

ICOMOS AOTEAROA NEW ZEALAND
TE MANA O NGA POUWHENUA O TE AO
INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
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Submission – Heritage New Zealand Pouhere Taonga Consultation Draft, Statements of General Policy October 2024

6 March 2025

Introduction

ICOMOS is a non-governmental international organisation dedicated to the conservation of the world's monuments and sites. Founded in 1965, the organisation is a principal advisor to UNESCO and includes over 10,000 members in 132 countries and territories.

ICOMOS Aotearoa New Zealand (ICOMOS ANZ) is an incorporated society whose members include architects, engineers, heritage advisers, experts in Te Ao Māori, historians, archaeologists, lawyers, and planners.

The [ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value](#) is the benchmark for conservation standards and practice in Aotearoa New Zealand. The heritage conservation principles outlined in the Charter are based on a fundamental respect for significant heritage fabric and the intangible values of heritage places.

Context of this submission

Aotearoa New Zealand retains a unique assemblage of places of cultural heritage value relating to its indigenous and more recent peoples. New Zealand shares a responsibility with the rest of humanity to safeguard its cultural heritage places for present and future generations.

ICOMOS NZ welcomes this opportunity to provide feedback on Heritage New Zealand Pouhere Taonga's (HNZPT) Consultation Draft, Statements of General Policy October 2024 (SOGP). We join with HNZPT in treasuring New Zealand's historic heritage, and welcome and support the development of policy guidance to facilitate better management and protection of these resources.

ICOMOS NZ previously provided comments on a draft version of the current SOGP in April 2015. More recently, at the request of HNZPT, ICOMOS NZ representatives provided feedback on the current Statements of General Policy on 2 July 2024, after meeting with

HNZPT staff on 19 April 2024. Our members have also attended the online presentations on the SOGP.

Scope of submission

In general, ICOMOS ANZ are supportive of the SOGP. Where we disagree or recommend an amendment to specific policies, this is specified in the table attached to this letter.

General comments

ICOMOS ANZ notes that a number of our suggestions outlined previously have been addressed, including: the simplification of language; reduction in the number of objectives and policies; reduction of repetition; the addition of graphics; clear statement of strategic context for each SOGP. We also note our support for the improved integration of Tapuwāe: Te Kōrero a te Kaunihera Māori o te Pouhere Taonga.

The reduction in the number of policies reduces the length of the documents, repetition and complexity. However, we also note that there could be risks of key policies not having been carried over (eg the determinants of broad support), and note the potential for system users to refer back to the policies in the existing SOGP. We have not carried out a detailed review of policies not carried over to the draft SOGP as part of our submission.

Each of the five SOGPs is set out under the three high-level objectives. This ensures that each policy contributes to meeting the objectives and this relationship is clear. However, this organisation of the SOGPs results in some added complexity to the documents and for the reader. We note that some policies will likely contribute to more than one objective (eg Recognising all values in the Advocacy SOGP relates to the te Tiriti objective and the best practice objective), and therefore, this way of organising the documents results in some residual repetition. Placing the three overarching objectives at the beginning of each SOP and grouping the policies below would simplify the SOGPs. It would also serve to better emphasize the status of the objectives. It is unclear what the status of the unnumbered headings is – are they simply headings for organising groups of policies or are they intended as outcomes/goals? Clarity about this would improve the clarity of the SOGP.

Please note the recent change of name of our organisation to ICOMOS Aotearoa New Zealand – we request this be updated throughout the SOGP.

For future consultations we suggest increasing the font size for accessibility.

We note there is still some repetition – for example is it necessary to repeat the recovering costs policy in each Policy Statement?

We note the increasing relevance of digital tools and information in relation to heritage practice and consider that it would be useful to add a policy around their use to the SOGP. We also note the availability of best practice guides on aspects such as 3D Laser scanning for heritage, BIM for heritage, photogrammetry, metric Survey specifications for heritage, digital tools overall.

Detailed submission

Please refer to the attached table for detailed comment on the SOGP.

Concluding remarks

We hope this submission is useful, and are happy to be contacted further regarding our submission.

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Appendix 1 – ICOMOS Aotearoa New Zealand detailed submission on HNZPT Statements of General Policy, Draft for consultation

Section	Topic	Submission	Discussion and relief sought (if applicable)
Introduction	How we define cultural heritage, p.4	Retain	Strongly support the adoption of the term cultural heritage.
	Why cultural heritage is important, p.4	Amend	<p>ICOMOS ANZ supports the stated reasons why heritage is important. We have, however, identified a gap in local based evidence and documentation that quantifies the various benefits of heritage to New Zealand communities. We consider that such information is an essential tool for achieving the step-change sought in the advocacy statement, to communicate the value of New Zealand’s heritage and influence more effective protection of cultural heritage.</p> <p>ICOMOS ANZ suggests the addition of an advocacy policy seeking to quantify and increase understanding of the social, cultural, environmental and economic benefits of heritage. We consider gathering this type of information would lead to strong and measurable evidence of the value of cultural heritage to the nation and better support good outcomes for New Zealand’s heritage.</p>
Objectives	Objective: <i>Heritage New Zealand Pouhere Taonga delivers best practice heritage recognition, conservation, and</i>	Amend	<p>We broadly support the three high-level Objectives, but note the following:</p> <p>This objective refers to ‘international best practice.’ Given the importance of local cultural context to best practice heritage conservation, we consider that this should state ‘national and international best practice.’</p> <p>Bullet point 2 - suggest could also mention value of cultural heritage to the world here.</p> <p>We note the inclusion of the following statement within the objective explanation:</p>

Section	Topic	Submission	Discussion and relief sought (if applicable)
	<p>protection outcomes., p. 5</p>		<p><i>Often this involves balancing competing needs. The growth and development of communities put pressure on our cultural heritage, requiring creative solutions to ensure it is protected and conserved.</i></p> <p>We consider that this statement is out of place as it states an ‘issue,’ and could appear to be advocating for the ‘balancing of competing needs’ as part of best practice heritage conservation. We suggest that the objective is revised to focus on achieving the best possible outcomes through best practice, as necessary considering the outside pressures on heritage.</p> <p>The set of conservation principles set out in the objective is inconsistently worded – we suggest that the last two bullet points are reworded as stand-alone statements to match the other principles above – e.g. instead of ‘the principle that there is value in working collaboratively’ – change to ‘there is value in working collaboratively’ and delete ‘that’ from the beginning of the last bullet point. We also note that the last bullet point has quotation marks but no reference.</p> <p>ICOMOS ANZ supports the inclusion of high-level conservation principles within the objective, and that these are supported by detailed conservation principles in the Advocacy policy statement.</p> <p>We note that the ICOMOS NZ Charter 2010 is no longer referenced by name in any of the SOGP policies. The current Advocacy statement (1.1, p.12) appears to make a stronger statement regarding the role of the ICOMOS NZ Charter – ‘HNZPT recognises that the identification, protection, preservation and conservation of New Zealand’s historical and cultural heritage should ... recognise the purpose and principles of the ICOMOS New Zealand Charter.’ We support the reference to the ICOMOS NZ Charter 2010 in the best practice objective.</p>

Section	Topic	Submission	Discussion and relief sought (if applicable)
	<p data-bbox="488 244 680 395">How the heritage management system works</p> <p data-bbox="477 480 692 512">Diagram 1., p. 7</p>	<p data-bbox="719 244 808 276">Clarify</p>	<p data-bbox="936 244 2024 395">It is unclear why the shape for Heritage Orders is white and how the order on the regulatory line was arrived at. We support the aim (to summarize the system), but note that the system is complex and consider that this diagram is oversimplified and could be confusing for readers.</p> <p data-bbox="936 443 2011 555">It is unclear how the order on the regulatory line in particular has been arrived at. We suggest that it is reworded to explain why HOs provide more protection than DPs.</p>
	<p data-bbox="477 608 680 799">How the heritage management system works, pages 7 and 8</p>	<p data-bbox="719 608 824 679">Clarify /amend</p>	<p data-bbox="936 608 2024 759">‘What the tools do’, bullet point one, page 7 - The List is not <i>the</i> national record of Aotearoa New Zealand’s cultural heritage. We suggest that this is reworded to include the other inventories that make up the national record including ArchSite and district plan schedules.</p> <p data-bbox="936 783 2040 895">We suggest an addition be made to this section with reference to Section 6(f) (Matters of National Importance on Historic Heritage) in the Resource Management Act.</p> <p data-bbox="936 919 2011 1031">Property Interests – We suggest that clarification on a ‘duty of care’ by owners for cultural heritage is added, as this term suggests a regulatory requirement. Our suggested alternative wording is as follows:</p> <p data-bbox="999 1054 2047 1286"><i>Owners and manager of heritage places - whether hapū and iwi, the Department of Conservation, local government, trusts, companies, or individuals - are responsible for the care of cultural heritage.’ Or ‘The onus for care of heritage places sits with owners and manager of heritage places - whether hapū and iwi, the Department of Conservation, local government, trusts, companies, or individuals.</i></p>

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			<p>Heritage orders - Under the RMA, s188 heritage orders are intended to protect ‘any place’ including ‘any feature or area, and the whole or part of any structure’. Not just ‘individual sites and buildings’. This should be reworded.</p> <p>We note that heritage orders are not mentioned on HNZPT’s website as a tool available to immediately protect heritage places, and suggest that they are added.</p>
Advocacy Statement, From p10	Recognising all values / Working with hapū and iwi, p.9-10	Amend	<p>Policies 1.2/1.4/1.5 – traditional Māori knowledge. We agree that it is appropriate to have regard to traditional Māori knowledge to inform conservation approaches and disaster risk management. This aligns with the international discourse on the use of traditional knowledge of indigenous communities to inform disaster risk management and climate change response.</p> <p>1.4 - Is there a reason why this is limited to built heritage? We suggest that it is widened to include all heritage places.</p>
	Recognising Iwi Management Plans, p.10	Retain	Policy 1.8 – We support this point, but acknowledge that HNZPT may have limited ability to action this, considering that building and resource consent applications are received and processed by TLAs.
	Setting Priorities p.10	Amend	Policy 1.9 a) add ‘and internationally.’
	Early engagement and no surprises approach	Amend	We support opportunities for early engagement by HNZPT on consenting and district plan matters, and a ‘no surprises’ approach. We consider that HNZPT can proactively engage early on in consent processes through invitations to comment by the TLA.

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	(Policies 1.10, 1.11), p.10		<p>We note however that there may be limited ability for HNZPT to provide advice at a pre-application stage if that is what is intended by Policy 1.10.</p> <p>We also note that in our experience it can be problematic when an applicant has support from HNZPT for a proposal prior to lodging a consent application which is then not supported by heritage advice through the consent process.</p> <p>We consider that it would be beneficial for a collaborative working arrangement with heritage specialists in TLAs and to add TLAs to the list of parties to be consulted in Policy 1.11.</p>
	Advocating for all cultural heritage, p11	Amend	<p>Policy 1.12 should be strengthened by changing the wording from ‘may’ to ‘will.’ Tangible and intangible heritage values are equally important and generally experienced as intertwined or inseparable. We consider that protecting and maintaining such connections is part of best practice heritage conservation management.</p>
	Incentivising cultural heritage conservation, p.11	Amend	<p>We support Policy 1.14 and suggest that priority should be given in the policy to funding which targets the greatest risks to heritage, for example earthquake strengthening in high- risk earthquake prone areas. In our experience, the Heritage EQUIP fund was effective in supporting owners to reduce earthquake risks to heritage buildings.</p> <p>Suggest that this policy need not be limited to private owners and could also advocate for local and national government to fund heritage conservation of places in their care.</p>

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	Climate change response and sustainability, p.11	Amend	<p>1.16(a) – we suggest this is expanded to include reference to buildings and structures rather than just buildings.</p> <p>Policy 1.16 b) - We question whether the policy as worded is achievable by HNZPT. We consider that HNZPT’s role is more appropriately a supporting and advocacy role for this work. If HNZPT does not own a property, they will have limited mandate to undertake risk mitigation works. As well as working with hapū, iwi, and communities, HNZPT will likely need to work with owners, TLAs and appropriate experts on this policy. The wording should be changed to better reflect HNZPT’s support and advocacy role in regard to achieving good heritage outcomes with regard to climate change adaptation.</p> <p>We do not consider that the SOGP adequately addresses natural hazard risks beyond climate change, such as earthquakes. We would support the addition of a policy which emphasises the role of HNZPT in working with national bodies such as NIWA, NEMA, CDEM, FENZ, MBIE and to support TLAs and communities to plan to reduce risks to heritage. We note that given the recent comprehensive guidance produced by HZNPT on disaster risk management planning, HNZPT would be well placed to implement a policy to support advocacy work on disaster risk management of heritage places, risk identification, reduction, planning for recovery and advocating for heritage to be a key part of disaster recovery. If added to the SOGP, this would assist in achieving the step-change in protection that is sought through the advocacy policy.</p> <p>Policy 1.16 c) is very broad in nature insofar that ‘sustainable management of buildings and building materials’ could be interpreted in any number of ways. We suggest rewording is needed to specify what is sought here in relation to cultural heritage. For example, is this policy about advocating for the use of sustainable materials in repair and restoration of heritage places, or is it addressing adaptation and reuse of heritage places as being sustainable?</p>

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			<p>We consider that a clause could be added to usefully address a role for HNZPT to provide advice on how to sensitively adapt heritage buildings to improve sustainability (e.g. insulation/ retro fitting of double glazing). We note that New Zealand based evidence and documentation of the sustainability benefits of heritage retention would assist in achieving policy 1.16.</p> <p>It would be beneficial to also recognise the positive role heritage can play as a source of resilience (this is recognised in the Sendai Framework for Disaster risk Reduction 2015-2030, and documented in international literature, e.g. ICOMOS publication 'Future of our pasts'). We suggest this is best placed as a new clause.</p>
	<p>Earthworks and cultural heritage places with archaeological values, p.11</p>	<p>Amend</p>	<p>Policy 1.17 is supported, with the addition of 'where appropriate.' in c) 'scheduling and protecting archaeological sites and cultural landscapes in District Plans'.</p> <p>In our experience, the inclusion of recorded archaeological sites in district plan schedules where there is insufficient information regarding geographic location and/or site type is problematic. Scheduling of archaeological sites could be seen to largely duplicate the protection already provided under the HNZPT Act.</p> <p>Clarity is needed regarding HNZPT's position on how the relationship between the archaeological authority and RMA consenting processes will be managed so as to provide an efficient process for approval under two different legislative frameworks. There is otherwise a risk of criticism of unnecessary regulation.</p> <p>Policies should be drafted to ensure there is appropriate alignment between the archaeological site-related processes under the RMA and the HNZPT Act.</p>
	<p>Burial places and places of remembrance, p.12</p>	<p>Retain</p>	<p>Policy 1.18 – we agree that burial grounds are part of cultural heritage that is important to recognise and protect. A number of cemeteries are scheduled in District Plans as heritage items. Burial grounds are commonly considered to be part of</p>

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			<p>heritage by the community. There is repetition of this policy with Policy 3.13. It is not clear why burial grounds are singled out from other types of cultural heritage places in the Statements of General Policy. We suggest clarification of why these places are unique, or removal of the duplication.</p> <p>Policy 1.19/1.20 –we recognise that places of remembrance may not accord with places, people or events that communities consider appropriate to memorialize today – or memorialise in the same way. However, we acknowledge that memorials are a record of places, people or events that people in the past thought important and are therefore a crucial record of past values and practices.</p>
	National direction and planning documents, p.12	Support	We support Policy 1.21 regarding HNZPT advocating for national direction in heritage management, including through the development of a National Policy Statement under the RMA.
	Scheduling in District Plans and Regional Coastal Plans, p.12	Amend	<p>Policy 1.23 and 1.24 are worded to state desired outcomes that may be beyond what HNZPT can achieve as they are related to District Plans. It is suggested that the policies are reworded to use active wording and indicate what HNZPT will do.</p> <p>Policy 1.24 – the use of HNZPT Act criteria as a basis for scheduling appears to be in conflict with the use of the RMA historic heritage ‘qualities’ in the SOGP glossary to define cultural heritage. In addition, this could be seen as muddling two pieces of legislation.</p> <p>Our view is that the RMA definition of historic heritage should technically be a basis for scheduling heritage places in District Plans, and TLAs have the ability to build on this narrow range of values through reference to the broader range of values as articulated in the HNZPT Act, the ICOMOS NZ Charter 2010 and international</p>

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			<p>references (eg Burra Charter, UNESCO World Heritage), as well as recent best practice guidance.</p>
	<p>Activity status, p.12</p>	<p>Amend</p>	<p>Policy 1.25 sets out minimum levels of control that HNZPT will advocate for and states that they support higher standards. We note that higher standards could have unintended consequences, for example if alterations were to be discretionary or non-complying, this could deter the adaptive reuse of heritage buildings. It is suggested the wording is amended – for example ‘...and will support higher standards <i>as appropriate</i>’.</p> <p>It is not clear whether this table is intended to also apply to a scheduled heritage area which may contain buildings of varying heritage value, in which case we note that a hierarchy of protection could apply to buildings in heritage areas which are not individually protected.</p> <p>ICOMOS ANZ supports some aspects of policy 1.25 but have some suggested changes. These are discussed below and summarized in the separate table below (Figure 1.).</p> <p>Demolition - we support the activity status recommended for demolition HNZPT proposes to advocate for, as these are appropriate for offering adequate protection to cultural heritage.</p> <p>Subdivision – we note that although it is important to retain an appropriate setting for heritage places, subdivision can often be undertaken in a way which supports maintenance of heritage values and retention of heritage places. We support discretionary or restricted discretionary status for this activity as it would provide appropriate protection for the heritage place but still enable sympathetic development. This would be a more pragmatic approach for very large settings, such as rural contexts.</p>

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			<p>New structures within scheduled sites – we suggest this could be restricted discretionary rather than fully discretionary on the basis that matters can be prescribed provided they are robust. This would still provide appropriate protection from adverse effects through how a new structure is designed and located in relation to the heritage place.</p> <p>Relocation – we do not support the minimum restricted discretionary status for relocation considering the potential adverse effects. Heritage items may be moved to incompatible settings outside of the local context or outside of the district – this can impact social, cultural, contextual and historical values of a heritage place. Effects on communities can be similar to demolition of the place. Relocating a heritage feature within its setting has less potential for adverse effects than its relocation off the site, therefore we consider it would be appropriate to distinguish the minimum activity status for the two scenarios. We consider that restricted discretionary is the appropriate status for relocation within the setting and favour discretionary status for relocation of heritage places beyond their setting.</p> <p>Restoration – we note that restoration is undefined in the Glossary, or addressed as a separate policy. The ICOMOS NZ Charter, 2010 has a definition which could be useful to reference. Controlled activity status does not provide certainty that the works would align with the best practice heritage conservation definition of restoration. Controlled activity status is likely to be problematic and potentially inefficient because the TLA cannot decline the application and will have very limited scope to use conditions to adjust the scope of works if the application does not adequately manage the potential effects of the work. ICOMOS ANZ considers that controlled activity status for restoration could result in adverse effects on heritage places as a result. We suggest a minimum activity status of restricted discretionary for restoration, in order to meet the objective for protection of heritage protection. We note also that it is relatively uncommon for a scope of works to heritage places to be</p>

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			<p>restricted to 'restoration', as this is usually related to a wider work programme of alterations and/or building code works.</p> <p>Seismic strengthening, fire protection and accessibility upgrades – we consider these are necessary interventions to enable the ongoing use and safety of heritage buildings and places, therefore we agree that activity standards should show such works are anticipated by the District Plan. However, as these activities have potential for adverse effects on heritage places, associated standards are required (e.g. input from a heritage professional) to protect heritage values. Otherwise, given the great potential for adverse effects we consider that these activities should have restricted discretionary status. We do not consider that a rule dependant on a subjective judgement to be made as to whether strengthening is 'non-intrusive', 'will destroy 'significant heritage fabric' or will be 'highly visible' is appropriate in the planning context.</p> <p>Earthworks – we note that the minimum activity status appears to relate to the pre 1900 cut- off date for archaeological provisions in the HNZPT Act. Earthworks associated with post 1900 drainage etc. could still have potential to impact heritage fabric of the scheduled heritage item, so recommend that permitted activity status includes standards (such as requiring a temporary protection plan) to address this risk. We note that a maximum activity status of Restricted Discretionary for earthworks would offer very good protection for heritage settings. Depending on their nature, earthworks have a range of potential degree of effects on heritage settings, and although requiring consent for minor earthworks could be seen as onerous for the owner, we note that earthworks are commonly associated with other works that trigger consent requirements.</p> <p>We note that reconstruction (Policy 1.30) is not included in the table.</p>

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	Demolition and destruction, p.13	Amend	<p>Policy 1.27 - Rather than risks to safety which can usually be addressed, often the issue prompting a decision by an owner to demolish is related to financial reasons, the degree, extent or nature of damage, or due to the impact of the necessary works on heritage fabric and values. We suggest the policy should be amended to provide useful clarity on HNZPT's advocacy stance regarding the exceptional circumstances where HNZPT would not oppose demolition.</p> <p>Suggest referring to interim protection 'works' rather than 'measures' as measures could be confused with regulatory protection when we think you mean physical works.</p>
	Demolition by neglect, p.13	Retain	Policy 1.28 – we support this policy for HNZPT to advocate for regulatory measures to prevent demolition by neglect as this is an ongoing issue for TLAs and has resulted in the loss or removal of protection for heritage buildings.
	Alterations and additions, p.13	Amend	<p>Policy 1.29 b) - It could be helpful to articulate further what 'respect cultural heritage values' actually means. Does this include respecting heritage fabric? The policy could benefit from adding 'heritage fabric' here to make it clear. Article 21. Adaptation of the ICOMOS NZ Charter, 2010 provides useful direction in this regard. In particular, avoiding inappropriate or incompatible contrasts with heritage form and fabric is a useful principle to sit alongside the need to distinguish new work from heritage fabric. Aspects such as compatibility with and not dominating or obscuring heritage form and fabric are also important to note in this policy.</p>
	Seismic Strengthening, fire protection	Amend	Policy 1.31 e) – suggest replace e) 'whether the visual impact of additions is minimised and sympathetic' with 'whether the <u>physical and</u> visual impact of additions is minimised and sympathetic.' This would better provide for

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	and accessibility upgrades, p.13		consideration of the significance of heritage fabric, construction techniques and associated craftsmanship values.
	New Structures, p.14	Amend	<p>Policy 1.33 b) – suggest replacing ‘compatibility with the architectural style, character, and scale of the site, structure, and setting’ with ‘compatibility with <u>the form and fabric</u>, architectural style, character, and scale of the site, structure, and setting.’ This change would better align the policy with best practice heritage conservation principles, such as those set out in the ICOMOS NZ Charter, 2010 (referred to in the objectives). It would also provide for new structures which are of materials and architectural forms compatible with the heritage place. These two aspects of form and fabric are not clearly conveyed with the other words used in the existing draft policy.</p> <p>This policy includes consideration of e) advice from suitably qualified and experienced heritage experts. We note that this is equally applicable to demolition and destruction, additions and alterations, reconstruction, seismic strengthening, fire protection, and accessibility upgrades, relocation and managed retreat, and should be added to those policies.</p>
	Modifying practice in exceptional circumstances, p.14	Amend	Policy 1.36 – ICOMOS ANZ questions whether this belongs here as this appears to relate to legislation and outside influences, and actions of other bodies, rather than that which is actionable by HNZPT or within their ability to control. The wording of the policy may need amending if it is intended to convey that HNZPT may change their advocacy approach to not align with their policies in such circumstances.

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	Monitoring and evaluation, p.14	Amend	<p>Policy 1.38 – suggest a change of wording to ‘Periodically, Heritage New Zealand Pouhere Taonga will publish an assessment of the degree of alignment by local authorities against the policies in this Statement and will <u>advocate for improved alignment</u> if HNZPT consider it to be necessary.</p> <p>We note that TLAs have not agreed to these policies or to meet these policies. Whilst the SOGP provides useful statements of what HNZPT considers to be best practice for heritage, and this is a good benchmark for TLAs, we note that TLAs are not required or obliged to align with or measure their performance against the HNZPT SOGP.</p>
Archaeology Statement	Avoiding damage and modification of sites, p.16	Amend	<p>Policy 2.7 – ‘Heritage New Zealand Pouhere Taonga promotes early, ongoing, and meaningful engagement with applicants to consider ways of avoiding or minimising the modification or destruction of archaeological sites’. This reads as though HNZPT is promoting that others engage and could be strengthened by changing the wording to HNZPT ‘undertakes’.</p>
	Climate change response, p.17	Amend	<p>Support the coverage of climate change but note that the policy does not address other risks, and the disaster risk management in general of archaeological sites. Refer earlier comments on Policy 1.16.</p>
	Processing authority applications, p.17-18	Amend	<p>Policy 2.22 – we suggest rewording this to:</p> <p>‘Heritage New Zealand Pouhere Taonga will promote the preservation of the archaeological heritage of New Zealand by: a) exploring practical alternatives to avoid or limit the modification and destruction of archaeological sites, and</p>

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			<p><u>advocating for</u> the retention of in situ archaeological deposits, where practicable...’</p> <p>We note there is a mix of styles of policy wording – including ‘will’ statements and then statements worded as fact. E.g. Policy 2.23 –</p> <p><i>Archaeological investigations should minimise alteration or loss so far as is reasonably practicable, and should leave some archaeological material undisturbed unless it is accepted that destruction is inevitable because of development or natural processes.</i></p> <p>ICOMOS ANZ supports the coverage of climate change but notes that policy does not address other risks, and the disaster risk management in general of archaeological sites. Refer to earlier comments on Policy 1.16.</p> <p>There is a reference to ‘significant’ archaeology in the policy (e.g. 2.24) – it is clear what this means? A suggestion is to clarify the meaning of significant archaeology.</p> <p>Policy 2.35 – whilst, in principle, we support the intent for archaeological material to be displayed, we are unsure whether it is within HNZPT’s jurisdiction to require this.</p>
	Diagram 2, p.20		Diagram needs labels e.g. ‘customer is’ on left ‘HNZPT will’ on right.
List and Landmarks Statements	Strategic Context, p.21	Clarify	<p>We note the intent to promote ‘...<i>the development of a single coordinated heritage identification system through which heritage conservation efforts may ultimately connect to a single heritage list (see Diagram 3 below)</i>’, together with Diagram 3 and footnote 27 – but consider that the diagram is not particularly clear.</p> <p>Particular issues include:</p> <ul style="list-style-type: none"> • The place of District Plan and regional coastal plan schedules.

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			<ul style="list-style-type: none"> • The meaning of triangular shapes. We suggest providing an explanation regarding any intended meaning of the triangle shapes as this could potentially be misinterpreted. • The difference between protect and recognise. We consider that although the diagram notes that district plans ‘protect’ and HNZPT ‘recognise’ places – this is not emphasised, and the current and future intended relationship is not clear or transparent. • Relationships between the different components now and in the future. We consider that this should be more clearly indicated for example with arrows and a reference to the RMA requirement for District Plans to have regard to the Heritage List. If the long-term goal is to amalgamate HNZPT listed heritage with TLA scheduled heritage to create one New Zealand wide list – we note that this could result in a bias towards recognising places of national significance, particularly given HNZPT’s focus (Policy 3.7) on listing potential Category 1 Historic Places. It would also be problematic given the different criteria, methodologies and legislation that currently exist. This intent is not mentioned in the 2023-2027 statement of intent or statement of performance expectations 2024-2025. <p>ICOMOS Aotearoa NZ supports the potential for national historic landmarks to be a useful indicator for (maybe: of the) potential for inclusion on New Zealand’s tentative list for nominations inscription on the World Heritage List. However, we note the potential differences in criteria and assessment methodology between HNZPT and UNESCO World Heritage. We also note DOC’s existing role in relation to World Heritage nominations.</p> <p>Strategic context, p.22 - The legislative context in the existing SOGPs for listing and landmarks make the policies much easier to understand. Suggest these be added into the document.</p>

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List Statement	Setting and communicating priorities, p.23-24	Retain	Support Policies 3.7, 3.8, 3.10 in respect of working with local authorities.
	Maintaining strong relationships, p.24	Retain	Support Policy 3.12 around considering listing by agreement with the owner.
	Honouring burial places, p.24	Amend	<p>Policy 3.14 – ICOMOS ANZ does not support the specific de-prioritisation of listing burial places. Other policies (3.13, 1.18) state their importance. We consider that it is very important for HNZPT to recognise these burial places on the List, along with other types of places in New Zealand. It is not clear or justified why these are singled out in the SOGP as not being a priority for HNZPT listing.</p> <p>Cemeteries are a nation-wide at-risk type of heritage place as a result of inadequate legislative and regulatory protection, maintenance issues and natural and climate change related risks.</p> <p>HNZPT listing, although it offers no statutory protection, does carry some influence in terms of owners and decision makers’ efforts and allocation of resources to heritage places. It may also assist with seeking external funding. We consider that HNZPT listing of burial places assists with recognising the importance of burial places and also supports their protection through regulatory means such as District Plan schedules (via the RMA requirement for District Plans to have regard to the HNZPT List).</p>

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			<p>Although some district plans schedule cemeteries, this is not comprehensively done. We are concerned that this policy could send an unintended message that these places are not a priority for recognition in district plans at a time when they are especially vulnerable, due to the risks outlined above.</p>
	<p>Recognising places created for remembrance, p.24</p>	<p>Amend</p>	<p>Policy 3.17 – the issues are similar to 3.14. ICOMOS ANZ considers that specifically not prioritising these places for listing is not justified because remembrance places, even if ‘protected under the law’, will still benefit from listing. In our experience there is usually a stronger case to prevent demolition or loss or inappropriate alteration of heritage places that are listed as well as scheduled.</p> <p>In general, we do not consider it appropriate to indicate de-prioritisation in the SOGP. However, we are supportive of the priorities being indicated.</p>
	<p>Commitment to quality and accuracy, p.25</p>	<p>Retain</p>	<p>Support Policy 3.18 regarding consultation with TLAs on listing reports. We note that this already occurs locally, is appreciated and has benefits to both parties.</p>
	<p>Respecting legacy data, p.25</p>	<p>Retain</p>	<p>ICOMOS ANZ would like to note their particular support for this policy.</p>
	<p>Protecting information, p.25</p>	<p>Amend</p>	<p>Removing listings following destruction or demolition Policy 3.47 – ‘HNZPT <i>should</i> give the notice of removal...within two weeks’.</p> <p>The policy could be improved by strengthening the discretionary wording. This would align with our earlier advice (2015) – ‘The wording of the policies is in most cases passive and discretionary – for example, the use of terms such as “may” and “might”. INZ notes that such language enables avoidance, or release from,</p>

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			responsibility. As certainty is a key factor in informing intended policy actions and directing the provision of necessary funding or resources, INZ considers that greater reliance should be placed on the use of such terms as ‘will’ or ‘shall’ in framing the policies.’
	Listing process p.25-27	Amend	<p>Policy 3.28 - The current SOGP includes the words ‘at the time of the application’. Suggest ensuring it is explicitly clear in the new policy that this means actual change occurring, not planned change.</p> <p>Policy 3.29 – support informing the owner of applications.</p> <p>The stages of the listing process on page 26 lack a heading and consistency with the rest of the policy document. The location of Diagram 4 is confusing and it would be better placed at the beginning of this section. Headings are in red, or underlined and not bold. It is not clear what these different headings indicate and how they sit in the policy in relation to the other policies which have bold headings.</p> <p>Policy 3.31, 3.32 - ICOMOS ANZ supports the listing of multiple examples of types of cultural heritage, and places of any age as this aligns with what we consider to be a best practice approach, which is in line with international discourse. Specifying here that places that meet the threshold are eligible for listing could help clarify what is meant.</p>
Landmarks Statement	p.28	Amend	Policy 4.7, p.28 The rationale for this is unclear, unnecessarily complex and does not align with the engagement objective.
	Assess, p.29	Amend	<p>Policy 4.11 - The use of the word ‘recommendation’ here is confusing as HNZPT recommends landmarks to the Minister. Suggest replace with ‘assessment.’</p> <p>Policy 4.15 - This does not appear to be required by the HNZPT Act. Therefore, we question whether it is necessary to introduce this extra process step.</p>

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	Support, p.29	Amend	Policy 4.18 – ICOMOS ANZ considers it would be beneficial to cross reference best practice principles here, including those referred to in the Advocacy statement.
Properties Statement	Disposing of properties, p.33	Amend	<p>Policy 5.13 – ICOMOS ANZ considers that the reference to condition could be misconstrued. We suggest the first line is deleted so the policy commences ‘the property no longer possesses significant cultural heritage value’. Damage can be a part of the story/significance of a place for communities – for example after the Christchurch Earthquakes.</p> <p>Suggest amend to ‘For Māori <u>and others</u> the relationship to a place may endure despite damage.</p> <p>Policy 5.14 - ‘Before disposing of property, Heritage New Zealand Pouhere Taonga will...</p> <p>Re: f) ‘consider whether the property is protected by appropriate legal mechanisms.’ As conservation covenants offer very great protection against demolition, ICOMOS ANZ considers it relevant to include a requirement to the policy to consider whether a covenant is needed in order to offer protection as part of disposal.</p>
	Plans, p.34	Retain	ICOMOS ANZ notes their support for this policy.
Glossary	Definition of cultural heritage, p.37	Amend	Re: the use of the RMA definition of Historic Heritage for ‘cultural heritage’ in the SOGP Glossary. We do not consider that HNZPT’s SOGP needs to be restricted to the RMA definition for heritage, given that HNZPT functions under its own legislation which includes a broader range of heritage values, which are recognised in the SOGP glossary definition for ‘cultural heritage value(s)’ The cultural heritage definition could be deleted and relevant wording included in the cultural heritage value(s)

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			definition or could be simplified to reference the values in the cultural heritage value(s) definition so that they two definitions work together. The HNZPT Act itself (section 66 (1) includes a broader range of values than the RMA definition (i.e. aesthetic, traditional, spiritual and social value). The ICOMOS NZ Charter, 2010 definition of cultural heritage values also includes spiritual, traditional, aesthetic, symbolic, commemorative, functional, monumental and landscape values.
	Intangible values	Amend	Historic and social values are missing from the definition.
	Non-intrusive		Refer to our comments on activity status above. We consider that this is problematic to define and problematic to link to a trigger for a regulatory rule because of the nature of heritage values which differ for each heritage place and because it requires a value judgement. In practice the definition and activity status do not create certainty for the owner - in order to determine if consent is required for seismic strengthening works, a determination needs to be made whether the proposal reduces heritage values.
	Restoration		Definition needed

Figure 1. Summary table

Activity	Minimum activity status in Draft SOGP	Support	Suggested change
Demolition	NC – most significant /D – other	Y	n/a
Subdivision	NC or D	N	D or RD
New structures within scheduled sites	D	In part	D or RD
Alterations and additions	RD	Y	n/a
Relocation	RD	In part	RD for relocation within setting/D for relocation off the site
Signs	RD	Y	n/a
Restoration	C	N	RD Or permitted with standards incl. works plan by certified Heritage Professional
Seismic strengthening, fire protection, and accessibility upgrades	P or controlled	N	RD Or permitted with standards incl. works plan by certified Heritage Professional
Earthworks	P, D or RD	N	Permitted with standards or RD
Maintenance and repair	P	Y	n/a