



23 October 2015

The Chief Executive  
Queenstown Lakes District Council  
Private Bag 50072  
Queenstown 9348

Dear Sir/Madam

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED QUEENSTOWN LAKES DISTRICT PLAN**

1. This is a submission on the Proposed Queenstown Lakes District Plan (PDP).
2. Heritage New Zealand could not gain an advantage in trade competition through this submission.
3. The specific provisions of the PDP that Heritage New Zealand's submission relates to are the historic heritage-related aspects of the PDP.
4. The heritage of the Queenstown Lakes district is unique, complex and fascinating. The district contains buildings, structures, objects and sites that reflect some of the most formative episodes in the history of New Zealand. The management of these finite resources is especially important for enabling existing and future generations' full understanding and appreciation of the district and to enhance the value that the district's residents gain from living and working in and around historic places. Considered management of heritage resources can also render these a drawcard for potential visitors to the region, with all of the attendant economic benefits that tourism can offer.
5. Heritage New Zealand generally supports the PDP as it concerns historic heritage, but does seek amendments and additions to certain provisions. Heritage New Zealand's submission points are outlined in Appendix A to this submission. The suggested amendments are intended to improve, clarify, qualify and strengthen the provisions as they relate to the management and protection of historic heritage.
6. Overall Heritage New Zealand supports the Council's approach to identifying, assessing and protecting significant historic heritage values. In particular we would like to acknowledge the effort and resources that have gone into assessing individual heritage items, heritage landscapes and heritage precincts.
7. Heritage New Zealand appreciates the opportunities it has had to provide input into the PDP, and looks forward to working further with the Queenstown Lakes District Council towards a robust and effective District Plan that protects the historic heritage of the Queenstown Lakes district for future generations.
8. Heritage New Zealand wishes to be heard in support of this submission.

Yours sincerely

Jonathan Howard

Acting General Manager – Southern Region

Address for service: Heritage New Zealand, c/- Jane O'Dea, Heritage Advisor – Planning, [jodea@heritage.org.nz](mailto:jodea@heritage.org.nz), PO Box 5467, Dunedin 9058.

Attachments:

- Appendix A: Submission of Heritage New Zealand Pouhere Taonga
- Appendix B: Proposed Archaeological Site Provisions
- Appendix C: New Zealand Heritage List Reports – Pleasant Terrace Workings  
Mt Aurum Homestead and Skippers School Complex  
Bullendale Hydro Electric Dynamo and Mining Site  
Gratuity Cottage  
Sew Hoy's Big Beach Claim  
Wong Gong's Terrace Historic Area  
Kawarau Falls Dam  
Skippers Bridge (part of Skippers Road report)  
Hullert  
Wakatipu Flourmill Complex  
Tomanovitch Cottage  
Kinross Farm Steading
- Appendix D: Archaeological site descriptions and maps - West Wanaka Māori occupation sites  
Reko's Point  
Roaring Meg Bridge Abutment
- Appendix E: Guidelines for Preparing Conservation Plans (under review)

**Appendix A**  
**Submission of Heritage New Zealand Pouhere Taonga**

Key:

Strike eg. ~~abc~~ = delete text

Underline eg. abc = additional text

RMA = Resource Management Act 1991

HNZPTA = Heritage New Zealand Pouhere Taonga Act 2014

PDP = Proposed Queenstown Lakes District Plan

PORPS = Proposed Otago Regional Policy Statement 2015

Ref. no.	Proposed Plan: Chapter & provision number	Support or oppose	Reasons for submission	Relief sought
<b>Chapter 26</b>				
1	Entire Plan but particularly Sections 26.9 and 26.10	Amendment sought	Under the Heritage New Zealand Pouhere Taonga Act 2014, roman numerals are no longer used to describe New Zealand Heritage List categories. New Zealand Heritage List categories are now Category 1 and Category 2. References throughout the PDP to Category I and Category II should be amended accordingly.	Amend all references to Category I and Category II to Category <u>1</u> and Category <u>2</u> .
2	26.10	Amendment sought	The sixth column heading incorrectly refers to 'NZHPT.' The New Zealand Historic Places Trust is now called Heritage New Zealand. The Column heading should therefore be amended so as to refer to 'Heritage New Zealand' and be consistent with section 26.9.	Amend column heading 'NZHPT Category' as follows: <del>NZHPT</del> <u>HNZ</u> Category

3	General	Support	Heritage New Zealand supports the general format of Chapter 26. The activity tables in section 26.6 are easy to use, and Heritage New Zealand considers that it is worthwhile including the heritage schedules, and precinct and landscape maps in this chapter for ease of reference.	Retain general chapter format, including activity tables.
4	26.2	Amendment sought	<p>Heritage New Zealand supports this section, which discusses the identification and protection of heritage resources.</p> <p>Heritage New Zealand considers that identification and assessment as directed by this section are pre-requisites for effective management and protection of heritage resources.</p> <p>Heritage New Zealand supports the intention outlined in this section that nominations for inclusion in the District Plan heritage schedule, or removals and amendments to individual items should be accompanied and informed by a sound level of information. However there are two areas that Heritage New Zealand has concerns about, and requests amendments in relation to:</p> <ul style="list-style-type: none"> <li>• The statement that nominations for inclusions, removals or amendments must include the written consent of the owner/s is not supported. Whilst Heritage New Zealand believes that it is always preferable for owners consent to be obtained when an item is proposed for inclusion in a district plan, this is not always possible. District plan listing brings with it certain restrictions on the use of a place/site, and accordingly it may be difficult to obtain owner agreement to District Plan scheduling. Heritage New Zealand would not like to see significant historic places excluded from consideration due to lack of owner agreement. The plan change process required in order to add or amend district plan heritage schedule listings provides an appropriate process in which to consider and balance heritage significance and owner interests.</li> <li>• Heritage New Zealand considers that the provision of a conservation plan when nominating Category 1 heritage items for inclusion in the District Plan should not be a requirement.</li> </ul>	<p>Adopt section 26.2 with amendments as outlined below:</p> <p>Amend section 26.2 as follows:</p> <p>The District's <u>most significant known</u> heritage features are represented in the Inventory of Protected Features.</p> <p>...</p> <p>Nominations for inclusions, removals or amendments to Categories for individual features will be welcomed from the public, but must contain sufficiently detailed and robust reports in line with assessments that Council use. <u>It is preferable to include <del>They must</del> the written consent of the owners and;</u></p> <p><b>26.2.1</b> For heritage precincts and landscapes, a report from an appropriately qualified and experienced conservation / landscape architect is required. These may include site specific reports from government bodies</p>

		<p>It is acknowledged that conservation plans are very valuable in terms of providing an assessment of significance, condition, and guidance for future works to heritage items, and Heritage New Zealand encourages the preparation of conservation plans for items that are entered on the New Zealand Heritage List.</p> <p>Heritage New Zealand is concerned that the funding and owner co-operation needed to produce conservation plans may mean that nominating Category 1 heritage items for district plan inclusion becomes unfeasible for individuals, community groups, and organisations such as Heritage New Zealand and the Department of Conservation.</p> <p>Where a suitable heritage assessment has been undertaken which demonstrates that a place has Category 1 heritage value, Heritage New Zealand would not like to see the lack of a conservation plan become a barrier to District Plan scheduling. Accordingly, Heritage New Zealand would like to see the wording of paragraph 2.6.3 amended as shown opposite.</p> <p>An additional point is that the scope and quality of conservation plans seen by Heritage New Zealand varies greatly. Accordingly, if the District Plan is to encourage the preparation of conservation plans for Category 1 heritage items, then it should be clear about what standard is expected from a conservation plan, and encourage a consistent standard to be achieved. Heritage New Zealand has published best practice guidance for preparation of conservation plans and it is requested that the District Plan refer to this as a standard. Because this document is currently under review and is likely to be superseded within the next 6 months, a generic reference to 'Heritage New Zealand best practice guidance' is requested.</p> <p>Heritage New Zealand supports the commitment to review the schedule of protected features at the mid-point in the life of the Plan.</p> <p>Heritage New Zealand supports the acknowledgement in this section that not all historic heritage will be captured in the schedule of protected features, and that</p>	<p>with a remit for heritage, such as Heritage New Zealand Pouhere Taonga and the Department of Conservation.</p> <p>26.2.2 For sites of significance to Māori, a detailed assessment of the extent of the site and related values must be obtained from the appropriately mandated iwi.</p> <p>26.2.3 For individual buildings and structures, a report from a suitably qualified conservation architect, using the Council's criteria, and for Category 1 features a Conservation Plan is encouraged. <u>Any Conservation Plan shall be prepared in accordance with Heritage New Zealand's best practice guidelines.</u></p> <p>26.2.4 For archaeological sites, a detailed assessment by a suitably qualified and experienced archaeologist.</p>
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5	26.3.1 Archaeology alert layer	Support	<p>matters of nation importance still apply. This is particularly important in relation to archaeological values, which are often not fully known, presenting difficulties in providing targeted district plan management mechanisms, but which are nevertheless of significance and require consideration in resource management processes.</p> <p>There are close to a thousand recorded archaeological sites in Queenstown Lakes district, and many more that have not been formally recorded. At a resource consent level, Heritage New Zealand sees numerous resource consent applications which do not acknowledge the presence, or likely presence of archaeological values.</p> <p>Heritage New Zealand finds QLDC planning staff to be very competent in terms of identifying where archaeological values may be present, and consulting Heritage New Zealand in regards to the management of such sites through the resource consent process. However resource consent applications should be informed by this information from the outset, rather than relying on individual QLDC staff members to pick up any issues, and/or the New Zealand Archaeological Association Site Recording Scheme (Archsite) which does not record all sites in the district.</p> <p>Early identification of archaeological values allows for site avoidance and/or mitigation to be incorporated into applications, and ensures that resource consents and archaeological authorities can be aligned, avoiding potential costs and project delays where, for example, a resource consent needs to be varied in order for the development to comply with the conditions of an archaeological authority.</p> <p>Populating the Councils GIS system with information about the location of known archaeological sites, and alert layers where significant sites have not been formally recorded, will go some way to ensuring that applicants and owners are aware of the presence of archaeological sites. Effects on such sites can then be considered as part of the resource consent process where appropriate. In other situations this information will act as an alert, making applicants aware of potential obligations under the Heritage New Zealand Pouhere Taonga Act 2014.</p>	Adopt section 26.3.1
6	26.5.1 26.5.1.1	Support	Heritage New Zealand supports this objective and the supporting policies.	Adopt Objective 26.5.1 and Policies 26.5.1.1 – 26.5.1.3

	<p>26.5.1.2 26.5.1.3</p>		<p>Heritage New Zealand considers that significant heritage values must, as far as possible, be recognised in the District Plan in order to achieve protection as directed by the RMA. Heritage New Zealand therefore supports the wording of this policy which aims to 'recognise' and 'protect' historic heritage.</p> <p>The policies which support the objective are also supported by Heritage New Zealand. Of particular importance is the reference to cumulative effects which Heritage New Zealand sees as a challenge in Queenstown Lakes District, where strong economic activity results in dynamic town centres and puts pressure on heritage buildings which are constantly being adapted and redeveloped. Such change can result in cumulative degradation of those heritage features which give buildings their heritage significance.</p>	
7	<p>26.5.2 26.5.1.1 26.5.2.2</p>	<p>Support with amendment</p>	<p>Heritage New Zealand supports this objective and the supporting policies. The policies rightly identify that enabling ongoing uses for heritage buildings is desirable in terms of sustainable management. At the same time it is important to be cognisant of how adaptations to buildings and sites can impact on heritage significance and avoid adverse effects as far as possible, particularly loss of significant heritage features/fabric through incremental change. The wording of the objective and policies captures these ideas and accordingly Heritage New Zealand supports these provisions with the minor amendment sought opposite.</p> <p>Heritage New Zealand does seek one amendment to policy 26.5.1 as shown opposite. Heritage building adaptation and re-use can result in incremental changes which gradually erode the significant heritage values of place. This is a particular challenge in relation to building re-use in a dynamic commercial environment such as Queenstown. Heritage New Zealand considers that it would be appropriate to reiterate the point made in section 26.5.1.2 by specifically relating this to building adaptation and ongoing use.</p>	<p>Adopt Objective 26.5.2 and Policies &amp; 26.5.2.2</p> <p>Amend Policy 26.5.1 as follows:</p> <p>Encourage the ongoing economic use of heritage buildings and sites by allowing adaptations and uses that do not permanently adversely affect heritage values, <u>including through incremental change.</u></p>
8	<p>26.5.3 26.5.3.1 26.5.3.2 26.5.3.3 26.5.3.4</p>	<p>Support with amendment</p>	<p>Identification of the diverse range of heritage values that fall within the definition of 'historic heritage' is supported.</p> <p>As a general comment on this section, identification of heritage values associated with precincts, buildings, sites, archaeological sites, landscapes and sites of significance to Māori will enable heritage protection to be properly targeted at those aspects of a</p>	<p>Adopt Objective 26.5.3 and Policies 26.5.3.1 – 26.5.3.4 with the amendment outlines below:</p> <p>26.5.3.4 Avoid <u>unnecessary</u></p>

9	<p>26.5.4 26.5.4.1 26.5.4.2 26.5.4.3</p>	Support	<p>place which are of the most significance.</p> <p>On the other hand, and although not directly associated with these provisions, Heritage New Zealand considers that the identification of non-contributing buildings within heritage precincts (refer to section 26.8) is very useful in terms of avoiding unnecessary consent processes and giving primacy to those buildings which do make strong heritage or character/aesthetic contributions to precincts.</p> <p>In relation to the amendment sought to 26.5.3.4, Heritage New Zealand's position is that for less significant archaeological sites, the HNZPTA provides sufficient regulation for any effect that may modify or destroy an archaeological site. However it is Heritage New Zealand's view that the Plan should provide additional protection to archaeology in certain circumstances. For development of highly significant archaeological sites, this means that some duplication of processes with the HNZPTA can occur. This submissions point is linked to point 14 below which provides a fuller explanation of Heritage New Zealand's position.</p>	<p>duplication of consents with other statutory bodies on archaeological sites.</p>
10	26.6	Support	<p>Heritage New Zealand supports these provisions - in particular the provision for possible relaxations in non-heritage Plan rules, in order to provide for better heritage outcomes.</p> <p>District Plan requirements can have unintended poor outcomes in relation to heritage, for example adherence to minimum car parking requirements on a constrained site may result in adverse effects on important heritage settings. Moreover, heritage building re-use can be fostered more effectively if the opportunity to relax certain standards is available. Heritage New Zealand is therefore very supportive of the provision to consider relaxation of rules on a case by case basis.</p> <p>Heritage New Zealand supports the general rule framework and activity status' set out in Tables 1-5 (with qualifications as outlined elsewhere in this submission). The rule framework and activity status' for land use activities are generally consistent with Heritage New Zealand's best practice guidance for District Plans (Sustainable Management of Historic Heritage Guide No. 3). Heritage New Zealand considers that the proposed rule framework provides a sound basis for the protection of historic heritage as required under section 6(f) of the Act.</p>	<p><b>Adopt</b> Objective 26.5.4 and Policies 26.5.4.1-26.5.4.3</p> <p><b>Adopt</b> Section 26.6 except for the amendments requested elsewhere in this submission.</p>



11	26.6.1	Support with amendment	<p>This section is generally supported, however Heritage New Zealand seeks clarification in the policy that closely matching materials to the original are an alternative where it is not possible or reasonable to use materials that match the original.</p>	<p>Amend section 26.6.1 paragraph 2 as follows:</p> <p>This includes . . . The replacement items should be of the original or, if not achievable, closely matching material, colour, texture, form and design.</p>
12	<p>Various provisions – Topics: Heritage Landscapes</p>	Support	<p>Although heritage landscapes have long been included in the Operative District Plan, Heritage New Zealand is very supportive of the format of the PDP which brings these together with other heritage-related provisions in Chapter 26 and introduces standards for land use activities within these areas.</p> <p>The Statements of Significance in section 26.12 concisely demonstrate the high heritage values that are present within these areas, and substantiate the need for District Plan standards to manage these heritage values.</p>	<p>Adopt provisions relating to heritage landscapes:</p> <p>26.6 Table 6 &amp; 26.12</p>
13	<p>Various provisions – Topic: Heritage settings</p>	Support	<p>Heritage New Zealand particularly supports the PDP approach to recognising and protecting heritage settings. In relation to individual sites, this is achieved through specific rules such as 26.6.2 which relates to subdivision, and 26.6.7 which relates to development within the curtilage of a schedule item. In a wider sense, heritage settings are recognised and provided for through the provisions relating to heritage precincts and heritage landscapes.</p> <p>Heritage items are part of an environmental context which is essential for retaining and interpreting heritage significance. This is recognised in the RMA wherein the definition of historic heritage under the RMA is clear that historic heritage includes the surroundings associated with the natural and physical resources. The careful management of change within the surroundings of heritage places therefore makes an important contribution to the quality of the built environment. Poorly managed development within heritage settings can adversely affect our ability to appreciate a place's heritage values. It is therefore appropriate to provide protection to heritage settings where these contribute towards the significance of a heritage item.</p>	<p>Adopt provisions which recognise and protect heritage settings as notified, including but not necessarily limited to:</p> <ul style="list-style-type: none"> <li>• Heritage Precincts</li> <li>• Heritage Landscapes</li> <li>• Sites of Significance to Maori (to be confirmed)</li> <li>• 26.6.2</li> <li>• 26.6.4</li> <li>• 26.6.7</li> <li>• 26.6.15</li> <li>• 26.6.21</li> <li>• 27.5.1.4</li> <li>• 27.5.1.6</li> </ul>

14	26.6 Table 5	Amendment sought	<p>Under section 6(f) of the RMA Councils are directed to recognise and provide for the protection of historic heritage, which includes archaeology, as a matter of national importance.</p> <p>The principle means of regulating activities that lead to the destruction or modification of archaeological sites is the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). Heritage New Zealand is the agency that considers applications for authorities (consents) for proposals to destroy or modify sites.</p> <p>For less significant sites, the HNZPTA provides sufficient regulation for any effect that may modify or destroy an archaeological site. However it is Heritage New Zealand's view that the Plan should provide additional protection to archaeology in certain circumstances.</p> <p>Heritage New Zealand recommends the scheduling of those archaeological sites that meet significance criteria. Heritage New Zealand is therefore supportive of the inclusion of several sites in section 26.10 of the PDP which have been included primarily for their high archaeological heritage significance. It is noted that these sites are also scheduled in the operative District Plan. Such sites are worth scheduling because, with the appropriate rules that give the opportunity to avoid or minimise adverse effects, it enables a high level of protection under the RMA, and allows effects not dealt with through the archaeological authority process, and non-physical effects (such as visual effects) to be taken into account. The RMA also provides for public consultation, an opportunity not afforded under the HNZPTA.</p> <p>As a matter of Government policy, duplication of processes should be avoided. The Plan should only seek to regulate activities affecting archaeology where those provisions can provide additional protection beyond the scope of the HNZPTA.</p> <p>Whilst the proposed rule framework for the archaeological sites does well to raise awareness over the management of archaeological sites, and avoids duplication of processes with the HNZPTA; Heritage New Zealand considers that the district plan should go further in providing a level of RMA protection to significant, scheduled archaeological sites. This is the case under the provisions of the operative district plan wherein significant archaeological sites are subject to the same heritage rule</p>	Refer to Appendix B for proposed rule framework for archaeological sites listed in section 26.10.
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	<p>framework as other heritage buildings and features.</p> <p>It is considered that the proposed rule framework introduces unnecessary complexity and uncertainty in terms of differentiating between alteration, damage or destruction that is permitted by an archaeological authority, and that which is not; and also in determining what constitutes 'minor' or 'more than minor effects on other heritage.'</p> <p>A recent example of an archaeological authority can be used to demonstrate where this could become an issue:</p> <p><i>The owner of a highly significant pre-1900 stone building proposed to relocate the building in one piece, ie. without deconstructing it. Because there would be no alteration or damage to the structure itself, the archaeological authority was only required for the small amount of earthworks required to lift the building. The archaeological authority did not extend to considering the effects on heritage values of relocating the building away from its original site, and because the archaeological authority process does not involve public consultation, there was no public process through which the community could comment on the proposal.</i></p> <p>Whilst in the above situation it could be argued that standard 26.6.18 or 26.6.19 would apply to the relocation of the building, and it should be treated as a restricted discretionary or discretionary activity, Heritage New Zealand questions whether these kinds of complexities will be properly understood by applicants. Furthermore, and with all due respect, Council staff who are not overly familiar with the archaeological authority process may also have difficulty in applying the rule framework without seeking advice from Heritage New Zealand.</p> <p>Heritage New Zealand would prefer to see a simpler approach, more in line with the rule framework under the operative District Plan. Heritage New Zealand considers that it would be appropriate to treat archaeological sites identified in section 26.10 in a similar manner to heritage landscapes, which generally consist of groups of interrelated archaeological sites, as the heritage values are similar but merely on a smaller geographical scale.</p> <p>An additional point in relation to this section is that it is presumed that Table 5 applies only to items listed under section 26.10. If so, this should be clearly stated so as to</p>	
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15	26.8 Precincts	Support with amendments	<p>clarify that the activity standards do not apply to items listed in section 26.9 which also fall within the HNZPTA definition of an 'archaeological site' (below).</p> <ul style="list-style-type: none"> <li>• <i>archaeological site means, subject to section 42(3), —</i> <ul style="list-style-type: none"> <li>• <i>(a) any place in New Zealand, including any building or structure (or part of a building or structure), that—</i> <ul style="list-style-type: none"> <li>• <i>(i) was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and</i></li> <li>• <i>(ii) provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and</i></li> </ul> </li> <li>• <i>(b) includes a site for which a declaration is made under section 43(1)</i></li> </ul> </li> </ul>	
			<p>Heritage New Zealand supports the continuation of the concept of heritage precincts in the PDP, and considers that the work that has been done on assessing significance, key values, and non-contributing structures to be very valuable in terms of substantiating the significance of the precincts, and the justification for management of these areas through the District Plan.</p> <p>Notwithstanding the above, Heritage New Zealand considers that the precinct provisions should be strengthened by being more specific about the nature of the key features to be protected. For example key features to be protected include matters such as 'scale,' 'materials,' and 'street pattern' however there is no explanation of how these values are manifest within the precincts. Such characteristics can change over time as new development occurs. Accordingly it would be useful to benchmark these values in the District Plan in order to ensure that applicants, Council staff and interested parties have clear standards against which to design and assess new development within these areas. In the long term this will help to avoid cumulative erosion of the values that the precinct originally sought to protect.</p> <p>This could be achieved by spending less text on the statements of significance and</p>	<p>Review section 26.8 providing further detail in relation to the 'key features to be protected.'</p> <p>Include reference to the heritage precinct background reports as a source of further detail/guidance regarding precinct values.</p>

		<p>more on the key features to be protected.</p> <p>Examples:</p> <p>Scale – if there is consistency in building scale, specify what this is. In the case of Queenstown Mall, a larger/higher building might be present in the precinct, or be permitted in the future. Whilst this might not be deemed to be inappropriate in the circumstances, the PDP should provide sufficient detail to ensure that over time, larger scale buildings do not come to be seen as part of the precinct character against which other developments assessed.</p> <p>Materials – what are the traditional building materials of the precinct eg. Arrowtown town centre has traditionally been characterised by informal materials such as corrugated iron and timber. Whilst some modern buildings in the precinct might be clad in other materials, the PDP should provide sufficient clarity for it be understood that although pre-cast concrete, for example, has been used in the precinct, it is not a material that is part of the traditional palette of materials.</p>	<p>Adopt section 26.11</p>
16	26.11 Sites of Significance to Māori	Support	<p>It is clear in the RMA definition of historic heritage that heritage value can be derived from cultural qualities, and that historic heritage includes sites of significance to Māori, including wāhi tapu and wāhi tupuna. Mana Whenua culture and heritage is a component of historic heritage, and may differ from historic heritage places and areas by virtue of there often being little physical evidence of cultural associations. Heritage New Zealand considers that such values are not currently adequately recognised in the PDP. It is understood that there is a future work plan to engage with iwi to identify, assess and protect sites of cultural significance within the Plan and the inclusion of Section 26.11 to allow for this future work is noted and supported.</p> <p>As part of this future work, Heritage New Zealand recommends that Māori occupation sites at west Wanaka should be considered for inclusion in section 26.11 (information included in Appendix D.)</p>
Chapter 27 - Subdivision & Development			

17	<p>27.2.4</p> <p>27.2.4.2</p> <p>27.2.4.4</p> <p>27.2.4.5</p> <p>27.2.4.6</p> <p>27.5.1.4</p> <p>27.5.1.5</p>	Support	<p>Some land use activities, such as subdivision and associated land development, have greater potential to impact on heritage values than do others. It is appropriate that the Council has the opportunity to consider effects on historic heritage values as a result of such activities.</p> <p>The provisions listed opposite are supported as they rightly identify that subdivision and development may impact on heritage values, and set out an appropriate set of policies to ensure that heritage matters are adequately managed through the planning process. Heritage New Zealand is particularly supportive of the emphasis on the integration of heritage features into development proposals. Appropriate subdivision design can ensure that heritage values (whether scheduled or not) are not destroyed and/or marginalised.</p> <p>Heritage New Zealand's best practice guidance for District Plans (Sustainable Management of Historic Heritage Guide No. 3) recommends discretionary activity status for the subdivision of land containing protected heritage features. The proposed rule framework for subdivision is consistent with this guidance and accordingly Heritage New Zealand supports provisions 27.5.1.4 and 27.5.1.5, which are reiterated in Chapter 26 – provisions 26.6.2 &amp; 26.6.2.1.</p>	<p>Adopt sections 27.2.4, 27.2.4.2, 27.2.4.4, 27.2.4.5, 27.2.4.6, 27.5.1.4, 27.5.1.5.</p>
18	27.5.1.6	Neutral/ Advice	<p>As discussed above, Heritage New Zealand's policy guidance recommends discretionary activity status for the subdivision of land containing a scheduled heritage item (including scheduled archaeological sites). Heritage New Zealand does not usually seek that this same level of subdivision control be applied to all land containing a known archaeological site, as many archaeological sites will not be of sufficient archaeological heritage value to merit such regulation where there are no other consent triggers.</p> <p>Heritage New Zealand's interpretation of the subdivision provisions is that all subdivision activities require resource consent and accordingly the presence of an archaeological site would not, in itself, trigger a requirement for resource consent. In this context Heritage New Zealand is comfortable that the provision 27.5.1.6 is not unduly onerous.</p>	N/A
Chapter 26 - Sections 26.9 & 26.10: Inventory of Protected Features				

19	26.9 34 Invincible Mine 26.10 703 Battery 704 Buddle	Amendment sought	<p>There are three schedule entries relating to this site, not all of which refer to the New Zealand Heritage List entries. To clarify, the Invincible Mine and buddle site were functionally linked but are located on separate land parcels and are the subject of two separate New Zealand Heritage List entries – 5603 &amp; 5604. Heritage New Zealand considers that for the sake of clarity, these should be combined into a single entry covering both sites, rather than having three separate District Plan entries relating to this place.</p> <p>It is also noted that the legal description provided in sections 26.9 &amp; 26.10 appears to be out of date. The New Zealand Heritage List and Quickmap V7.5.185 gives the legal description provided opposite.</p> <p>A copy of the New Zealand Heritage List entry reports can be provided on request.</p>	<p>Amend Schedule 26.9 ref. 34 with the following details:</p> <ul style="list-style-type: none"> <li>Rationalise items 34, 703 &amp; 704 (by deleting items 703 &amp; 704) into one entry under the following details -</li> </ul> <p>Description: <u>Invincible Mine and Buddle sites</u></p> <p>Legal description: <u>Sections 1 and 2 Blk XII Earnslaw SD, SO 18563 (Invincible Mine Historic Reserve, NZ Gazette 1979 p.570) Otago Land District</u></p> <p><u>Heritage New Zealand Cat/No: 2/5603 &amp; 5604</u></p>
20	26.9 67 Sainsbury's House & addition of Pleasant Terrace Workings	Addition /Amendment sought	<p>Heritage New Zealand would like to raise several issues in relation to this entry as follows:</p> <p>This entry does not provide the correct New Zealand Heritage List reference. See requested amendment opposite.</p> <p>Neither sections 26.9 or 26.10 appear to include the Pleasant Terrace Workings, a category 1 historic place (NZ Heritage List ref.5175). It is acknowledged that Sainsbury's House, which is included within the extent of the historic place, is included in section 26.9 under reference 67.</p> <p>The proposed Plan is required to recognise and provide for matters of national importance, in particular 6(f) <i>"the protection of historic heritage from inappropriate subdivision, use and development."</i> Accordingly, Heritage New Zealand seeks the inclusion</p>	<p>Amend section 26.9 ref. 67 as follows:</p> <p>Description: <u>Pleasant Terrace Workings, Sainsbury's House and Outbuilding, Skippers Mt Aurum Recreational Reserve.</u></p> <p>Heritage New Zealand Cat/No: <del>2/5176</del> 1/5175</p> <p>QLDC Cat: 3-1</p>

21	26.9 131 Stables, Barn, Smithy, Stone Cottage, Wooden Cottage and Ruins, Thurlby Domain, Speargrass Flat Road	Amend ment sought	<p>of Pleasant Terrace Workings within the Proposed District Plan heritage schedule.</p> <p>For the sake of clarity, and in acknowledgement of the linkages between the various heritage values that comprise the historic place, Heritage New Zealand would prefer that instead of creating an additional entry for the Pleasant Terrace Workings, the existing entry for Sainsbury's House be extended to encompass the full extent of the Category 1 historic place - the workings and the outbuilding associated with the Sainsbury's House.</p> <p>Category 1 status denotes 'special or outstanding historical or cultural significance or value.' Heritage New Zealand considers that the Category 1 status of the historic place, as supported by the 2013 registration report (attached) qualifies this place as a Category 1 QLDC heritage item. Heritage New Zealand requests that this be recognised in the PDP.</p> <p>The New Zealand Heritage List entry for this item has recently been reviewed and is now a Category 1 historic place. Schedule 26.9 should be updated accordingly. QLDC has previously been provided with a copy of this report but another copy can be provided on request.</p>	Amend Schedule 26.9 column headed HNZ Cat/No for item 131 as follows:  #1/2240
22	26.9 139 School House at Mt Aurum	Amend ment sought	<p>Heritage New Zealand believes that this item is the former Skippers School. Accordingly this item is within the extent of New Zealand Heritage List entry 5176 Mt Aurum Homestead and Skippers School Complex. Heritage New Zealand requests that Schedule 26.9 be updated accordingly. See attached New Zealand Heritage List entry report for further information.</p>	Add New Zealand Heritage List reference 5176 and Category 2 to the column headed HNZ Cat/No for item 139.



23	<p>26.9 Bullendale Township</p> <p>26.10 701 Dynamo</p> <p>702 All settlement and gold mining relics</p>	Amendment sought	<p>Bullendale township and items 701 (Dynamo) &amp; 702 (All settlement and gold mining relics) in section 26.10 fall within the extent of New Zealand Heritage List entry 5601 (Category 1) which is as follows:</p> <p><i>includes part of the land described as Sec 148 Blk XI Skippers Creek SD (Recreation Reserve, NZ Gazette 1985, p.5386) and Pt Legal Road (Bullendale Track), Otago Land District, and the structures associated with Bullendale thereon, and a class of chattels that includes all remnants around the site belonging to the era of gold mining era and all objects associated with the mining and power generation operations and settlement at Bullendale within the extent of registration boundary.</i></p> <p>Heritage New Zealand considers that as the three entries are all components of one historic place, they should be rationalised into a single entry, with updated legal description and New Zealand Heritage List information.</p> <p>Category 1 status denotes 'special or outstanding historical or cultural significance or value.' Heritage New Zealand considers that the Category 1 status of the historic place, as supported by the 2012 upgrade report (attached) qualifies this place as a Category 1 QLDC heritage item. Heritage New Zealand requests that this be recognised in the PDP.</p>	<p>Amend Section 26.9 ref 140 as follows:</p> <p>Description: <u>Bullendale Township</u> <u>Bullendale Hydro Electric Dynamo</u> <u>and Mining site.</u></p> <p>Legal Description: Section 148 Block XI Skippers Creek SD (2907300400) (<u>Recreation Reserve, NZ Gazette 1985, p.5386</u>) and <u>Pt Legal Road (Bullendale Track)</u></p> <p>HNZ Cat/No: <u>1/5601</u></p> <p>Amend Section 26.10 as follows:</p> <p><u>Delete entries 701 &amp; 702</u></p>
24	<p>26.9 543 Cardrona Hotel Façade</p>	Amendment sought	<p>This entry does not include a New Zealand Heritage List reference number. Heritage New Zealand requests that the New Zealand Heritage List reference for this item be added to section 26.9. A copy of the New Zealand Heritage List entry report can be provided on request.</p>	<p>Amend section 26.9 ref 543 column headed HNZ Cat/No for item 543 as follows:</p> <p><u>#2/2239</u></p>
25	<p>26.10 705 Sawmill Settlements Turners</p>	Amendment sought	<p>This symbol for this entry is located incorrectly on PDP Map 09. The legal description provided in section 26.10 does not match up with the legal description in the New Zealand Heritage List report (ref.5605) and Quickmap V7.5.185.</p>	<p>Amend section 26.10 entry 705 as follows:</p> <p>Legal Description:</p> <p><u>Crown Land Block VI Upper</u></p>

Creek – Kinloch Mill Creek			<p><u>Wakatipu</u></p> <p>Pt Recreation Reserve C. Blk II <u>Upper Wakatipu SD (NZ Gazette 1891 p.790), Otago Land District</u></p> <p>Amend map symbol 705 on Map 09 to show the correct location for this site.</p>
26 26.9 Addition – Gratuity Cottage, 9 Gorge Rd, Queenstown	Addition	<p>The proposed Plan is required to recognise and provide for matters of national importance, in particular 6(f) <i>“the protection of historic heritage from inappropriate subdivision, use and development.”</i></p> <p>Gratuity Cottage is entered on the New Zealand Heritage List as a category 2 historic place, meaning that it has been confirmed as having ‘historical or cultural significance or value.’ An assessment of the place in accordance with the QLDC’s heritage assessment criteria is attached to this submission. This assessment concludes that Gratuity Cottage meets the criteria for QLDC category 2.</p> <p>Based on the above, Heritage New Zealand requests that Gratuity Cottage be listed in section 26.9 of the PDP.</p>	<p>Add the following item to Section 26.9:</p> <p>Description: Gratuity Cottage, 9 Gorge Rd, Queenstown</p> <p>Legal Description: Lot 1 DP 12476</p> <p>HNZ Cat/No: 2/2339</p> <p>QLDC Cat: 2</p>
27 26.10 Addition – Sew Hoys Big Beach Claim Historic Area	Addition	<p>The proposed Plan is required to recognise and provide for matters of national importance, in particular 6(f) <i>“the protection of historic heritage from inappropriate subdivision, use and development.”</i></p> <p>Sew Hoys Big Beach claim is entered on the New Zealand Heritage List as an historic area, meaning that it has been confirmed as having heritage value worthy of recognition on the national list. Given that the site has been identified as being of national significance, Heritage New Zealand considers that it would be appropriate to include it in section 26.10</p>	<p>Add the following item to Section 26.10:</p> <p>Description: Sew Hoy’s Big Beach Claim</p> <p>Legal Description: Legal river</p> <p>HNZ Cat/No: Historic Area/7545</p>

28	26.10 Addition –  Wong Gong’s Terrace Historic Area	Addition	<p>of the PDP.</p> <p>See attached report for further information regarding this site.</p> <p>The proposed Plan is required to recognise and provide for matters of national importance, in particular 6(f) <i>“the protection of historic heritage from inappropriate subdivision, use and development.”</i></p> <p>Wong Gong’s Terrace Historic Area is entered on the New Zealand Heritage List as an historic area, meaning that it has been confirmed as having heritage value worthy of recognition on the national list. Given that the site has been identified as being of national significance, Heritage New Zealand considers that it would be appropriate to include it in section 26.10 of the PDP.</p> <p>See attached report for further information, including a description of the main features of this site.</p>	<p>Add the following item to Section 26.10:</p> <p>Description: Wong Gong’s Terrace Historic Area</p> <p>Legal Description: Pt Run 27 (CT OTA2/1228)</p> <p>HNZ Cat/No: Historic Area/7549</p>
29	26.10 Addition –  Reko’s Point Chinese Goldmining Sites	Addition	<p>Heritage New Zealand seeks the inclusion of three interrelated archaeological sites at Reko’s Point in Section 26.10. These sites are recorded archaeological sites with the New Zealand Archaeological Association references: G40/98, G40/99 and G40/100.</p> <p>The site is rare in that it is known as being mined by a Chinese miner (Ah Wee), is extensive and is very well preserved with the water system (G40/98) that fed the herring bone workings (G40/99) still intact. The reservoir is a stunning example of a box-walled stone and earth reservoir. A mud hut (G40/100) is associated with the site which may have been occupied by one of the miners. This is the only gold mining site in the area that can be historically attributed to a Chinese miner and is also the best site of this mining style remaining in the Upper Clutha Valley. The Northburn are also very significant for herring bone tailings, however its water supply reservoir and system was destroyed in the 1990’s. Description and map attached in Appendix D.</p> <p>The sites are located on Department of Conservation and private land.</p>	<p>Add the following item to Section 26.10:</p> <p>Description: Reko’s Point Chinese Goldmining Sites.</p> <p>Legal Description: Reko’s Point Conservation Area &amp; Lot 2 DP 26911 Otago Land District</p>

30	26.10 Addition – Roaring Meg Bridge Abutment	Addition	Heritage New Zealand seeks the inclusion of part of archaeological site F41/131 in Section 26.10, being the Roaring Meg bridge abutment located on the true right of the Roaring Meg. The other bridge abutment is located within Central Otago district. The bridge is the last on the Kawarau with substantial green dressed schist stone abutments still in use and which date from the 19 <sup>th</sup> century. The abutments are of a completely different style and form from those of the Kawarau River Suspension Bridge and are one of a kind for the Wakatipu. Description and map attached in Appendix D.	Add the following item to Section 26.10:  Description: Roaring Meg Bridge Abutment.  Legal Description: Road Reserve, State Highway 6.
31	26.9 & 26.10 New listings	Support	Heritage New Zealand commends QLDC for commissioning significance assessments for places proposed for inclusion in sections 26.9 & 26.10.  These assessments are well-researched, rigorous and fit-for-purpose in accordance with the Council's established methodology and criteria for identifying and assessing historic heritage values.  We note and support that the Council has adopted qualitative methodology for evaluating heritage significance, following international best practice.  Heritage New Zealand supports the proposed addition of the 10 historic places that we are aware of as, new listings for the District Plan sections 26.9 and 26.10. These places have been individually assessed by the Council and found to meet criteria for inclusion. Their inclusion in the heritage schedules is therefore appropriate.	Adopt sections 26.9 & 26.10 in regards to the inclusion of the following new heritage items:  <ul style="list-style-type: none"> <li>- Kinloch Jetty and wharf building (ref. 239)</li> <li>- Marshall Cottage (ref. 240)</li> <li>- Kawarau Falls Dairy and meat store (241)</li> <li>- Threepwood Stables (ref. 242)</li> <li>- Miller's Flat Church (re. 250)</li> <li>- Former Methodist Church (ref. 251)</li> <li>- Shanahan's Cottage (ref. 252)</li> <li>- Stone Cottage (ref. 253)</li> <li>- Old Butchery (ref. 500)</li> <li>- Old House site (ref. 714)</li> </ul>
32	26.9 & 26.10	Amendments	There are several heritage listings in sections 26.9 and 26.10 where Heritage New Zealand considers the QLDC category assigned to the item to provide inadequate recognition of	In section 26.9, amend the QLDC category of the following items

	sought	<p>heritage significance. This is an existing situation which has been carried over from the operative District Plan. All of the relevant listings are items that are entered on the New Zealand Heritage List. The heritage values of these places have been established through the process of entry onto the New Zealand Heritage List. Given the emphasis in sections 26.2 and 26.5.1 on protection being applied on a scale based on the relative significance of heritage items, Heritage New Zealand considers it important that the QLDC categories assigned to scheduled items accurately reflect the level of heritage significance.</p> <p>It is considered that the reports enclosed in Appendix C relating to each of these items supports the relief sought ie. the upgrading of items from QLDC category 3 to category 2; or QLDC category 2 to category 1.</p>	<p>from Category 2 to Category 1:</p> <ul style="list-style-type: none"> <li>• 40 Kawarau Falls Bridge - QLDC Cat <u>2</u> <u>1</u></li> <li>• 45 Skippers Bridge – QLDC Cat <u>2</u> <u>1</u></li> </ul> <p>In section 26.9, amend the QLDC category of the following items from Category 3 to Category 2:</p> <ul style="list-style-type: none"> <li>• 56 Hulbert House – QLDC Cat <u>3</u> <u>2</u></li> <li>• 76 Mill House – QLDC Cat <u>3</u> <u>2</u></li> <li>• 77 Oast House – QLDC Cat <u>3</u> <u>2</u></li> <li>• 79 Tomanovitch Cottage – QLDC Cat <u>3</u> <u>2</u></li> <li>• 91 Kinross Store and Buildings – QLDC Cat <u>3</u> <u>2</u></li> </ul>
33	26.12.4 Maps 09, 10, 12, 13	<p>Heritage New Zealand requests that the boundaries of the Seffertown and Moke Lake Heritage Landscape be checked as there appear to be inconsistencies between the map included in Chapter 26, the main District Plan Maps, and the description of the heritage landscape in the back ground Heritage Landscape Appraisal prepared by Jackie Gillies and Associates. For example the mapped boundaries diverge from known goldmining remains which the report infers should be included in the heritage landscape.</p>	<p>Review and confirm correct and consistent boundary for Seffertown and Moke Lake Heritage Landscape as shown in section 26.12.4 and on maps 9, 10, 12 &amp; 13.</p>
General			

34	Various	Support	<p>In addition to the specific heritage related provisions of the PDP, it is noted that the consideration of heritage values is embedded throughout the Plan where activities have the potential to impact on these values, for example the Energy &amp; Utilities and Urban Development sections. Heritage New Zealand supports both the approach of integrating historic heritage provisions throughout relevant areas of the Plan, and supports the wording of the individual provisions. This approach is supported as it encourages heritage values to be considered and integrated into development proposals rather than dealt with in isolation of other matters; and acknowledges that some land use activities have greater potential to impact on heritage values than do others. It is appropriate that the Council has the opportunity to consider effects on historic heritage values where these activities will occur.</p>	<p>Adopt historic heritage related provisions throughout the PDP, including but not necessarily limited to those included in Chapters 3, 4, 5, 10, 12, 14, 21 &amp; 30.</p>
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Heritage New Zealand Submission Proposed Queenstown Lakes District Plan 2015

Appendix B – Proposed Archaeological Site Provisions (refer to point 14 of Appendix A)

Table 5	Activity Standards - Archaeological sites	All Sites
26.6.17	<p><b>Destruction or demolition of an archaeological site listed in Section 26.10</b></p> <p>Destruction of any archaeological feature or demolition of any built archaeological feature associated with an archaeological site listed in Section 26.10.</p>	D
26.6.18	<p><b>Relocation</b></p> <p>Works that result in any archaeological feature associated with an archaeological site listed in section 26.10 being relocated within the same site.</p>	D
26.6.19	<p><b>Alteration or modification to an archaeological site listed in Schedule 26.10</b></p> <p>*Restricted discretion is limited to: The effect of the alteration on the heritage values of the site.</p>	RD*
26.6.20	<p><b>Development</b></p> <p>Works including earthworks, signage, new buildings and structures.</p>	D
26.6.21	<p><b>Subdivision</b></p> <p>Subdivision of any site containing all or part of an</p>	D

Heritage New Zealand Submission Proposed Queenstown Lakes District Plan 2015

Appendix B – Proposed Archaeological Site Provisions (refer to point 14 of Appendix A)

	archaeological site listed in section 26.10	
26.6.21	Modification, damage or destruction of an archaeological site In breach of the HNZPTA 2014.	PR





17 December 2015

The Chief Executive  
Queenstown Lakes District Council  
Private Bag 50072  
Queenstown 9348

Dear Sir/Madam

**FURTHER SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON PROPOSED  
QUEENSTOWN LAKES DISTRICT PLAN 2015**

**TO: Queenstown Lakes District Council**

**FROM: Heritage New Zealand Pouhere Taonga**

1. This is a further submission in respect of submissions on the Proposed Queenstown Lakes District Plan 2015
2. Heritage New Zealand has as an interest in the proposal that is greater than the interest the general public has:

Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust) 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. Heritage New Zealand is New Zealand's lead agency for heritage protection.

3. Heritage New Zealand supports the submission of:  
See the table attached as Appendix A
4. Heritage New Zealand opposes the submission of:  
See the table attached as Appendix A
5. The particular parts of the submission Heritage New Zealand supports are:  
See the table attached as Appendix A
6. The particular parts of the submission Heritage New Zealand opposes are:  
See the table attached as Appendix A
7. The reasons for Heritage New Zealand's support/opposition are:  
See the table attached as Appendix A

8. Heritage New Zealand seeks that the whole/part of the submission be allowed:

See the table attached as Appendix A.

9. I wish to be heard in support of my further submission.

Yours sincerely



Sheila Watson  
General Manager Southern Region

**Address for Service:**

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109 Princes St  
Dunedin 9058

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Email: [jodea@heritage.org.nz](mailto:jodea@heritage.org.nz)  
Contact person: Jane O'Dea – Heritage Advisor Planning

**Attachments:**

Appendix A – Further submission of Heritage New Zealand on Proposed Queenstown Lakes District Plan 2015

Appendix A – Further Submission of Heritage New Zealand on Proposed Queenstown Lakes District Plan

Submission Ref & PDP provision ref.	Submitter	Support/Oppose	Reasons
201.6 Heritage item 42 - Stone walled race	IPENZ	Support	This item is entered on the New Zealand Heritage List as a category 2 historic place, meaning that it has been confirmed as having 'historical or cultural significance or value.' Heritage New Zealand will provide what information we have available to contribute towards an assessment of the current heritage values of this site and accordingly inform a decision on the appropriate district plan category.
383.46 Section 26.9	Queenstown Lakes District Council	Support	It is appropriate to include the legal description and map identifier for this heritage item in order to avoid uncertainty regarding its location.
383.109 Map 11A	Queenstown Lakes District Council	Support	Heritage items 544, 539, 524 & 545 have been omitted from Map 11A in error. It is appropriate for this to be remedied by annotating the map to include these items.
383.122 Map 36	Queenstown Lakes District Council	Support	It is appropriate to amend map 36 so as to identify heritage item 38 in order to avoid uncertainty regarding the location of the heritage item.
604.16 26.5.4 Objective 4	Jackie Gillies & Associates	Support	This submission point is aligned with and expands upon Heritage New Zealand's submission point 426.9. Heritage New Zealand encourages the use of financial incentives as a mechanism to encourage seismic strengthening of heritage buildings.
604.21 26.3	Jackie Gillies & Associates	Support	Given that consultation with Heritage New Zealand is usually necessary for resource consent applications required under the rules of this section, it is appropriate to specifically mention 'Heritage New Zealand' in this section.
604.42 Heritage Item 58 – 17 Brisbane St	Jackie Gillies & Associates	Oppose	17 Brisbane St is entered on the New Zealand Heritage List as a category 2 historic place meaning that it has been established as having 'historical or cultural significance or value' at a national level (NZ heritage List ref. 5225). Heritage New Zealand would expect any decision in regards to the appropriate district plan category for this item ie. category 2 or category 3, to be informed by a

Appendix A – Further Submission of Heritage New Zealand on Proposed Queenstown Lakes District Plan

Submission Ref & PDP provision ref.	Submitter	Support/Oppose	Reasons
604.43 Heritage Item 59 – McNeill Cottage	Jackie Gillies & Associates	Oppose	<p>heritage assessment. Such an assessment should be undertaken within a timeframe that allows all interested parties time to review the information prior to the hearing on the topic.</p> <p>McNeill Cottage is entered on the New Zealand Heritage List as a category 2 historic place meaning that it has been established as having 'historical or cultural significance or value' at a national level (NZ Heritage List ref. 2330). Heritage New Zealand is aware that this building and site have been heavily modified over the years. Nevertheless Heritage New Zealand would expect any decision in regards to the appropriate district plan category for this item ie. category 2 or category 3, to be informed by a heritage assessment. Such an assessment should be undertaken within a timeframe that allows all interested parties time to review the information prior to the hearing on the topic.</p>
604.58 Heritage Item 101 – St Peter's Parish Centre	Jackie Gillies & Associates	Support	<p>St Peter's Parish Centre is entered on the New Zealand Heritage List as a category 2 historic place meaning that it has been established as having 'historical or cultural significance or value' at a national level (NZ Heritage List ref. 2342). Heritage New Zealand supports upgrading this item from Category 3 to Category 2 and will provide what information we have available to contribute towards an assessment of the current heritage values of this site and accordingly inform a decision on the appropriate district plan category.</p>
604.59 Heritage Item 107 - Courthouse	Jackie Gillies & Associates	Oppose	<p>Queenstown Courthouse is entered on the New Zealand Heritage List as a category 1 historic place meaning that it has been established as having 'special or outstanding historical or cultural significance or value' at a national level (NZ Heritage List ref. 7655). Heritage New Zealand is aware that this building and site have been modified, however efforts have been made in the past to retain certain interior features which may mean that the interior still has sufficient heritage significance to merit district plan category 1 status. Heritage New Zealand would expect any decision in regards to the appropriate district plan category for this item ie. category 1 or category 2, to be informed by a heritage assessment. Such an assessment should be undertaken within a timeframe that allows all interested parties time to review the information prior to the hearing on the topic.</p>
604.69	Jackie Gillies & Associates	Support	<p>This submission point is aligned with Heritage New Zealand's previous submission on plan change 50 which recommended the following:</p>

Appendix A – Further Submission of Heritage New Zealand on Proposed Queenstown Lakes District Plan

Submission Ref & PDP provision ref.	Submitter	Support/Oppose	Reasons
Queenstown Campground Cabins			<p><i>That the Council considers the following options in relation to the Thompson St cribs:</i></p> <ol style="list-style-type: none"> <li>1. <i>Inclusion of one or more of the cribs in the District Plan Inventory of Protected Features as a representative example from an important period of Queenstown's development, or;</i></li> <li>2. <i>Facilitate relocation of the cribs.</i></li> </ol>
798.11	Otago Regional Council	Support	This submission point in generally aligned with, but expands on, Heritage New Zealand's submission point 426.4 regarding the information required under section 26.2 to accompany nominations for scheduled heritage items.
810.5 & 810.7	Te Runanga o Moeraki, Kati Huirapa Runaka ki Puketeraki, Te Runanga o Otakou and Hokonui Runanga collectively	Support	As outlined in Heritage New Zealand's submission point 426.17, Heritage New Zealand supports the identification of sites of significance to Māori. It is appropriate to incorporate the proposed wording into the Plan in order to provide an appropriate policy framework for the future identification of wāhi tupuna.
Policy 3.2.3.2.1			
New objective and policy			

