

From: [Mike Vincent](#)
To: [Mailroom Mailbox](#)
Subject: Submission to Air Regional Plan
Date: Wednesday, 29 April 2015 9:29:38 a.m.
Attachments: [HNZ_Submission FINAL 2015-04-29.pdf](#)

Dear Sir Madam

Please find attached a copy of the Heritage New Zealand submission to the Air Regional Plan.
Hard copy will follow by post.

Regards

Mike

Mike Vincent | Heritage Advisor Planning | Heritage New Zealand Pouhere Taonga | PO Box 4403
Christchurch | DDI: 03 357 9616 | M: 027 223 1646 | Visit www.heritage.org.nz and learn more about New
Zealand's heritage places

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1 May 2015

File ref: 33002-281

Freepost 1201
The Proposed Canterbury Air Regional Plan
Environment Canterbury
P.O. Box 345
Christchurch 8140

Via email: mailroom@ecan.govt.nz

Dear Sir, Madam

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

The Proposed Canterbury Air Regional Plan

TO: Environment Canterbury

FROM: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed policy statement (the proposal):

The Proposed Canterbury Air Regional Plan

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

Matters of historic heritage as they relate to the Proposed Regional Air Plan.

4. Heritage New Zealand's submission is:

- Heritage New Zealand supports the Proposed Canterbury Air Regional Plan subject to minor amendments

5. The reasons for Heritage New Zealand's position are as follows:

- Please find attached a summary sheet with the Heritage New Zealand submission points. Refer to the table attached as Appendix 1.

6. Heritage New Zealand wishes to be heard in support of our submission.

Yours sincerely



Rob Hall
General Manager Southern Region.

Address for service

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Heritage Advisor Planning
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03 357 9616

Appendix 1

Submission of Heritage New Zealand Pouhere Taonga to Proposed Canterbury Air Regional Plan.

(Strike: ~~abc~~ =delete and underline and italics: abc = addition)

Part & provision number	Support or Oppose	Reasons for submission	Relief sought
Space heating in Clean Air Zones - On all sites within all Clean Air Zones.			
Policy 6.34: <i>Enable discharges of contaminants into air from any space heating device that is significant to the heritage fabric of particular heritage buildings.</i>	Support in part	<p>Heritage New Zealand supports the enabling intention of this policy. Many historic building employed traditional heating methods such as open fire places, coal or wood fired ovens, cast iron devices such as AGA™ and other traditionally flue heating devices. Many of these formed an integral and sometimes significant part, both structurally and decoratively, of heritage properties.</p> <p>Heritage New Zealand seeks clarification of the term “significant”. The threshold for significance may convey a Conservation Plan standard of identification of significant fabric. Heritage New Zealand questions whether this is the intent of the policy or whether the term “integral” may be an appropriate alternative to define the nature of the heating device.</p>	<p>That consideration is given to amending policy 6.34 as follows:</p> <p><i>Enable discharges of contaminants into air from any space heating device that is significant <u>integral</u> to the heritage fabric of particular heritage buildings</i></p>
Policy 7.81 Space heating - Space heating Region Wide: <i>Within a Clean Air Zone, the discharge of contaminants into air from any space heating appliance within a heritage building is a permitted activity provided the</i>			

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Part & provision number	Support or Oppose	Reasons for submission	Relief sought
<p><i>following conditions are met:</i></p> <ol style="list-style-type: none"> <i>The space heating appliance is located within a heritage building that is listed in Schedule 9 or a heritage building that is listed as a Category 1 heritage building by Heritage New Zealand Pouhere Taonga; and</i> <i>The space heating appliance and chimney were original features of the building (including restored original features).</i> 			
7.81 Permitted activity	Support in part	Individual Local Authorities have a range of rules associated with the use and alteration of heritage buildings. Heritage New Zealand is concerned to ensure that the Policy does not inadvertently encourage alteration to space heating appliance and chimney without obtaining suitable planning permissions.	An advice note is included in the Plan clarifying that this provision does not exempt people from other district plan provisions relating to the alteration of heritage structures.
7.81 Permitted Activity	Support	<p>Heritage New Zealand supports this policy and wants to ensure that the policy does not deter owners from undertaking actions to improve energy efficiency or structural strength of Chimneys.</p> <p>For example an unmaintained fire place could be an insurance issue or has the potential to cause serious damage to a historic place via unintended consequences or a natural disaster.</p> <p>Heritage New Zealand has developed best practice information guides on the maintenance of brick and stone work specific to chimneys. Heritage New Zealand wish to make this available to building owners</p>	<p>That the policy is adopted and a collaborative approach between Heritage New Zealand and Environment Canterbury is established to educate building owners on the repair and maintenance of chimney and other heritage features specific to space heating.</p> <p>Direction to best practice repair and maintenance guidance is made available on Environment Canterbury webpages.</p>

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7.81.1	Support in part	<p>A number of the items identified in Scheduled 9 have been demolished. For example Ashburton Railway Station was demolished via resource consent. Cracroft (Old Stone House) and Chadwell (also known as Haskell House) have been demolished following earthquake damage.</p> <p>Whilst the number of demolished buildings has no direct bearing on the Policy it is important that any schedule identifying heritage buildings remain relevant and up to date.</p> <p>Section 76 of the Heritage New Zealand Pouhere Taonga Act 2014, directs Heritage New Zealand to maintain and supply an update of the New Zealand Heritage List / Rārangī Kōrero to local authorities. We undertake this action each quarter. As such, new items may be eligible for exemptions under the proposed policy. Heritage New Zealand seeks a mechanism to ensure these items are recognised within Schedule 9.</p>	Provision is made to update Schedule 9 on a regular basis to correct errors and coincide with any eligible items entered on the New Zealand Heritage List / Rārangī Kōrero.
Space heating - Space heating Region Wide.			
Policy 7.81.1	Neutral	Heritage New Zealand notes that the Policy provides specific exemptions for items listed as Category 1 ¹ on the New Zealand Heritage List / Rārangī Kōrero. It also provides exemption for other items identified in Scheduled	Heritage New Zealand seeks clarification on the intent of the inclusive nature of the Policy.

¹ The Heritage New Zealand Pouhere Taonga Act 2014 defines Category 1 items as “places of special or outstanding historical or cultural heritage significance or value”.
Proposed Canterbury Air Regional Plan
Submission of Heritage New Zealand
1 May 2015

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Part & provision number	Support or Oppose	Reasons for submission	Relief sought
		<p>9, whether Category 2 items or individually scheduled in District Plans.</p> <p>It is not clear whether the intention of the Policy is to delineate between highly significant items or be as inclusive as possible of all heritage items.</p> <p>Schedule 9 contains a high number of Category 2 listed items. Does the policy want to extend exemptions to items listed as Category 2 as well?</p> <p>Is the intention of the Policy to capture those buildings which are not entered on the New Zealand Heritage List / Rārangī Kōrero but are independently scheduled on District Schedules?</p> <p>Heritage New Zealand are neither for nor against the intention to allow other buildings exemption as we support the ongoing use of original features of heritage buildings, however we are of a view that if the intention of the policy is to be as inclusive of all possible heritage items, then reference should be made to any item on the New Zealand Heritage List / Rārangī Kōrero as well as any individual item on Schedule 9.</p>	