Otherwise places of 'lesser interest' can be lost with no physical record of the features which saw them initially listed on the plan. We ask also that the plan include the guidance note that under the Heritage NZ Pouhere Taonga Act, any place demolished which pre-dates 1900 requires archaeological consent and assessment by Heritage NZ. Minor alterations: we support the proposed change to the District Plan which will permit minor changes to more modern parts of existing heritage buildings where they are not constructed in the same style, materials or finishes as the original. Attachments: we support the proposed change which will permit solar panels, heat pumps and infrastructure to be added where they are not visible from a road or public space NEW HERITAGE SCHEDULE Table 1 lists existing rural places on the District Plan with their proposed categories. We support this listing and the new proposed categories. In particular we are in favour of the category for the Opiki Toll Bridge being altered from C to A which reflects its Category I rating by Heritage NZ. Table 2 lists heritage places which it is proposed should be added to the Manawatu District Plan. We support this listing and the recommended categories for these places. In particular we support the inclusion of the Ohakea Air Force hangers and Highden as Category A. These have Category I ratings by Heritage NZ but are not on the District Plan. We also support the inclusion of the RNZAF Operations Room for its national rarity as a historic place. In the next review of heritage places [or this one] we would like to see the investigation and inclusion of post-World War II modernist places in this listing. Heritage should not be confined to the colonial era and the lack of modernist buildings or places would be to neglect over 70 years of history. In particular we are thinking of the late Betty Williamson's Group Architects house at Cheltenham or for instance the house architect Sir Michael Fowler built for his parents in Feilding. Table 3 lists heritage places which the Council proposes be removed from the list. We appreciate that some have been demolished, moved from their sites or now are part of the Palmerston North City Council area due to boundary changes. We support the changes made in this list.

I/we seek the following decision from the Manawatu District Council::

Policies: Categories: change current category listing A - B - C to a two-part listing, A and B only Add guidance note requiring photography of any historic place to be demolished Add guidance note requiring archaeological assessment of any historic place pre-1900 in age Add policy permitting changes to external features Add policy permitting attachments to non-essential sections of a historic structure We approve of Table 1 with the proposed categories We approve of Table 2 with the proposed categories We approve of Table 3 and the removal of this heritage places for various reasons from the Manawatu District Plan Historic Places Manawatu-Horowhenua

Withhold my contact details:

Would you like to speak to Council in

support of  
your  
submission?:

If others  
make a  
similar  
submission,  
would you  
consider  
presenting a  
joint case  
with them at  
the hearing?:



14 December 2022

RAI 04 02  
2022  
LMS:RBM

Manawatu District Council  
Private Bag 10 001  
FEILDING 4743

By email: [districtplanreview@mdc.govt.nz](mailto:districtplanreview@mdc.govt.nz)

Dear Sir/Madam

## **PROPOSED PLAN CHANGE HISTORIC HERITAGE AND NOTABLE TREES – HORIZONS SUBMISSION**

### Introduction

Thank you for the opportunity to make a submission on the proposed Historic Heritage (Ha) and Notable Trees (Hb) Plan Changes.

At Horizons Regional Council (Horizons) our responsibilities include managing the region's natural resources, flood control, monitoring air and water quality, pest control, facilitating economic growth, leading regional land transport planning and coordinating our region's response to natural disasters.

Environmental planning is a key function. Horizons integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use and threatened indigenous biodiversity.

Horizons' interest in proposed plan changes H(a) and H(b) is as the regional authority for the affected area. In this submission we consider the proposed plan change in the context of giving effect to the regional policy statement components of Horizons' One Plan, and ensuring that these changes would not be inconsistent with the regional plan provisions<sup>1</sup>. Horizons does not meet the criteria of gaining an advantage in trade competition through this submission and therefore is not limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

### Historic Heritage (Proposed Plan Change H(a))

Horizons' response to the Historic Heritage Plan Change has three parts as follows:

- Alignment with the One Plan provisions.
- From the perspective of Horizons' role in river management and flood control in the region.
- Information on liquefaction risk at the Opiki bridge site.

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<sup>1</sup> As set out in section 75 of the Resource Management Act 1991

Each point is discussed in detail below.

1. One Plan alignment:

The relevant provisions from the RPS are:

- Objective 6-3 (Historic Heritage) and Policies 6-11 and 6-12.
- Objective 3-2 (Energy) and Policy 3-7 (energy efficiency)

Historic Heritage: One Plan Policy 6-11 requires territorial authorities to include provisions in their District Plans to protect *historic heritage* of national significance from inappropriate use, development or subdivision and give consideration to the implementation of a management framework for other places of historic heritage. Policy 6-12 requires territorial authorities to develop and maintain a schedule of their district's known historic heritage in the District Plan, with a statement of the qualities applying to each site.

The changes proposed through the historic heritage proposed plan change H(a) align with the requirements of the One Plan RPS. On that basis Horizons supports the proposed changes.

Energy efficiency: One Plan Policy 3-7 requires territorial authorities to "(a) have particular regard to the efficient end use of energy in consent decision-making processes for large users of energy" and "(b) territorial authority decisions and controls on subdivision and housing including layout of the site and layout of the lots in relation to other houses/subdivisions, must encourage energy-efficient house design and access to solar energy."

The proposed changes to enable solar panels, heat pumps, and infrastructure connections where they are not visible from a road or public space align with One Plan provisions in policy 3-7 relating to energy efficiency. On that basis Horizons supports the proposed changes.

2. River Management & flood control

Horizons Regional Council is responsible for managing flood control and land drainage in the region and it is an important part of keeping our communities safe. Managing rivers through identification of flood control and drainage schemes, construction and maintenance of flood control and protection structures and drainage schemes allows Horizons to help prevent floods and provide adequate land drainage where required.

We note the proposed plan change lists the Ōpiki Toll Bridge as a Category A site of historic built heritage in Schedule 4b. As such, we understand there are rules and conditions relating to activities affecting the structure. The land adjacent to the bridge is owned by Horizons Regional Council and functions as a floodway as part of the Lower Manawatū flood control and drainage scheme. It is understood that Horizons does not own the bridge or the land it is located on (with this being part of the river parcel). Horizons' Engineers have advised they do not undertake works on the bridge or any abutments. As such we understand works in this area will not require resource consent. Given the bridge is located within a flood control and drainage scheme, we request that any party undertaking works on the bridge

structure advise Horizons Regional Council's river management department in advance to ensure risks to any flood protection structures are avoided. We also advise that due to the flood control and drainage value associated with this site, certain works in the riparian margin (10 metres from the bed of the River) may require resource consent from Horizons Regional Council.

### 3. Ōpiki Bridge liquefaction risk

We advise GNS Science has completed regional scale liquefaction susceptibility mapping. It appears that this area has *moderate* susceptibility to liquefaction. Please refer to Horizons Regional Natural Hazard map profile on [Horizons Maps | Public Viewer](#) to view the liquefaction map for the Region. Please note, the liquefaction hazard map supplied is a regional scale map that identifies areas where liquefaction might be damaging to buildings and infrastructure. It is not suitable for use as a site-specific analysis of liquefaction, but it may be used to identify and prioritise areas where a site-specific analysis of liquefaction hazard is warranted. Further questions should be directed to GNS Science. For more information about planning and engineering guidance for potentially liquefaction-prone land, visit the Government's website: <https://www.building.govt.nz/assets/Uploads/building-code-compliance/b-stability/b1-structure/planning-engineering-liquefaction.pdf>

#### Notable Trees (Proposed Plan Change H(b))

The relevant provisions from the RPS is Policy 6-1(b)(i) which requires Territorial Authorities to retain schedules of notable trees and amenity trees in their District Plans. The proposal to update Appendix D based on the STEM threshold and add a new Notable Trees chapter appears to align with the requirements of the One Plan RPS and we are generally supportive. However we make the following comments in relation to the rules proposed:

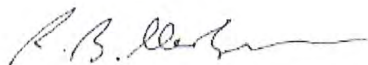
- Rule TREE-R1 (pruning): We support standards TREE-S1 and TREE-S2 requiring the works to be undertaken by a Level 4 qualified arborist, however consider this could be strengthened by requiring confirmation of the arborist to be used and their qualification level to be supplied at the time notification of the works is given to Manawatū District Council.
- We note standards TREE-S1, TREE-S2 and TREE-S3 require two different timeframes for notifying Council. Tree S1(ii) states council be "advised 10 working days prior to works taking place", whereas TREE-S2(i) and TREE-S3(i) requests notification "as soon as reasonably practicable". In our view this creates inconsistency, particularly in relation to rule TREE-R1 which references both TREE-S1 and TREE-S2. We suggest the 10 working day timeframe be applied to all three standards.
- Rule TREE-R4 (removal of a notable tree): the comments in relation to Rule TREE-R1 also apply. We suggest, confirmation of the Level 6 arborist to be used be supplied at the time Manawatū District Council is notified of the works.

#### Conclusion

Horizons generally supports the proposed plan changes for historic heritage and notable trees, subject to the comments within this submission. Horizons seeks the relief set out in its submission above, or any further alternative or consequential relief that achieves the outcomes sought.

We do not wish to be heard in support of this submission but are happy to provide clarification on any matters raised in this submission as required.

Yours sincerely,



Robert Marshall  
**SENIOR POLICY ANALYST**

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