



HERITAGE NEW ZEALAND
POUHERE TAONGA

9 August 2023

Taupō District Council,
Private Bag 2005,
Taupō 3352
Attn: CEO-Julie Gardyne

Email: districtplan@taupo.govt.nz

Tēnā koe Julie,

**HERITAGE NEW ZEALAND POUHERE TAONGA – LETTER TO BE TABLED FOR PLAN CHANGE 42,
GENERAL RURAL AND RURAL LIFESTYLE ENVIRONMENTS**

To: Hearings Panel for Plan Change 42, General Rural and Rural Lifestyle Environments, Taupō District Council Proposed District Plan.

Name of submitter: Heritage New Zealand Pouhere Taonga.

1. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historic heritage.
2. **This is a letter to be tabled for the hearing on the s42A report for Plan Change** General Rural and Rural Lifestyle Environments, Taupō District Council Proposed District Plan.
3. Heritage New Zealand Pouhere Taonga (HNZPT) lodged a submission on Plan Change 42 (PC 42) to the proposed Taupō District Council District Plan (the Plan). Through its submission, HNZPT supported the following provisions being retained as notified: Subdivision general rule 4b.5 (OS96.11), Subdivision general rule 4b.5.2 (OS96.12), Subdivision general rule (OS96.13), and Subdivision bonus lot assessment criteria-4b.5.8(OS96.15) and that the following provisions are retained and amended or clarified: Objectives and Policies 3b.2(OS96.8), Objectives and Policies 3b.3 (OS96.9) subdivision bonus lots 4b.5.8(OS96.14) and that new rules and assessment criteria are developed for earthworks (OS96.10)

HNZPT has reviewed and considered the Overarching s42A report prepared by Hilary Samuel, and the Plan Change 42 S42A Report by Craig Sharman for this hearing. HNZPT is generally supportive of most of the recommendations made by the authors and comments further on these provisions below.

Subdivision general rule 4b.5 (OS96.11), Subdivision general rule 4b.5.2 (OS96.12), Subdivision general rule (OS96.13)

4. HNZPT sought that this subdivision assessment criteria, that assessed effects on cultural and history heritage at the time of subdivision was retained. The criteria have been retained, unaltered from the notified version and HNZPT submission is supported.
5. HNZPT continues to seek the retention of the assessment criteria at the time of the decision making on this Plan Change.

Subdivision bonus lots-4b.5.8 (OS96.14)/Subdivision bonus lot assessment criteria-4b.5.8 (OS96.15)

6. HNZPT submitted that the bonus lot provisions should be expanded to include historic heritage, or for access to sites of significance to Māori. The reporting planner has responded to advise that while there may be merit in this at the time of the review of the historic heritage chapter, at the current time the focus of the Plan is the protection of Significant Natural Areas. The reporting planner has advised that access to Māori sites of significance can be achieved through a discretionary activity subdivision resource consent.
7. As the matter on which HNZPT submitted can be achieved in part through other mechanisms in the Plan, and the other aspect has the potential to be achieved at a future time in the rolling review of the Plan, I accept the reasoning of the reporting planner on this submission point.
8. With regard the assessment criteria related to bonus lot subdivision, I note that the assessment criteria related to effects on historic and cultural values has been recommended to be retained and I continue to seek its retention at the time of the decision making on this Plan Change.

New rules and assessment criteria are developed for Earthworks (OS96.10)

9. HNZPT submitted for earthworks provisions, in addition to those provided for earthworks in outstanding landscapes, to provide additional protection for historic heritage. The reporting planner has advised that the Plan is predicated on the Waikato Regional Plan providing a rule framework in relation to earthworks. On review I note that while there are many components to the regional plan earthwork rules, it seems that large quantity of earthworks could be undertaken as a permitted activity, potentially as much as 250m³. The reporting planner has advised that to consider making earthworks rules efficient and effective in the District Plan, that a District Wide historic heritage and cultural sites study would need to be undertaken to make these types of rules targeted.
10. While I agree that a targeted approach would be the most effective approach, I am disappointed that such a study has not been undertaken as HNZPT met with Council Policy staff several years on the matter of a historic heritage study and we had been hopeful that it would be part of this review together with an associated rule framework.

Retain and add additional objectives and policies 3b.2 (OS96.8)/3b.3 (OS96.9).

11. HNZPT submitted seeking additional objectives and policies related to historic heritage while acknowledging that there was an acceptable policy framework related to Tangata Whenua. The reporting planner has advised that they consider that there is sufficient recognition of historic heritage matters through assessment criteria for a number of activities in this Plan Change, and also within the District Wide historic heritage chapter.
12. Given the additional matters related to historic heritage that have been included into the plan changes as part of HNZPT pre notification advice, I accept this reasoning.

Conclusion

13. HNZPT supports the amendments to the above provisions as recommended in the s42A report for Proposed Plan Change 42. Given HNZPT is in general support of the planner's recommendations, HNZPT does not consider it necessary to be heard at the hearing.
14. Should the Hearings Panel require clarification or wish to discuss the above matters further, please contact HNZPT via the address for service below.

Kā mihi



Ben Pick
Director Northern region (Acting)

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