

Rochelle Waugh

From: Rochelle Waugh
Sent: Monday, 29 May 2023 11:40 am
To: Ryan O'Leary; Dean Raymond
Subject: Relocation Policy for Plan Change H(a) Historic Heritage

Good morning Ryan and Dean

Since my evidence was uploaded onto the website, further conversations have taken place on the Relocation Policy. I outline and record the discussions and updates below.

Ryan - following on from our phone conversation on Friday afternoon about possible changes to Policy 11 (Relocation) in Plan Change H(a), I have reviewed and reflected what we talked about – specifically moving the reference to avoid demolition to the main policy stem and adding a reference to Council making the decision in clause c. In terms of moving reference to demolition, I do not support moving 'to avoid demolition' from clause c. to the first sentence of the policy (as below) as it doesn't follow the intention of the policy:

"To only allow relocation of heritage items listed in Schedule 4b, to avoid demolition, where it can be demonstrated that:..."

My reasons are:

- If 'to avoid demolition' was to be added to the first sentence, it would tie relocation to avoiding demolition for those items that are a threat from or danger/damage from natural hazards. This is not the intent of clause a – which was to clearly enable relocation where the heritage item is at threat of or damage from natural hazards, not demolition.
- Placing 'to avoid demolition' at the front part of the policy makes the policy about demolition, but Policy 11 is about relocation, not demolition which is covered by Policy 5.

In considering your concerns about including 'to avoid demolition' in clause c., I have talked through the issues with Ian Bowman and have reviewed the relevance of clause c., and I make the following comments:

- The end result for managing relocation of heritage items in Schedule 4b is clearly outlined in clause b., that is, that the relocation will protect the heritage values and significance of the heritage item identified in Schedule 4b;
- As outlined in my evidence, under clause c., the realistic alternatives to relocation for the heritage items included in Schedule 4b are: to retain the item on the site, relocation within the site; relocation to another site; or demolition. Demolition is dealt with under Policy 5.
- Given your concerns about the current wording of clause c. requiring an evidential basis to determine that demolition is likely as a result of the wording of this policy, in discussion with Ian Bowman, we consider that removing clause c. altogether and making an amendment to clause b. that outlines that a report from a suitably qualified heritage expert, would appropriately ensure that relocation of an item will protect the heritage values and significance of that item. This is irrespective of whether the relocation is within or beyond the existing site.

Based on the above, I am now recommending the following changes to Policy 11 to simplify the policy and reduce confusion about whether clause a. is a standalone clause:

To only allow relocation of heritage items listed in Schedule 4b where it can be demonstrated that:

- a. The work relocation is necessary to save the heritage item and protect the heritage values from the threat of, or damage from imminent danger to natural hazards; or
- b. The work relocation will protect the heritage values and significance of the heritage item, as confirmed by a suitably qualified heritage expert.
- c. In the case of relocation to another site, alternatives to relocation have been explored and relocation is considered by a suitably qualified heritage expert to be a reasonable option.

In terms of your comments about inserting 'by Council but informed by a suitably qualified heritage expert', I do not consider these words are necessary as that is inherent to all consenting processes. The District Plan already uses reference to the type of expert throughout the document.

Dean – I note that HNZPT is a further submitter to the submission on Policy 11 and I wanted to ensure you were also aware of the discussions from late last week. I am interested if you have any comments on the suggested new policy above.

I am aware that you both are required to submit expert evidence by tomorrow, as per the Panel minute. I do intend to provide the hearing panel with an update of our discussions at the hearing (including any further discussions post tomorrow).

Ngā mihi

Rochelle.

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