

Horowhenua District Plan

Section 32 Report

Proposed Plan Change 1

(Historic Heritage – Update of Schedule 2 to include additional buildings, structures and sites and consequential other amendments)

November 2017

Contents

1	Introduction.....	1
1.1	Background	1
1.2	Scope	4
2	Regulatory and Policy Context	5
2.1	National Legislation and Policy Context.....	5
2.2	Regional Regulatory and Policy Context.....	7
2.3	District Strategic and Policy Context	8
3	Proposed Plan Change 1.....	9
3.1	Proposed Amendments to the District Plan.....	9
3.2	Supporting Documents	9
3.3	Consultation	9
4	Section 32 Evaluation.....	11
4.1	Update Schedule 2 of the Plan to include additional buildings, structures and sites, and other minor amendments.....	11
4.2	Risk of Acting or Not Acting Where There is Uncertain or Insufficient Information	16
4.3	Conclusion.....	16

1 Introduction

The primary purpose of Proposed Plan Change One (Proposed PC1) is to update Schedule 2: Historic Heritage – Buildings, Structures and Sites of the operative Horowhenua District Plan 2015 (the Plan) to include additional heritage buildings, structures and sites. The plan change also includes a few minor, consequential amendments to Chapter 13 (Historic Heritage) of the Plan resulting from the update to Schedule 2.

Proposed PC1 focuses on ‘*post contact*’ heritage and therefore does not include sites of significance to Tangata Whenua or associated provisions that would apply to these sites. These matters will be separately addressed in future by way of a targeted, stand-alone plan change.

This report outlines the background, scope, regulatory and policy context and the amendments proposed as part of Proposed PC1. It also provides an evaluation of the proposed amendments in accordance with the requirements of section 32 of the Resource Management Act (RMA) 1991.

1.1 Background

1.1.1 District Plan Review – Amendment of Historic Heritage Provisions

A full review of the former District Plan (1999) was undertaken between 2012 and 2013, with the Horowhenua District Council (the Council) making its second generation District Plan operative on 1 July 2015. As part of this review, ‘*Section 7 – Issues, Objectives: Heritage*’, of the previous District Plan was replaced by ‘*Chapter 13 – Objectives/Policies: Historic Heritage*’ of the now operative District Plan.

The review also resulted in amendments being made to the rules relating to management of historic heritage buildings, structures and sites listed in Schedule 2. The rules apply across the various zone chapters and were updated to facilitate more effective management of historic heritage in the district; they reflect current best practice and aid interpretation.

The revised rules allow for the repair, redecoration and maintenance of heritage buildings and structures listed in Schedule 2 as a Permitted Activity, while the alteration of, addition to, or demolition of listed heritage buildings or structures requires resource consent. The rules also place restrictions on earthworks, subdivision and the erection of signage on listed heritage sites or within the heritage setting of a listed building or structure. Specific historic heritage related definitions for the ‘*repair, redecorate and maintenance*’ were also inserted in Chapter 26 of the Plan.

Since the decisions on submissions on the ‘Proposed District Plan’ were public notified on 16 October 2013 (and the amended objectives, policies and rules have had legal effect) the owners of the following buildings, structures or sites which are currently listed in Schedule 2 have applied for resource consents:

- **H2** - All Saints Church (Group 2 and Heritage NZ Category 2 building): Three lot subdivision consent (reference number 502/2016/3774) granted in August 2016;

- **H15** - Horowhenua College Main Building (Group 2 and Heritage NZ Category 2 building): Outline Plan (reference number 504/2016/18) for alterations and additions to the Science Block at Horowhenua College was approved without recommendations in July 2016;
- **H26** - Mangahao Hydro Electric Power Station (Group 2 and Heritage NZ Category 2 building): Land use consent (reference number 501/2015/3643) for earthquake strengthening and alterations was granted in July 2015;
- **H47** - Miranui Flaxmill Remains (Group 2): Two land use consents have been granted: one to relocate a second dwelling on to 448 State Highway 57 (reference number 501/2014/3569) which was granted in February 2015; and another to erect a new shed at 467 State Highway 57 (reference number 501/2015/3604) which was granted in March 2015.

As well as introducing changes to the objectives, policies and rules in the Plan, Schedule 2 was also updated to fully reflect the current range of buildings, structures and sites within the district included on the Register of Historic Places, Historic Areas, Wahi Tapu, and Wahi Tapu Areas (now the New Zealand Heritage List/Rārangi Kōrero) administered by Heritage New Zealand Pouhere Taonga (Heritage NZ).

In line with proposed Policy 13.1.1 (which is now operative) the schedule was also reformatted to reflect the division of the listed buildings and structures into two distinct groups based on their relative significance as follows:

- Group 1 - Buildings and structures that have outstanding national and/or regional significance due to their "rarity" and/or level of "integrity".
- Group 2 - Buildings and structures have regional and/or local significance.

By contrast, historic heritage sites are separately listed and are not assigned to a distinct group based on their national, regional and/or local significance.

1.1.2 Rationale for the Proposed Plan Change

As an input to developing the first generation District Plan, an initial survey and assessment of historic heritage buildings, structures and sites in the district was carried out in 1995/96 by local historian, Val Burr. This list was largely based on the buildings, structures and sites included on the Register of Historic Places, Historic Areas, Wahi Tapu, and Wahi Tapu Areas (now New Zealand Heritage List/Rārangi Kōrero) at that time.

Over time it has become apparent that there are gaps in the list of buildings, structures and sites currently included in Schedule 2. For example, there are currently only four buildings in Foxton on the Schedule which are the All Saints Church and three residential dwellings (being Duncan House, Nye Homestead and 31 Robinson Street). This illustrates a potential under-representation of the built heritage of the town, particularly given its rich history and important association with the Flax Industry. Although it is noted that the town centre of Foxton is covered by the 'Town Centre Heritage/Character Area' under the Plan which recognises, and offers some protection of, the heritage values of this area.

The changes made to Schedule 2 as part of the District Plan Review were considered to be an interim measure until a more comprehensive review of local historic heritage was undertaken. The need to undertake a comprehensive review of the historic heritage buildings, structures and sites in the district was recognised during the development of Council's Heritage Strategy in 2012, as highlighted by actions 4.1.1 and 4.1.2 of the Strategy (*these actions are listed below; see 2.3.2*).

The decision to defer a comprehensive review of the historic heritage buildings, structures and sites as part of the District Plan Review, was largely based on the following factors:

- That the Proposed District Plan introduced substantive amendments to the framework of objectives, policies and rules specifically associated with Schedule 2 listed features; and
- Given these proposed changes, it was considered to be advantageous for there to be certainty around what owners of listed properties could do as of right with their property, and what works/activities would be subject to restrictions, prior to any further buildings, structures or sites being included on the schedule.

Instead a commitment was made by Council under the 'Methods for Issue 13.1 and Objective 13.1.1' in Chapter 13 of the now operative Plan, to:

"Commence, in line with the Horowhenua Historic Heritage Strategy 2012, a comprehensive survey of historic heritage in the District, including sites of significance to Māori, wāhi tapu, wāhi tūpuna and archaeological sites, within 12 months of the date of notification of the Proposed District Plan. The survey should apply a thematic approach to the identification of prospective historic heritage buildings, sites, and interrelated areas and be undertaken in consultation with Iwi, local historical societies, the NZHPT and potentially affected landowners."

The submissions received in relation to the amendments proposed to the historic heritage provisions as part of the District Plan Review reinforced the need for a comprehensive review of listed heritage features to be undertaken.

1.1.3 Identification and Assessment of Historic Heritage Features

In December 2015 and January 2016 the Council invited members of the public to nominate any buildings, structures or sites in the district that they considered to be of sufficient historic merit to warrant inclusion in Schedule 2 of the Plan.

The Council received 78 nominations, with 60 of these requiring further assessment and the balance being either duplicates (i.e. features that were nominated more than once), features already protected under the Plan, or were outside of the scope of this project (e.g. several were cultural sites of significance which will be assessed as part of a separate plan change process).

Due to the number of nominations received, the nominated heritage buildings, structures and sites were divided into two groups: non-residential nominations (e.g. commercial/industrial buildings or churches) and residential nominations (e.g. dwellings).

Proposed Plan Change 1 (Historic Heritage - Update of Schedule 2 to include additional buildings, structures and sites and consequential other amendments)

During 2016 the non-residential nominated buildings, structures and sites were researched by two suitably qualified heritage professionals (Historian, Val Burr and Architect and Conservator, Ian Bowman), and assessed against the heritage assessment criteria set out in Policy 13.1.2 of the Plan (refer Chapter 13). A total of 32 non-residential buildings, structures and sites were assessed in 2016, although not all of these met the heritage assessment criteria.

The decision to assess the non-residential nominated buildings, structures and sites first (as opposed to the residential nominations), was based on the fact that they are:

- Illustrative of a wider range of building type, representative of the historical influences or events that have helped shape the district; and
- They are typically more accessible and/or visible to the public than residential buildings (e.g. Foxton's Main Street).

The residential nominations will be assessed at a later date, as funding and resourcing permits.

1.2 Scope

The scope of Proposed PC1 is largely limited to amending the list of historic heritage buildings, structures and sites in Schedule 2 of the Plan, as well as updating the District Plan – Planning Maps to reflect the changes made to Schedule 2. The buildings, structures and sites that are proposed for inclusion in Schedule 2 at this stage are only those features which property owners are supportive of their listing.

Some minor amendments to Chapter 13 – Objectives/Policies: Historic Heritage are also proposed as part of the proposed plan change. These include amending the 'Methods for Issue 13.1 & Objective 13.1.1' to clarify what work still needs to be carried out in regards to identifying additional buildings, structures and sites to include in Schedule 2 in the future.

The 'Explanation and Principal Reasons' associated with Issue 13.2, Objective 13.2.1 and Policies 13.2.2 to 13.2.8 is also proposed to be slightly amended to insert reference to 'structures' (as well as buildings) and to improve the clarity around how these objectives and policies relate to the earthworks provisions associated with historic heritage features.

As a full evaluation of the costs, benefits, efficiency, effectiveness and appropriateness of the operative objectives, policies and rules (including the entries currently contained in Schedule 2) was undertaken as part of the 2011-2013 District Plan Review process, no further re-evaluation of these existing provisions is considered to be required for the purposes of this proposed plan change.

As noted this proposed plan change focuses solely on 'post contact' historic heritage buildings, structures and sites, 'Sites of significance to Tangata Whenua' have been excluded and will be subject to a separate plan change in future.

2 Regulatory and Policy Context

This section identifies the regulatory and policy context of this proposed plan change including the national legislation and policies, regional regulations and policies, and district strategies and policies considered to be of relevance.

2.1 National Legislation and Policy Context

2.1.1 Resource Management Act 1991

Under section 5, the purpose of the Resource Management Act 1991 (RMA) is ‘to promote the sustainable management of natural and physical resources’.

Sustainable management means “the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health while:

- a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations;
- b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.”

Section 6 of the RMA identifies seven matters of national importance which need to be recognised and provided for in policies and plans. Of these, section 6(f) is the most relevant to this proposed plan change as it requires “the protection of historic heritage from inappropriate subdivision, use, and development.”

Section 7 of the RMA requires particular regard to be given to a range of ‘other matters’. Of the matters identified, the most relevant to Proposed PC1 are the following:

- (b) the efficient use and development of natural and physical resources;
- (c) the maintenance and enhancement of amenity values; and
- (g) any finite characteristics of natural and physical resources.

Section 8 of the RMA requires that in managing the use, development, and protection of natural and physical resources the principles of the Treaty of Waitangi are to be taken into account.

In addition to the above sections of the RMA Council must, in preparing a District Plan (or Plan Change), fulfil a number of additional statutory requirements set down in the RMA, including:

- Section 31 - Functions of Territorial Authorities;
- Section 32 - Duty to consider alternatives, assess benefits and costs;
- Section 72 - Purpose of district plans;
- Section 73 - Preparation and change of district plans;
- Section 74 - Matters to be considered by territorial authorities; and
- Section 75 - Contents of district plans.

2.1.2 Resource Legislation Amendment Act 2017

In April 2017 the Resource Legislation Amendment Act (RLAA) came into force. Amongst the range of amendments introduced that take immediate effect are a number relating to the plan-making process.

In terms of these amendments the following have been identified as relevant to Proposed PC1:

- A requirement to supply iwi authorities with a copy of any draft proposed policy statement or plan (including a proposed change) prior to notification and to have particular regard to any advice received (Schedule 1, cl.4A, RLAA); and
- A requirement to summarise, in the associated s.32 evaluation report prepared for any proposed statement, plan or change, all relevant iwi authority advice received along with the Council's response (s.32(4A), RMA).

2.1.3 National Policy Statements

Under Section 75(3)(a) of the RMA a District Plan must also give effect to any National Policy Statement (NPS). Currently there are no NPSs that are of specific relevance to the protection and management of historic heritage.

2.1.4 Heritage New Zealand Pouhere Taonga Act 2014

The purpose of the Heritage New Zealand Pouhere Taonga Act 2014 (Heritage NZ Act) is to *"promote the identification, protection, preservation, and conservation of the historical and cultural heritage of New Zealand."*

The Heritage NZ Act provides for the establishment of Heritage NZ, which has a primary focus to identify and protect heritage through entry onto the New Zealand Heritage List/Rārangi Kōrero. Section 74(2)(b)(iia) of the RMA requires Councils to have regard to relevant entries on this list when preparing or changing their District Plans.

In this regard it is noted that Schedule 2 of Horowhenua District Council's Plan currently includes all of the buildings and structures that are listed by Heritage NZ within the Horowhenua District. It is noted that the buildings, structures and sites currently listed in Schedule 2 are not being reviewed as part of this plan change.

2.1.5 Building Act 2004

The Building Act 2004 includes a range of provisions relevant to historic heritage such as section 4(2)(l) which identifies the need to facilitate the preservation of buildings of significant cultural, historical, or heritage value as a principle that must be taken into account in achieving the purpose of the Building Act 2004.

It also contains a number of provisions relating to health and safety, especially for earthquake prone, dangerous and insanitary buildings, which can sometimes create tensions with heritage protection.

The Building (Earthquake-Prone Buildings) Amendment Act 2016 is also of interest in relation to historic heritage buildings identified as earthquake prone. The provisions of this Amendment Act are anticipated to commence in July 2017 (as outlined in the Ministry of Business, Innovation and Employment's, Discussion Document '*Proposals*

Proposed Plan Change 1 (Historic Heritage - Update of Schedule 2 to include additional buildings, structures and sites and consequential other amendments)

for Regulations under the Building (Earthquake-prone Buildings) Amendment Act 2016' published in September 2016). There are different timeframes that will apply to the assessment and strengthening of earthquake-prone buildings depending on their geographic location and relative level of seismic risk identified (e.g. low, medium or high).

The Horowhenua District has been categorised as 'high risk' and as such the Council is required to assess priority buildings within two years and six months of the Act taking effect and other buildings within five years. If an Earthquake Prone Building (EPB) notice is issued then remedial work must be completed within seven years and six months for a Priority Building (which are yet to be identified) and 15 years for any other building.

The Former Manawatu Herald Building (6 Main Street, Foxton) and Racing Club Building (8 Main Street, Foxton), which are proposed for inclusion in Schedule 2 of the Plan as part of Proposed PC1, have previously been assessed by Council as being potentially earthquake prone. Although according to Council's records, works have been done to alter and upgrade both of these buildings since they were assessed.

2.2 Regional Regulatory and Policy Context

2.2.1 Horizons Regional Council's One Plan

Under Section 75(3)(c) of the RMA, a District Plan must give effect to any Regional Policy Statement which, in this instance, is the Horizons Regional Council's 'One Plan' (which comprises of a combined Regional Policy Statement and Regional Plan).

Chapter 6 of the One Plan outlines the regionally significant issues, objectives, policies and methods to manage living heritage within the Manawatu-Wanganui Region, including indigenous biological diversity, landscape and historic heritage. Issue and Objective 6-3 specifically relate to historic heritage. The issue outlines the respective role and responsibilities of the Regional Council and corresponding Territorial Authorities, with the objective requiring that they '*protect historic heritage from activities that would significantly reduce heritage qualities*'.

To achieve this objective Policy 6-11 outlines the responsibilities of the Regional Council and Territorial Authorities in relation to historic heritage under the RMA, while Policy 6-12 focuses on the identification of historic heritage and it requires that:

- (a) *Territorial Authorities^ must develop and maintain a schedule of known historic heritage^ for their district to be included in their district plan^; and*
- (c) *Historic heritage^ schedules must include a statement of the qualities that contribute to each site.*

The proposed plan change largely gives effect to these provisions by incorporating additional buildings, structures and sites into Schedule 2 of the Plan.

Relevant supporting information setting out the respective values and qualities of the places proposed for inclusion in Schedule 2 is contained in the '*Technical Assessments of Buildings, Structures and Sites*' - which is a compilation of the assessments prepared by Ian Bowman and Val Burr for the buildings, structures and sites proposed

for inclusion in Schedule 2 as part of Proposed PC1. This will be made available for the public to view.

2.3 District Strategic and Policy Context

2.3.1 District Plan – Chapter 13 Historic Heritage

Chapter 13 of the District Plan outlines the Issues, Objective, Policies and Anticipated Environmental Results relating to the identification and protection of local historic heritage. This chapter was extensively reviewed during the District Plan Review, along with the specific rules associated with historic heritage features in the zone chapters of the Plan.

The approach applied to the identification and categorisation of the buildings, structures and sites included within the proposed plan change aligns with that set out in Policies 13.1.2 and 13.1.3 of the Plan.

2.3.2 Horowhenua Heritage Strategy 2012

The Horowhenua District Heritage Strategy was adopted by the Council in September 2012. Its purpose is to assist the Council and community to more effectively manage heritage in the District, and it does this through:

- Identifying key issues and opportunities to address heritage management in the District;
- Setting out a clear vision to ensure that the District's heritage is recognised, protected and promoted; and
- Identifying a range of actions and goals to facilitate more effective management of local heritage.

3 Proposed Plan Change 1

(Historic Heritage – Update of Schedule 2 to include additional buildings, structures and sites and consequential other amendments)

3.1 Proposed Amendments to the District Plan

The primary focus of Proposed PC1 is to update the historic heritage buildings, structures and sites that are currently listed in Schedule 2 of the Plan along with subsequent amendments to the relevant District Plan - Planning Maps.

The following District Plan – Planning Maps will be amended to show the locational markers for the heritage buildings, structures and sites that are proposed to be included in Schedule 2:

- Planning Map 1
- Planning Map 3
- Planning Map 4
- Planning Map 5
- Planning Map 6
- Planning Map 7
- Planning Map 14
- Planning Map 15
- Planning Map 15A
- Planning Map 16
- Planning Map 27
- Planning Map 28
- Planning Map 28B

Proposed PC1 also involves some very minor amendments to Chapter 13 including updating the Method for Issue 13.1 and Objective 13.1.1 to reflect the work that has been done as part of the proposed plan change and to improve clarity of the Explanation and Principal Reasons associated with Issues 13.2, Objective 13.2.1 and Policies 13.2.2 to 13.2.8.

3.2 Supporting Documents

The buildings, structures and sites proposed for inclusion in Schedule 2 as part of Proposed PC1 were assessed by two suitably qualified heritage professionals (Historian, Val Burr and Architect and Conservator, Ian Bowman) in 2016. The assessments produced by Val Burr and Ian Bowman have been compiled in the '*Technical Assessments of Buildings, Structures and Sites*' document. This document is attached to this report under a separate cover as supporting information.

3.3 Consultation

Letters were sent to the Ministry for the Environment, the Manawatu-Wanganui (Horizons) Regional Council and Iwi Authorities in accordance with clauses 3(1) and 4A(1) of Schedule 1 of the RMA outlining the nature and scope of the proposed plan

Proposed Plan Change 1 (Historic Heritage - Update of Schedule 2 to include additional buildings, structures and sites and consequential other amendments)

change and inviting comment. A list of the buildings, structures and sites that are proposed for inclusion in Schedule 2 as part of this proposed plan change was supplied.

With the exception of a representative of Te Taiao o Raukawa (the environmental resource unit for Ngati Raukawa ki te Tonga) expressing their disapproval of the timeframe that had been set for initial comments to be sent to Council officers, no further responses were received. It is acknowledged that the timeframe for initial comments was short, although it was considered appropriate in this context as the proposed plan change involved the listing of new heritage buildings, structures and sites and not changes to the objectives, policies or rules of the Plan.

Officers have also been in contact with the owners of the properties that were assessed by Val Burr and Ian Bowman. Information, including the draft assessment of their building, structure or site as well as on the relevant provisions in the District Plan, was provided to owners.

At this stage the buildings, structures and sites which are proposed for inclusion in Schedule 2 of the District Plan are those which have the support of their respective owner/s for inclusion.

4 Section 32 Evaluation

Section 32 sets out the requirements for preparing and publishing plan change evaluation reports. A proposed plan change must be evaluated in terms of whether its stated objective/s is the most appropriate way to achieve the purpose of the RMA and whether the proposed provisions are the most appropriate way to achieve the objective/s. For this proposed plan change the existing objectives in the operative District Plan are still considered to be the most appropriate way to achieve the purpose of the RMA.

The primary objective relevant to this matter is Objective 13.2.1, which states as follows:

Objective 13.2.1 Protection of Historic Heritage

To protect significant historic heritage that reflects the culture and history of the Horowhenua District from inappropriate subdivision, use and development.

The Council is also required to identify other reasonably practicable options and to assess their efficiency and effectiveness; this includes identifying and assessing the benefits and costs of the environmental, economic, social and cultural effects that are anticipated. Where practicable the benefits and costs should be quantified. Any opportunities for economic growth and employment (and whether these are anticipated to be provided or reduced by the change) must also be assessed.

4.1 Update Schedule 2 of the Plan to include additional buildings, structures and sites, and other minor amendments

The objective of Proposed PC1 is to provide for local, non-residential buildings, structures and sites that are historically significant to be protected from inappropriate subdivision, use, and development. This is proposed to be achieved by updating Schedule 2 to include 11 additional buildings, structures and sites as well as making some minor amendments to Chapter 13 of the Plan to increase clarity. The current list of heritage buildings, structures and sites in Schedule 2 was compiled in 1995/96 as part of the development of Horowhenua's first generation District Plan. As such this list largely comprises buildings, structures and sites that were on the Register of Historic Places, Historic Areas, Wahi Tapu, and Wahi Tapu Areas (now New Zealand Heritage List/Rārangī Kōrero).

Over time it has become apparent that there are gaps in the current list of buildings, structures and sites included in Schedule 2 (e.g. there are only four buildings in Foxton that are protected; three dwellings and a church). As part of the District Plan Review, Schedule 2 was updated to

ensure that it still reflected the relevant entries contained on the New Zealand Heritage List/Rārangi Kōrero. However, this was only considered to be an interim measure until a comprehensive survey of local heritage buildings, structures and sites could be carried out.

It is considered that Proposed PC1 will help to ensure that the Council meets its statutory obligations under section 6(f) of the RMA and Policy 6-12(a) of the Horizons Regional Council’s One Plan. It does this by proposing additional buildings, structures and sites identified as being of historic heritage value for inclusion in Schedule 2 of the Plan; which means that these places will be subject to specific provisions to encourage their ongoing protection and management. The minor amendments to Chapter 13 simply involve the Method for Issue 13.1 and Objective 13.1.1 and the Explanation and Principal Reasons associated with Issues 13.2, Objective 13.2.1 and Policies 13.2.2 to 13.2.8 being updated to improve clarity and confirm Council approach going forward.

Proposed PC1 is consistent with Chapter 13 of the Plan including Objective 13.1.1 which is *“To identify historic heritage within the District that is representative of its history of occupation and settlement.”* Furthermore, the identification, assessment and categorisation of the non-residential buildings, structures and sites proposed for inclusion in Schedule 2 aligns with the approach outlined in Policies 13.1.2 and 13.1.3 of the Plan.

4.1.1 Evaluation of Other Reasonably Practicable Options:

This part of the report evaluates the following alternative options:

Option 1: Proposed Plan Change – update Schedule 2 and Chapter 13 as proposed.

Option 2: Status Quo - Retain the existing list of Schedule 2 of heritage buildings, structures and site, without change and do not amend Chapter 13.

Option 3: Rely on Non-Regulatory Measures (e.g. promoting greater public awareness of heritage, waiving consent fees for heritage buildings, structures or sites, or providing funding or grants to owners of heritage buildings, structures or sites to help them maintain or enhance the heritage values of the property) – without amending Schedule 2 and Chapter 13 as proposed.

	Option 1: Proposed Plan Change	Option 2: Status Quo	Option 3: Non-regulatory measures
Costs (Environmental, Economic, Social and Cultural)	<p>Economic Cost: Costs associated with the development and implementation of a proposed plan change.</p> <p>Economic Cost: Potential increase in</p>	<p>Environmental and Social Cost: Potential for loss of local, significant heritage. Not all significant non-residential heritage buildings, structures and sites are currently listed in Schedule 2 and therefore their protection</p>	<p>Economic Cost: Potential development and implementation costs depending on the nature and extent of non-regulatory measures the Council decides to implement (e.g. financial incentives such as</p>

	Option 1: Proposed Plan Change	Option 2: Status Quo	Option 3: Non-regulatory measures
	<p>compliance (e.g. resource consents) and operational costs (e.g. sympathetic alterations) for owners of newly listed heritage buildings, structures and sites, and extra cost incurred by Council (i.e. resource consents are currently 30-40% publicly funded and 60-70% privately funded).</p> <p>No Environmental, Social or Cultural Costs have been identified.</p>	<p>and management is not provided for through the Plan. As a result the potential exists for unlisted, yet significant heritage buildings, structures and sites to be demolished or inappropriately redeveloped/altered.</p> <p>No Economic or Cultural Costs have been identified.</p>	<p>discretionary grants or rates relief).</p> <p>Environmental and Social Cost: Potential for loss of currently unlisted local significant heritage where current or future property owners are not responsive to non-regulatory methods.</p> <p>Environmental and Social Cost: Property owners are supportive of Schedule 2 of the Plan being amended to include their building, structure or site. To not include them would be a lost opportunity and would mean that significant heritage in the District would continue to be unrecognised and not protected in the Plan.</p> <p>No Cultural Costs have been identified.</p>
<p>Benefits (Environmental, Economic, Social and Cultural)</p>	<p>Environmental Benefit: Incorporation of additional buildings, structures and sites into Schedule 2 that have been assessed as being of local, regional or national significance and which warrant protection and management through the Plan. Would facilitate more effective management of these places and reduce the potential for unlisted, yet significant, buildings, structures and sites to be demolished or inappropriately redeveloped/altered.</p> <p>Environmental and Social Benefit: The</p>	<p>Economic Benefit: No costs in terms of implementation, as no change to the Plan would be required.</p> <p>Economic Benefit: Owners of heritage buildings, structures and sites proposed for listing in Schedule 2 would not be subject to additional planning controls or incur a potential increase in compliance costs.</p> <p>No Environmental, Social or Cultural Benefits have been identified.</p>	<p>Economic Benefit: No costs in terms of implementation, as no change to the Plan would be required.</p> <p>Economic Benefit: Owners of heritage buildings, structures and sites not currently listed in Schedule 2 would not be subject to additional planning controls or incur a potential increase in compliance costs.</p> <p>Environmental and Social Benefit: Council could ensure that guidance/advice is made available to the owners of heritage buildings, structures and sites which are</p>

	Option 1: Proposed Plan Change	Option 2: Status Quo	Option 3: Non-regulatory measures
	<p>proposed additions to Schedule 2 would ensure that events or activities that helped shape the District are more fully recognised and better represented by the historic heritage buildings, structures and sites entered on the schedule (e.g. flax industry in Foxton).</p> <p>No Economic or Cultural Benefits have been identified.</p>		<p>not currently listed (as well as those which are) and this would help ensure their continued appreciation by the community and on-going contribution to their surrounding environment.</p> <p>No Cultural Benefits have been identified.</p>
<p>Efficiency and Effectiveness of Achieving Objectives</p>	<p>This option is considered to be the most efficient and effective response to ensure the protection and management of a more representative range of significant historic heritage buildings, structures and sites in the District. This is in line with the objectives of the Horowhenua District Plan, particularly Objective 13.1.1.</p> <p>This option is also the most effective in terms of alignment with Council's Heritage Strategy (2012). The Strategy includes a range of goals and actions for Council to work towards (both regulatory and non-regulatory) to ensure local heritage is recognised, protected and promoted.</p> <p>This proposed plan change would also ensure increased effectiveness and efficiency through the identification and</p>	<p>This option would result in Schedule 2 and Chapter 13 not being updated, with gaps in the range of historic heritage buildings, structures and sites included in the schedule persisting. Consequently, it would have limited effectiveness given the restricted scope of heritage places currently included in the Plan; it would also present an inefficient and ineffective means to achieve the objectives and policies of the Plan, as well as the Goals and Actions outlined in Council's Heritage Strategy (2012).</p>	<p>The efficiency and effectiveness of this option relies almost exclusively on the willingness of property owners to voluntarily regulate their property rights in the interests of the wider community.</p> <p>Consequently, sole reliance on non-regulatory measures is unlikely to present an efficient and effective means to achieve the objectives and policies of the Plan. It is recognised that non-regulatory measures can be quite effective when used in conjunction with regulation.</p>

	Option 1: Proposed Plan Change	Option 2: Status Quo	Option 3: Non-regulatory measures
	mapping of a more representative range of historic heritage places in the Plan. The minor consequential amendments to Chapter 13 resulting from the update to Schedule 2 will improve the clarity of these relevant provisions.		
Appropriateness	<p>This is considered to be the most appropriate option to achieve the objectives and policies in Chapter 13 of the Plan. Objective 13.1.1 provides for the identification of historic heritage within the District “<i>that is representative of its history of occupation and settlement</i>”, while Policies 13.1.2 and 13.1.3 outline how buildings, structures and sites are to be assessed and categorised; the approach adopted in this proposed plan change aligns with, and reflects, the intent expressed within these provisions.</p> <p>This option would help to ensure that additional buildings, structures and sites identified as being of heritage value would be protected from inappropriate use, development and subdivision in accordance with section 6(f) of the RMA; it is also more consistent with the relevant objectives and policies of the Horizons One Plan.</p>	<p>This option is not considered to be the most appropriate to achieve the purpose of the RMA, as some heritage buildings, structures and sites which have been assessed as significant and which their current owners are supportive of them being listed in Schedule 2 would not be protected from inappropriate use, development and subdivision in the future. It would also not be entirely consistent with the relevant objectives and policies of the Horizons One Plan.</p> <p>Furthermore this option would not achieve the relevant objectives and policies in Chapter 13 of the Plan which encourage the listing of a more representative range of historic heritage features.</p> <p>This option also does not align with Council’s Heritage Strategy (2012).</p>	<p>This option is not considered to be the most appropriate means to achieve the purpose of the RMA, the relevant objectives and policies of Horizons’ One Plan or the objectives and policies in Chapter 13 of the District Plan.</p> <p>Even if an expansive regime of non-financial and financial methods were developed and implemented by the Council for the heritage buildings, structures and sites proposed for inclusion in Schedule 2, in the absence of these places being listed private property owners are under no obligation to ensure that they are protected from inappropriate use, development or subdivision. It’s noted that while current owners may be sympathetic of the heritage values of their property, future owners may not be.</p>

4.2 Risk of Acting or Not Acting Where There is Uncertain or Insufficient Information

The proposed plan change primarily relates to updating Schedule 2, along with some minor amendments to Chapter 13. The buildings, structures and sites that have been proposed for inclusion in Schedule 2 of the Plan were nominated via a public process, have been assessed by suitably qualified professionals and their owners are generally supportive of them being listed.

Consequently, it is considered that there is sufficient information to act on this proposal. There may be a small degree of uncertainty, although the risk of acting is not considered to outweigh the risk of not acting. The risk of not acting is the potential loss or compromise of local historic heritage buildings, structures and sites.

4.3 Conclusion

This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits and costs arising from Proposed PC1 and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that the proposed plan change is the most appropriate option as it will provide:

- Effective historic heritage identification, through identifying and mapping additional buildings, structures and sites with significant heritage values in the district that merit protection and management through the Plan;
- Effective recognition and management of historic heritage values, through identification of the relevant heritage values associated with the additional historic heritage buildings, structures and sites in the '*Technical Assessments of Buildings, Structures and Sites*'; and
- Better alignment with the RMA, by amending Schedule 2 of the Plan to provide for the protection of additional historic heritage in the district as a matter of national importance.