



Te Aroturukitanga o
te Mahere ā-Wae ki
Tāmaki Makaurau

**Auckland
Unitary Plan.
Resource
Management
Act 1991,
Section 35
Monitoring:
B5.2 Historic
Heritage**









10
In memory of
MARY WATSON,
late of
SOUTHWELL, NOTTS
who died 17 June
1866.
Aged 77 years

WALTON JAMES
born 18th Dec 1810
died 18th Dec 1880
aged 70 years

WALTON JAMES
born 18th Dec 1810
died 18th Dec 1880
aged 70 years

WALTON JAMES
born 18th Dec 1810
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Auckland Unitary Plan. Resource Management Act 1991, Section 35 Monitoring:

B5.2 Historic Heritage

July 2022

Technical Report

Plans and Places Department, Auckland Council

Auckland Council
Technical Report

ISBN 978-1-99-110139-6 (PDF, Online)

This report has been peer reviewed by the Auckland Council Peer Review Panel.	
Review completed on 5 May 2022.	
<i>REVIEW STEP</i>	<i>DATE COMPLETED</i>
<i>1. Review by Project leads</i>	<i>N/A</i>
<i>2. Review by Portfolio Lead</i>	<i>26 November 2021 & 3 February 2022</i>
<i>3. Review by Plans & Places Senior Lead Team, Resource Consent Department representative(s)</i>	<i>4 March 2022</i>
<i>4. Auckland Council Peer Review Panel (internal and external reviewers)</i>	<i>5 May 2022</i>

Recommended citation

Auckland Council (2022). Auckland Unitary Plan. Resource Management Act 1991, section 35 monitoring: B5.2 historic heritage. Auckland Council TR2022/13.

Cover images: Parnell Baths (Category B historic heritage place, ID 01708), © Rebecca Fox, Auckland Council; Mount Eden/Maungawhau R11_17 (Category A* historic heritage place, ID 01577), © David Bade, Auckland Council; St Stephen's Anglican Church (and cemetery) (Category B historic heritage place, ID 00616), © Joe Mills, Auckland Council.

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Executive summary

The Auckland Unitary Plan (AUP) became operative in part in November 2016. This report considers how effective and efficient the objectives, policies, rules and other methods of the AUP have been in meeting the outcomes intended by the Regional Policy Statement (RPS) – B5.2 Historic Heritage. This monitoring work addresses the Section 35(2)(b) plan monitoring requirements of the Resource Management Act 1991 (RMA). It also contributes to our knowledge base – what is working in the plan and where there may be challenges – and, consequently, will help to inform future plan changes and fulfill the policy cycle. It is recommended that this report is read in conjunction with its companion technical topic reports, and the summary report.

The objectives of Chapter B5.2 – Historic heritage are as follows:

(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.

(2) Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

Significant historic heritage places are protected in the AUP through being identified in the Schedule of Historic Heritage (AUP Schedule 14.1 and 14.2). Tāmaki Makaurau Auckland has 2,278 historic heritage places and 15 historic heritage areas located throughout the region.¹ Tāmaki Makaurau Auckland’s scheduled historic heritage places comprise a diverse range of typologies, the most common being residential (29 per cent); Māori-origin archaeology (24 per cent); commercial (11 per cent); and civic/institutional (10 per cent).

Four indicators were developed to assess the progress toward achieving the objectives and outcomes intended by the RPS. The period of analysis generally covers November 2016 to June 2021.

Indicator 1. Significant historic heritage places are identified and evaluated

Indicator 1 gauges the number, typology and location of places that have been identified and evaluated each year since the AUP became operative. It determines whether the AUP outcome of “significant historic heritage places are identified” is being achieved.

Overall, Indicator 1 confirmed that significant historic heritage places have been identified and evaluated since the AUP became operative in November 2016: 661 places have been identified, 76 of these have been evaluated, and 71 of those evaluated met the criteria and thresholds to be scheduled.

The analysis found that some areas of Auckland, and some heritage typologies, had fewer places identified and fewer places evaluated. For example, four local boards had under five places identified as places of heritage interest: Howick (0 places), Hibiscus and Bays (one place), Kaipātiki (two places) and Manurewa (three places). In addition, typologies with no places that were evaluated following identification were: European-origin archaeology (59 places identified) and Māori-origin archaeology (41 places identified). Rather than being a result of the effectiveness of the AUP, however, these discrepancies are more a result of past (legacy) council priorities towards heritage (some scheduling more than other councils), patterns of settlement in Auckland that mean some areas have a greater concentration of older places than others, the number and location of historic heritage places added to the schedule during the development of the AUP, and prioritisation of places for evaluation beyond whether they may reach the threshold for scheduling

¹ There are also an additional 196 places and three areas from the Hauraki Gulf Islands District Plan which are yet to be included within the AUP (Auckland Council [2021], *Auckland’s Heritage Counts 2021: Annual Summary*; p.4).

(such as places located on council-owned land or regional parks, which have a lower risk compared to places in urban areas undergoing intensification).

Despite regional and typological discrepancies, this indicator clearly shows that the AUP is effective in enabling a variety of historic heritage places to be identified and evaluated in terms of location or typology.

Indicator 2. Significant historic heritage places are protected through the Schedule of Historic Heritage

Indicator 2 gauges the number, typology and location of places that have been protected (including reviewed) through the Schedule of Historic Heritage each year since the AUP became operative. It determines whether the AUP outcome of “protecting” significant historic heritage places is being achieved.

Indicator 2 has shown that a significant number of historic heritage places (2,278) are protected through the Schedule of Historic Heritage and that they consist of a wide variety of typologies and are located throughout the region.

Although a notable number (50 places) have been added to the Schedule of Historic Heritage since the AUP became operative in part in November 2016, there are variances in the 50 places added in terms of their geographical spread and typology. For example, 11 local boards did not have any places added to the Schedule of Historic Heritage during this time period. There are also clear gaps between the types of places added to the Schedule of Historic Heritage: there is a significant dominance of built heritage places. However, like with Indicator 1, these numbers are more reflective of past priorities of legacy councils, patterns of settlement, and prioritisation of places more at risk, rather than the AUP precluding heritage protection for specific places or areas.

Reviews of the Schedule of Historic Heritage have resulted in a number of historic heritage places having their scheduling refined. These changes have created greater consistency, resulting in a more robust Schedule of Historic Heritage, aligning identified values with management. However, although some recommendations from the archaeological review (2016-2018) have been progressed through Plan Change 10 and Plan Change 27, many have not yet been implemented.

Indicator 3. Inappropriate² development, subdivision, and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied, or mitigated

Indicator 3 relates to both objectives in B5.2, specifically how the objectives, policies and rules of the plan avoid, remedy, or mitigate “inappropriate” outcomes for historic heritage places. B5.2 Policies 6 and 7 call for significant adverse effects to be avoided, and, where these effects are unavoidable, that they be remedied and mitigated.

Between November 2016 and April 2021 there were 431 resource consent applications relating to historic heritage. Of these, 429 (99.5 per cent) were granted and two were refused (one in 2017 for demolition of a scheduled building and one in 2018 to make modifications to a scheduled building).

Overall, for built heritage, archaeology and cemeteries, the objectives, policies and rules of the plan generally lead to avoidance, or at least mitigation or remediation, of “inappropriate” outcomes for scheduled historic heritage places. Across all types of heritage, the best outcomes came from early engagement between the applicant and the heritage specialists, be that through informal advice and guidance or pre-application meetings.

The findings from this indicator were divided into three categories relating to different kinds of heritage.

² For the purposes of this monitoring report, any works described as “inappropriate” are those not supported by the advice of Auckland Council’s Heritage Unit.

Built heritage findings:

The great majority (around 92 per cent) of historic heritage resource consent applications relating to built heritage were supported by the council's built heritage specialists. Most of these applications were supported following pre- or post-application meetings between applicants and council heritage specialists where the application was refined to produce an appropriate heritage outcome. Many of those supported were "supported with recommended conditions", which are measures to ensure mitigation and remediation of effects on historic heritage places. Of the eight per cent which were not supported, most were granted through a hearing process and most of the applicants had their own heritage specialist advice that differed from that of the council's heritage specialists.

Inappropriate built heritage outcomes most often result from:

- inconsistencies with interpretation of plan provisions, such as interpretation of demolition percentages, when a "modification" to a building may be deemed a "new building", or rules for historic heritage areas
- a lack of strength in some rules, such as controls for digital billboards on or close to scheduled historic heritage places, the status of contributing properties within historic heritage areas, cumulative effects, or demolition by neglect
- general errors/anomalies of places in the Schedule of Historic Heritage that have not yet been reviewed, which relate to extent of place, historic heritage values, exclusions, and primary features
- recommendations on applications made by consent planners, who are tasked with balancing competing considerations which may impact heritage values.

Archaeology findings:

When the council's Heritage Unit archaeologists are involved in applications, negative effects are generally avoided, or at least mitigated or remediated on archaeological sites. Negotiation with the applicants to refine their proposal either before or during the application process has been effective, alongside conditions and advice notes appended to consent decisions.

However, an important finding is the lack of consistent involvement in applications from Heritage Unit archaeologists. In some cases, authorities issued to modify or destroy an archaeological site under the *Heritage New Zealand Pouhere Taonga Act 2014* are considered by consent planners to trump AUP policies and rules, which is not the case. This means Heritage Unit archaeologists are not consulted on applications which may lead to inappropriate outcomes for AUP historic heritage.

In addition, the definition of archaeology as being "pre-1900" has also become problematic (for places with both pre- and post-1900 archaeology) and led to inappropriate works on archaeological sites. A lack of clarity for archaeology provisions in historic heritage areas is also an issue.

General errors/anomalies in the Schedule of Historic Heritage can also lead to inappropriate outcomes for historic heritage, particularly relating to the identification of "additional rules for archaeological sites or features" for places in the Schedule of Historic Heritage, as well as the extent of place, historic heritage values, exclusions, and primary features.

Cemeteries findings:

A process of working closely with applicants and stonemasons prior to lodgement has meant that the majority of proposals for cemetery restoration work are refined before reaching the resource

consent stage. As a result, many do not have to go through the resource consent process, or if they do, the proposals are in keeping with the objectives and policies of the AUP.

The lack of a permitted activity standard for various activities, such as new headstones, restoration work, or installing a plaque outside of the permitted activity standards (for example, a body burial with a plaque), has been problematic. An alternative process has been devised and is effective, but it is time- and resource-consuming and not efficient.

The definition of archaeological sites as “pre-1900” also makes it hard to assess and enforce archaeological rules when cemeteries have both pre- and post-1900 features.

Indicator 4. Protection, management and conservation of historic heritage places, including retention, maintenance and adaptation, are encouraged

Indicator 4 focuses on how incentives encourage protection, management and conservation of historic heritage places before they reach the resource consent stage (noting that protection, management and conservation are encouraged during the resource consent process, as identified in the Indicator 3 findings). For this indicator, the four main historic heritage incentives used through the AUP were examined in the rough order of most-commonly-used to least-commonly-used: expert advice and guidance; grants; regulatory incentives; and resource consent fee waivers.

The findings show that all four incentives are overall effective in encouraging the protection, management and conservation of historic heritage places. Free heritage advice and guidance (oral and written) can be hugely effective in encouraging good heritage outcomes (and discouraging inappropriate works). Over \$700,000 has been granted through regional and local historic heritage grants which contribute to good heritage outcomes for historic heritage places. Regulatory incentives are not used as widely as other incentives but are important tools alongside other incentives. Likewise, resource consent application fee waivers have been successfully used, particularly for cemeteries.

Recommendations

For each of the four indicators in the report, recommendations are made that relate directly to the AUP, as well as relating to internal programme or process issues (outside of the AUP).

Contents

1.0	Introduction.....	1
1.1	RPS Chapter B5.2 overview.....	2
1.2	Connections with other parts of the plan.....	2
1.3	Tāmaki Makaurau Auckland context.....	3
2.0	Indicators	7
2.1	B5.2 Indicators and measures	7
3.0	Data and information.....	11
3.1	Methodology.....	11
4.0	Findings and analysis.....	17
4.1	Indicator 1.....	17
4.2	Indicator 2	24
4.3	Indicator 3	33
4.4	Indicator 4	73
5.0	Summary and conclusions	83
5.1	Indicator 1. Significant historic heritage places are identified and evaluated	83
5.2	Indicator 2. Significant historic heritage places are protected through the Schedule of Historic Heritage.....	84
5.3	Indicator 3. Inappropriate development, subdivision and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied or mitigated.	85
5.4	Indicator 4. Protection, management and conservation of historic heritage places, including retention, maintenance and adaptation, are encouraged.....	87
	References	88
	Appendix A. Breakdown of historic heritage places added during the development of the AUP (2014-2016)	89
	Appendix B. Chapter B11 Monitoring and environmental results anticipated	90
	Appendix C. Heritage surveys in Auckland (2010-2021)	92
	Appendix D. Questions for discussions with Heritage Implementation specialists	95

List of figures

Figure 1. Steps in the monitoring process.....	1
Figure 2. The sources for the identification of historic heritage places (2016-2021)	18
Figure 3. Geographic breakdown of identified and evaluated historic heritage places (2016-2021) with a comparison with the total places in the Schedule of Historic Heritage	20
Figure 4. Typology breakdown of identified and evaluated historic heritage places (2016-2021) with a comparison with the total places in the Schedule of Historic Heritage.....	21
Figure 5. Map showing the distribution of Tāmaki Makaurau Auckland’s scheduled historic heritage places by local board (2021). Note: the numbers also include historic heritage places from the Hauraki Gulf Islands District Plan.	25
Figure 6. Geographic breakdown of places within the Schedule of Historic Heritage (2021).....	26
Figure 7. Typology breakdown of places in the Schedule of Historic Heritage.....	26
Figure 8. Distribution of heritage values (criteria in B5.2.2 (1)) of historic heritage places scheduled in Schedule 14.1.....	27
Figure 9. From identification to being added to the Schedule of Historic Heritage (2016-2021). ...	28
Figure 10. Geographic breakdown of historic heritage places added to the Schedule of Historic Heritage in 2016-2021 (with comparison with the total places in the Schedule of Historic Heritage).	29
Figure 11. Typology breakdown of identified historic heritage places and places added to the Schedule of Historic Heritage in 2016-2021 (with comparison with the total places in the Schedule of Historic Heritage)	29
Figure 12. Breakdown of historic heritage resource consents by Historic Heritage Place Category and Historic Heritage Area	36
Figure 13. Historic heritage resource consents by category (not including historic heritage areas) compared to the proportion in Schedule 14.1 overall.	36
Figure 14. Historic heritage resource consents by type of historic heritage place compared with the overall proportion in the Schedule of Historic Heritage (Schedule 14.1).....	37
Figure 15. Type of activity for historic heritage resource consents (2016-2021).....	37
Figure 16. Historic heritage resource consents by local board (Nov 2016- Apr 2021).....	38
Figure 17. Map showing the location of historic heritage resource consents (Nov 2016-Apr 2021). This does not include Aotea / Great Barrier Local Board or Waiheke Local Board as most of the historic heritage in these areas is governed through the HGIDP as opposed to the AUP.	39
Figure 18. Breakdown of Built Heritage Implementation team recommendation by type of historic heritage resource consent.....	47
Figure 19. Proportion of historic heritage places within a general zone/area.....	65
Figure 20. General types of historic heritage places and the proportion within general zones/areas (Note: the per centages for each type add up to over 100 per cent as some places overlap with two or more different zones).	66
Figure 21. Types of resource consents relating to properties adjacent to historic heritage places	67
Figure 22. Page views of the Auckland Council Heritage webpage (Nov 2016 - Jul 2021).....	76
Figure 23. Type of work funded through the regional historic heritage grants programme (2016-17 to 2020-21).....	78
Figure 24. Category of historic heritage place funded through the regional historic heritage grants programme (2016-17 to 2020-21).....	78

Figure 25. Type of heritage place funded through the regional historic heritage grants programme (2015-16 to 2020-21)..... 79

Figure 26. Type of work local board historic heritage grants were granted for (2016-17 to 2020-21)80

List of tables

Table 1. Indicators for Chapter B5.2 9

Table 2. Measures and methods/data source used 12

Table 3. Historic heritage places identified and evaluated (November 2016 – April 2021).....18

Table 4. Heritage places added to the Cultural Heritage Inventory (November 2016 – April 2021).19

Table 5. Places added to the Schedule of Historic Heritage (2016-2021)..... 27

Table 6. Review of historic heritage places (2016-2021)31

Table 7. The number of resource consents relating to historic heritage by year (Nov 2016 – Apr 2021)40

Table 8. Breakdown of historic heritage places by business and residential zones 67

Table 9. The number of webpage views from the Auckland Council heritage website (Jan 2017- Dec 2021) 75

Table 10. Auckland Council Regional historic heritage grants (2016/17 - 2020/21) 77

Table 11. Auckland Council Local Board – local grants towards heritage (2015/16 - 2020/21) 79

Table 12. Local board historic heritage grants by local board (2016-17 to 2020-21)..... 80

Table 13. Breakdown by local board of historic heritage places added during the development of the AUP (2014-2016) 89

Table 14. Breakdown by type of historic heritage places added during the development of the AUP (2014-2016) 89

Abbreviations in this report include:

Abbreviation	Meaning
AUP	Auckland Unitary Plan Operative in Part
the council	Auckland Council
RMA	Resource Management Act 1991
RPS	Regional Policy Statement
resource consents database	Plans and Places resource consent decision tracking database

1.0 Introduction

This report considers how effective and efficient the objectives, policies, rules and other methods of the AUP have been in meeting the outcomes intended by the Regional Policy Statement – B5.2 Historic Heritage. Monitoring plan provisions are in accordance with 35(2)(b) of the RMA.

Section 35(2)(b) specifies that monitoring results are published every five years. The AUP became operative in part in November 2016, and by November 2021 had been operative in part for five years.

The findings provide a narrative of what the AUP is achieving and where challenges may be. With monitoring being a key link in the policy development lifecycle, this data can also provide the evidence base for taking appropriate action where necessary.

The terms ‘effectiveness’ and ‘efficiency’ are not explicitly defined in the RMA. For the purposes of this monitoring report, the terms are generally interpreted as:

Effectiveness is the contribution that the provisions make towards achieving the objective, and how successful they are likely to be in solving the problem they were designed to address when compared with alternatives. The difficulty when assessing effectiveness is to be able to answer the question ‘how do we know that implementing the policy, rule or method led or contributed to the outcome?’.

Efficiency is an assessment of whether the provisions will be likely to achieve the objectives at the lowest total cost to all or achieves the highest net benefit relative to cost to all.³

The steps undertaken in this monitoring work are briefly summarised in Figure 1.

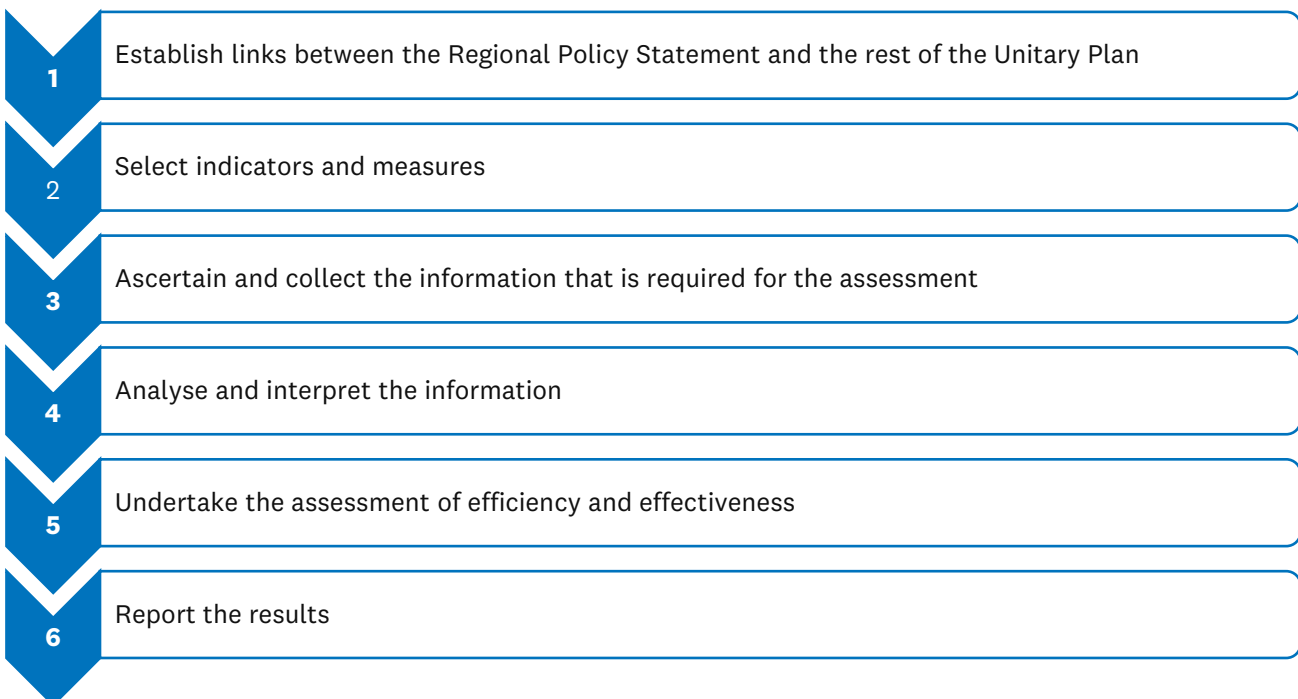


Figure 1. Steps in the monitoring process

³ Auckland Unitary Plan Monitoring Strategy 2018 (Auckland Council).

1.1 RPS Chapter B5.2 overview

The intent of Chapter B5.2 - Historic heritage is to provide a management framework to respond to key issues relating to Tāmaki Makaurau Auckland's historic heritage places.⁴ The identified issues are:

(1) Auckland's distinctive historic heritage is integral to the region's identity and important for economic, social, and cultural well-being.

*(2) Historic heritage needs active stewardship to protect it from inappropriate subdivision, use and development.*⁵

These issues relate directly to Section 6 (matters of national importance) of the RMA, specifically: *(f) the protection of historic heritage from inappropriate subdivision, use, and development*, which underpins the approach to the identification and evaluation of historic heritage and the application of further policies and rules.

The broader policy direction of the chapter is underpinned by a recognition of the contribution of historic heritage in helping people understand and appreciate their history, culture and identity. The policy direction is informed by an understanding of the role historic heritage places play in supporting the distinctiveness of Tāmaki Makaurau Auckland and its economic vitality.

The policy direction also seeks to recognise that historic heritage places are a finite resource that cannot be duplicated or replaced. The identification, protection, conservation and appropriate management of historic heritage places helps current and future generations understand and appreciate how Tāmaki Makaurau Auckland has developed and changed over time and provides a context for future growth.

The objectives and policies in Chapter B5.2 focus on three key components in managing historic heritage places. The first group of objectives and policies relates to the identification and evaluation of significant historic heritage places, including the criteria for assessing places and areas for scheduling. The second group of provisions focus on the protection of historic heritage places, including controls on demolition and inappropriate modification. The final group of objectives and policies deal with the appropriate use of significant historic heritage places, including adaptive re-use.

1.2 Connections with other parts of the plan

At the Regional Policy Statement (RPS) level, Chapter B5.2 is most closely connected to Chapter B5.3 – Special Character. While Special Character is an amenity-based area control, its intent is to identify and manage legacy (including historical⁶) values and physical and visual qualities. The Special Character and Historic Heritage provisions, therefore, share similar themes of identification, evaluation, and management of identified values by restricting or encouraging various activities.

Chapter B5.2 is also closely connected to other RPS chapters and their associated schedules which include heritage or historical values in their criteria for identification and assessment. These include: Chapter B4.2

⁴ "Historic heritage places" include areas. As defined in D17.1 of the AUP, a scheduled historic heritage place can be: 'an individual feature, or encompass multiple features and/or properties, and may include public land, land covered by water and any body of water. A historic heritage place may include; cultural landscapes, buildings, structures, monuments, gardens and plantings, archaeological sites and features, traditional sites, sacred places, townscapes, streetscapes and settlements.'

⁵ AUP Chapter B5.1

⁶ AUP Chapter B5.3.2

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

– Outstanding Natural Features and Landscapes; B4.3 – Viewshafts; B4.4 – Waitākere Ranges Heritage Area; B4.5 – Notable Trees; and B6.3 – Recognising Mana Whenua Values.

At the District Plan level, the primary chapter relating to B5.2 is Chapter D17 – Historic Heritage Overlay, which sets out objectives, policies, and rules for historic heritage places. In addition to D17, there are other linkages across the AUP in relation to activities affecting historic heritage places, including E12 – Land Disturbance, E26 – Infrastructure, E38 – Subdivision, and various precincts in Chapter I which include site specific provisions for historic heritage places.

1.3 Tāmaki Makaurau Auckland context

1.3.1 Background

Tāmaki Makaurau Auckland has 2,278 historic heritage places and 15 historic heritage areas.⁷ Most of these places were scheduled in one of the 14 legacy district and regional plan heritage schedules that were combined during the development of the AUP. Each legacy plan had the same broad approach to identifying the heritage values and significance of places and areas. The various approaches considered the values of places and areas against a set of similar heritage criteria, through an evaluation process. The approach of many legacy councils differed, however, in the quality and level of information required to support scheduling.

The AUP combined and refined these approaches to evaluation, introducing a consistent set of criteria and thresholds, and a non-statutory methodology to inform the preparation of evaluations reports. During the development of the AUP (2014-2016), 125 historic heritage places and one historic heritage area were added to the schedule (see Appendix A for a geographical and typological breakdown). Since the AUP became operative in part in 2016, 76 places have been evaluated against the new criteria and thresholds. Forty-three of these places (including two areas) have been added to the Schedule of Historic Heritage (Schedule 14.1 and 14.2 in the AUP) after it was determined through their evaluation that they meet the RPS thresholds for scheduling.⁸

1.3.2 Current context

All significant historic heritage places⁹ (except for those which are scheduled as areas) are classified according to their level of significance: Category A places, which are those of “outstanding significance well beyond their immediate environs”¹⁰, constitute 8.7 per cent of Schedule 14.1.¹¹ Category B places, which are those of “considerable significance to the locality or beyond”¹², constitute 83.1 per cent of Schedule 14.1.¹³

The AUP introduced a third, temporary, category of scheduling to address the disparity between the way significant historic heritage places were managed in legacy plans and the rules proposed in the AUP. The remaining 8.2 per cent of places in Schedule 14.1 are included in the interim Category A*.¹⁴ All Category A* places will be re-evaluated in advance of plan review to determine whether they should be classified as Category A or B. At the time of writing, 107 Category A* historic heritage places have been re-evaluated and

⁷ There are also an additional 196 places and three areas from the Hauraki Gulf Islands District Plan which are yet to be included within the AUP (Auckland Council [2021], *Auckland's Heritage Counts 2021: Annual Summary*; p.4).

⁸ Another seven places were added in 2018, but were based on evaluations from 2014.

⁹ For the purpose of the monitoring report “significant historic heritage places” mean those places identified in the AUP Schedule of Historic Heritage (Schedule 14.1 and 14.2).

¹⁰ B5.2.2 (4)(a)

¹¹ *Auckland's Heritage Counts 2021: Annual Summary*, p.10.

¹² B5.2.2 (4)(c)

¹³ *Auckland's Heritage Counts 2021: Annual Summary*, p.10.

¹⁴ *Ibid.*

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

a plan change to update their category status is intended be notified in 2022. Sixteen Category A* places have already subject to a plan change to amend their category.¹⁵

Tāmaki Makaurau Auckland’s scheduled historic heritage places comprise a diverse range of typologies, the most common being residential (29 per cent); Māori-origin archaeology (24 per cent); commercial (11 per cent); and civic/institutional (10 per cent).¹⁶

Scheduled historic heritage places are located throughout Tāmaki Makaurau Auckland. The highest numbers of places are located in the Rodney Local Board (453 places); Waitemātā Local Board (366 places, 7 areas); and Devonport-Takapuna Local Board (248 places). The lowest numbers of places are in the Aotea / Great Barrier Island Local Board (10 places); Manurewa Local Board (16 places); and Puketāpapa Local Board (16 places, one area).¹⁷

Scheduled historic heritage places amount to 0.47 per cent of Tāmaki Makaurau Auckland’s land area, which equates to 0.83 per cent of property parcels in Tāmaki Makaurau Auckland.¹⁸

Seventy-four per cent of scheduled historic heritage places are in private ownership.¹⁹ The AUP supports landowners by enabling activities such as repair and maintenance and supporting appropriate development, use and adaptation through identified methods, such as incentives.

1.3.3 Plan changes

Plan change 4: Corrections to technical errors and anomalies in the Auckland Unitary Plan Operative in part

This was a council-initiated plan change. The objective of the plan change was to correct technical errors and anomalies in the AUP (except for the regional coastal plan provisions).

For historic heritage, the plan change:

- amended B5 to correct the title and headers included in the chapter and elsewhere where it was referenced in the plan,
- amended D17 to clarify that demolition under 30 per cent is to be considered as a modification,
- amended wording relating to trees and vegetation, signs and temporary structures.

Status: Operative in full. 14 February 2020

Plan Change 5: Whenuapai Plan Change

This is a council-initiated plan change. The objective of the plan change is to rezone 351 hectares of mostly Future Urban zoned land to a mix of business and residential zones. Plan Change 5 also introduces a new precinct and proposes amendments to the Schedule of Historic Heritage.

For historic heritage, the plan change proposes to:

- add one historic heritage place to the Schedule of Historic Heritage,
- delete five individually scheduled historic heritage places and combine them into one new historic heritage area in the Schedule of Historic Heritage,
- amend Schedule 14.2 to include a Statement of Significance for the historic heritage area.

¹⁵ Plan Change 10; Plan Change 27

¹⁶ *Auckland’s Heritage Counts 2021: Annual Summary*, p.8.

¹⁷ *Ibid.*

¹⁸ *Ibid.* p.13.

¹⁹ *Ibid.* p.14.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Status: Further submissions closed 23 November 2017, with the plan change understood to be currently on hold.

Plan change 7: Additions to Schedule 14 Historic Heritage

This was a council-initiated plan change. The objective of the plan change was to recognise the values of 49 historic heritage places (46 individual historic heritage places and three historic heritage areas) by adding them to the Schedule of Historic Heritage.²⁰

For historic heritage, the plan change:

- added 42 new historic heritage places (40 individual places and two areas) to the Schedule of Historic Heritage.

Status: Operative in full. 27 August 2020

Plan change 10: Historic Heritage Schedule (errors, anomalies and information update)

This was a council-initiated plan change. The objective of the plan change was to amend 146 historic heritage places, including one historic heritage area, in the Schedule of Historic Heritage.

For historic heritage, the plan change:

- amended 146 scheduled historic heritage places, including one historic heritage area, to correct errors and update information,
- removed one place from the Schedule of Historic Heritage that was found to not meet the criteria and thresholds for scheduling.

Status: Operative in full. 12 June 2020

Plan change 14: Improving consistency of provisions for Auckland-wide and Overlays

This was a council-initiated plan change. The objective of the plan change was to correct identified technical issues and resolve identified gaps in the horizontal and vertical alignment of provisions, to improve the workability of the plan and ensure that the AUP functions in an integrated way.

For historic heritage, the plan change:

- amended D17 to identify further permitted activities for features identified as exclusions,
- amended D17 to provide clarity on activities involving trees within scheduled extents of place,
- amended D17 to provide clarity on modifications to grave ledgers to allow insertion of cremated ash remains,
- amended D17 to provide clarity on invasive seismic strengthening works.

Status: Operative in full. 17 January 2020

Plan change 27: Amendments to Schedule 14.1 Schedule of Historic Heritage

This was a council-initiated plan change. The objective of the plan change was to amend information in the Schedule of Historic Heritage for 73 historic heritage places, including to add or amend the extent of place shown in the Plan maps for relevant places.

For historic heritage, the plan change:

- amended the Schedule of Historic Heritage and the GIS viewer/planning maps to correct errors and update information for 74 places,

²⁰ AUP Chapter D17 Historic Heritage Overlay

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- removed 14 places from the Schedule of Historic Heritage that were either destroyed or found to not meet the criteria and thresholds for scheduling.

Status: Operative in part. 11 September 2020

Plan change 31: Schedule 14.1 Historic Heritage Additions

This was a council-initiated plan change. The objective of the plan change was to recognise the values of six historic heritage places (five individual places and one area) by adding them to the Schedule of Historic Heritage.

For historic heritage, the plan change:

- added five historic heritage places (four individual places and one area) to the Schedule of Historic Heritage.

Status: Operative. 9 April 2021

2.0 Indicators

Indicators and measures have been developed to assess the progress made toward achieving the objectives and outcomes intended by the RPS. They are qualitative or quantitative gauges that assess changes and help identify potential issues.

An **indicator** (for the purposes of this report) is a qualitative or quantitative gauge that displays degrees of progress to determine whether the AUP is moving in the right direction toward meeting its objectives. An indicator should be used to assess the condition of the environment, to identify changes to that condition, to diagnose problems and then to guide future changes to objectives, policies, or methods (via plan change or plan review).

A **measure** is the selected information that enables evaluation of the indicator. Methods of measurement will differ depending on the indicator.²¹

The selected indicators and measures for this topic have been shaped by limitations. It was not possible to develop a set of indicators which encompassed all facets of the topic – this is due to constraints on time, resource, and data availability. See more about data constraints in Section 3.0 Data and information.

The indicators in this report were developed from indicators listed in Chapter B11 (Monitoring and environmental results anticipated) of the AUP. See Appendix B for a commentary of the indicators and why they were amended and added to.

2.1 B5.2 Indicators and measures

Four indicators have been developed to assess progress toward the two objectives in Chapter B5.2:

1. Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.
2. Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

The indicators are as follows (the measures are identified in Table 1 below):

1. Significant historic heritage places are identified and evaluated.
2. Significant historic heritage places are protected through the Schedule of Historic Heritage.
3. Inappropriate²² development, subdivision, and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied, or mitigated.
4. Protection, management, and conservation of historic heritage places, including retention, maintenance and adaptation, is encouraged.

Indicators 1 and 2 assess progress toward the first objective. The indicators were developed in response to a series of key questions including:

- What are significant historic heritage places?
- How do we identify significant historic heritage places?

²¹ Auckland Unitary Plan Monitoring Strategy 2018 (Auckland Council).

²² For the purposes of this monitoring report, any works described as “inappropriate” are those not supported by the advice of Auckland Council’s Heritage Unit.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- How many places have we identified since the plan has been made operative?
- How do we evaluate significant historic heritage places?
- How many places have we evaluated since the plan has been made operative?
- How do we choose which places to evaluate from the wider pool of “identified” places?
- Has there been a loss of identified but not scheduled places? If so, under what conditions?

Indicator 3 assesses progress towards both objectives. This indicator was also developed in response to a series of key questions, which include:

- What is inappropriate subdivision, use and development?
- Are places being protected from inappropriate subdivision, use and development?
- How are places being protected from inappropriate subdivision, use and development?
- What are adverse effects on historic heritage values? What are adverse effects on historic heritage places?
- Are adverse effects on significant historic heritage values, places and areas being avoided, remedied, or mitigated?
- How are adverse effects being avoided, remedied, or mitigated?
- How are historic heritage values protected? How are historic heritage places protected?
- Is new development having regard to the values of adjacent historic heritage places?
- How is new development having regard to the values of adjacent historic heritage places?
- How can appropriate use be provided for?
- Are the rules sufficiently enabling?
- Are there inefficiencies in the rules that hinder the achievement of policies and objectives?
- Do the rules, standards, and matters for discretion contribute to the goals of protection? Are any of these more effective or used more than others?
- Are there any clear weaknesses/gaps in the rules or standards?

Indicator 4 assesses progress towards the second objective. This indicator was developed in response to key questions, which include:

- How is protection, management and conservation encouraged?
- How effective are grants in encouraging good heritage outcomes?
- How effective are public talks and guidance for encouraging good heritage outcomes?

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Table 1. Indicators for Chapter B5.2

Objectives	Indicators	Measures
RPS 5.2.1(1)	1. Significant historic heritage places are identified and evaluated.	<ul style="list-style-type: none"> The number, location and typology of places and areas of potential historic heritage value that have been identified through projects, resource consents, surveys, plans, programmes, private plan changes, and public nominations each year. The number of places added to the Cultural Heritage Inventory (CHI) each year. The number, location and typology of places and areas that have been evaluated each year. The number of evaluated places and areas that have been determined to meet the criteria and thresholds for scheduling each year. The number, location and typology of new places and areas that have been added to the Schedule of Historic Heritage each year.
RPS 5.2.1(1)	2. Significant historic heritage places are protected through the Schedule of Historic Heritage.	<ul style="list-style-type: none"> The number, location and typology of places and areas currently included in the Schedule of Historic Heritage. The number, location and typology of places and areas that have been added to the Schedule of Historic Heritage each year. The number of scheduled places and areas that have been reviewed each year (to align identified values with management), including: <ul style="list-style-type: none"> places and areas removed from the schedule and reasons why places and areas that have had a category change places and areas that have had changes to known Heritage Values places and areas that have had changes to their extent of place.
RPS 5.2.1(1) RPS 5.2.1(2)	3. Inappropriate ²³ development, subdivision, and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied or mitigated.	<ul style="list-style-type: none"> The number of historic heritage resource consent applications each year, including: <ul style="list-style-type: none"> the types of historic heritage places subject to the application their categories their geographical breakdown the work involved in the application (such as demolition, relocation, modifications, subdivision, use/change of use) the proportion granted. The proportion of historic heritage resource consents supported by council heritage specialists. <ul style="list-style-type: none"> Including the number of discrepancies between heritage advice and consent outcomes, and reasons why. The number of historic heritage applications for demolition, relocation, modification, subdivision, or use/change of use that have been influenced through pre-application processes. The available methods of mitigation for loss or degradation of historic heritage values. The number of historic heritage compliance investigations.

²³ For the purposes of this monitoring report, any works described as “inappropriate” are those not supported by the advice of Auckland Council’s Heritage Unit.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Objectives	Indicators	Measures
		<ul style="list-style-type: none"> The number of historic heritage places with an underlying zone that does not support an appropriate use (an underlying zone that could undermine the protection of the place). The number of times B5.2.2 Policy 8 has been used in heritage resource consents.
RPS 5.2.1(2)	4. Protection, management, and conservation of historic heritage places, including retention, maintenance, and adaptation, is encouraged.	<ul style="list-style-type: none"> The number of applications applying for the regional and local board historic heritage grants each year, and the type of works proposed. <ul style="list-style-type: none"> The number of landowners receiving the grant, the type of works funded and the average value of each grant The rate of over-subscription of the grants. The number of pre-application meetings each year. The number of requests for free advice each year. The availability of incentives – financial and regulatory – and their frequency of use. The number of workshops, talks, lectures provided by the Heritage Unit each year. The amount of guidance (internal and external) prepared by the Heritage Unit each year.

2.1.1 Linkages to other RPS topic indicators

Historic heritage is a cross-cutting topic which is reflected by the fact that heritage-specific indicators have been developed for other RPS topics. The monitoring topics for Chapters B2.2 – Urban Growth and Form, B2.4 – Residential Growth, B2.6 – Rural and Coastal Towns and Villages, and B3.2 – Infrastructure all include at least one indicator that measures plan outcomes for historic heritage. These indicators support those that specifically relate to Chapter B5.2, included in Table 1 above, but as they were developed through the context of their specific topics, these indicators are not considered to overlap or compete.

There are also RPS topics that do not have specific historic heritage indicators, but which consider historic heritage through their measures. These include: B4.2 – Outstanding Natural Features and Landscapes; B4.4 – Waitākere Ranges Heritage Area; B4.5 – Notable Trees; B5.3 – Special Character; B6.3 – Recognising Mana Whenua Values; B6.4 – Māori Economic, Social and Cultural Heritage; and B6.5 – Protection of Mana Whenua Cultural Heritage.

Finally, there are topics which make no specific reference to historic heritage through their indicators or measures, but which are nonetheless linked to the topic through shared outcomes. These include: B2.3 – A Quality Built Environment; B2.5 – Commercial and Industrial Growth; and B3.3 – Transport.

3.0 Data and information

Where available, and where time and resources allowed, data has been collected to quantify and qualify the measures identified in Table 1 above.

3.1 Methodology

3.1.1 Types of data collected

The data collected for the historic heritage topic is a mixture of quantitative and qualitative information. Quantitative data allows a larger set of data to be collected and studied and provides the ability for broad generalisations on the efficiency and effectiveness of plan provisions to be drawn from wider patterns, themes, and trends. Quantitative data is easily accessed, objective and accurate, but can be limited in its depth. To gain a more detailed understanding of the quantitative data, and to consider various complex issues more closely, qualitative data has also been sourced and analysed to paint a more complete picture of the progress the AUP is making toward meeting its objectives in Chapter B5.2.

3.1.2 Data sources

Most data referred to in this report is sourced from Auckland Council, including projects, research, plans, surveys, programmes, and resource consents. Data has also been sourced from direct discussions with the Auckland Council Regulatory Services team and members of the Heritage Unit.

Sources include, but are not limited to:

- A* Review Project
- Archaeological Review Project
- Area Plans
- Auckland Council GeoMaps
- Auckland Heritage Survey Programme
- Auckland’s Heritage Counts 2021
- AUP Issues Log
- AUP Schedule of Historic Heritage (14.1 and 14.2)
- Compliance Team database
- Context analysis of AUP Schedule of Historic Heritage (14.1)
- Cultural Heritage Inventory
- Decision reports from resource consents
- Direct discussion
 - Heritage Unit (Built Heritage and Cultural Heritage Implementation teams; Information and Advice team; Heritage Policy team)
 - Regulatory services
- Guidance documents
- Places of heritage interest list
- Heritage Unit files
- Plan Changes – council-initiated and private, including submissions and RMA Section 32 reports
- Public nominations database
- Regional and Local Board Historic Heritage Grants Fund Programme
- Regional Thematic Framework
- Resource consents database (Plans and Places)
- Resource consents database (Built Heritage Implementation Team)
- Resource consents records (Cultural Heritage Implementation Team)
- Structure plans

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

3.1.3 Methods

In general, the time period used for all data analysis was between November 2016 (when the AUP became operative in part) to the end of April 2021 (when the indicators for this topic were finalised and data collection began). In Table 2 below, the methods and data sources used for each measure are listed. In addition to this table, five datasets are discussed in more detail as they have specific approaches to analysis and limitations.

Table 2. Measures and methods/data source used

Indicator number	Measures	Methods / Data source
1	<ul style="list-style-type: none"> The number, location and typology of places and areas of potential historic heritage value that have been identified through projects, resource consents, surveys, plans, programmes, private plan changes, and public nominations each year. 	<ul style="list-style-type: none"> Identifying places from the following sources: Area Plans; Auckland Heritage Survey Program; Plan Changes – council-initiated and private; Places of heritage interest list; Public nominations database; Regional Thematic Framework; Structure plans Analysis of the Schedule of Historic Heritage
	<ul style="list-style-type: none"> The number of places added to the Cultural Heritage Inventory (CHI) each year. 	<ul style="list-style-type: none"> Analysis of the Cultural Heritage Inventory database Direct discussion with the Heritage Information and Advice Team
	<ul style="list-style-type: none"> The number, location and typology of places and areas that have been evaluated each year. 	<ul style="list-style-type: none"> Identifying evaluations completed using Heritage Unit files Analysis of the Schedule of Historic Heritage
	<ul style="list-style-type: none"> The number of evaluated places and areas that have been determined to meet the criteria and thresholds for scheduling each year. 	<ul style="list-style-type: none"> Identifying evaluations completed using Heritage Unit files, as well as heritage-based plan changes Analysis of the Schedule of Historic Heritage
	<ul style="list-style-type: none"> The number, location and typology of new places and areas that have been added to the Schedule of Historic Heritage each year. 	<ul style="list-style-type: none"> Identifying evaluations completed using Heritage Unit property files, as well as heritage-based plan changes Analysis of the Schedule of Historic Heritage
2	<ul style="list-style-type: none"> The number, location and typology of places and areas currently included in the Schedule of Historic Heritage. 	<ul style="list-style-type: none"> Auckland’s Heritage Counts (2021), including further investigation using the context analysis of the Schedule of Historic Heritage
	<ul style="list-style-type: none"> The number, location and typology of places and areas that have been added to the Schedule of Historic Heritage each year. 	<ul style="list-style-type: none"> Examining heritage-based plan changes, and using the Heritage Unit files, the Cultural Heritage Inventory database and the context analysis of AUP Schedule 14.1 to determine their typology. Analysis of the Schedule of Historic Heritage

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Indicator number	Measures	Methods / Data source
	<ul style="list-style-type: none"> • The number of scheduled places and areas that have been reviewed each year (to align their management with their identified values), including: <ul style="list-style-type: none"> ○ Places and areas removed from the schedule and reasons why ○ Places and areas that have had a category change and reasons why ○ Places and areas that have had changes to Known Heritage Values and reasons why ○ Places and areas that have had changes to their EOP and reasons why 	<ul style="list-style-type: none"> • Examining heritage-based plan changes, as well as determining lists from the A* Review Project and the Archaeological Review Project. • AUP Issues Log
3	<ul style="list-style-type: none"> • The number of historic heritage applications for demolition, relocation, modifications, subdivision, and use/change of use consented/declined each year. <ul style="list-style-type: none"> ○ Including number of discrepancies between heritage advice and consent outcomes, and reasons why 	<ul style="list-style-type: none"> • Analysis of Resource consents database (Plans and Places); Resource consents database (Built Heritage Implementation Team) and Resource consents records (Cultural Heritage Implementation Team) • Resource consents decision reports • Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services ○ Heritage Unit Implementation teams ○ Heritage Unit Heritage Policy team
	<ul style="list-style-type: none"> • The number of historic heritage applications for demolition, relocation, modification, subdivision, or use/change of use that have been positively influenced through pre-application processes. 	
	<ul style="list-style-type: none"> • The available methods of mitigation for loss or degradation of historic heritage values, and their frequency of use. 	
	<ul style="list-style-type: none"> • The effectiveness of consent conditions in avoiding, remedying, or mitigating loss of heritage values. 	<ul style="list-style-type: none"> • Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services ○ Heritage Unit Implementation teams
	<ul style="list-style-type: none"> • The number of historic heritage compliance investigations. 	<ul style="list-style-type: none"> • Compliance Team database
	<ul style="list-style-type: none"> • The number of historic heritage places with an underlying zone that does not support an appropriate use (an underlying zone that could undermine the protection of the place). 	<ul style="list-style-type: none"> • Auckland Council GeoMaps and GIS analysis • Direct discussion <ul style="list-style-type: none"> ○ Heritage Unit Implementation teams
	<ul style="list-style-type: none"> • The number of consents for modifications that support adaptive re-use of historic heritage places. 	<ul style="list-style-type: none"> • Analysis of Resource consents database (Plans and Places); Resource consents database (Built Heritage Implementation Team) and Resource consents records (Cultural Heritage Implementation Team) • Resource consent decision reports
	<ul style="list-style-type: none"> • The number of times B5.2.2 Policy 8 has been used in historic heritage resource consents 	<ul style="list-style-type: none"> • Analysis of Resource consents database (Plans and Places); Resource consents database (Built Heritage Implementation Team) and Resource consents records (Cultural Heritage Implementation Team) • Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Indicator number	Measures	Methods / Data source
		<ul style="list-style-type: none"> ○ Heritage Unit Implementation teams ● Heritage Unit Heritage Policy team
4	<ul style="list-style-type: none"> ● The number of landowners applying for the Historic Heritage Grant each year, and the type of works proposed. <ul style="list-style-type: none"> ○ The number of landowners receiving the grant, the type of works funded and the average value of each grant. 	<ul style="list-style-type: none"> ● Analysis of grants from the Regional Historic Heritage Grants Fund Programme ● Analysis of grants from the Local Boards Heritage Grants Fund Programme
	<ul style="list-style-type: none"> ● The number of pre-application meetings each year. 	<ul style="list-style-type: none"> ● Analysis of Resource consents database (Plans and Places); Resource consents database (Built Heritage Implementation Team) and Resource consents records (Cultural Heritage Implementation Team) ● Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services ○ Heritage Unit Implementation teams ○ Heritage Unit Heritage Policy team
	<ul style="list-style-type: none"> ● The number of requests for free advice each year. 	<ul style="list-style-type: none"> ● Heritage Unit files ● Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services ○ Heritage Unit Implementation teams ○ Heritage Unit Information and Advice team ○ Heritage Unit Policy Team
	<ul style="list-style-type: none"> ● The availability of incentives – financial and regulatory – and their frequency of use. 	<ul style="list-style-type: none"> - Direct discussion <ul style="list-style-type: none"> ○ Regulatory Services ○ Heritage Unit Implementation teams ○ Heritage Unit Heritage Policy team ● Analysis of Resource consents database (Plans and Places)
	<ul style="list-style-type: none"> ● The number of workshops, talks, lectures provided by the Heritage Unit each year. 	<ul style="list-style-type: none"> ● The Heritage Unit was asked for this information
	<ul style="list-style-type: none"> ● The amount of guidance (internal and external) prepared by the Heritage Unit each year. 	

Resource consents database (Plans and Places) (RCD – PP)

This database contains a list of resource consents from November 2016 until the end of April 2021. It was filtered according to those resource consents relating to “D17” (the Historic Heritage chapter the AUP), resulting in a list of 458 resource consents. Limitations of this data source are set out in greater detail in the overarching monitoring report. However, a notable limitation is missing or inaccurate decision records.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Obvious errors (from both inputting errors and errors in the decision report) were corrected in the “D17”-filtered resource consents database. These included:

- inputting inconsistencies (such as spaces in the text, missing “A” before the Activity Status number, the date of decision being missing or in the wrong column)
- duplicate entries (six of these)
- places that were incorrectly identified as historic heritage.

A total of 27 consents were removed from the analysis for these reasons, leaving a list of 431.

Once these errors were corrected, the Schedule 14.1 IDs were added as a column for it to be linked via “vlookup” to the Heritage Unit context analysis of Schedule 14.1. This meant that the typology of places, their category, and their local board location were able to be determined. This also provided a means to double-check if the resource consents related to historic heritage. Further work was required in cases where more than one historic heritage place related to a resource consent.

As it is difficult, or near impossible, to work out which resource consents are missing from the RCD – PP, other sources of heritage resource consents were also used:

- **Resource consents database (Built Heritage Implementation Team), 2018-2020 (RCD – BHIT)**
This database is used by the Built Heritage Implementation Team of the Heritage Unit (who provide specialist input into resource consents related to built heritage, such as buildings and other structures) to allocate resource consents to the team, record the number and type of resource consents inputted into by the team, and to monitor outcomes of the team’s input (where possible). Only 113 (26 per cent) of the 428 historic heritage resource consents in the RCD – BHIT were also recorded in the RCD – PP. This may include missing entries/decision reports and inputting errors in the RCD – BHIT. Likewise, only 114 (48 per cent) of the 239 resource consents in the RCD – PP were also in the RCD – BHIT (accounting for the 2018-2020 time period and for only built heritage consents).

Because of these inconsistencies, analysis relating to discrepancies between heritage advice and consent outcomes was taken from the RCD – BHIT database as this database relates directly to input from the Built Heritage Implementation team, and because discrepancies (if known) were already recorded in the RCD – BHIT database. In any case, of the resource consents that did overlap, the same general trends occurred.

- **Resource consents records (Cultural Heritage Implementation Team) (RCD – CHIT)**
This database is used by the Cultural Heritage Implementation Team of the Heritage Unit (who provide specialist input into archaeological and cemetery resource consents) to record who worked on which resource consent. It was started in 2014 and was not created or used for the purposes of monitoring. The database has 1,847 entries between November 2016 and July 2021. Resource consent ID numbers were only recorded from 2021 onwards (95 entries). Only two (two per cent) of the RCD – CHIT resource consents match with the 24 resource consents in the RCD – PP (after accounting for 2021 resource consents only); and only two (eight per cent) of the RCD – PP resource consents out of the 92 in the RCD – CHIT database match.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

To complement the quantitative resource consents data, discussion and interviews were also held with resource consent planners and historic heritage specialists:

- **Regulatory services workshop**

A discussion workshop was held with resource consent planners in May 2021. The resource consent planners who attended had experience with historic heritage resource consent applications. A discussion took place, based around four main themes: Policy B5.2.2(8) (development to have regard to adjacent historic heritage places); the effectiveness of regulatory incentives; historic heritage area provisions; and specialist historic heritage advice.

- **Feedback from Heritage Implementation Teams**

Feedback was also gained from representatives from the Built Heritage Implementation Team and the Cultural Heritage Implementation team. Nine questions (both specific to the indicators and general to the effectiveness and efficiency of the AUP) were emailed to participants with the option of meeting in-person to discuss the questions. See Appendix D for a list of the questions.

4.0 Findings and analysis

This section reports on the findings of the indicators and measures, and considers how effective and efficient the objectives, policies, rules, and other methods of the AUP have been in meeting the outcomes intended by the RPS. Where appropriate, recommendations are also provided.

Objective 1:

B5.2.1(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.

4.1 Indicator 1

1. Significant historic heritage places are identified and evaluated

Indicator 1 gauges the number, typology and location of places that have been identified and evaluated each year since the AUP became operative. It determines whether the AUP outcome of “significant historic heritage places are identified” is being achieved.

During the development of the AUP (2014-2016), 125 historic heritage places and one historic heritage area were added to the schedule. These added places also give effect to Objective 1. However, as the time period for this monitoring report is since the AUP became operative (November 2016), they are not part of the analysis of Indicator 1 or 2. See Appendix A for a geographical and typological breakdown. A North Shore City Council plan change (Plan Change 38) was the reason for the bulk of the Devonport-Takapuna and Kaipātiki additions shown in Appendix A.

4.1.1 Measures and analysis

Potential historic heritage places are identified through council-, local board- and community-initiated projects; local and area plans; surveys; and public nominations (Figure 2). See Appendix C for a list of heritage surveys undertaken. They are identified for their potential values, which are based on visual appearance, an understanding of a wider historical or thematic context, or knowledge of how they could be special or important to a community. Identified places are recorded in study and places of interest lists, thematic studies, council’s property files and/or the Cultural Heritage Inventory (CHI).

Identified historic heritage places may then be evaluated to determine whether a place meets the threshold for scheduling in the AUP. An evaluation consists of assessing eight criteria from B5.2.2 (1) (historical, social, mana whenua, knowledge, technology, physical attributes, aesthetic and context) to see whether the place has considerable or outstanding value in relation to one or more of the criteria, and overall significance to its locality or greater geographical area.

Time and resources do not allow all identified places to be evaluated. Places therefore need to be prioritised, with the most pertinent factor being the places’ likelihood to meet the value thresholds required to be scheduled in the AUP. However, there are also a range of reasons why a place might not be prioritised for evaluation, beyond whether it is likely to meet criteria and thresholds. These include:

- level of risk (i.e. places at low risk of being lost may not be a priority)

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- public ownership (confers some protection due to internal policies around asset management, particularly being located in parks or open space, such as regional parks)
- protection through other methods (e.g. it is already in a special character area or covered by another overlay that recognises its heritage value, managed through coastal provisions, within a precinct with heritage controls).

Prioritisation does not mean that these kinds of places would not be scheduled, but that they may not be as a high a priority as other places that are on private land in intensifying areas, for instance.

As shown in Table 3, between November 2016 and May 2021, 661 places were identified as being of heritage interest. Of these, 76 (11 per cent) were evaluated. Places are selected for evaluation through a prioritisation process during which their potential values are tested through preliminary research and investigation. Places determined to be a high priority for evaluation demonstrate a strong likelihood of meeting the criteria and thresholds set out in B5.2.2 of the AUP.

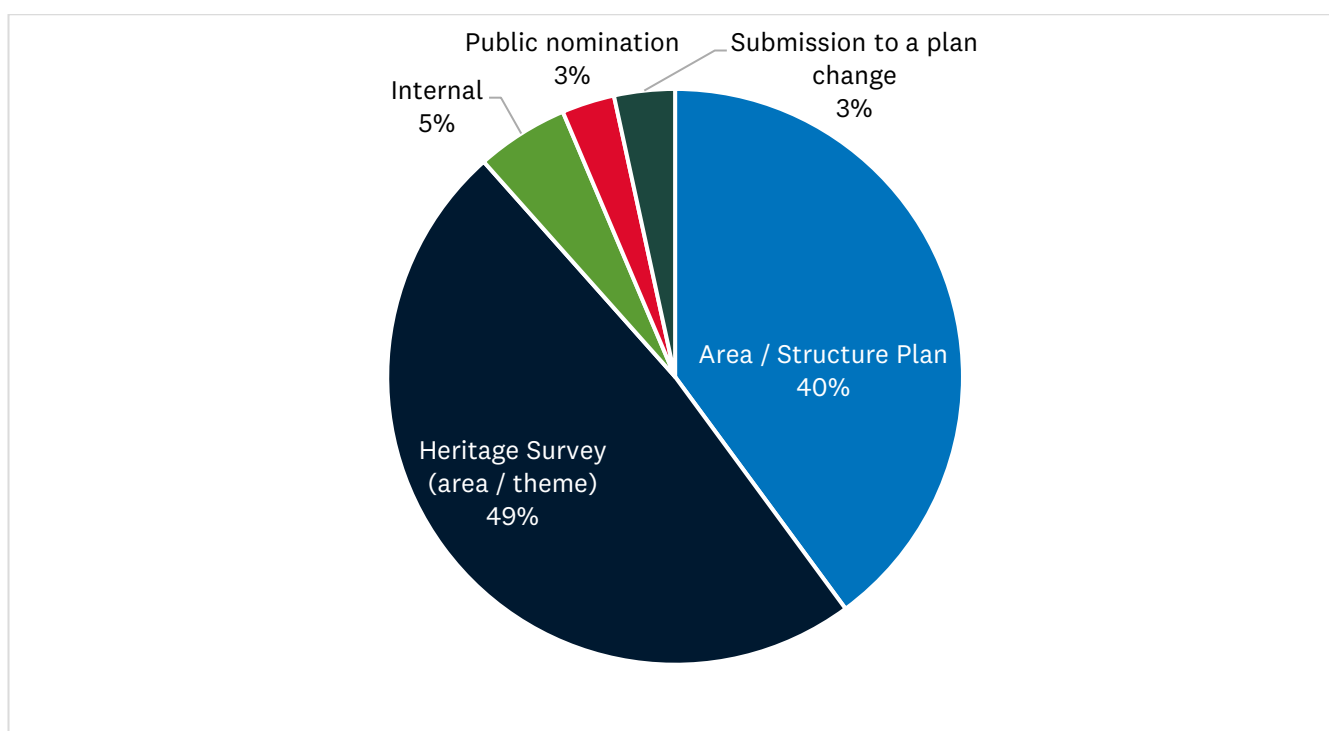


Figure 2. The sources for the identification of historic heritage places (2016-2021)

Table 3. Historic heritage places identified and evaluated (November 2016 – April 2021)

Measures, by year	No. of places and areas						
	2016	2017	2018	2019	2020	2021 (Jan-Apr)	Total
Identified through projects, surveys, plans and public nominations	26	122	147	193	171	2	661
Evaluated	24	35	6	4	7	0	76

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Evaluated and determined to meet criteria and thresholds	21	34	5	4	7	0	71
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Notes on table: In this table, places “evaluated” are places that were evaluated by or on behalf of council – not evaluated by consultants for private clients. 2021 figures are lower because of the numbers covering the first four months of the year.

Another measure of the number of places identified is the number of places added to the CHI. As shown in Table 4, over 1,400 places were added between November 2016 and April 2021.

Table 4. Heritage places added to the Cultural Heritage Inventory (November 2016 – April 2021)

Measures, by year	No. of places and areas						
	2016	2017	2018	2019	2020	2021 (Jan-Apr)	Total
Added to the CHI	19	245	181	206	760	1	1,412

The highest priority places progress to formal evaluation against the criteria and thresholds in B5.2.2 of the AUP, a process also informed by the *Methodology and guidance for evaluating Auckland’s historic heritage* (2019). Most places that progress to evaluation are expected to meet the criteria and thresholds for historic heritage places. Of those evaluated between 2016 and 2021, five (7 per cent) did not meet the significance threshold for scheduling.

As places progress through identification to prioritisation to evaluation, their numbers diminish considerably (Table 3). This reduction, however, is an anticipated outcome of the process, not symptomatic of an issue with the AUP or its implementation. As shown in Table 3, more evaluations took place in 2016 and 2017 compared to later years. Many of the evaluations from 2016 and 2017 were responding to submissions during the proposed AUP that were not able to be actioned while the AUP was becoming operative.

4.1.1.1 Geographical breakdown

Although a geographical spread is not required in Objective 5.2.1(1), the original indicator in B11 included the term “distribution of scheduled significant historic heritage places”. For this reason, the location of places identified, evaluated, and added to the Schedule of Historic Heritage is analysed as it is useful in understanding where efforts have been concentrated.

The following analysis concerns places identified and evaluated following the AUP becoming operative. However, as mentioned earlier, the completion of many heritage surveys prior to and during the development of the AUP meant that some areas did not have as many places identified post-2016, as surveys had already been completed for these areas. Likewise, some local boards sponsored specific heritage surveys to their local board areas following the AUP becoming operative, meaning these areas had more places identified than other local boards, such as Albert-Eden and Puketāpapa. See Appendix C for a list of surveys.

Figure 3 shows this geographical breakdown. Aotea / Great Barrier and Waiheke local boards were excluded from this analysis as they are predominantly under the jurisdiction of the Hauraki Gulf Islands District Plan (HGIDP) and not the AUP.²⁴ All local boards had at least one place of heritage interest identified between

²⁴ Only places within the Coastal Marine Area in the Hauraki Gulf are under the jurisdiction of the AUP. A Historic Heritage Survey was undertaken for Aotea / Great Barrier Local Board in 2019 (<https://www.aucklandcouncil.govt.nz/about-auckland->

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

November 2016 and May 2021 apart from Howick Local Board. Franklin (25 per cent - 170 places), Waitākere Ranges (17 per cent - 117 places), Albert-Eden (13 per cent - 83 places) and Rodney (12 per cent - 78 places) had the highest number of places identified. Local boards with under five places of interest identified were: Howick (zero places), Hibiscus and Bays (one place), Kaipātiki (two places) and Manurewa (three places).

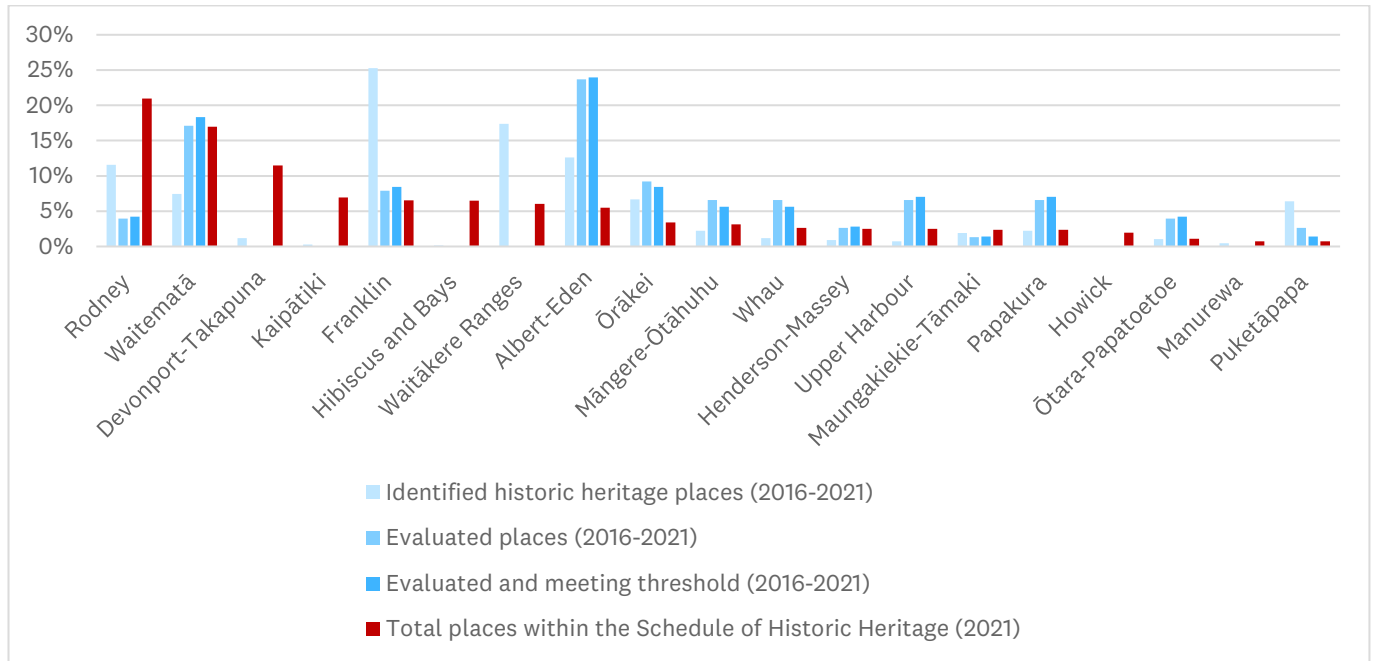


Figure 3. Geographical breakdown of identified and evaluated historic heritage places (2016-2021) with a comparison with the total places in the Schedule of Historic Heritage²⁵

Local boards that have had a notably higher proportion of places of interest identified compared to the proportion already in the schedule are: Franklin (25 per cent of places of interest, compared to seven per cent of the schedule) – mainly due to the Drury-Opāheke Structure Plan and the Pukekohe-Paerata Structure Plan; Waitākere Ranges (17 per cent, compared to six per cent) – mainly due to the Waitākere Ranges State of the Environment Monitoring; Albert-Eden (13 per cent, compared to five per cent) and Puketāpapa (six per cent, compared to one per cent).

In contrast, local boards that have had a notably smaller proportion of places of interest identified compared to the proportion already in the schedule are: Devonport-Takapuna (one per cent of places of interest, compared to 12 per cent of the schedule), Waitematā (seven per cent, compared to 17 per cent), Rodney (12 per cent, compared to 21 per cent), Kaipātiki (0.3 per cent, compared to seven per cent) and Hibiscus and Bays (0.1 per cent, compared to six per cent).

In terms of places that are evaluated once they have been identified, Albert-Eden (24 per cent) and Waitematā (17 per cent) had the highest proportion. When analysing the proportion of places of potential heritage interest evaluated, Upper Harbour (100 per cent - five evaluated), Whau (63 per cent - five evaluated), and Ōtara-Papatoetoe (43 per cent - three evaluated) had the highest per centages. Conversely, six local boards did not have any places evaluated following identification: Waitākere Ranges

[council/how-auckland-council-works/local-boards/all-local-boards/great-barrier-local-board/Documents/aotea-great-barrier-island-historic-heritage-survey-report.pdf](https://www.aucklandcouncil.govt.nz/council/how-auckland-council-works/local-boards/all-local-boards/great-barrier-local-board/Documents/aotea-great-barrier-island-historic-heritage-survey-report.pdf)

²⁵ Note that Aotea / Great Barrier and Waiheke local boards were excluded from this analysis as they relate predominantly to the Hauraki Gulf Islands District Plan and not the AUP. Guidance to read the graph: For example, 12 per cent of all places of heritage interest identified were in Rodney Local Board, four per cent of all evaluated places were in Rodney Local Board, and 21 per cent of all places in the schedule of historic heritage are located in Rodney Local Board.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

(which had 100 identified), Devonport-Takapuna (which had eight identified), Manurewa (which had three identified), Kaipātiki (which had two identified), and Hibiscus and Bays (which had one identified). Prioritisation of places for evaluation based on risk is particularly relevant to the Waitākere Ranges Local Board area. In this area most of (or potentially all) the places identified were within a regional park or within the Waitākere Ranges Heritage Area (governed by the Waitakere Ranges Heritage Area Act 2008), and therefore being less at risk than other areas.

4.1.1.2 Typology

“Historic heritage”, as identified in the AUP, can include cultural landscapes, buildings, structures, monuments, gardens and plantings, archaeological sites and features, traditional sites, sacred places, townscapes, streetscapes, and settlements.²⁶

Figure 4 shows the typology breakdown of places identified as of heritage interest. Places of interest identified between November 2016 and May 2021 covered all heritage place typologies. Residential places had by far the highest proportion of places identified (56 per cent) and had the highest proportion of places of interest identified compared to the proportion already in the schedule (56 per cent of places of interest, compared to 29 per cent of the schedule). European-origin archaeology also had a higher proportion identified (nine per cent) compared to the proportion already in the schedule (five per cent).

In contrast, typologies that had a notably lower proportion of places of interest identified compared to the proportion already in the schedule are Māori-origin archaeology (six per cent compared to 25 per cent), and Churches and other religious buildings (two per cent compared to seven per cent).

In terms of places evaluated once identified, Residential (37 per cent) and Civic/Institutional (32 per cent) had the highest proportion. When analysing the proportion of places of heritage interest evaluated out of those identified, Military (75 per cent - four identified) and Civic/Institutional (41 per cent - 58 identified) had the highest proportions. In contrast, typologies with no places evaluated once identified were: European-origin archaeology (59 places identified) and Māori-origin archaeology (41 places identified). Again, this relates to prioritisation reasons outlined above, with most archaeological sites being located on council-owned land or regional parks (having some form of protection and therefore not being a high priority for evaluation).

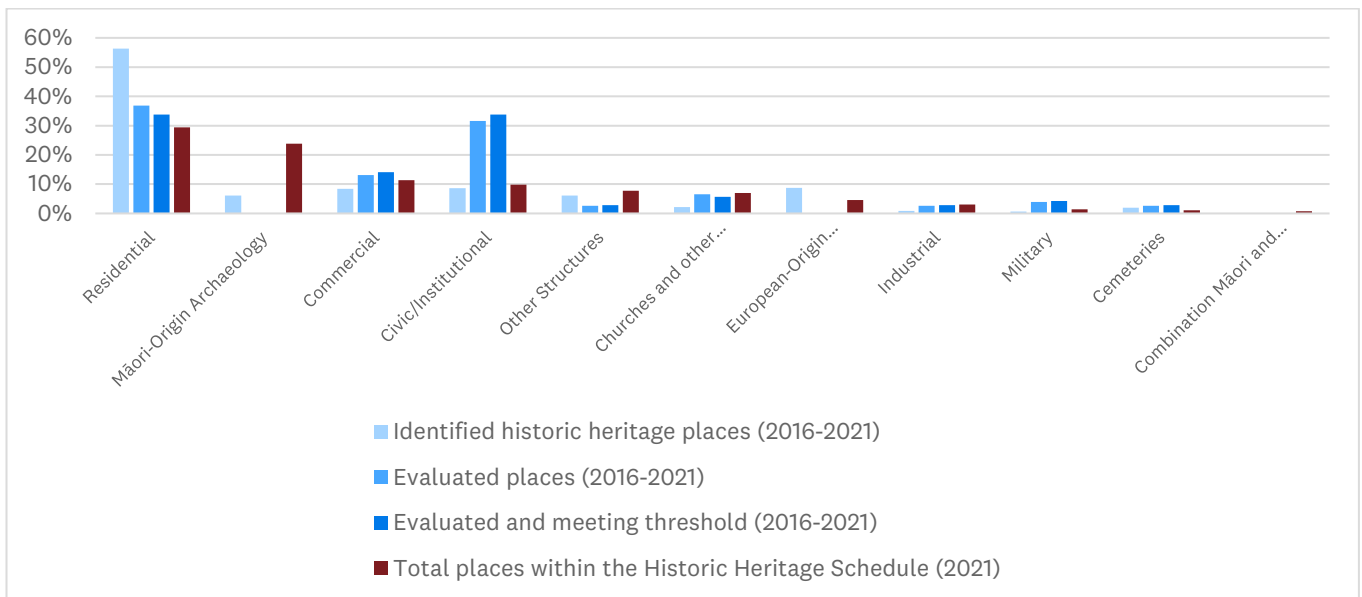


Figure 4. Typology breakdown of identified and evaluated historic heritage places (2016-2021) with a comparison with the total places in the Schedule of Historic Heritage.

²⁶ Auckland Unitary Plan, D17.1

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

4.1.2 Findings

Overall, Indicator 1 has confirmed that significant historic heritage places have been identified and evaluated since the AUP became operative in November 2016. The council Heritage Unit has identified 661 places, evaluated 76 of these, and 71 of those evaluated met the criteria and thresholds to be scheduled. The general trend over the time period is for fewer places to be evaluated, but for a higher proportion of those evaluated to meet the criteria and thresholds to be scheduled. This shows that places are being selected more carefully for evaluation.

Although several places are being identified, there are gaps in terms of geographical spread. For example, four local boards had under five places identified as places of heritage interest: Howick (0 places), Hibiscus and Bays (one place), Kaipātiki (two places) and Manurewa (three places). In addition, five local boards had substantially fewer places of interest identified compared to the schedule as a whole: Devonport-Takapuna (one per cent of places of interest, compared to 12 per cent of the schedule), Waitemātā (seven per cent compared to 17 per cent), Rodney (12 per cent compared to 21 per cent), Kaipātiki (0.3 per cent compared to seven per cent) and Hibiscus and Bays (0.1 per cent compared to six per cent).

In terms of the typology of places of interest, the typologies that had a notably fewer proportion of places of interest identified compared to the proportion already in the schedule are Māori-origin archaeology (six per cent compared to 25 per cent) and Churches and other religious buildings (two per cent compared to seven per cent).

There are also gaps within the types of places evaluated once identified, with a significant dominance of built heritage places. Typologies with no places evaluated once identified were: European-origin archaeology (59 places identified) and Māori-origin archaeology (41 places identified).

Although these geographical and typological gaps have been identified, these are more a result of past (legacy) council priorities towards heritage (some having identified and scheduled more than other councils, meaning fewer places to identify and evaluate), patterns of settlement in Auckland (that mean some areas have a greater concentration of older places than others), the location of the 125 historic heritage places added during the development of the AUP (meaning fewer places to identify and evaluate) (Appendix A), and prioritisation of places for evaluation beyond whether they may reach the threshold for scheduling (such as places located on council-owned land or regional parks, which have a lower risk compared to places in urban areas undergoing intensification).

It also should be noted that the focus of protection of Māori sites since the AUP became operative has been through Schedule 12 Sites and Places of Significance to Mana Whenua. Through Plan Change 22 in 2021, 30 new sites and places were added to this schedule. However, the use of Schedule 12 does not replace the need for the Schedule of Historic Heritage to protect archaeological value.

This indicator has highlighted geographical areas and types of places which may need more prioritisation in the future to identify and evaluate Tāmaki Makaurau Auckland's significant historic heritage. It is acknowledged that this indicator may be more reflective of the priorities of the Auckland Council (including those of the Heritage Unit), and the communities it serves, during this period rather than the effectiveness of the AUP. However, this indicator does clearly show that the AUP is effective in enabling a variety of historic heritage places to be identified and evaluated in terms of location or typology.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

4.1.3 Recommendations

Recommendations are broken into two groups: one relating to action directly relating to the AUP, and one relating to council operational actions.

There are no recommendations relating to the AUP for Indicator 1.

The following recommendations are made to Auckland Council, including the future Heritage Unit work programme:

- Identify and evaluate high priority places in local boards which have had the least investigation since the AUP came into effect such as: Howick, Hibiscus and Bays, Kaipātiki, and Manurewa.
- Identify and evaluate types of places (if high priority) which have had the least investigation since the AUP came into effect such as: Māori-origin archaeology and European-origin archaeology.

4.2 Indicator 2

2. Significant historic heritage places are protected through the Schedule of Historic Heritage

Indicator 2 gauges the number, typology and location of places that have been protected (including reviewed) through the Schedule of Historic Heritage each year since the AUP became operative. It determines whether the AUP outcome of “protecting” significant historic heritage places is being achieved.

Historic heritage places that have been evaluated and determined to meet the criteria and thresholds set out in B5.2.2 of the AUP may be recommended for inclusion in the Schedule of Historic Heritage. To be included in the schedule, places must go through a plan change process.

To be included in a plan change, significant historic heritage places are subject to a planning analysis as part of a Section 32 RMA cost and benefit evaluation. The purpose of a planning analysis is to determine if scheduling is the most appropriate way to manage the identified values of a place. It also considers ‘reasonable use’²⁷ of the subject land, including any competing issues, such as the development potential of the land and the physical condition of the place. The planning analysis may determine that a significant historic heritage place should not be scheduled, even if it has sufficient heritage value.

Places that pass the planning analysis are usually included in a plan change. Plan changes are publicly notified, providing the opportunity for any interested party to submit their views. Plan changes culminate in a hearing during which the views in support of or opposition to each place are considered, usually by a panel of independent commissioners. The commissioners decide whether each place should be included in the Schedule of Historic Heritage – as notified or with modifications – after considering the views and evidence presented by the council and any submitters. This decision is then adopted by the council.

Adding new places to the Schedule of Historic Heritage is not the only way that historic heritage places are protected. Places are also protected through the regular reviewing of their scheduling to ensure their values align with their management. These reviews also ensure that the Schedule of Historic Heritage is robust. Reviews may result in changes to the heritage values, category of scheduling, or extent of place, and may also result in removing a place from the schedule.

Places are generally reviewed methodically through projects, but also arise on an ad hoc basis through projects, surveys, private plan changes and resource consents.

4.2.1 Measures and analysis

As of June 2022, there are 2,278 historic heritage places and 15 historic heritage areas included in the Schedule of Historic Heritage.²⁸ These are located across Tāmaki Makaurau Auckland, and are generally concentrated in areas of coastal pre-European Māori settlement and in areas of early European settlement in Tāmaki Makaurau Auckland (Figure 5 and Figure 6). However, the distribution of places is also related to the priorities of prior councils in scheduling under their district plans. For example, Devonport Borough Council had a significant focus on increasing their heritage schedule, and the North Shore City Council carried this forward. In contrast, Franklin and Papakura District Council focussed less on scheduling in their heritage programmes. The highest concentration of historic heritage places is in Rodney Local Board (21 per cent - predominantly due to coastal Māori-origin archaeology), Waitemātā Local Board (17 per cent -

²⁷ Section 85 Resource Management Act (1991)

²⁸ There are also an additional 196 historic heritage places and three historic heritage areas scheduled in the Hauraki Gulf Islands District Plan (not part of the AUP).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

predominantly due to 19th century and early-20th century European settlement in the central city) and Devonport-Takapuna (12 per cent - predominantly due to 19th century and early-20th century European settlement in Devonport).²⁹

Of the historic heritage places in the Schedule of Historic Heritage, 198 are Category A (8.7 per cent), 186 are Category A* (8.2 per cent) and 1,894 (83.1 per cent) are Category B.³⁰

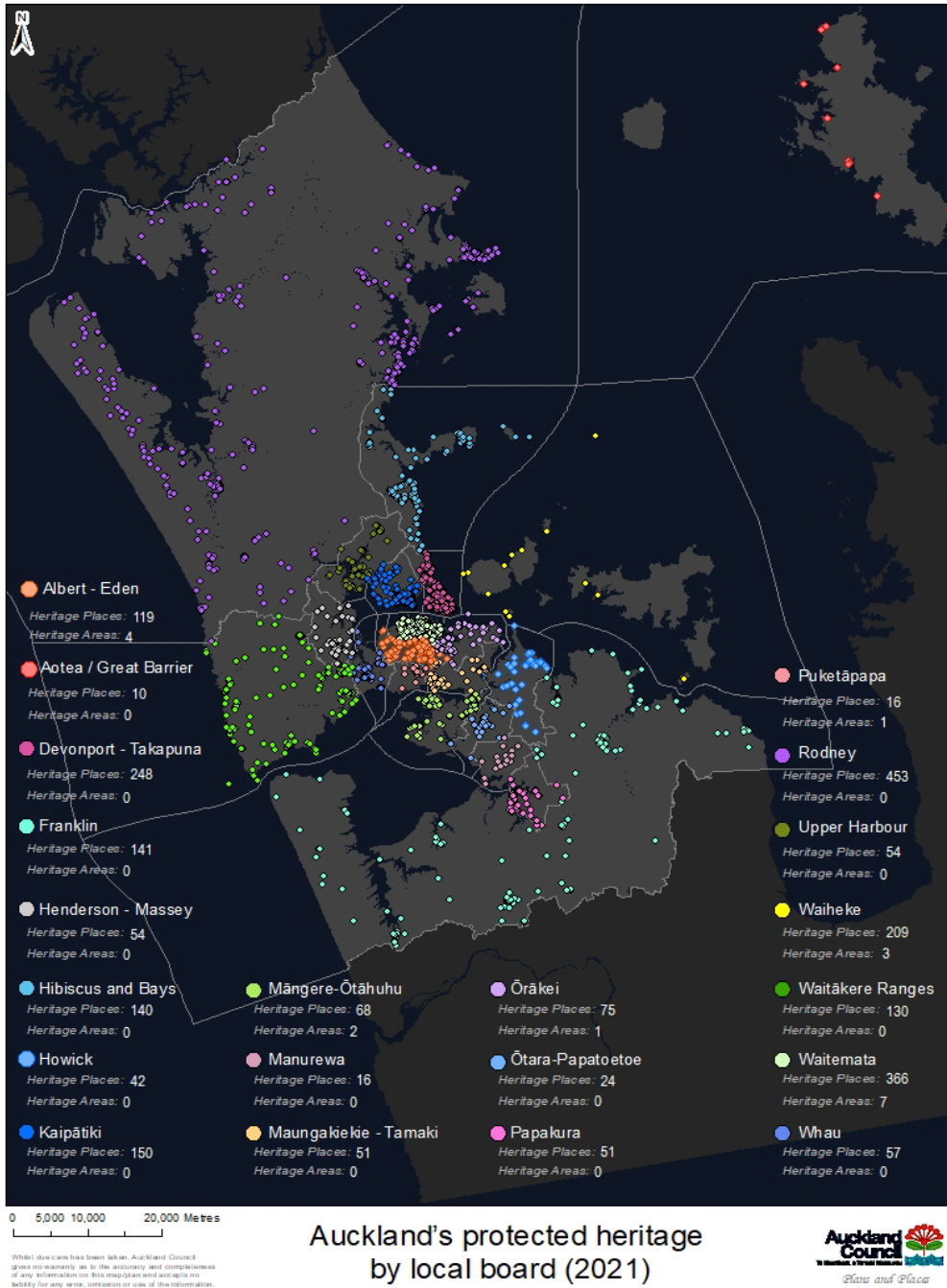


Figure 5. Map showing the distribution of Tāmaki Makaurau Auckland’s scheduled historic heritage places by local board (2021).³¹ Note: the numbers also include historic heritage places from the Hauraki Gulf Islands District Plan.

²⁹ These figures relate to historic heritage places in Schedule 14.1 and do not include historic heritage areas (Schedule 14.2).
³⁰ Noting that this does not include 67 Category A places and 129 Category B places in the Hauraki Gulf Islands District Plan
³¹ Auckland’s Heritage Counts (2021), p. 9.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

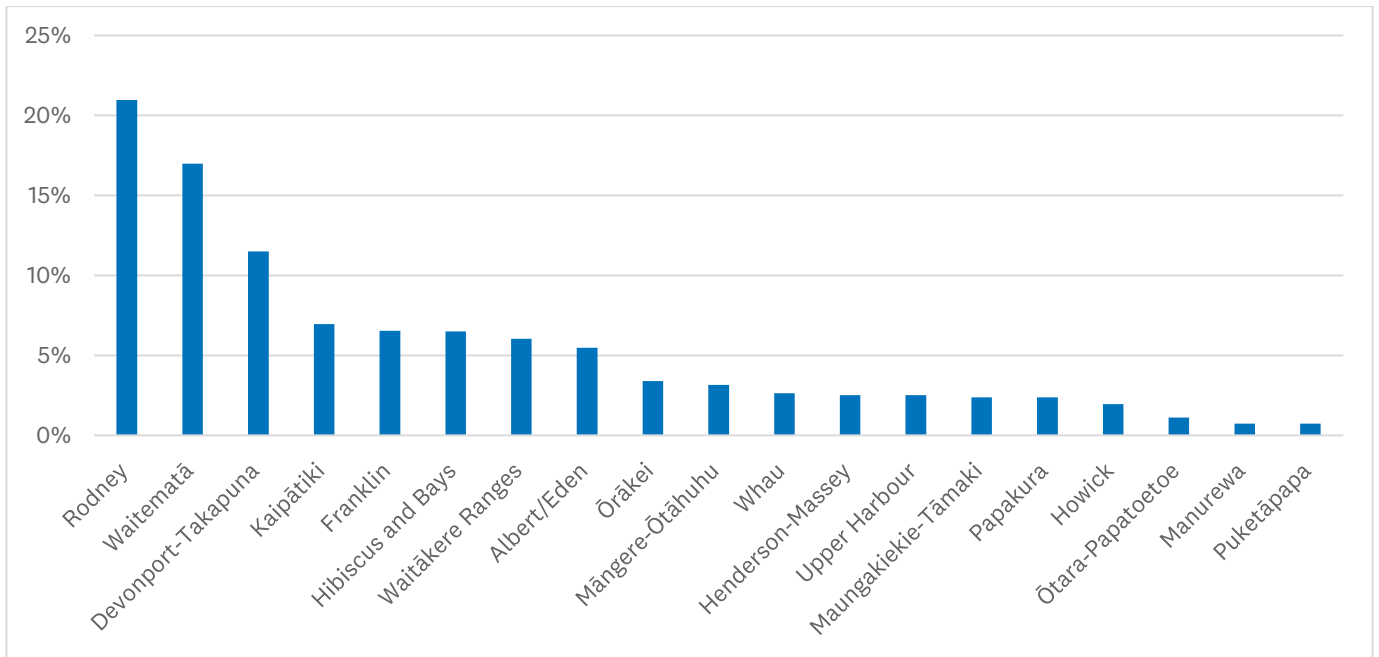


Figure 6. Geographical breakdown of places within the Schedule of Historic Heritage (2021)

As shown in Figure 7 below, a variety of typologies are protected within the Schedule of Historic Heritage, with Residential (29 per cent) and Māori-origin archaeology (24 per cent) being the most common. Most of the schedule is built heritage (69 per cent) compared to 31 per cent of places which relate to archaeology and cemeteries (noting that there may be some overlaps, particularly with “Other structures” and “Military” places, which may be archaeological).³²

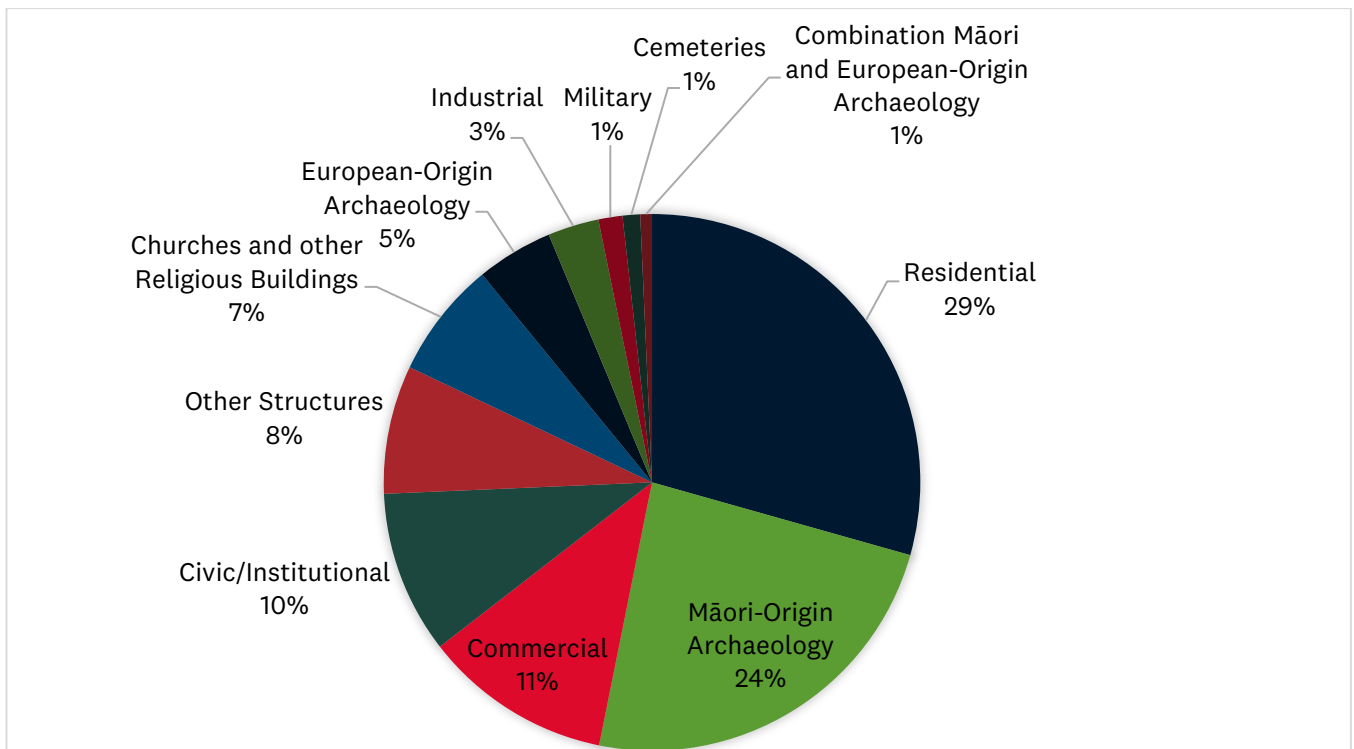


Figure 7. Typology breakdown of places in the Schedule of Historic Heritage

³² These figures relate to historic heritage places in Schedule 14.1 and do not include historic heritage areas (Schedule 14.2).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

In addition, there are also a variety of heritage values associated with scheduled historic heritage places (Figure 8). Eight criteria (types of historic heritage values) are identified in B5.2.2 (1). Historic (A) values and Physical attributes (F) values are associated with the highest percentage of places, while Technology (E) values and Mana Whenua (C) values are associated with the lowest proportion. A noticeable statistic from Figure 8 is that only three per cent of places have been identified as having Mana Whenua (C) value, despite 24 per cent of Schedule 14.1 places being Māori-origin archaeology. This is because the council Heritage Unit is still working with mana whenua to understand how and when to use criterion C, including who can decide if those values exist and where. The places currently scheduled under criterion C were “rolled over” from legacy council heritage schedules.

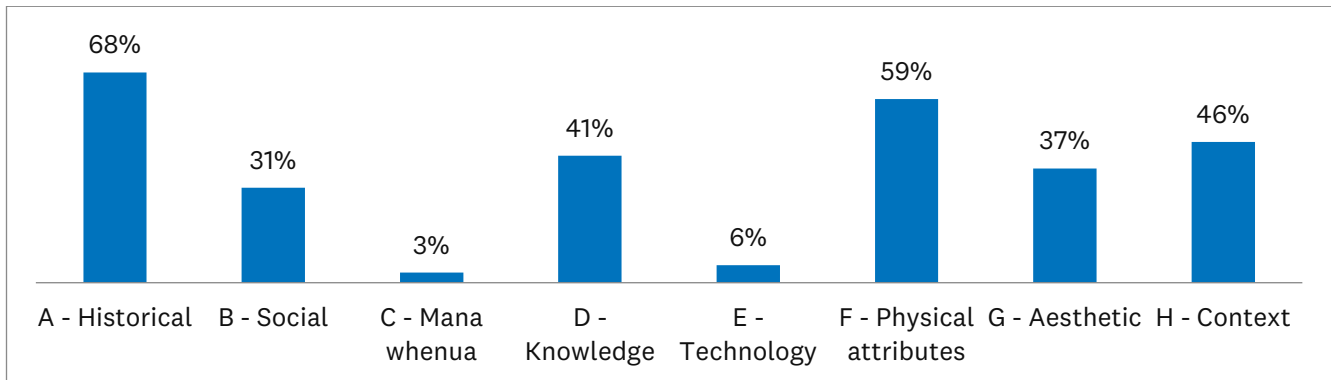


Figure 8. Distribution of heritage values (criteria in B5.2.2 (1)) of historic heritage places scheduled in Schedule 14.1.

As shown in Table 5 below, between November 2016 and May 2021, 50 places were added to the Schedule of Historic Heritage. These places have been through a plan change and are fully operative. As noted earlier, during the development of the AUP (2014-2016), 125 historic heritage places and one historic heritage area were added to the schedule. These added places also give effect to this indicator. However, as the time period covered by this monitoring report is since the AUP became operative (November 2016), they are not part of the analysis of Indicator 2. See Appendix A for a geographical and typological breakdown of places added during the development of the AUP.

Table 5. Places added to the Schedule of Historic Heritage (2016-2021)

Measures, by year	No. of places and areas						
	2016	2017	2018	2019	2020	2021	Total
Added to the Schedule of Historic Heritage	13	24	11 ³³	2	0	0	50

Figure 9 shows the relationship between places identified, places evaluated, and places ultimately added to the schedule. Some key statistics from Figure 9 are:

- of all the places identified between 2016 and 2021, seven per cent (43³⁴ places) were ultimately added to the Schedule of Historic Heritage
- of all those places that met the threshold for scheduling, 61 per cent were ultimately added to the Schedule of Historic Heritage
- of all those evaluated, 57 per cent were ultimately added to the Schedule of Historic Heritage.

³³ This number includes seven places that were evaluated in 2014, but which were not proposed to be added to the Schedule of Historic Heritage until 2018.

³⁴ This number excludes seven places that were evaluated in 2014, but which were not proposed to be added to the Schedule of Historic Heritage until 2018.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

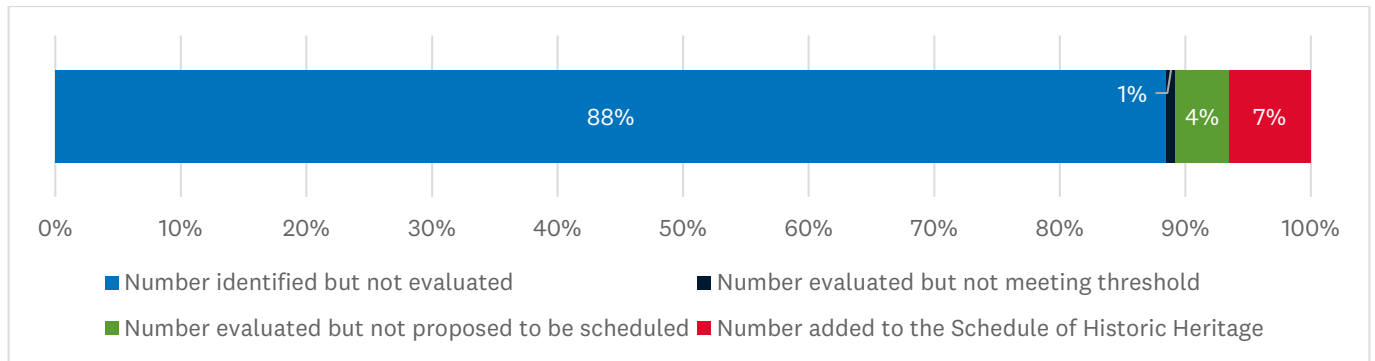


Figure 9. From identification to being added to the Schedule of Historic Heritage (2016-2021).

Discrepancies between those places determined to meet the criteria and thresholds for scheduling and those added to the Schedule of Historic Heritage are explained by:

- planning analysis – some places did not pass this test and could not be put forward into a plan change
- plan change decisions – some places were proposed to be added to the Schedule of Historic Heritage, but were not accepted by the hearing panel, as a submitter opposed the proposed scheduling of the place
- no process – some places were recently evaluated and have not yet had the opportunity to be put forward to a plan change
- incomplete – some evaluations were never finalised.

4.2.1.1 Geographical breakdown

Figure 10 below shows the geographical breakdown of places added to the Schedule of Historic Heritage between November 2016 and November 2021. As noted in Indicator 1, historic heritage places within Aotea / Great Barrier Local Board and Waiheke Local Board areas are excluded as they are under the jurisdiction of the HGIDP (apart from those places within the Coastal Marine Area).

As outlined in Indicator 1, a reason for some local boards not having any places added to the schedule is because of previous council plan changes (particularly Plan Change 38 by the North Shore City Council) and because of places having already been added as a result of surveys conducted during the development of the AUP.

Ten of the 19 local boards (excluding Waiheke and Aotea / Great Barrier local boards) had at least one place added to the schedule. Albert-Eden (18 places) and Waitemātā (11) were the two local boards with the highest number added. The two local boards with the biggest difference between the number of places identified and the number of places added are: Franklin (187 identified and four scheduled) and Waitākere Ranges (100 identified and none scheduled). In contrast, the local boards with the highest proportion of places ultimately scheduled after being identified are: Upper Harbour 80 per cent (five identified and four added), Papakura 33 per cent (15 identified and five added), and Albert-Eden 21 per cent (85 identified and 18 added).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

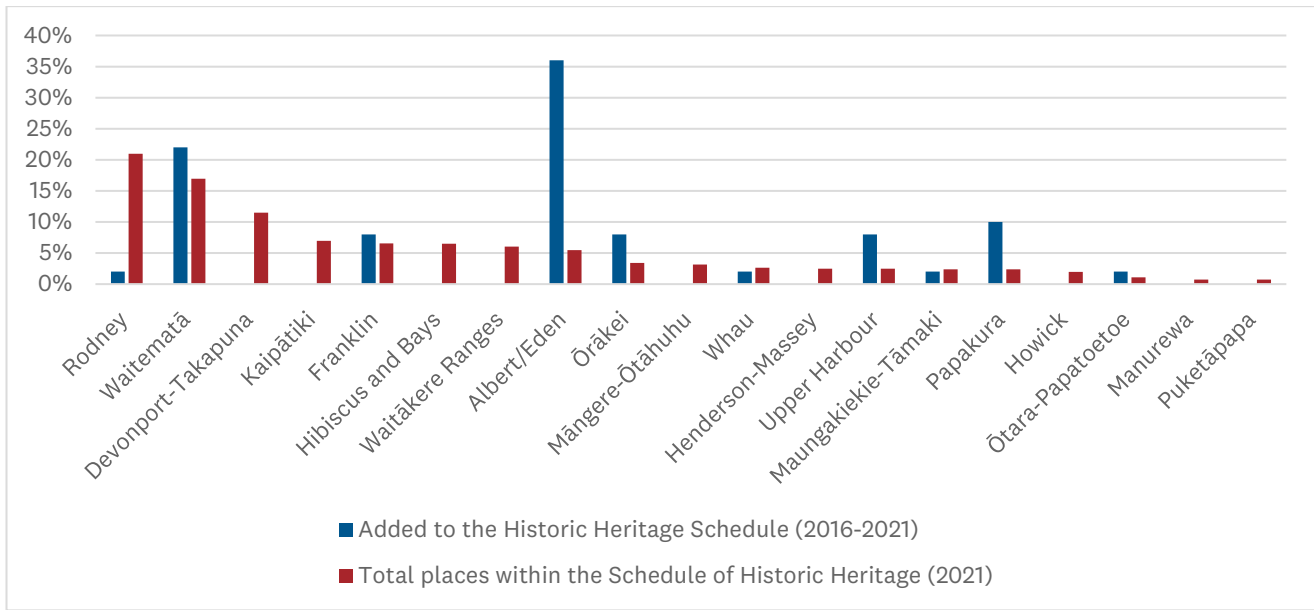


Figure 10. Geographical breakdown of historic heritage places added to the Schedule of Historic Heritage in 2016-2021 (with comparison with the total places in the Schedule of Historic Heritage).³⁵

4.2.1.2 Typology breakdown

As shown in Figure 11 below, the typologies with the largest number of places added to the schedule are Civic/Institutional buildings (18), Residential buildings (10) and Commercial buildings (10). The three typologies with no places added to the schedule are: Māori-origin archaeology, European-origin archaeology and cemeteries.

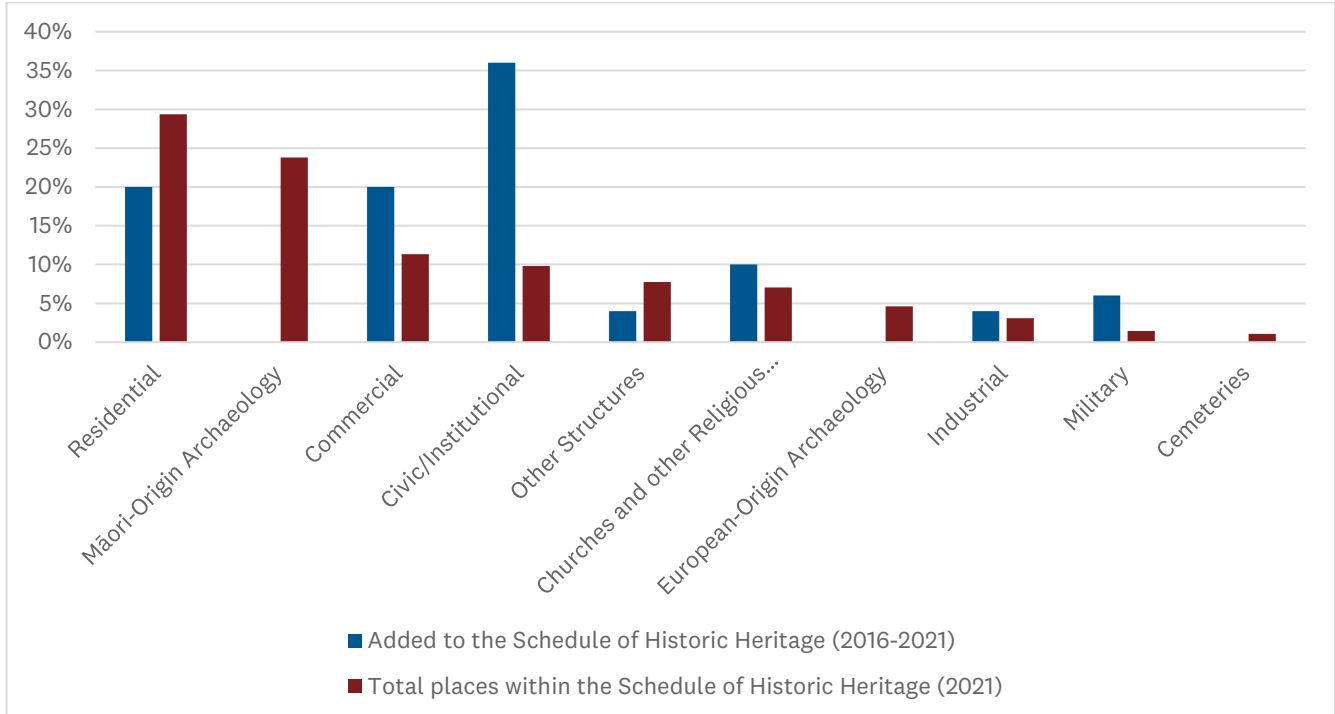


Figure 11. Typology breakdown of identified historic heritage places and places added to the Schedule of Historic Heritage in 2016-2021 (with comparison with the total places in the Schedule of Historic Heritage)

³⁵ For example, two per cent of all places of all places added to the schedule were in the Rodney Local Board area, and 21 per cent of all places in the schedule of historic heritage are located in the Rodney Local Board area.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

The typology of places with the highest per centage ultimately being scheduled after being identified are Military (75 per cent – four identified and three added), Industrial (33 per cent – six identified and two added), Churches and other religious buildings (33 per cent – 15 identified, five added), and Civic/Institutional (31 per cent – 58 identified, 18 added).

4.2.1.3 *Review of the schedule*

Several places in the schedule have undergone review since November 2016 (see Table 6 below). Many of the reviews are ad hoc, with reasons including submissions on plan changes, errors found while processing resource consents, property owners identifying errors, and Heritage Unit staff identifying errors or anomalies. However, several reviews were planned. For example, the Category A* places review, commenced in 2020, reviewed over 100 places in the Whau, Henderson-Massey, Kaipātiki and Devonport-Takapuna local board areas (primarily to confirm the category of scheduling, but also reviewing other aspects of the scheduling, such as heritage values). The Category A* places review is due to go to a plan change in 2022. Similarly, a review of over 165 archaeological places was carried out in 2016-2019. The purpose of this programme was to ensure that archaeological places in the Schedule of Historic Heritage are accurately described, located, and mapped, are assigned to the appropriate category, have a baseline monitoring record, and meet the AUP criteria for inclusion in the schedule. Some of the recommendations from this archaeological review were able to be amended through Plan Change 10 – Historic Heritage Schedule (errors, anomalies and information update) (operative in full June 2020) and Plan Change 27 – Amendments to Schedule 14.1 Schedule of Historic Heritage (operative in full August 2021).³⁶ The necessity of these on-going archaeological reviews is highlighted in the findings from a case study of Pāhurehure Inlet (south Manukau Harbour, South Auckland) which show that some of the archaeological sites in the area scheduled in the AUP as historic heritage places may no longer meet the criteria for which they are scheduled. Some places also have other issues with scheduling, such as the extent of place not being defined.³⁷

Through these planned and ad hoc reviews of places in the Schedule of Historic Heritage, the quality and robustness of the schedule has been maintained and improved, better protecting these significant historic heritage places.

Like the 125 historic heritage places and one historic heritage area which were added during the development of the AUP (2014-2016), it should also be mentioned that 39 historic heritage places and eight historic heritage areas were removed from the Schedule of Historic Heritage during this time, as these also give effect to Objective 1. However, they are not part of this monitoring analysis as they were removed before the AUP became operative.

³⁶ Corrections to places in Plan Change 27 included: ID 00569 Coombes/Daldy Lime Kilns (defined the extent of place and added a primary feature), ID 00729 Te Marae o Hinekakea village site R10_163 (defined the extent of place, added the grave site to the name and added a primary feature), ID 1270 Mill site R11_1633, site of water-powered mill, including water race and dam (amended the extent of place, identified a primary feature and removed the reference to the place being of Māori interest of significance), ID 01587 Midden R11_2158 (amended the extent of place, added the correct address and legal descriptions, identified the extent of place and identify exclusions).

³⁷ Brassey, R. (2021). 'Findings from a case study related to the archaeology review of Pahurehure Inlet (south Manukau Harbour, South Auckland) show that Pahurehure', Auckland Council.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Table 6. Review of historic heritage places (2016-2021)

Measures, by year	No. of places and areas						
	2016	2017	2018	2019	2020	2021	Total
Removed from the schedule ³⁸	0	0	0	0	0	15	15
Amended category ³⁹	0	0	0	0	3	0	3
Amended Known Heritage Values ⁴⁰	0	0	0	0	17	11	28
Amended extent of place	0	0	0	0	253	0	253
Reviewed through planned projects (such as A* and archaeological review)	Over 165 ⁴¹				90	0	Over 255

Notes on table: These measures do not include removing duplicate entries or deleting line items following a merge of two places. The same place may appear multiple times - for example, a place may have had changes to its category and extent of place.

Of the 15 places that were removed from the schedule, 12 did not meet the threshold for scheduling, one was a duplicate entry, and two no longer existed (due to fire). Of the three with categories amended, two were from Category A to Category B, and one was from Category B to Category A.

A major reason for recommending changes in the scheduling of places is that most of the places on the schedule were scheduled pre-AUP. Legacy councils had different criteria and guidelines and different information requirements. Although every effort was made to create consistency when the legacy district plans were amalgamated into the AUP, discrepancies and further information about the significance of places are still discovered. To help with consistency, the *Methodology and guidance for evaluating Auckland's historic heritage* was updated in 2019. This was an update of an earlier methodology (from 2013). The updated methodology provided more detail and examples to assist with consistency between places evaluated.

4.2.2 Findings

Indicator 2 has shown that a significant number of historic heritage places (2,278) are protected through the Schedule of Historic Heritage, and that they consist of a wide variety of typologies and are located throughout the region. The distribution and typology of the Schedule of Historic Heritage is based on past patterns of settlement as well as legacy council priorities.

Although a notable number (50 places) have been added to the Schedule of Historic Heritage since the AUP became operative in part in November 2016, as with the places of interest and places evaluated, there are variances in the 50 added in terms of their geographical spread and typology. For example, 11 local boards did not have any places added to the Schedule of Historic Heritage during this time period. There are also gaps within the types of places added to the Schedule of Historic Heritage: there is a significant dominance of built heritage places. The three typologies with no places added to the schedule all related to archaeology: Māori-origin archaeology, European-origin archaeology, and cemeteries. However, as with Indicator 1, this may be more reflective of the relative priority given to heritage not at high risk of destruction (such as archaeological sites in regional parks) and past heritage surveys (during and pre the development of the AUP).

Like with Indicator 1, these numbers may be more reflective of the priorities of the Auckland Council (including the Heritage Unit) and the community it serves than the effectiveness of the AUP. However, the

³⁸ Year the Plan Change became operative

³⁹ Not including A* places, year the Plan Change became operative

⁴⁰ Year the Plan Change became operative

⁴¹ Many more archaeological places were also reviewed for their scheduling, but this number is unknown.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

numbers do show that a variety of historic heritage places have been added to the Schedule of Historic Heritage and that the AUP is not precluding the addition of a variety of places to the Schedule of Historic Heritage.

Reviews of the Schedule of Historic Heritage have resulted in several historic heritage places having their scheduling refined. These changes have created greater consistency, resulting in a more robust Schedule of Historic Heritage, aligning identified values with management. However, many recommendations from the archaeological review (2016-2018) have not yet been implemented.

4.2.3 Recommendations

There are no recommendations relating to the AUP for Indicator 2.

The following recommendations are made for the future Auckland Council and Heritage Unit work programme:

- Conduct more investigation and evaluation of places in local boards which have not had any places added to the schedule since the AUP came into effect such as: Waitākere Ranges and Māngere-Ōtāhuhu.
- Conduct more investigation and evaluation of types of places which have not had any places added to the schedule since the AUP came into effect such as: Māori-origin archaeology and European-origin archaeology.
- Prioritise the findings of the archaeological review as a plan change and consider different options for recognising and managing archaeological places that may be removed from the Schedule of Historic Heritage (such as adding them to Schedule 12 Sites and Places of Significance for Mana Whenua, where appropriate).
- Prioritise work with mana whenua to understand how and when to use criterion C in the scheduling of historic heritage places
- Work side-by-side with Schedule 12 Sites and Places of Significance to Mana Whenua nominations and potentially concurrently schedule places in Schedule 14 Schedule of Historic Heritage.

Objective 1:

B5.2.1(1) Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.

and Objective 2:

B5.2.1(2) Significant historic heritage places are used appropriately, and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

4.3 Indicator 3

3. Inappropriate development, subdivision, and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied or mitigated

Indicator 3 relates to both objectives in B5.2, specifically how the objectives, policies and rules of the plan avoid, remedy, or mitigate “inappropriate” outcomes for historic heritage places. Policies 6 and 7 call for significant adverse effects to be avoided, and, where there these effects are unavoidable, that they be remedied and mitigated.

To interpret this indicator, it is important to understand the rules that determine if a resource consent is necessary, and the process applicants go through to apply for a historic heritage resource consent.

D17 Historic Heritage Overlay rules

The B5.2.2. Policies are implemented through the provisions in the D17 Historic Heritage Overlay chapter of the AUP. In the chapter, three Activity Tables specify the activity status of activities affecting scheduled historic heritage places (including historic heritage areas and places subject to additional archaeological rules). The activities include maintenance, repair, use, development, adaptation, modification, restoration, demolition, destruction, relocation, temporary activities, and subdivision. The activity tables indicate what activity status (permitted, controlled, restricted discretionary, discretionary, non-complying and prohibited) relates to which activity, depending on if the activity relates to the Primary feature of a Category A, A* or B place (or a contributing/non-contributing site or feature of a Historic Heritage Area), or is within the scheduled extent of place of a Category A, A* or B place, or is identified as an exclusion within a historic heritage place or area. All activities require a resource consent, unless it is a permitted activity (or a prohibited activity, as the activity cannot be carried out).

“Maintenance and repair” are permitted activities and do not require a resource consent (as long as the work complies with D17.6.2 standards – if the work does not, then the application defaults to being a restricted discretionary activity status). Likewise, generally-speaking, tree-trimming, temporary buildings and signs, security systems, farming, and many activities related to exclusions are permitted (when D17.6 standards are adhered to). Only two activities are Prohibited: Demolition or destruction of 70 per cent or more by volume or footprint of primary features within Category A places; and the relocation of primary features of a Category A place outside of the extent of place.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

The rest of the activities are either non-complying, discretionary, restricted discretionary or controlled.

If the scheduled heritage place is also on the Heritage New Zealand Pouhere Taonga (HNZPT) list, then HNZPT becomes an affected party to the resource consent. Prior to starting work, or making an application for a resource consent affecting a historic heritage place, Heritage New Zealand should be contacted to confirm whether, in addition to any rules applying in the AUP, an authority is required to modify an archaeological site.

Process for historic heritage resource consents

Generally, if an applicant (owner of a property/developer) wishes to do an activity affecting a historic heritage place (that is not permitted or prohibited), the process is as follows. The applicant:

- may obtain free advice and information/guidance from the Auckland Council and heritage specialists in the council Heritage Unit (written or verbal)
- may have a pre-application meeting with planning and council heritage specialists who provide guidance on the design/activity that may be supported
- lodges a resource consent application (the applicant may have a heritage specialist of their own)
- receives feedback on the application and may make changes to the application to align with the council heritage specialists' advice
- receives a decision on whether the resource consent is supported or not and whether the application is notified (limited or public) – the resource consent planner makes an overall recommendation based on specialist reports (not only from heritage) and other factors (such as zone rules and other overlays)
- may lodge an appeal and go to a hearing / environment court or go through mediation (if the application is declined)
- will have a completed resource consent once the work of the application is done and routine compliance monitoring is carried out and any conditions are complied with.

Historic heritage resource consents (November 2016 – April 2021)

According to the Plans and Places Resource Consents Database (RCD – PP), between November 2016 and April 2021 there were 431 resource consents relating to historic heritage (Table 7). Of these, 429 (99.5 per cent) were granted and two were refused (one in 2017 and one in 2018). The two not granted are explained in more detail below:

- Resource consent refused: 31 Esplanade Road, Mt Eden (2017)

The application was to demolish the Category B Sunday School Hall at 31 Esplanade Road, Mount Eden, due to its poor condition. Council's built heritage specialists did not support this application due to the effects on the adjacent St James Church, the lack of options given to strengthen the building, and a lack of alternatives for demolition such as adaptive re-use. The reporting resource consent planner refused the resource consent. The applicant appealed this decision, and the application went to a hearing. At the hearing, the commissioners agreed with the opinion of the reporting planner that it was not conclusively established that demolition of the building was the only option or was appropriate, and that the demolition of the building could not be sufficiently mitigated or remediated.

This decision became subject to an Environment Court Appeal in 2018 which ultimately granted consent to the application (mainly on the basis on public safety outweighing heritage values). It was

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

deemed that the structural stability of the hall (which had a Dangerous Building Notice) affected the ability to repurpose the hall as part of an upgrade. The decision required the parties to agree to a set of conditions, including the salvage of materials and the seismic upgrade (covered by a bond) of the adjacent St James Church. However, following the decision in December 2018, there was an arson attack on the Sunday School Hall and the building was destroyed before any conditions could be imposed.⁴²

- Resource consent refused: 7 Papakura-Clevedon Road, Clevedon (2018)⁴³

The application sought to make modifications to the existing commercial building, a Category B historic heritage place. The proposal was to replace the existing verandah on the eastern elevation of the building (street front) and to add a verandah along its northern elevation.

This resource consent was not supported by council's built heritage specialists. The principal issue in contention was whether the design and scale of the verandah, and the use of posts to support it (northern and eastern elevations) was in keeping with, and consistent with, the values for which the building had been scheduled in the AUP.

The reporting resource consent planner recommended a refusal of the resource consent. The applicant appealed the decision, and the application went to a hearing. Ultimately the hearing commissioners agreed with the reporting planner to refuse the application: "the proposed north verandah could be considered an intrusive modification" and that the verandah extension (including with the bull-nosed edge) would also have a significant adverse effect on the "known heritage values of a historic heritage place from the design of the proposal" and on the "overall significance of the place". It was deemed that from a heritage perspective (and in terms of the AUP) it would be preferable to maintain historical accuracy of the building, site, and place.

As explained in Section 3.1.3, there are some limitations to this RCD – PP data. For this reason, the percentages in this section should be treated as indicative and not absolute values.

Figure 12 breaks down the types and location of historic heritage resource consents from the RCD – PP (Nov 2016- Apr 2021).

⁴² ENV-2017-AKL-000151, summary accessed from:

https://infocouncil.aucklandcouncil.govt.nz/Open/2019/03/REG_20190314_AGN_6988_AT_files/REG_20190314_AGN_6988_AT_Attachment_66587_1.PDF.

⁴³ Decision following the hearing of an application for resource consent under the Resource Management Act 1991: Application Number LUC60305958 (March 2018).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

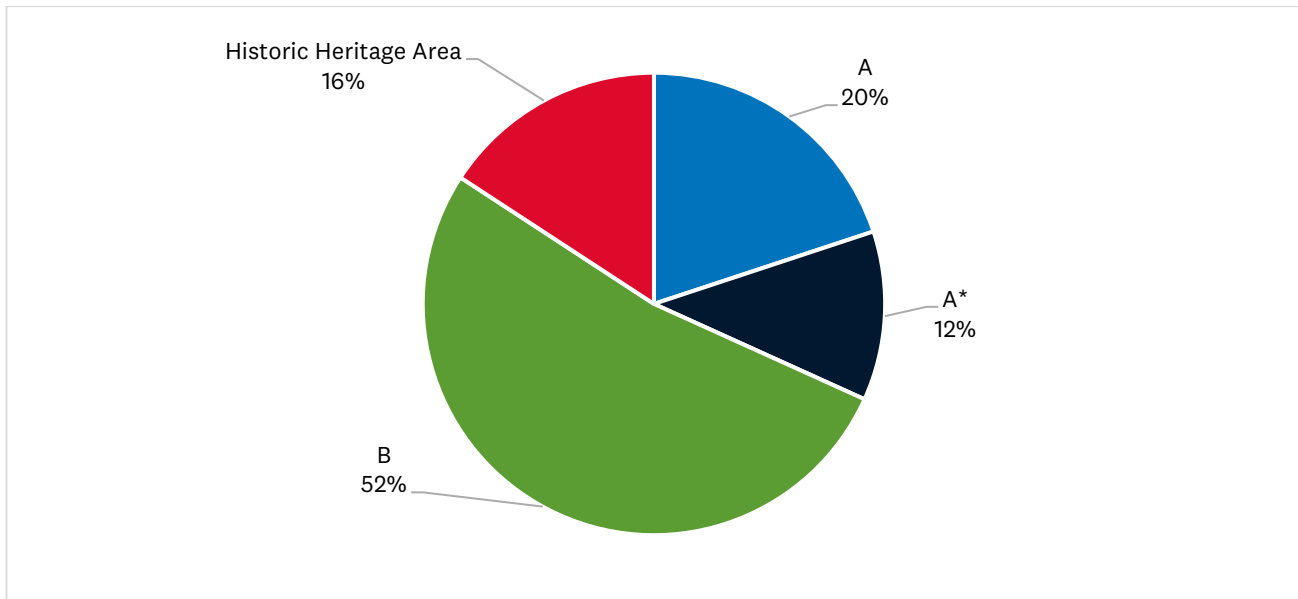


Figure 12. Breakdown of historic heritage resource consents by Historic Heritage Place Category and Historic Heritage Area

Figure 13 and Figure 14 show that a greater proportion of Category A and Category A* historic heritage places required resource consents compared to their representation in the Schedule of Historic Heritage.

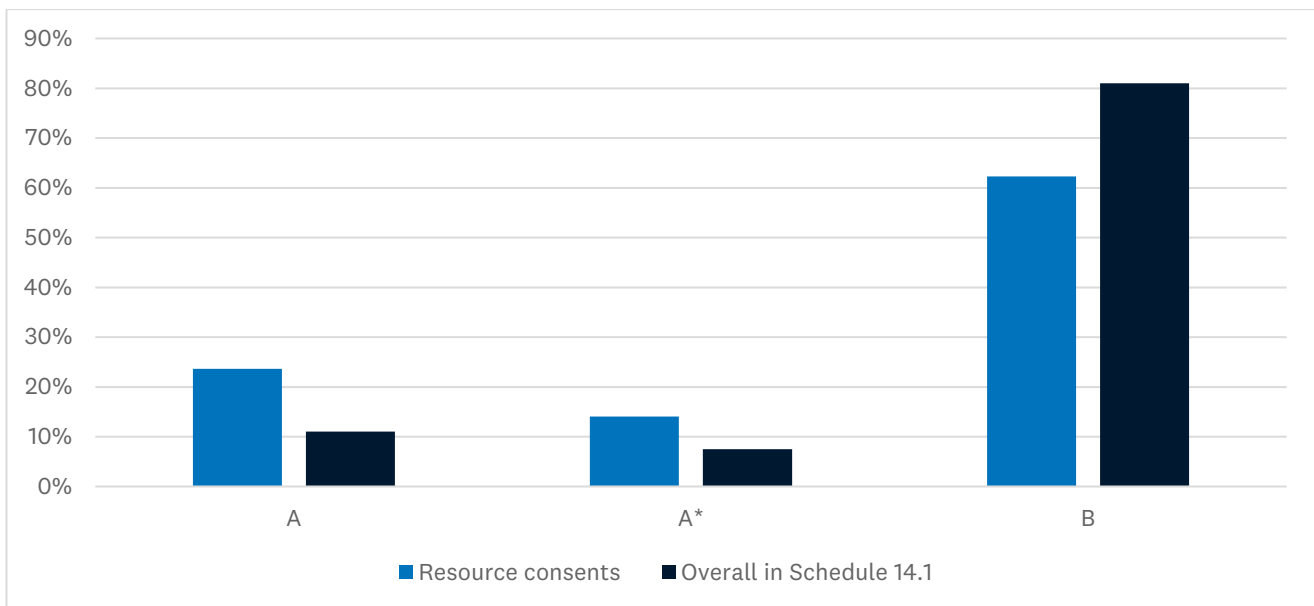


Figure 13. Historic heritage resource consents by category (not including historic heritage areas) compared to the proportion in Schedule 14.1 overall.

Figure 14 compares the proportion of types of resource consents with the types of places in the Schedule of Historic Heritage. It shows that Residential-, Māori-origin archaeology-⁴⁴, and Churches and other religious buildings-type historic heritage places had fewer resource consents compared to the overall proportion in the Schedule of Historic Heritage. In contrast, Civic/Institutional-, Other structures-, Military-, and Cemeteries-type historic heritage places had more resource consents compared to the overall proportion in the Schedule of Historic Heritage.

⁴⁴ One reason is that many Māori-origin archaeological sites are in rural areas, where rural-lot subdivisions can be designed to avoid these sites.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

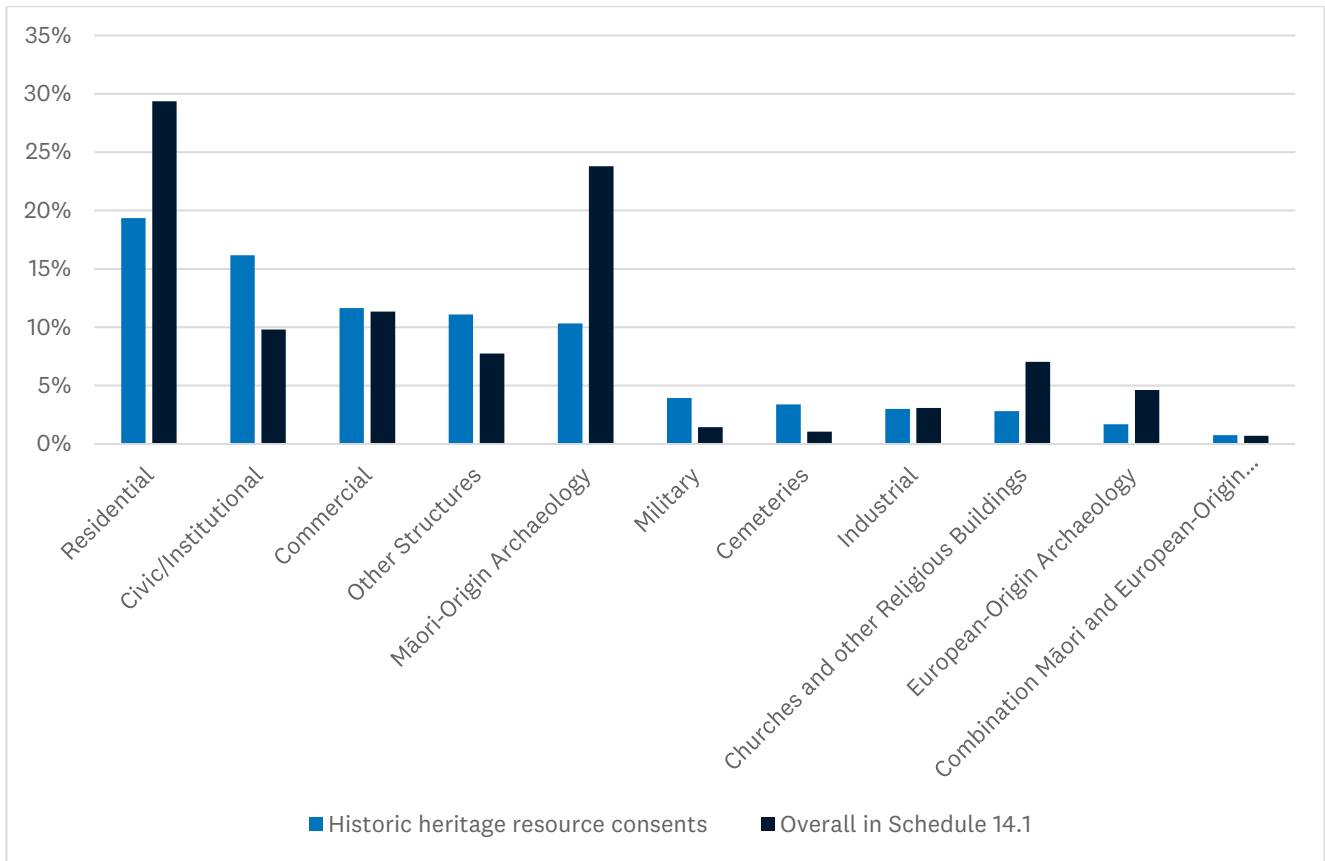


Figure 14. Historic heritage resource consents by type of historic heritage place compared with the overall proportion in the Schedule of Historic Heritage (Schedule 14.1).

Figure 15 below breaks down what activity each historic heritage consent related to – blue bars relate to general historic heritage place resource consents, red relates to historic heritage places with archaeological rules, and purple bars relate to historic heritage areas:

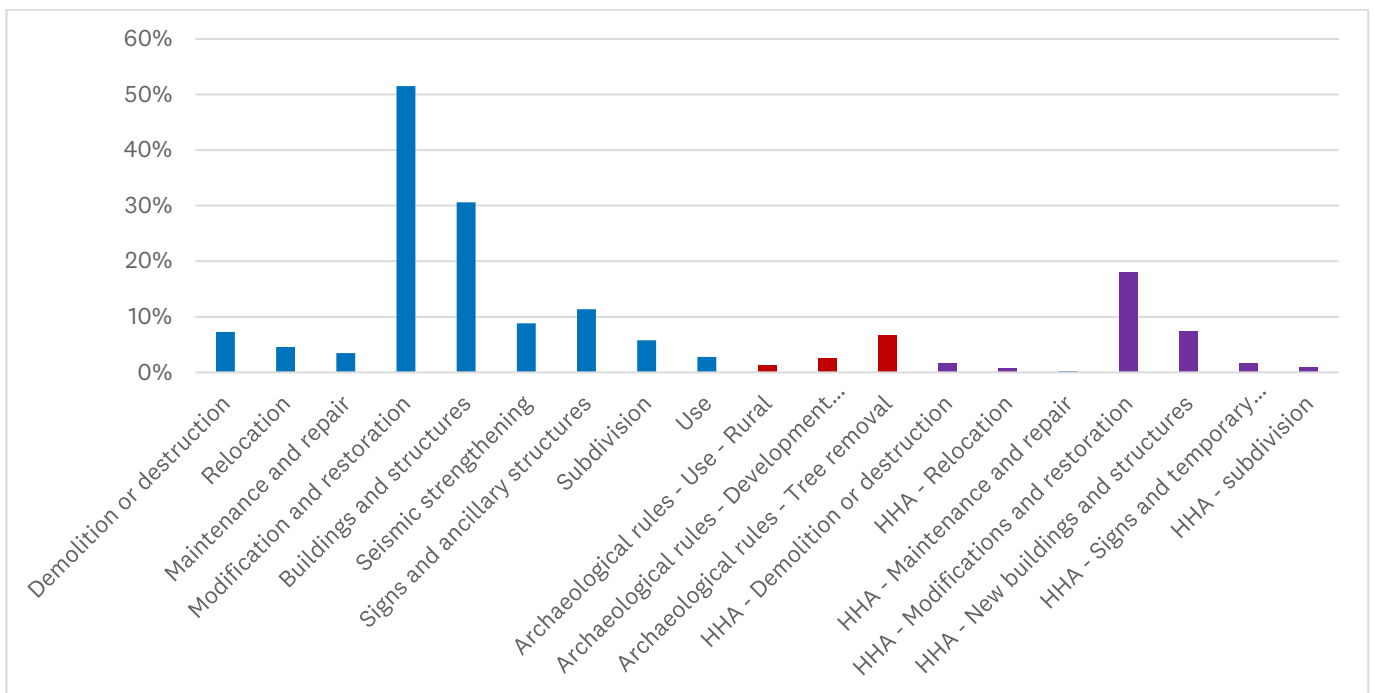


Figure 15. Type of activity for historic heritage resource consents (2016-2021)

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Over the period, half (52 per cent) of all historic heritage resource consents related to the modification and restoration of historic heritage places (not including historic heritage areas). If historic heritage places and historic heritage areas are combined, this proportion reaches 70 per cent of all historic heritage resource consents. Nearly a third of all resource consents (31 per cent) relate to new buildings and structures. This increases to 38 per cent if historic heritage places and historic heritage areas are combined. The only activities with no consents over the period were A24 (Farming within a scheduled extent of place) and A29 (Relocation of features beyond a Historic Heritage Area).

In terms of geographical coverage, historic heritage resource consents generally follow the pattern of urban scheduled historic heritage places in Tāmaki Makaurau Auckland (Figure 16 and Figure 17). The graph below shows the proportion of all historic heritage consents by local board. Waitemata Local Board has by far the highest proportion of all the local boards with 42 per cent. Albert-Eden has the second highest with 11 per cent. Only Aotea / Great Barrier Local Board had no historic heritage resource consents over this period – as most of the historic heritage is governed through the HGIDP as opposed to the AUP. Waitemata (42 per cent, compared to 16 per cent), Albert-Eden (11 per cent, compared to five per cent), and Upper Harbour (six per cent, compared to three per cent) had the highest proportion of historic heritage resource consents compared to the proportion of historic heritage places on the schedule. Rodney (three per cent, compared to 20 per cent) and Hibiscus and Bays (one per cent, compared to six per cent) Local Boards had the lowest proportion of historic heritage resource consents compared to the proportion of historic heritage places on the schedule.

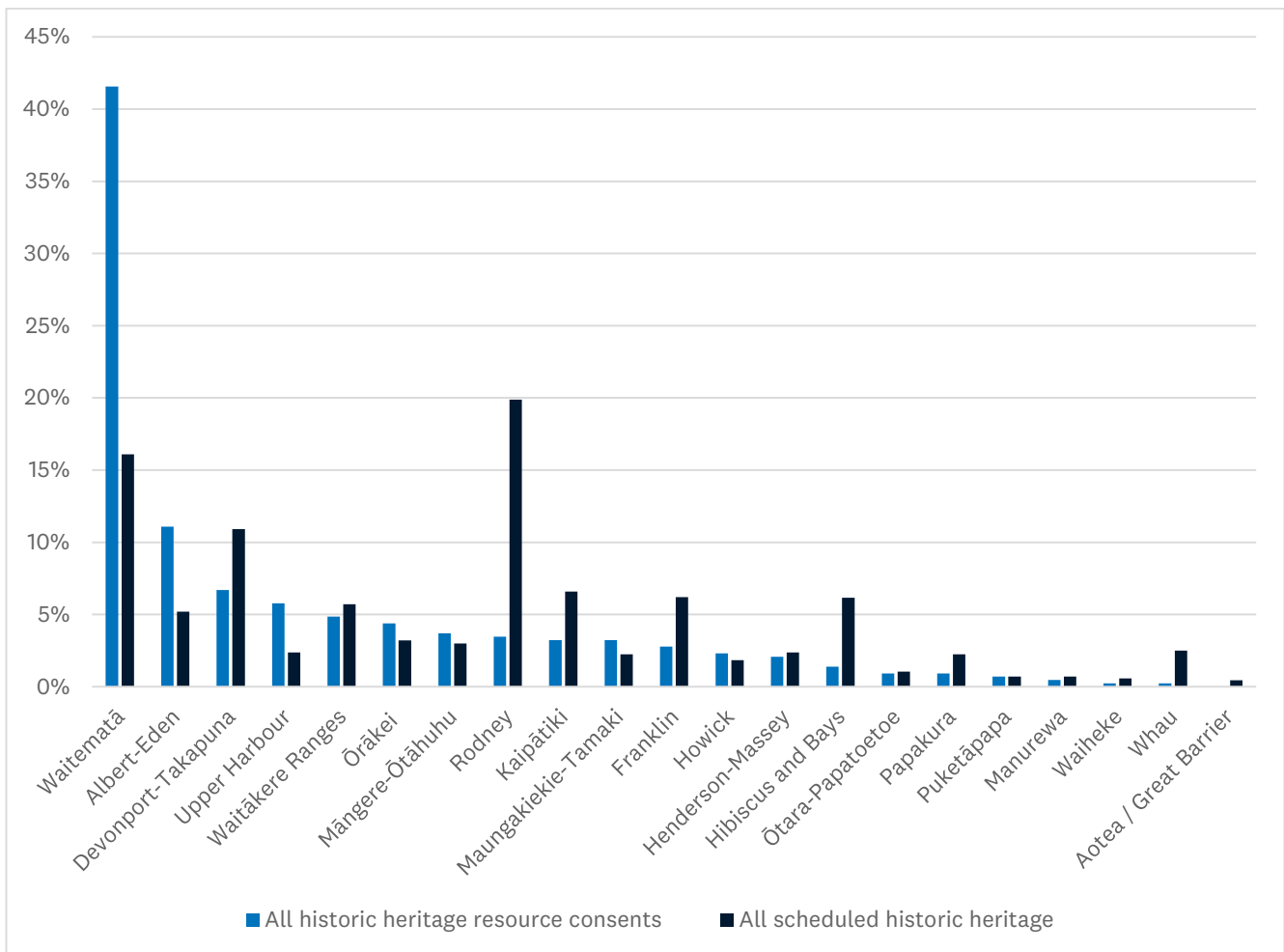


Figure 16. Historic heritage resource consents by local board (Nov 2016- Apr 2021)

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

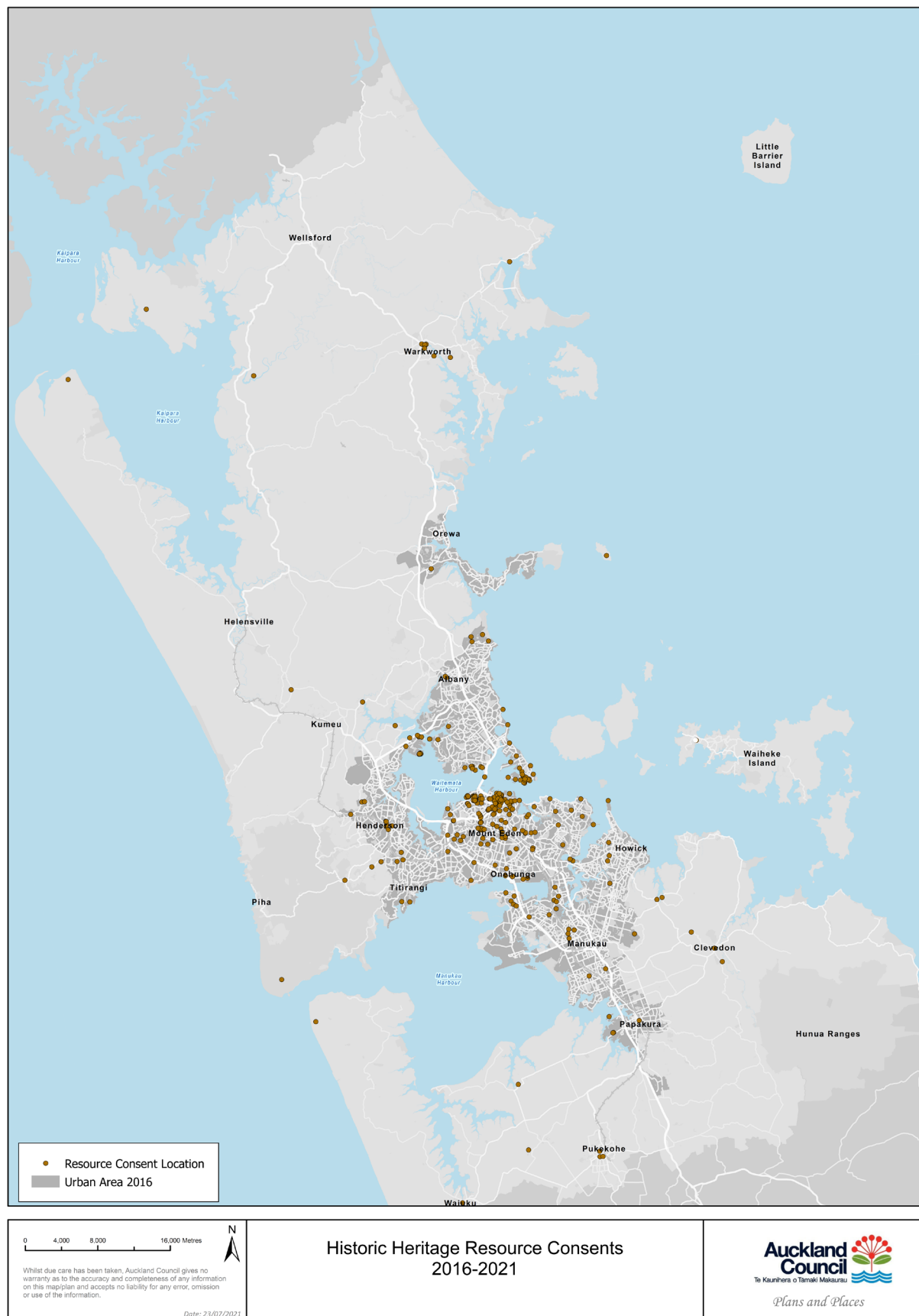


Figure 17. Map showing the location of historic heritage resource consents (Nov 2016-Apr 2021). This does not include Aotea / Great Barrier Local Board or Waiheke Local Board as most of the historic heritage in these areas is governed through the HGIDP as opposed to the AUP.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Table 7. The number of resource consents relating to historic heritage by year (Nov 2016 – Apr 2021)

Year	Number
2016 (Nov-Dec)	7
2017	90
2018	115
2019	136
2020	59
2021 (Jan-Apr)	24
All	431

The general split in historic heritage resource consents between the different types of heritage during this period is: “built heritage”⁴⁵ (84 per cent), “archaeology”⁴⁶ (13 per cent) and “cemeteries” (3 per cent).

Most of the analysis and findings of this indicator has been split into “built heritage”, “archaeology” and “cemeteries”. This was done primarily to better analyse findings specific to types of heritage, as there can be differences in outcomes and approaches taken for these different types of heritage. This was also done because of differences in data availability across these types (built heritage resource consents had more data available). The analysis and findings for each type of heritage is further split into *avoidance of inappropriate works* and *remediation and mitigation of inappropriate works*. Two other sections relate to historic heritage places as a whole: the effects of zoning on avoidance, mitigation, and remediation of inappropriate works on historic heritage places, and the effectiveness of Chapter 5.2.2 Policy 8, which relates to development adjacent to historic heritage places.

Other management of historic heritage

It is also worth noting that there are other ways historic heritage is managed. Because the focus on this report is on the Schedule of Historic Heritage and its provisions, an analysis of these has not been done.

- Precincts and heritage

Heritage can also be managed and protected through precincts. Some precincts contain more detailed information and specific rules relating to a scheduled historic heritage place. Where this is the case, the more specific precinct rules replace the rules in D.17.4. Precinct rules are in Chapter I of the AUP.

- Heritage orders

The RMA enables heritage protection authorities to make requirements for heritage orders to assist in the protection and conservation of historic heritage places. There are currently six heritage orders listed in the AUP Heritage Orders Schedule. All of these were set up in the 1980s.

- Designations

Several scheduled historic heritage places are designated sites, relating to, for example, the Ministry of Education, Auckland Transport, Ministry of Defense, Chorus, and Regional Parks. In

⁴⁵ The following types categorised as “built heritage”: Residential, Civic/Institutional, Commercial, Other Structures, Military, Industrial, Churches and other Religious Buildings, and Historic Heritage Area.

⁴⁶ The following types were categorised as “archaeology/cemeteries”: Māori-origin archaeology, European-origin archaeology, and Combination Māori and European-origin archaeology.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

these cases, plan provisions may not be addressed like they would be for non-designated places which follow standard resource consent processes.

- Other frameworks

Some historic heritage places are also under the Department of Conservation - Conservation Management Strategy framework, which also follows different processes to those in the AUP. Council-owned historic heritage places are also managed through an internal policy (Strategic Heritage Asset Management Plan) which identifies heritage buildings which have heritage value (but not scheduled) and have processes relating to renewal and disposal which help protect the heritage values of the place.

4.3.1 Measures and Analysis – Built heritage

The data in this section is based on the BHIT – RC database as well as interviews with heritage specialists and resource consent planners. The BHIT – RC database, as explained in Section 3.0, covers the involvement of built heritage specialists between 2018 and 2020 (so does not include November 2016 to 2017 or 2021). In addition, around four per cent of the data is not fully completed in the BHIT – RC database (mainly due to specialist memos or planning decision reports not being able to be located), meaning these proportions may differ from the actual proportions. The numbers quoted in this section should therefore be considered as indicative.

4.3.1.1 Avoidance⁴⁷ of inappropriate development, subdivision, use of historic heritage places

In general, inappropriate work to built heritage (work not supported by council’s built heritage specialists due to there being overly adverse impacts on the historic heritage values of the place) is avoided. Most (92 per cent) historic heritage resource consent applications relating to built heritage were supported by built heritage specialists (including “support with recommended conditions”). Apart from applicants adhering to the provisions of the AUP in their application designs, other methods in the plan, such as providing (free) expert advice before the application, providing advice at the pre-application stage, and providing advice following lodgement of the application, significantly contributes to this 92 per cent support rate from built heritage specialists and the avoidance of inappropriate works on historic heritage places.

Case study: Golder House, 14 Rewiti Avenue, Takapuna

One good example of early meeting and involvement of council heritage specialists in a resource consent is Golder House in Takapuna (a Category A* historic heritage place, ID 01059), located on a large corner property.

Built in 1923, Golder House is a notable example of an Arts and Crafts-style house designed by architect-craftsman James Chapman-Taylor. Chapman-Taylor is recognised as one of the most significant proponents of the Arts and Crafts movement in New Zealand. The house is of great significance as an example of his work, embodying his ideals of hand-crafted construction and detailing.

In 2017, the owners sought resource consent to modify the historic heritage place, specifically:

- demolition of standalone garden sheds and a lean-to attached to the western elevation
- construction of a pavilion, glazed link, garage and carport
- construction of a standalone boatshed

⁴⁷ “To avoid” is defined as adverse effects to be escaped or evaded. (Willis, A. [1995]. *The Call To ARMs or why the concept of ‘avoid, remedy, or mitigate...’ is worth a closer look*, Master of Science in Resource Management, Lincoln University, Christchurch)

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- modification and development of the landscape including removal of trees.

Considerable consultation was undertaken during the development of the design between the owners, the owners' designer, the owners' conservation architect and Auckland Council's heritage specialists. During this consultation process the design was modified to better acknowledge the scheduled architecture and provide clarity between the heritage and the contemporary design of the new pavilion.

In this case, the consultation and subsequent revisions to the design lead to an outcome in which both the council heritage specialists and the owners were happy with the outcome. The following are some extracts from the heritage specialist memo (photographs added):

Construction of a pavilion, glazed link, garage and carport:

Developing a new pavilion adjacent to the scheduled building will have contextual and aesthetic implications for the heritage values. By constructing a detached structure, a related but recognisably different form can be developed that provides the requirements of modern living but also allows the heritage to be clearly recognised and understood. The proposed pavilion, in my option, achieves these objectives



Golder House (David Bade, Auckland Council, 2020).

Construction of a standalone boatshed:

Establishing a substantial shed to the north-west of the existing house does reduce the existing impression of space surrounding the heritage house. Redeeming factors are the separation between the two buildings and the “pulling back” of the north-east elevation of the shed so that the facades of the shed and house are in align. This reduces the visual presence of the boat shed and allows the entire north-east frontage to remain unobstructed. The design and proposed materials for the boatshed characterizes the function of the building and it is considered that it will be clearly “read” as a later introduction that has a period and local connection with the original building.



Golder House (David Bade, Auckland Council, 2020).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Sometimes applicants may start out (either knowingly or unknowingly) with an application proposal that would be inappropriate to the historic heritage values of the place and not supported by built heritage specialists. This may be because they are not familiar with the historic heritage provisions or heritage values of the place or may be trying to push the boundaries of the provisions. Meeting early with applicants before lodgement of their application can be advantageous for heritage outcomes as the applicants can better understand the values of the historic heritage place and what works can or cannot be supported. Involvement from built heritage specialists with applicants can also help them save money through less reporting. One difficulty is that if an applicant makes a plan or design before lodging (and without pre-application input from specialists), it can be very hard for the applicant to change their mind on a design as they have already pictured what the outcome of their resource application might be. Another example of a good heritage outcome resulting from early and numerous meetings with council heritage specialists is provided in the following case study.

Case study: Farmers building (former), 34 Hobson Street, Auckland Central

Built in 1914, the Farmers building (former) is significant for its close historical associations with two innovative and popular businesses, Laidlaw Leeds and The Farmers' Union Trading Company (later Farmers'). An extension was made in 1921 to convert the building into a department store, with new attractions, such as upper-storey tearooms and a rooftop children's playground, created to lure shoppers away from the more traditional shopping strip on Queen Street. The tearooms were designed by American-born architect Roy Lippincott, who also designed other well-known buildings around Auckland, including the University of Auckland's ornate Arts Building. In 1992 the Hobson Street Farmers store was closed down and the building bought by Heritage Hotels who developed a hotel within the building. In the mid-2010s Heritage Hotels sought to convert the grand tearoom into apartments.

The historic heritage place is scheduled as Category B (ID 02734), with the interior excluded (apart from the tearooms on the top floor).

In 2018 an application was made to convert the grand tearoom into an apartment.⁴⁸ Designs were modified over a 12-month period following numerous discussions between the applicants and council heritage specialists, including two pre-application meetings.



The Grand Tearoom before conversion into an apartment.

⁴⁸ Resource consent number: LUC60334284.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

The proposed works needed to be designed in a way that made the apartment viable for the owner while also maintaining the heritage values of the room. The works were designed to be reversible and to not create permanent physical damage to the heritage fabric of the room. This was done by creating a steel-framed structure in the middle of the space, which did not touch the sides or ceiling of the grant tearoom. The use of glass for partitions and the absence of floor to ceiling walls retained the visual spaciousness of the voluminous space.

The adaptive-reuse of the space was a great success and was featured on the *Grand Designs New Zealand* television programme in 2020.⁴⁹



Selected images showing the steel-framed structure in the middle of the space and the use of glazing to maintain the heritage values of the space.⁵⁰

⁴⁹ Hawkes, C. (2020), "Grand Designs NZ: Massive build inserts \$6m penthouse into former Farmers tearooms", *Stuff*, 15 September 2020, accessed from: <https://www.stuff.co.nz/life-style/homed/latest/122754288/grand-designs-nz-massive-build-inserts-6m-penthouse-into-former-farmers-tearooms>.

⁵⁰ Bayleys, "Grand Design Masterpiece", accessed from: <https://www.bayleys.co.nz/1753640?ps-preview=true>.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

There is no data on how many applicants decided not to go ahead with an application (or changed their application to something more appropriate to a heritage place) following informal advice from a heritage specialist. However, there are likely to have been a few, based on anecdotal evidence.

At least one in five built heritage consents had a pre-application meeting. There were also at least 10 pre-application meetings that did not result in a resource consent application (there may have been more that were not recorded in the BHIT – RC database). This number is of interest in that following advice in the pre-application meeting, the applicant may have decided not to proceed as their proposal may not have been supported by built heritage specialists.⁵¹ Several resource consent applications also had revisions following heritage advice after lodgement. The proportion is difficult to ascertain as not all have been recorded in the RCD – BHIT spreadsheet, but at least 19 resource consents (five per cent) are recorded as having revisions following heritage advice after lodgement.

Of the consents requiring comment from built heritage specialists (as recorded in the RCD – BHIT spreadsheet 2018-2020⁵²):

- 56 per cent were supported with recommended conditions
- 36 per cent of consents were supported (without identified conditions)
- 8 per cent were not supported

Of the 27 consents that were not supported by the Built Heritage Implementation Team between 2018 and 2020, 19 (70 per cent) were granted, five had no decision, one was withdrawn, and two are still in progress (e.g., awaiting further information). None were refused.⁵³

Of the 19 that the Built Heritage Implementation Team did not support (and that were granted):

- two had been recommended to be refused and notified by the planner, but were granted after a hearing
- 14 went to hearings
- nine had had pre-application meetings
- 14 included expert heritage advice (heritage consultants external to the council).

The types of applications these related to were as follows:

- nine were for additions and alterations
- six were for signage
- four were for new construction.

In many cases, applicants have their own heritage specialist, and sometimes their opinion differs to that of council's built heritage specialists. In cases where the application is not supported, the planner may make a judgement to support the arguments of the applicant planner. Anecdotal evidence suggests that, in these cases, applicant heritage specialists tend to focus on the positives of adaptive re-use of heritage buildings to support the application. However, there can be a fine line between when adaptive re-use or change of use becomes inappropriate to the heritage values of the place. Council's heritage specialists may have more focus on specific elements of buildings and their impact on the heritage values of the place. One example is shown below as a case study.

⁵¹ The applicant also may have not proceeded due to non-heritage-related factors of the proposal.

⁵² Note that around four per cent of entries did not have complete data, meaning the proportions should be taken as indicative/estimates.

⁵³ The two historic heritage resource consents identified at the beginning of this section that had their application refused were not recorded in the BHIT spreadsheet because they were lodged in 2017, so were not part of the date range of the BHIT spreadsheet (2018-2020): one at Esplanade Road, Mt Eden, and one on Papakura-Clevedon Road, Clevedon.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Case Study: Property in Herne Bay (2020)

A contributing site within the Herne Bay Road Historic Heritage Area (also within a Special Character Area)

The applicant sought resource consent to alter and add to a villa at a property on Herne Bay Road, Herne Bay. The proposal included a new double garage, a minor dwelling, an addition at the rear, a second-storey addition over the original dwelling, the re-orientation of the front door and the enclosure of the southern part of the verandah. The property is a “contributing site” within a historic heritage area and is a corner property. A pre-application meeting was held in which a council built heritage specialist expressed concern about the proposal, particularly the second-storey addition.

Council’s built heritage specialist did not support the proposed application, stating that the new addition would dominate over the original dwelling through its bulk, scale, and form, diminishing the contribution of the building to the wider collection of houses within the historic heritage area.

The council’s reporting planner recommended that the application be refused consent as the proposal would have unacceptable heritage and special character effects, and that the proposal was inconsistent with the relevant objectives and policies of the AUP.

The application went to a hearing where the applicant presented views from other heritage specialists who supported the proposal. The applicant’s heritage specialists focused on the effects to the area as a *whole* and not to the property on its own, particularly emphasising that most of the changes were to occur to ‘the rear’ of the property (despite being on a corner site and the rear being viewable from the road).

Ultimately, the hearing commissioners favoured the views of the applicant’s heritage specialists and supported the application. They found the roof top addition to be “not excessively dominant” and cited the difference between individually-scheduled historic heritage places and properties within a collective historic heritage area:

“We find that the historic heritage form and fabric of the buildings is a contributing feature to the Historic Heritage Area, but they are not provided or protected at the level of an individual scheduled building. Given this, the buildings within a Historic Heritage Area have more capacity for change and adaptation while still appropriately contributing to the collective values of the historic heritage area, as opposed to an individually scheduled building.”⁵⁴

This case study raises issues around the effectiveness of the historic heritage area provisions, particularly the cumulative effects of alterations to one property and its effect on the area as a whole.

Figure 18 below shows the type of resource consent broken down by the recommendation from the Built Heritage Implementation team. Additions and alterations had the highest proportion of all three types of recommendation. For those which were not supported, new construction and signage had higher proportions than those which were supported. For those which were supported with conditions, there was a higher proportion of seismic-related consents than other types of recommendations.

⁵⁴ Decision following the hearing of an application for resource consent under the Resource Management Act 1991: LUC60343973, p.11.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

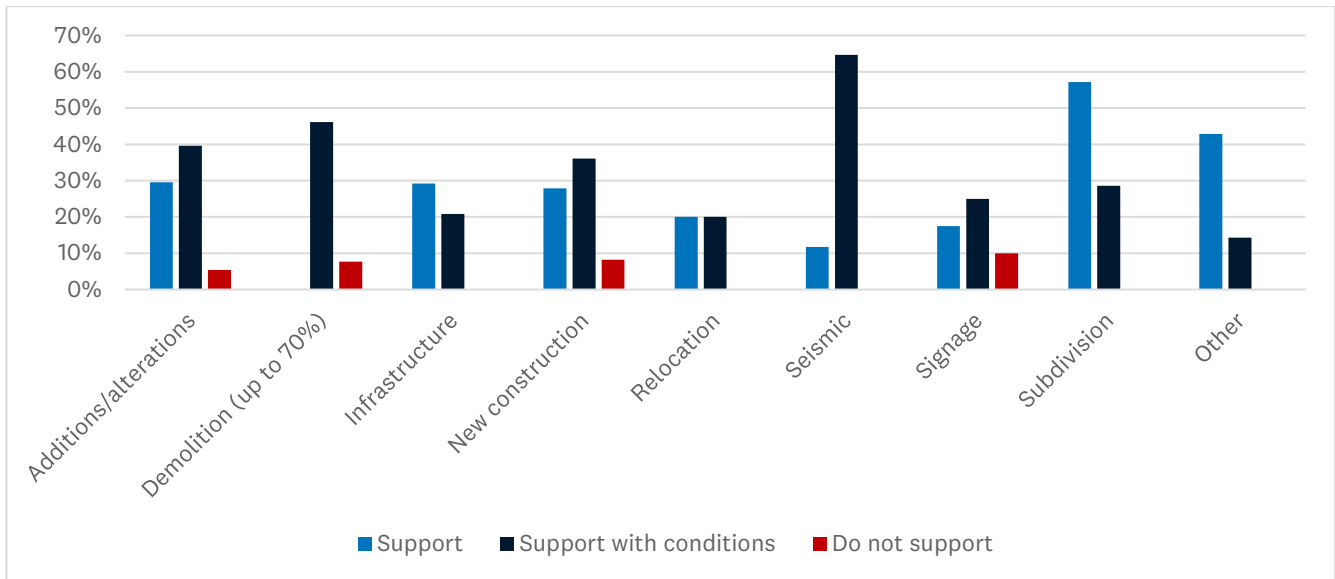


Figure 18. Breakdown of Built Heritage Implementation team recommendation by type of historic heritage resource consent

Case study: St Patrick’s Presbytery, 43 Wyndam Street, Auckland Central.

Another example of a good heritage outcome resulting from consultation between owners and heritage specialists is St Patrick’s Presbytery (part of the Category A St Patricks Cathedral complex historic heritage place, ID 02054, and also a Category 1 Historic Place on the NZHPT list).

St Patrick’s Presbytery has significance as the only purpose-built Roman Catholic cathedral presbytery dating from the nineteenth century to survive in New Zealand. Designed by Auckland architects Mahoney & Sons and built in 1888, the Presbytery building provided accommodation for the parish priest administering the adjacent St Patricks Cathedral.

The owners lodged a resource consent to seismically upgrade and restore the building. Several meetings, including a pre-application meeting, were held between the applicant, architect, engineer, Heritage New Zealand staff and Auckland Council heritage specialists to discuss and develop the proposal.

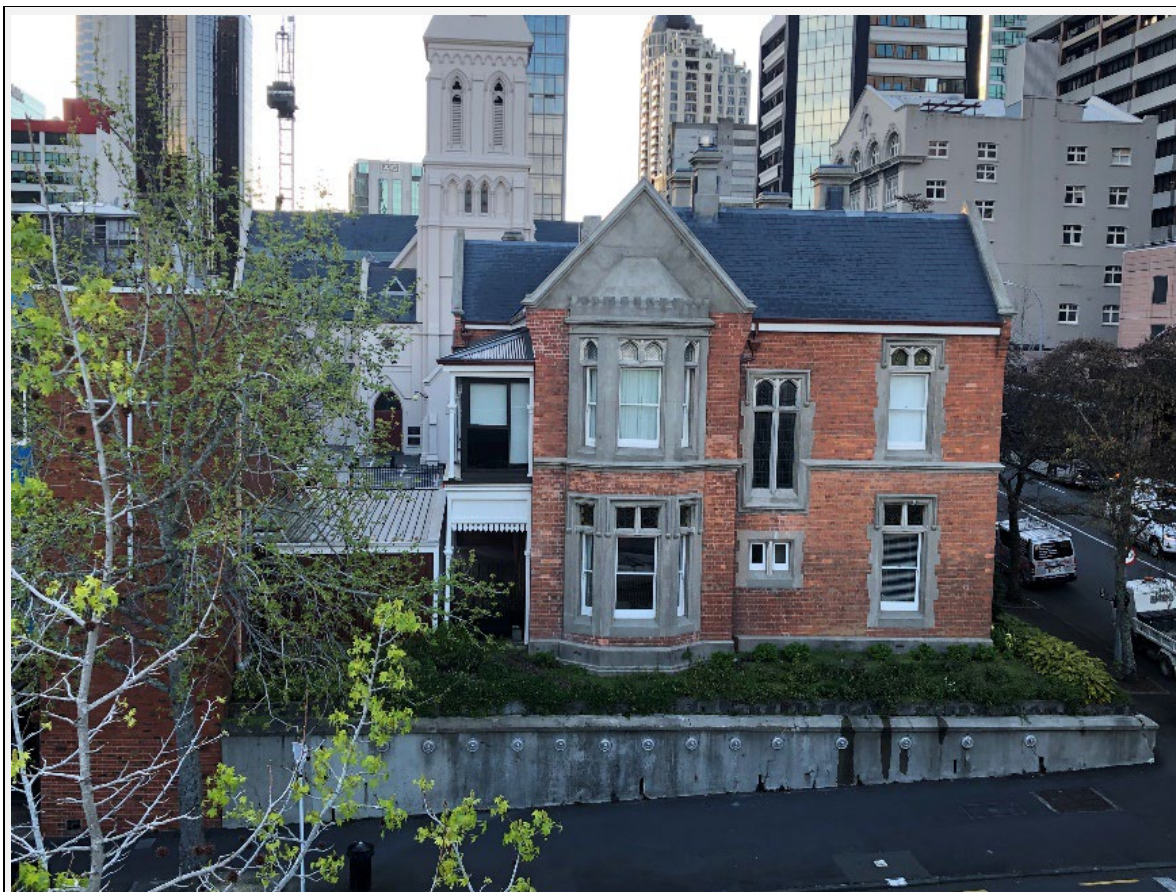
The work was supported by a heritage impact assessment, a conservation plan, and an assessment of environmental effects.

The work was completed in 2020 and a final site visit was made by a council heritage specialist, who determined that the built works had been carried out in accordance with the Resource Consent and that no further site visit was required.

The work was awarded the 2021 Auckland Architecture Award for Heritage from the New Zealand Institute of Architects.⁵⁵

⁵⁵ New Zealand Institute of Architects (2021), <https://www.nzia.co.nz/awards/local/award-detail/9724#>.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau



The Presbytery following seismic strengthening and restoration in 2021 (Auckland Council).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Overall, the AUP historic heritage objectives, policies and rules do lead to inappropriate work being avoided for built heritage places. However, there are cases where inappropriate work on built heritage scheduled places is not, or is unable to be, avoided. These can be grouped into three categories: interpretation of the rules, lack of necessary power in the rules, and general errors/abnormalities in the Schedule of Historic Heritage.

Interpretation of the rules

Inconsistencies with interpretation of the D17 rules from heritage specialists, resource consent planners and applicants has led, in some cases, to inappropriate works to scheduled built heritage places. One example is the interpretation of the demolition percentages. In the D17.4.1 Activity table, “Demolition or destruction of 70% or more by volume or footprint (whichever is the greater) of any feature” is a prohibited activity for primary features of Category A places, and a non-complying activity within Category A and A* extents of places. “Demolition or destruction of 30% or more, but less than 70%, by volume or footprint (whichever is the greater) of any feature” is non-complying activity for Category A and A* places. Sometimes applicants misrepresent the proportion of a scheduled heritage building that is being demolished, such as by incorporating other buildings or structures within the extent of place into their percentage calculation to thereby justify being able to demolish more of a building. This has led to examples where a higher proportion of a scheduled heritage building has been demolished than what the council’s built heritage specialists are able to support. This issue is a particular challenge for Historic Heritage Areas (HHAs). For example, there have been difficulties with treating “contributing” properties (properties that contribute to the values of the HHA) as scheduled places. Applicants sometimes argue that a change to one house will not have a major change on the whole area (see the case study above). If these changes are granted in a resource consent, then this leads to inappropriate heritage outcomes for that particular house within the HHA. If these kinds of activities are granted, then cumulatively the historic heritage values of the HHA will diminish.

Another example is the interpretation of when a “modification” becomes a new building or structure. A modification of a historic heritage place is noted in the Activity Table (A9) as a restricted discretionary (RD) activity. New buildings or structures in a historic heritage place extent are a discretionary (D) activity (or an RD activity if not a primary feature within a Category B place). For example, if a proposal is to add a two-storey building on a property (connected by an enclosed walkway to the original one-storey house), then it can technically be considered a “modification” (as it is connected) and therefore be a RD activity and not a D activity, thereby changing the way the resource consent planners assess the application as a whole. Resource consent planners may be more likely to support the application in these cases, even when the new “modification” may look like another building and be double the size of the original house – work which is likely to be deemed inappropriate by built heritage specialists. See the case study below as an example.

Case study: Property in Westmere

One of five properties within the Kingsley Street State Houses (former) Historic Heritage Place (Category A, ID 02619)

The applicant sought resource consent to alter and add to the existing villa. The proposal was to build a modern two-storey rear addition, connected to the original dwelling with a glazed walkway. A pre-application meeting was held prior to lodgement in which the council’s built heritage specialist expressed concern about the bulk of the two-storey addition.

The council’s built heritage specialist, in the technical memo assessing the application, did not support the proposal, noting:

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

“The proposed second storey of the addition and the overall bulk and mass of the addition... are not a positive response to the heritage values of the place. In my opinion, the proposal over develops the extent of place and the rear addition does not complement the heritage dwelling. It dominates the heritage dwelling through its bulk, scale and form.”⁵⁶

The specialist also remarked that it would not just be the subject dwelling that is affected, but the whole group of five properties which form the scheduled place.

The applicant had their own heritage specialist advice in support of the proposal. The council’s reporting planner favoured the views of the applicant’s heritage specialist and recommended to grant the application:

“The proposed development provides for the adaptation and modification of the dwelling to meet modern living standards without adverse effects on the identified heritage values and significance of the place, as a whole and 25 Kingsley Street in particular. Specifically, the modifications (including the removal of the northern post-1917 extension to the lean-to structure at the rear of the existing dwelling, resulting in a floorplan that more closely resembles the original plan) combined with the removal of the garage and lowering or removal of screening vegetation are an appropriate response to the significance and nature of the heritage place, and will sufficiently respect and enhance the form and appreciation of the original building form on the site. The upper level of the modification is appropriately separated and has a roof form that will be set appreciably below the ridge of the existing dwelling. The style is modern (as are the materials) and therefore the modification does not seek to replicate (and potentially confuse) the existing dwelling. Any loss of spaciousness will be mitigated by the removal of the garage at the rear of the property and the appreciable physical separation of the upper level from the property boundaries.”⁵⁷

Because the proposal was deemed to be a “modification” (it was technically connected to the original house), the application was considered a restricted discretionary activity and not a discretionary activity. This case study raises issues over the interpretation of the historic heritage provisions, namely when an addition to a historic heritage place should be considered a ‘modification’ or a ‘new building’.

Another example of interpretation issues relates to chimneys. If the interior of a building is excluded from scheduling, applicants have argued that the portion of the chimney that is below the roofline (inside the building) – which could be around 80 per cent of the whole feature – could be demolished as a permitted (P) activity (treated as an exclusion). Therefore, applicants have argued that the retention of the chimney above the roof is not required. Council’s built heritage specialists support the retention of original chimneys for scheduled historic heritage places and consider that removal of a chimney is detrimental to the values of historic heritage places and the removal of a chimney from the exterior of a building is an external alteration / modification requiring a consent.

Another example – which is described in more detail in Section 4.3.2 on archeology – is the definition of an archaeological site. In the AUP, an archaeological site has the same meaning as in the Heritage New Zealand Pouhere Taonga Act 2014 (i.e. the pre-1900 *terminus ante quem* date is used). This makes it very hard to assess and enforce archaeological rules when sites have pre- and post-1900 occupation.

⁵⁶ Built Heritage Specialist Memo (2018), LUC60317036 – Kingsley Street, Westmere Auckland 1022.

⁵⁷ Decision on non-notified application for resource consent under the Resource Management Act 1991 (RMA) - LUC60317036.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Lack of necessary power in the rules

There are also cases where historic heritage rules “lack teeth” (i.e. lack the necessary power to avoid inappropriate works that may be detrimental to the heritage values of a scheduled built heritage place).

The most major issue, which may be more of a reflection of the effectiveness of the RMA than the AUP, is termed “demolition by neglect”. This issue arises when owners of historic heritage places (particularly buildings) neglect the upkeep of the place, resulting in the place becoming degraded to such a point that it is a dangerous safety issue, resulting in its demolition. The AUP (as a reflection of the RMA) is reactive and cannot require action to be taken on owners. One example is shown in the following case study.

Case study: St Andrews Sunday School Hall (former), 40 Rankin Avenue, New Lynn⁵⁸

Opened in 1929, the St Andrews Sunday School Hall was built to support the former St Andrews Church across the road (built 1919) at 39 Margan Avenue, New Lynn. The hall was designed by notable Auckland architect H. Clinton Savage and was an excellent example of his work. The hall was a rare surviving example of a purpose-built Sunday School building.



The Sunday School in September 2019 (google street view image)

The deteriorating state of the building was first noted by the council in 2002 when it sent a letter to the Auckland District Methodist Tongan Trust regarding unsafe brickwork on the building. In 2003 the property (consisting of the Sunday School building and the manse) was sold by the Methodist church to a succession of private owners. The building continued to be used for worship services at points during private ownership until 2010 when Auckland Council issued a dangerous building closure notice. Sections of the brick superstructure required strengthening work.

During its period of private ownership, there were calls from the community for the building to be restored, particularly through a local newspaper campaign in 2008. An engineering assessment of the

⁵⁸ Based on information from Burgess (2016) St Andrews Hall Conservation Plan.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

building was commissioned by the owners in 2010. However, no work was done on the building. The building was neglected and deteriorated to the point where in 2012 the building was deemed to be a dangerous and an earthquake-prone building under the Building Act (2004). In 2014, part of the eastern wall collapsed, and the owners were ordered to erect a climb-resistant safety barrier around the building. No actual work was done by the owner to remediate the problems noted in the Dangerous Building Notices.

Following a Whau Local Board meeting in 2018, Auckland Council commissioned a report to provide a proposed scope of works for the stabilisation of the building so that it would not deteriorate further and would be made safe. The owner indicated they intended to restore the building. However, by 2019, the building was in such a poor state that demolition was regarded as the only way to remove danger for the public. The building was demolished in November 2019.

The New Lynn Protection Society stated the following on their website:

This piece of our history and has been left to fall into disrepair by private owner[s], the local community and the council have tried for many years to save this building but the owner has always had the intention of "DEMOLITION BY NEGLECT".⁵⁹

This case study demonstrates the inability to compel owners to maintain and look after their buildings to avoid demolition by neglect.



The Sunday School site following demolition in 2022 (Auckland Council).

⁵⁹ New Lynn Protection Society (2019) <https://www.newlynnprotectionsociety.co.nz/page/church-hall/>.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

There is also a lack of power in the AUP rules controlling for digital billboards on or close to scheduled historic heritage places. There is a standard in the signage chapter (E23) triggering consent for billboards within 30 metres of a scheduled historic heritage place. However, there is no policy direction to “avoid”, resulting in limited instances where the conversion of a static billboard to a digital billboard has been declined. Policy 8 in Chapter 5.2 does relate to managing the effects of development adjacent to historic heritage places. However, Chapter D17 does not have any rules to strengthen this policy (see Section 4.3.5 for more discussion).

There are also examples of rules relating to HHAs being too general and unclear. When conceived during the development of the proposed AUP, the idea was that HHAs could potentially be applied to a number of different types of heritage. This is partly why the rules are more general. However, to date, HHAs have only been used in relation to residential and commercial built heritage areas.

One example of the HHA rules being general or unclear is that the HHA activity table does not include features or roads, and only includes contributing or non-contributing properties, leaving a gap relating to other features in HHAs, such as fences. A33 of the Activity Table relates to modification to, and restoration of, a building, structure, or feature within an HHA, except for controlled and restricted discretionary activities specifically listed in Table D17.4.3. D17.7.1 lists matters of control, which are (1) demolition or destruction of 30 per cent or more; (2) relocation of features; (3) modifications for seismic strengthening; and (4) forestry 15m from archaeological site. D17.7.2 lists relevant assessment criteria that council will consider, but only in relation to the controlled activities listed in D17.7.1. There is therefore no ability to control modification and restoration activities in an HHA outside this list. Another example relates to modifications to a non-contributing site which are a controlled activity under rule D17.4.3(A33). This rule does not track through the provisions. There are no matters of control for this activity in D17.7.1, and no corresponding assessment criteria in D17.7.2. This makes it highly difficult to process a controlled activity consent for modifications to a non-contributing site, because there is nothing to assess it against.

Each HHA has a statement of significance. Some of these statements do provide some policy directions. However, others are limited more to physical descriptions. Without policy directions, the statements are difficult to use for consenting. In addition, where statements refer to features over which there are no direct heritage resource consent controls, this can also become problematic (such as road carriage, bluestone kerbing, references to buildings not within the HHA area).

Another example of rules not having enough power relates to cumulative effects of subsequent resource consents or variations to resource consents. One such example is described in the following case study.

Case study: Civic Administration building, 1 Greys Avenue, Auckland Central.

A Category A historic heritage place, ID 02723

The proposal was to convert the former Civic Administration building (CAB) into over 100 apartments. The application was granted with a robust set of conditions to protect the heritage values of the Category A scheduled CAB. One of these conditions included the façade of the CAB being reconstructed to its original design. The council built heritage specialist maintained that the heritage values of the CAB would be retained despite the loss of a considerable amount of original fabric because of the reconstruction the original façade.

Following approval of consent, a variation was later proposed. The proposal was to change the design of the curtain wall façade on the CAB so that it would not be a replica but would maintain the rhythm of the façade’s grid pattern. The council heritage specialist did not support the variation and explained in a memo:

The CAB is an unusual situation, in that it is unusable in its current state and requires the removal of more original fabric than is typically recommended or supported on heritage buildings,

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

especially Category A heritage buildings. The loss of the original curtain wall system was accepted in the original 2017 consent by my team only because the adverse effects caused by fabric loss would be mitigated by reconstructing the original façade with new material as a faithful replica. It was accepted that the reconstructed façade would be an exact match in terms of appearance, while being designed to meet modern building standards. This s127 variation eliminates this essential mitigation, and consequently will adversely affect the scheduled heritage values of the CAB.⁶⁰



The Civic Building in 2015 (Auckland Council).

Ultimately, the council's reporting planner favoured the views of the applicant's heritage specialist and recommended granting the variation. The duty commissioner ultimately granted the variation. The reporting planner found the actual and potential effects from the proposed variation to be acceptable, because:

a. Significant adverse effects that would reduce or destroy the heritage values of the scheduled historic place are avoided. This is based on an acceptance of the assessment of effects of the proposed works undertaken by the applicant's heritage expert, which has considered in detail the existing heritage values of the place, the significance of the place, and the relationship between the building and its environment.

b. The proposed replacement façade on the east and west elevations of the building will continue to mitigate adverse effects that result from the loss of the original façade fabric, noting though that this fabric is in effect damaged as a result of its asbestos contamination.

⁶⁰ Built Heritage Specialist Memo - LUC60118171-B (2019).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

c. No modifications are proposed to the primary features of the place.

d. The applicant's assessment that the Category A significance thresholds for the place will continue to be met is accepted.

e. The degree of visual change to the building will remain minor for most persons who view it from the surrounding area. It is unlikely that there will be any recognisable adverse effect on visual amenity.

f. The grant of this application will continue to provide for the adaptation of the building in accordance with the approved residential end use. This is a positive environmental effect.

This case study highlights the effects subsequent proposals and consent variations can have on historic heritage places, and how significant and cumulative modifications can affect the values for which the places was originally scheduled.

General errors and anomalies in the schedule

For various reasons, there can be errors and anomalies in historic heritage place entries in the Schedule of Historic Heritage and in planning maps in Auckland Council GeoMaps. Many of these are minor and have no effect on the management of places (such as errors with place names, typographical errors, and spelling mistakes). However, some can have a more-than-minor effect on the management of the place. Examples include: the extent of place not containing the historic heritage values of the place (being too large or too small), exclusions (features with little or no heritage value) not being identified, heritage values being wrong, primary features not being identified, and exclusions/features being worded ambiguously.

As highlighted in Section 4.2.1.3, the Schedule of Historic Heritage and the planning maps are constantly being reviewed and corrected when appropriate to make them robust. However, in instances where corrections have not been made before an application has been lodged, a resource consent may be overly onerous and inefficient to the applicant. For example, if an applicant makes an application to remove a window from a non-historic building on their property (which is not identified as an exclusion), such as a garage, they would require resource consent. Another example is the alteration or demolition of non-historic buildings and structures within the extent of place of a scheduled place that has archaeological values. Where such alteration or demolition does not involve earthworks, there is no intention to manage these activities, but there is no distinction in the rules. These kinds of instances can encourage people to do things illegally – possibly leading to inappropriate works on historic heritage places. In addition, in cases where the extent of place does not fully cover the historic heritage values of the place, or a primary feature is not defined clearly enough, inappropriate work may be carried out.

4.3.1.2 Remediation and mitigation of inappropriate development, subdivision, use of historic heritage places

If unable to be avoided, in general, inappropriate works on scheduled built heritage can be remedied or mitigated. Many of these mitigation/remediations are through consent conditions, which can be highly effective if they are carefully worded to be enforceable. As shown in the previous section, if a built heritage resource consent is supported by council's specialists, then most of the time it is supported *with recommended conditions* (54 per cent). Of all those supported by council's specialists, 61 per cent had recommended conditions to remedy or mitigate inappropriate works on built heritage, while the remaining 39 per cent were supported without any conditions.

The most common type of mitigation/remediation for built heritage is restorative changes. For example, if an application was for a large addition to a scheduled heritage building, one way to mitigate this change is

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

to do something beneficial to another part of the building or setting. This could include removing a recent addition or feature of the building which is considered “intrusive” to the heritage values of the building.

Another form of mitigation/remediation is through input into the design of an application. Through built heritage specialists working with the applicant and their architect, designs can be made more appropriate. For example, an addition can be made more appropriate by changing the design or location.

Another form of mitigation/remediation often used is the production of heritage management plans. These can include maintenance plans, conservation plans or conservation policies. Their aim is to ensure long-term stewardship of the heritage building.

Historical interpretation can also be a way to mitigate/remedy changes to a built heritage place. This may include signage, online information, being part of a heritage trail, or a historical publication. This type of mitigation/remediation would not mitigate/remedy all effects but is often used as part of the package of mitigation/remediation.

With large projects, conditions may also include having heritage construction management plans, pre-start meetings, details of design elements (e.g. for signage and joinery), having interpretive signage about the history of the place, and further conservation management documents (e.g. conservation policies).

There can, however, be difficulties with remedy and mitigation measures. For example, the scope of a resource consent may only be for part of the area of a heritage place. For instance, if a building – because of safety requirements – requires unavoidable demolition, a mitigation measure may be to restore other buildings or features within the heritage place. However, because the scope of the resource consent is only for the particular building to be demolished, then mitigation measures cannot extend beyond the scope of the building in question.

4.3.2 Measures and Analysis – Archaeology

Around 13 per cent of all heritage resource consents between 2016 and 2021 related to archaeology.

4.3.2.1 Avoidance of inappropriate development, subdivision, use of historic heritage places

If an archaeological site is scheduled and is identified to have additional archaeological controls, then generally inappropriate development (that is, work not supported by council’s heritage specialists due to there being overly adverse impacts on the historic heritage values of the place) is avoided. In fact, since the AUP became operative, no archaeological resource consent has been refused. However, this is not necessarily due to applicants respecting the heritage values of a place in their application, but – more likely – reflects the work of heritage specialists negotiating with the applicants to refine a proposal (if heritage specialists are involved by the resource consent planner in the application) and the planning assessment of the application as a whole. Heritage specialists may not support the application first lodged by the applicant, but negotiated changes and the inclusion of conditions during the consenting process can result in a different proposal that may be a better outcome for the heritage place.

Like built heritage applications, heritage outcomes of a lodged application can benefit greatly from pre-application meetings, as applicants can better understand the values of the historic heritage place and can be led to outcomes which avoid damage to archaeology. Applicants may be led to engage a heritage consultant to help with the assessment and design of the application. Avoidance of inappropriate work can be straightforward if designs inappropriate to heritage have not already been committed to at an early stage.

However (apart from large-scale projects), heritage specialists are often not involved in pre-application meetings for archaeological applications. Sometimes resource consent planners may determine that heritage specialist input is not needed at the pre-application stage. There have been cases where

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

consultation with mana whenua and/or a report from Heritage New Zealand Pouhere Taonga have led resource consent planners to decide that the views of those groups supersede AUP provisions, and heritage specialist input was not required. This increases the chance of poor heritage outcomes as heritage specialists are unable to comment on any elements of the proposal.

Unlike built heritage, which is often the primary focus of the application, archaeological consents are often landscape-focussed and archaeological values are one of many issues to be addressed, rather than the primary focus. Archaeology can be seen as an obstacle to development, rather than as an opportunity. Most developers want a blank canvas with all restrictions (such as archaeological sites and trees) removed. Indeed, some applicants refuse to have a pre-application meeting and instead lodge an application without any input from heritage specialists.

To a large extent, resource consent status affects the involvement of heritage specialists and the outcome of resource consents more than scheduling. A resource consent planner may accept heritage specialist recommendations of avoidance (and also remediation/mitigation recommendations) more readily when the application is non-complying and the site is not scheduled than when the status is restricted discretionary and the site is scheduled.

For unscheduled archaeology, heritage specialists are often consulted when the site has already been modified through previous land activities. This makes it difficult to argue for positive outcomes when there is already damage to the heritage values of the place. Instead, mitigation measures must be used (see the next section).

Aside from the involvement of heritage specialists in resource consents, there are four general themes that lead to inappropriate heritage outcomes for archaeological resource consents. These are outlined below.

Standing of the AUP rules

External archaeological consultant reports frequently do not consider or assess proposals against AUP provisions and applications can often have approved Heritage New Zealand Pouhere Taonga authority applications attached, which significantly undermines any internal (Heritage Unit) assessment of effects. These cases exacerbate the lack of consistent involvement of heritage specialists in archaeological consents explained above.

Likewise, as noted in the previous section, designations on scheduled historic heritage places can lead to outcomes that are not as appropriate for heritage as would normally be expected. However, for example in regional parks, historic heritage rules still have standing, despite the designation. Often this is not well known by applicants.

Definition of an archaeological site

In the AUP, an archaeological site has the same meaning as in the Heritage New Zealand Pouhere Taonga Act 2014 (i.e. the pre-1900 *terminus ante quem* date is used). This makes it very hard to assess and enforce archaeological rules when sites have pre- and post-1900 occupation, such as parks and cemeteries (discussed in the next section). Features which are post-1900 are not controlled by the archaeological controls of the AUP even though they can be of great significance such as industrial brickwork remains and World War I and II military installations. Likewise, the post-1900 features are also not covered by the accidental discovery rule outlined in Chapter E12 Land disturbance and noted in Chapter D17. One notable example described in the following case study.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Case study: The crash site of the USAAF Boeing B-17 Flying Fortress, Whenuapai

The USAAF Boeing B-17 Flying Fortress ('Texas Tornado') bomber crashed in Whenuapai on 9 June 1942. All eleven occupants were killed. A resource consent application was made to undertake bulk earthworks (which would destroy all evidence associated with the crash site) in preparation for future land development upon the site. However, because the site related to post-1900 activity, the archaeological site did not fit into the AUP definition, even though the site was of high significance. Mitigation measures (monitoring of earthworks and recording of evidence) had to be negotiated with the applicant to ensure better heritage outcomes.



A volunteer excavates remnants of the Texas Tornado in 2017.⁶¹

Another example is of a resource consent for a biennial sculpture exhibition at Fort Takapuna Reserve (scheduled as Fort Takapuna (Operetu)/ Fort Cautley military complex R11_1723, ID 01117). The place includes both pre- and post-1900 archaeology. However, because the Accidental Discovery Rule (ADR) is tied to the HNZPT definition of an archaeological site, the ADR had to be inserted as a condition to the resource consent.

Lack of clarity

As explained in the built heritage section, HHA rules can also be problematic for archaeology. At present, one HHA (Princes Street, ID 02511) has additional archaeological controls. However, D17.4.2 "Activity Table - Activities subject to additional archaeological rules" does not include a column for HHAs and the columns only refer to the primary feature of category A, A* and B places and activities within the extent of place of these places. This leaves a major gap where some activities that may occur in the Princes Street HHA, and in any future HHAs that have additional archaeological controls, are not captured.

General errors and anomalies in the schedule

⁶¹ Stuff (2017). World War II crash explored as part of the Auckland Heritage Festival, 4 October 2017, accessed from: <https://www.stuff.co.nz/auckland/local-news/western-leader/97452061/world-war-ii-crash-explored-as-part-of-the-auckland-heritage-festival>.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

As described in the built heritage section above, there can be errors and anomalies in historic heritage place entries in the Schedule of Historic Heritage and in planning maps in Auckland Council GeoMaps. Some of these can lead to overly onerous restrictions (such as the extent of place being too large, or exclusions not being identified) or may lead to works being permitted (and inappropriate works happening) when they should not be (such as the extent of place being too small or exclusions being worded ambiguously).

One major example in terms of archaeology which may lead to inappropriate works being permitted the lack of “additional archaeological controls” identified for some historic heritage places. There are a number of cases where historic heritage places with archaeology do not have “yes” under the additional archaeological controls column in the Schedule of Historic Heritage. This can mean adverse effects for heritage. For example, regarding land disturbance (earthworks) and scheduled historic heritage places, activities that are normally permitted are made restricted discretionary if the place is identified as being subject to archaeological rules in the Schedule of Historic Heritage. However, if it is not identified in the schedule, then this earthwork can be permitted, and archaeological destruction cannot be avoided.

An example where the rules are overly onerous relates to the definition of earthworks. Earthworks can be permitted if they meet standards within D17. However, “earthworks” in the land disturbance chapters of E11 and E12, is a restricted discretionary activity where archaeological controls apply. This means resource consent is required, therefore contradicting the permitted activity standards in D17. The intent of the historic heritage permitted activity standard was to provide for non-invasive investigation as a permitted activity. However, the earthworks definition, which is in turn linked to the land disturbance definition, has no lower threshold. Therefore, while small diameter boring and drilling is specifically excluded from that definition, test pitting, which is permitted in the overlay rules as a non-invasive archaeological investigation, is not.

In addition, an express requirement of *Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011* is that a detailed site investigation is undertaken where the use of the site may change. Unlike seismic strengthening in buildings, there is no permitted activity standard in Chapter D17. Earthworks provisions in E11 and E12 are triggered where there are additional archaeological controls. Many industrial archaeological sites have some level of hazardous activity, and where development is to occur, hazardous activities and industries list investigations often need to occur before the detailed design stage.

Another example relates to the removal of trees greater than three metres in height or greater than 300mm in girth. In Table D17.4.2 (A26), removal is a discretionary activity, even when earthworks are not involved. This is overly onerous on an applicant.

Accidental Discovery Rule review

Through the Auckland Council Cultural Values Assessment (CVA) Review Project, the Accidental Discovery Rule (ADR) is being reviewed. The ADR applies to protect presently unknown archaeological values that may be discovered when works or development is undertaken. The rule appears in chapters E11 – Land Disturbance – Regional and E12 – Land Disturbance – District. E11.6.1 and E12.6.1 set out the standards that must be met if accidental discovery occurs. The review project is working with mana whenua and council departments to improve the application of Accidental Discovery Protocols.⁶² The review is ongoing, and a forward work programme has been established for the next three to five years.

The following case study provides an example of where the ADR worked well.

⁶² Cultural Values Assessment (CVA) Co-design Wānanga: Consultation Summary Report, May 2020.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Case study: 179A Sharp Road, Matakana⁶³

On a Friday afternoon, the director of the earthworks contractors alerted the Heritage Unit through a phone call and e-mail that marine shell had been discovered on the property. Earthworks were being undertaken for a house platform. There were no previously recorded archaeological sites in the vicinity, with the nearest previous known archaeological site c.0.8km to the east towards the edge of an estuary. The Heritage Unit provided a verbal and written explanation of the ADR process to follow, linking in council Compliance officers and Heritage New Zealand Pouhere Taonga. The Heritage Unit also worked with the earthworks contractor to identify a local consultant archaeologist who was available at short notice to visit the site late on Friday afternoon, on behalf of the contractors. The consultant archaeologist visited the site and confirmed that the marine shell was part of a previously unidentified midden deposit on the property.

Mana whenua were consulted, as provided for in the ADR process. The consultant archaeologist prepared a technical report, and an Authority was sought and obtained from Heritage New Zealand Pouhere Taonga before works recommenced.

The case study below provides an example of when the ADR process was not followed.

Case study: 35-37 Walmsley Road, Mangere (BUN60371651)

In February 2022, the consent holder contacted Regulatory Compliance officers that marine shell had been exposed during earthworks at the subject property. The consent holder advised that they engaged an archaeologist to come out and verify the marine shell as part of a midden deposit. Further, they advised that all works had stopped within 10 metres of the find. Seeking Heritage Unit advice, Regulatory Compliance contacted the Unit.

The Heritage Unit advised that the AUP Accidental Discovery Rule outlined in Chapter E12.6.1. needed to be followed. However, a review of the granted resource consent noted that the following condition had been included -

If, at any time during site works, potential koiwi (human remains), archaeology or artefacts are discovered, then the following discovery protocol is to be followed:

- a) All earthworks will cease in the immediate vicinity (at least 10m from the site of the discovery) while a suitably qualified archaeologist is consulted to establish the type of remains.*
- b) If the material is identified by the archaeologist as human, archaeology or artefact, earthworks must not be resumed in the affected area (as defined by the archaeologist). The Consent Holder must immediately advise the Team Leader, Compliance Monitoring South, Heritage New Zealand and Police (if human remains are found) and arrange a site inspection with these parties.*
- c) If the discovery contains koiwi, archaeology or artefacts of Maori origin, representatives from Ngāti Whātua Ōrākei, Ngai tai Ki Tamaki, Te Kawerau ā Maki, Ngāti Tamaoho, Te Ākitai Waiohua, Te Ahiwaru Waiohua, Ngāti Te Ata Waiohua, Ngāti Maru, Ngāti Tamaterā,*

⁶³ Resource consent number: LUC60373643.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Waikato-Tainui and Ngāti Whanaunga are to be provided information on the nature and location of the discovery.

d) The Consent Holder shall not recommence works until approved by the Team Leader, Compliance Monitoring South.

The inclusion of the wording within the condition overrode the AUP Accidental Discovery Rule –

- (1) Despite any other rule in this Plan permitting earthworks or land disturbance or any activity associated with earthworks or land disturbance, in the event of discovery of sensitive material which is not expressly provided for by any resource consent or other statutory authority, the standards and procedures set out in this rule must apply.

The AUP ADR has an allowance for works stopping within 20 metres of the find, rather than the 10 metres in the consent condition. It did not provide mana whenua with as much involvement as the ADR does (i.e. provided information).

An unscheduled midden site had been identified on the south side of the adjacent Tararata Creek. The overall status of the application is Discretionary. During the processing of the application, the advice of the Heritage Unit was not sought regarding the consequences of including the consent condition ADR.

4.3.2.2 Remediation and mitigation of inappropriate development, subdivision, use of historic heritage places

Inappropriate works to scheduled archaeological sites have generally been able to be remedied and mitigated. As mentioned in the section above, most of this occurs with collaboration between heritage specialists and applicants before or during the application process. However, recommended consent conditions are also often added to heritage specialist reports for applicants to comply with in order to avoid, remedy or mitigate adverse heritage effects.

Typical conditions include the following:

- Contractor briefings
- Management/conservation plan development
- Planted perimeters of archaeological sites
- Inclusion of archaeological sites in esplanade reserve area/extension of esplanade reserve areas to include archaeological sites
- Public interpretation – update of records (such as the CHI), site signage, etc.
- Restrictions on materials and placement – boardwalks/signage/seats, etc.
- Screening of development
- Stabilisation planting – retain features
- Stabilisation/conservation (particularly for built heritage ruins)
- Stock removal/fencing/appropriate alternative vegetation management techniques
- Vegetation clearance off archaeological sites.

Less typical conditions include:

- Artefact curation (e.g. artefacts to be added to a museum collection)
- Heritage covenants
- Historic reserve status
- Public dissemination of information through talks, brochures, artefact display, etc.
- Reconstruction (e.g. a stone wall).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

An analysis of the resource consent applications received by the Cultural Heritage Implementation Team finds that the great majority of resource consent decision reports include archaeological conditions or advice notes (such as requiring Heritage New Zealand Pouhere Taonga authority for archaeological sites; and following the Protected Objects Act 1975 for Māori artefacts). From a sample of the 2020 resource consents in the RCD – CHIT spreadsheet, only four decision reports (out of the 62 sample) did not have archaeological conditions: two of these were unscheduled sites and two were scheduled (these were for activities which avoided any potential ground disturbance and therefore the potential to disturb any archaeology).

In terms of compliance with conditions, most compliance investigations relate to non-compliance with the ADR. The ADR acts as a precautionary measure to protect presently unknown archaeological values that may be discovered when works or development are undertaken. It is outlined in the standards of Chapter E12 Land Disturbance – District. On discovery of any sensitive material, the owner of the site or the consent holder must take the following steps:

- cease works and secure the area
- inform relevant authorities and parties
- wait for and enable inspection of the site.

4.3.3 Measures and Analysis – Cemeteries

Around three per cent of all heritage resource consents between 2016 to 2021 related to cemeteries.

4.3.3.1 Avoidance of inappropriate development, subdivision, use of historic heritage places

Generally, inappropriate works to scheduled cemeteries is avoided.

Approximately a quarter of all work in scheduled cemeteries relates to the restoration or enhancement of historical family graves. This work can be carried out as a permitted activity provided the standards are met for the work to be considered maintenance and repair. Council specialists provide guidance and recommendations for stonemasons and conservators. For this type of work, usually no additional applications or permissions are required. The following case study provides an example.

Case Study: Restoration of three headstones, Albany Village Cemetery (ID 00844)

A specialist from the Cultural Heritage Implementation team was asked to review an application made to the North Shore Cemeteries Team regarding the restoration of a grave in disrepair. The grave in question had a failing concrete cover and the three headstones on the grave were in varying states of instability. The stonemason intended to install stainless steel backing plates to strengthen the headstones. This was seen as a less-than-ideal heritage outcome as the addition of modern fabric would detract from the heritage values of the grave, and would require resource consent. Through collaborative discussion between the specialist and the stonemason, a revised methodology was reached that did not include steel backing plates, enabling the repairs to be carried out as a permitted activity and without impacting the heritage values of the cemetery.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau



Before (left) and after (right) the restoration of the headstones in Albany Village Cemetery

Another stream of work in scheduled cemeteries relates to the addition of plaques to mark ash internments in existing graves. For this work, council heritage specialists typically work directly with applicants and stonemasons, providing free advice and help with applications to settle on a suitable design which is in line with the permitted standard (D17.6.5B). This means a resource consent is not required at all, making the process effective and efficient for the applicants and the council. There have been some complaints from applicants that the standards are too restrictive in size and material, and that the size allowances are not clear (compared to if dimensions and area were used).

Most work in scheduled cemeteries relates to the addition of new headstones where there was not one previously (there is no permitted activity standard for new headstones where there was not one previously). In these cases, these works must go through the resource consent process as ‘modifications’ to a historic heritage place. Pre-application meetings with applicants and/or stonemasons help to refine the design to be sensitive to the heritage values of the place. Council heritage specialists work with the applicants or their representatives to prepare a resource consent application, often providing heritage impact assessments and assessments of environmental effects for the applicant *pro bono*. This work is typically carried out without charge, and a further fee waiver provided for resource consent fees. As outlined in Indicator 4 in the next section, a significant tool to achieve avoidance of inappropriate works is through resource consent fee waivers. Without this incentive, there would be significant backlash and non-compliance from applicants. This workable solution has led to avoidance but is not an efficient solution. An example is given in the case study below.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

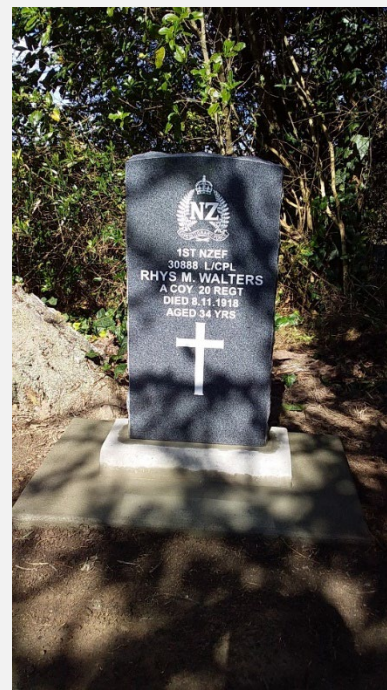
Case study: Installation of a gravestone in Pompallier Cemetery, Glenfield

A specialist from the Cultural Heritage Implementation Team was contacted by a funeral services company for advice on installing a gravestone in the Pompallier Cemetery in Glenfield, which is scheduled as a Category A* historic heritage place in the AUP. The funeral services company was acting on behalf of a family who wished to install a headstone for their deceased relative as his grave had been unmarked since his burial in 1918.

The funeral services company was aware of resource consent requirements, having been through this process previously, and requested assistance in preparing and lodging a resource consent application for the headstone installation. Discussions were had about acceptable designs within the cemetery to ensure a design that would not impact the values for which the cemetery is scheduled. The customer then provided a detailed design and information on the deceased that would form the basis of an Assessment of Environmental Effects (AEE) and Heritage Impact Assessment (HIA). These documents were prepared by the specialist following an existing acceptable template designed in conjunction with the resource consents team.

Once the documents were finalised, they were lodged directly with the resource consents team with a fee waiver in place. The resource consent was processed and granted with no charge and limited conditions. Once the resource consent was received the customer was able to install the headstone and provided evidence of the finished memorial to the Heritage Unit.

The process was collaborative and iterative and ultimately delivered a good result for the funeral services company and the family at no additional charge while ensuring the heritage values of the scheduled cemetery were protected.



Images of the unmarked grave (left) and the new gravestone (right) (Joe Mills, Auckland Council).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Other work in scheduled cemeteries relates to where the applicant wishes to install a plaque outside of the permitted activity standards (for example, a body burial where the applicant does not want a headstone and is fine with a plaque), or where the applicant wishes to carry out restoration projects that fall outside of the standards for maintenance and repair. In these cases, because they do not meet the standard, the same process outlined above is followed.

4.3.3.2 Remediation and mitigation of inappropriate development, subdivision, use of historic heritage places

For cemeteries, there are generally few to no consent conditions to be complied with, other than adherence to the submitted design. Sympathetic design may include requirements on form of monument/materials used/colour of materials/inscription style and backing colour.

4.3.4 Zoning and historic heritage places

Another important aspect relating to the avoidance, remediation, and mitigation of inappropriate works to historic heritage places relates to zoning. Zoning can be an important factor in the expectations of the applicant and the initial design of the application.

As illustrated in Figure 19 below, historic heritage places are spread over a variety of zones and other types of areas.

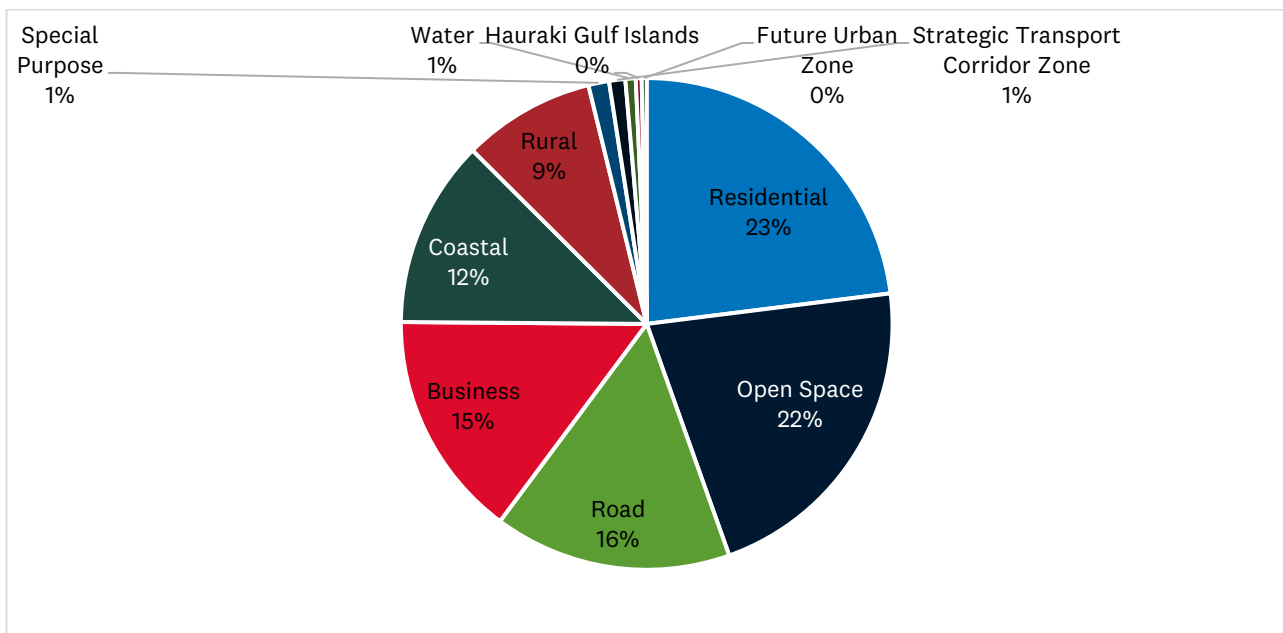


Figure 19. Proportion of historic heritage places within a general zone/area.

Almost half of all historic heritage places are in either residential zoning (23 per cent) or open space zoning (22 per cent). Figure 20 provides a further breakdown, showing four general types of historic heritage places and where they are located. In many cases, historic heritage places are located across two or more zones (meaning the per centages may add up to over 100 per cent). Built heritage places (not including historic heritage areas) are in a wider range of zones and areas than other types of historic heritage places. However, nearly half (43 per cent) of all built heritage places are in a residential zone. The great majority of archaeological places are either located in an open space zone (55 per cent) or in a coastal zone (40 per cent). Most (65 per cent) historic heritage areas are in a residential zone. Most cemeteries (63 per cent) are in open space zoning.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

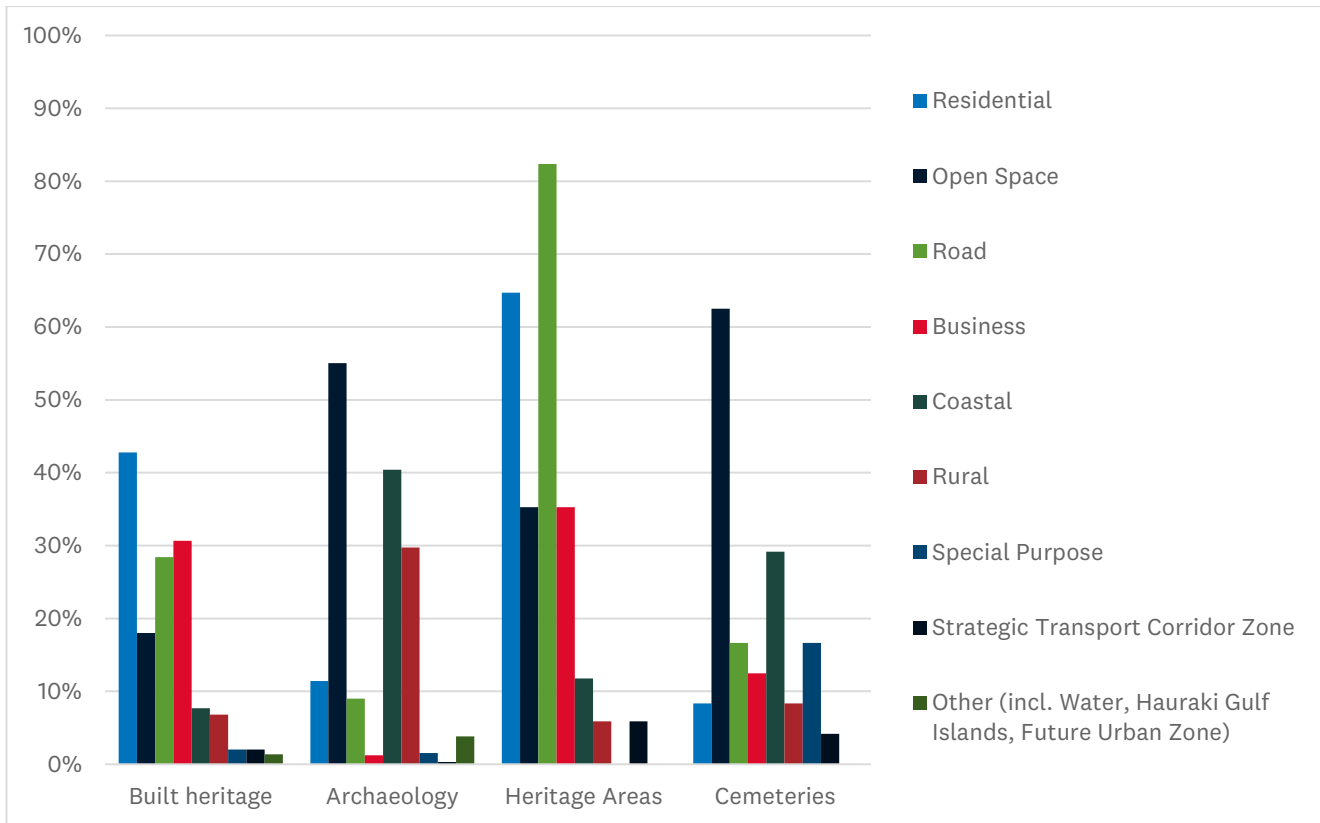


Figure 20. General types of historic heritage places and the proportion within general zones/areas (Note: the percentages for each type add up to over 100 per cent as some places overlap with two or more different zones).

The zones in which historic heritage places are located can have a significant impact on the outcomes of works on historic heritage, particularly in zones which allow intensification. Zoning can set up a different expectation for the applicant and a presumption that the property can be developed in line with the objectives of the AUP zoning. Examples include a large lot (former rural property) in an urban zone (e.g. a former farming homestead on a farm estate now being developed as part of a terrace housing and apartment [THAB] zone which allows buildings up to seven storeys); an archaeological landscape being rezoned from rural to urban; or an applicant wanting a large tower in the city centre zone on the site of a historic heritage place. In these cases, the push to avoid or mitigate inappropriate historic heritage outcomes starts on the back foot. Sometimes the level of development envisaged in the zone may not be possible in the historic heritage place.

Lower density urban, rural, and open space zones are often the most commensurate with supporting historic heritage values as the development expectations are less than other zones. As shown in Figure 19, a good proportion of historic heritage places are within lower density zones, such as open space (22 per cent), coastal (12 per cent) and rural (9 per cent). Table 8 below shows a breakdown of historic heritage places by business and residential zones. Of note regarding the issue described above are the 198 places (nine per cent overall) being fully or partially within the business – city centre zone and 100 historic heritage places (four per cent overall) within the most intensive residential zone (THAB zone). However, it is also important to note that most historic heritage places within residential zones are in the single house zone, which is one of the least intensive residential zones.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Table 8. Breakdown of historic heritage places by business and residential zones

ZONE	NUMBER	PROPORTION OVERALL
Business - City Centre Zone	198	9%
Business - Heavy Industry Zone	2	0%
Business - Light Industry Zone	23	1%
Business - Local Centre Zone	34	1%
Business - Metropolitan Centre Zone	19	1%
Business - Mixed Use Zone	69	3%
Business - Neighbourhood Centre Zone	36	2%
Business - Town Centre Zone	125	5%
Residential - Large Lot Zone	34	1%
Residential - Mixed Housing Suburban Zone	144	6%
Residential - Mixed Housing Urban Zone	121	5%
Residential - Rural and Coastal Settlement Zone	21	1%
Residential - Single House Zone	359	16%
Residential - Terrace Housing and Apartment Building Zone	100	4%

4.3.5 Historic heritage places and adjacent development

Chapter 5.2.2 Policy 8 relates to managing the effects of development adjacent to historic heritage places. The policy can lead to good heritage outcomes through mitigation of effects on heritage values of these historic heritage places. The policy reads:

Encourage new development to have regard to the protection and conservation of the historic heritage values of any adjacent significant historic heritage places.

The policy, however, has no clear connection to lower order provisions in Chapter D17. Nevertheless, the policy has been cited in heritage resource consents. According to the RCD - BHIT spreadsheet log, 46 resource consents related to properties adjacent to built heritage places between 2018 and 2020. Figure 21 shows the types of consents the council Heritage Unit’s built heritage implementation team were involved in relating to adjacent development. A significant proportion (37 per cent) relates to signage.

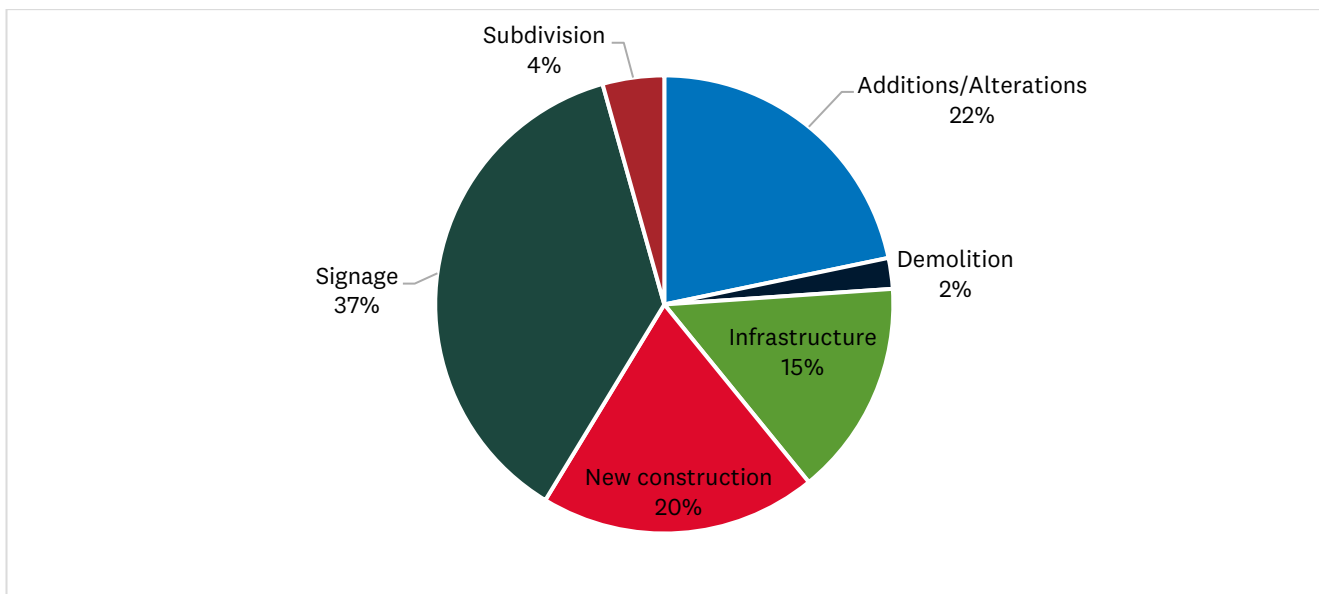


Figure 21. Types of resource consents relating to properties adjacent to historic heritage places

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

There are sometimes complaints from the public about work adjacent to historic heritage places, particularly around billboards and construction effects (infrastructure). Billboards (including digital billboards) can obscure or dominate nearby places, diminishing how the public can appreciate the heritage values of the place (particularly aesthetic values). However, because there are no explicit rules in D17 controlling adjacent development, there is no requirement for applicants to take this into account. Despite using the policy in heritage specialist reports, often it is not successful in providing good heritage outcomes. Furthermore, because of the lack of policy cascade and different interpretations of “adjacent”, there will be several cases where heritage advice is not sought despite adjacent development having an effect on historic heritage places. One example is shown in the following case study.

Case study: Residential development in Glendowie

One example where the policy on adjacent development was unable to be enforced is in Glendowie, where an application for residential development was granted adjacent to Taurere/Taylor’s Hill (a Category B scheduled historic heritage archaeological site, ID 01591). Auckland Council heritage specialists had no remit to request an archaeological assessment, despite the development likely having considerable risks for archaeology. This was because the development was not within the historic heritage overlay and was a restricted discretionary activity with no matters for discretion relating to archaeology. As a result, any effects from the development on archaeology were only governed by the accidental discovery rule protocol. Auckland Council heritage specialists could only strongly encourage the applicant to undertake an archaeological assessment and then discuss these findings with HNZPT.

However, there have been some examples where the policy, despite having no clear cascade to rules, has been used successfully, as shown in the case study below.

Case study: Science of the Soul church development at 315 Ihumatao Road, Māngere⁶⁴

This development was adjacent to the Ōtuataua Stonefields Historic Reserve which has recorded archaeological sites and is part of a significant wider heritage landscape that includes two scheduled historic heritage places: Ihumatao Mission Station site, including Māori settlement, Ellett Homestead, stone walls and structures, and fig tree (ID 02530) and Rennie Homestead (ID 01416). In the initial proposal, visual effects were considered more-than-minor on the adjacent Ōtuataua Stonefields Historic Reserve and the view between the stonefields and the scheduled mission site. The location of the church was moved to a lower building platform to reduce this effect. As mitigation of overall effects (mostly on the adjacent stone fields), the entire dry stone wall system was assessed and then rebuilt, and remaining features were covenanted.

Another example where Chapter 5.2.2 Policy 8 had some traction was an application which proposed to replace existing static billboards with a digital billboard on Great North Road near MOTAT, and its scheduled Category A pumphouse (ID 01678). The application was assessed in terms of its potential impacts on the pumphouse, specifically the digital billboard acting as a distraction to the visual values of the pumphouse. Ultimately the application was granted, but some mitigation measures were made during the application process, including, a reduction in size, a slight change in positioning, and an increase to 20

⁶⁴ Andesite Architects (2018). Science of the Soul Study Centre, accessed from: <https://www.andesite.nz/projects/science-of-the-soul-study-centre-sssc>; Auckland Council (2018). Building walls, breaking barriers, accessed from: <https://ourauckland.aucklandcouncil.govt.nz/news/2018/10/otuataua-stonefields-wall-building-project-helps-break-barriers-and-protect-heritage/>.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

second dwell time. Further mitigation included using heritage images/interpretive material on the billboard, but this measure was not adopted.⁶⁵

The policy has also been used in private plan changes. For example, Private Plan Modification 44 sought to introduce a new precinct over properties in Newmarket to enable buildings up to 65 metres in height (compared to current 27 metre height control).⁶⁶ Policy 8 was specifically cited and used in the hearing to oppose the proposed precinct. The height and resultant visibility of development enabled by the proposed plan change provisions was considered by the heritage specialist to have the potential to impact on the heritage values (particularly its context and aesthetic values) of the Auckland Domain (ID 01566) and the Museum (ID 01640), and the way in which they are experienced. The commissioners agreed that the proposed plan change is inconsistent with Policy B5.2.2(8) and agreed with the heritage specialist advice.⁶⁷

Overall, the fact that the policy does not cascade down to the D17 rules makes it weak and difficult to use to support heritage recommendations. Furthermore, heritage advice may not be sought for adjacent development due to the scheduled extent of place not covering the property relating to the development. However, the policy is better than nothing, and some inappropriate effects to historic heritage places have been mitigated or avoided due to it. Ultimately, however, it is not overly effective.

4.3.6 Findings and recommendations⁶⁸

Overall, for built heritage, archaeology and cemeteries, the objectives, policies, and rules of the plan generally lead to an avoidance, or at least mitigation or remediation, of “inappropriate” outcomes for scheduled historic heritage places. Across all types of heritage, the best outcomes came from early engagement between the applicant and the heritage specialists, be that through informal advice and guidance or pre-application meetings.

- A general recommendation (not specifically related to the AUP) is to promote and have further guidance on pre-application meetings and other online tools/advice for applicants (as this indicator has shown that early engagement between applicants and heritage specialists can lead to good heritage outcomes).

Built heritage

The great majority (around 92 per cent) of historic heritage resource consent applications relating to built heritage were supported by council’s built heritage specialists. Most of these applications were supported following pre- or post-application meetings between applicants and council heritage specialists where the application was refined to produce an appropriate heritage outcome. Many of those supported were “supported with recommended conditions”, which are measures to ensure mitigation and remediation of effects on historic heritage places. Of the eight per cent which were not supported, most of these were granted through a hearing process and most of the applicants had their own heritage specialist advice that differed to that of council’s heritage specialists.

Inappropriate built heritage outcomes most often relate to:

- recommendations on applications made by consent planners, who are tasked with balancing competing considerations, which may impact on heritage values

⁶⁵ Resource consent LUC60331976.

⁶⁶ Private Plan Modification 44 Hearing Report: Volume One, accessed from: <https://www.aucklandcouncil.govt.nz/HearingDocuments/pc44-hearing-rpt-vol-one-2021-09-28.pdf>

⁶⁷ Ibid.

⁶⁸ These recommendations will need to be tested fully through an RMA Section 32 assessment and be considered alongside other recommendations from other topics and the Plans & Places Department work programme.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- inconsistencies with interpretation, such as interpretation of demolition percentages, when a modification is a new building, and historic heritage area rules being unclear
- a lack of strength in the rules, such as controls for digital billboards on or close to scheduled historic heritage places, the status of contributing properties within historic heritage areas, cumulative effects, and the impact of adjacent development on scheduled historic heritage places
- general errors/anomalies in the Schedule of Historic Heritage relating to extent of place, historic heritage values, exclusions, and primary features
- demolition by neglect.

Built heritage recommendations:

- Define and/or provide guidance/training on the terms and concepts below to improve interpretation internally and externally:
 - demolition calculations
 - when a modification is a new building or structure
 - the status of contributing properties within a historic heritage area.
- Include policy directions in all statements of significance for historic heritage areas (to better assist the application of historic heritage area rules).
- Refine provisions for historic heritage areas to ensure they are clear and cascade down to the rules and assessment criteria, including the inclusion of features and activities in the road reserve in the activity tables for historic heritage areas.
- Investigate standards for digital billboards close to or on scheduled historic heritage places.
- Address the policy cascade issue of B2.2 Policy 8, which, if clarified/included in Chapter D17, has the potential to enable effective avoidance and mitigation measures relating to the impact on historic heritage places of adjacent development.
- Correct further errors and improve the robustness of the Schedule of Historic Heritage, particularly including:
 - the extent of place
 - exclusions.
- Continue to enforce rules/conditions, particularly relating to cumulative effects.
- Investigate methods to avoid the issue of “demolition by neglect”.
- Redefine “archaeological site” (to be broader than the pre-1900 definition).

Archaeology

When council’s Heritage Unit archaeologists are involved in applications, negative effects are generally avoided, or at least mitigated or remediated on archaeological sites. Negotiation with the applicants to refine their proposal either before or during the application process has been effective, alongside conditions and advice notes appended to consent decisions.

However, an important finding is the lack of consistent involvement in applications from Heritage Unit archaeologists. In some cases, authorities issued to modify or destroy an archaeological site under the *Heritage New Zealand Pouhere Taonga Act 2014* are considered by consent planners to trump AUP policies and rules, which is not the case. This means Heritage Unit archaeologists are not consulted on applications which may lead to inappropriate outcomes for AUP historic heritage.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

In addition, the definition of archaeology as being “pre-1900” has also become problematic (for places with both pre- and post-1900 archaeology) and lead to inappropriate works on archaeological sites. A lack of clarity for archaeology provisions in historic heritage areas is also an issue.

General errors/anomalies in the Schedule of Historic Heritage can also lead to inappropriate outcomes for historic heritage, particularly relating to the identification of “additional rules for archaeological sites or features” for places in the Schedule of Historic Heritage, as well as the extent of place, historic heritage values, exclusions, and primary features.

Archaeology recommendations

- Provide refresher training for consent planners around when heritage specialist input is required when processing a resource consent.
- Define and/or provide guidance/training on the terms and concepts below to improve interpretation internally and externally:
 - the role of the AUP archaeological provisions compared to the provisions of the *Heritage New Zealand Pouhere Taonga Act 2014*
 - how to reduce the impact of designations works on archaeological sites and improve outcomes for historic heritage
 - Clarifying the management of archaeological values in historic heritage areas, such as a column in D17.4.2 Activity Table - Activities subject to additional archaeological rules.
- Redefine “archaeological site” (to be broader than the pre-1900 definition).
- Continue to correct errors and improve the robustness of the Schedule of Historic Heritage, particularly including:
 - the column indicating additional rules for archaeological sites or features
 - the extent of place
 - exclusions.
- Address the policy cascade issue of B2.2 Policy 8, which, if clarified/included in Chapter D17, has the potential to enable effective avoidance and mitigation measures relating to the impact on historic heritage places of adjacent development.
- Addressing the earthworks definition to avoid E11 and E12 contradicting the permitted activity standards in D17.
- Address Table D17.4.2 (A26) (Removal of trees greater than 3m in height or greater than 300mm girth) being a discretionary activity, even when earthworks are not involved, and the lack of an activity standard.

Cemeteries

A process of working closely with applicants and stonemasons prior to lodgement has meant that most proposals for cemetery restoration work are refined before they get to the resource consent stage. As a result, many do not have to go through the resource consent process, or if they do, the proposals are in-keeping with the objectives and policies of the AUP.

The lack of a permitted activity standard for various activities, such as new headstones, restoration work or installing a plaque outside of the permitted activity standards (for example, a body burial with a plaque) has been problematic. An alternative process has been devised and is effective, but it is time- and resource-consuming and not efficient.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

The definition of archaeological sites as “pre-1900” makes it hard to assess and enforce archaeological rules when cemeteries have both pre- and post-1900 features.

Cemetery recommendations

- Introduce a permitted activity standard for new headstones, restoration-type work and body burials where the applicant wants a plaque (as opposed to a headstone).
- Better define an archaeological site (to be broader than the pre-1900 definition).

4.3.7 Other observations

The following observations have been made in the section which are worth highlighting, even if they have no associated recommendations related to the effectiveness of the AUP.

Zones

A zone can create an expectation for applicants about what development can happen on a property, even when the level of development anticipated in the zone may result in an adverse effect on or even loss of the heritage values of the place. This observation is less about the AUP, and more about the understanding of applicants/landowners. A similar issue is observed for precincts; however, this is not within the scope of this monitoring report.

A proportion of historic heritage places are within lower density zones which may be more appropriate to heritage values, such as open space, coastal, rural, and lower-density residential zones. However, there are 100 historic heritage places fully or partially within the most intensive residential zone (THAB zone) and 198 within the business – city centre zone.

Recommendation:

- Provide further guidance for applicants on the relationship between zones and overlays, to help with an understanding of the appropriate development potential of a subject property.

Data

A general observation relating to this indicator is the inconsistency of data and its availability. The recommendations below highlight ways to find a better way to store, manage and access this data.

Recommendation:

- Continue to improve the processes of collating the RCD – PP data to minimise errors and gaps in resource consents data.
- Create a systematic process of collecting data for the RCD – BHIT spreadsheet, including data relating to the outcome of the resource consent.
- Adapt the RCD – CHIT spreadsheet to use columns like the RCD – BHIT spreadsheet in order to record the resource consent application number, the heritage advice and application outcome.

Objective 2:

B5.2.1(2) Significant historic heritage places are used appropriately, and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

4.4 Indicator 4

4. Protection, management, and conservation of historic heritage places, including retention, maintenance and adaptation, are encouraged

Objective 2 of the Chapter B5.2 directs that the protection, management, and conservation of historic heritage places is to be encouraged. As already mentioned in the discussion of Indicator 3, appropriate historic heritage outcomes are encouraged during the resource consent process. However, Indicator 4 focuses on how incentives encourage protection, management, and conservation of historic heritage places *before* they get to the resource consent stage.

Approximately 74 per cent of historic heritage places in the Schedule of Historic Heritage are in private ownership, which means there is a reliance on private owners to proactively maintain and conserve historic heritage for the benefit of present and future generations.⁶⁹ Regulatory and non-regulatory incentives are ways to encourage appropriate heritage works and complement the historic heritage rules of the AUP. The AUP makes specific mention of historic heritage incentives in Chapter D17 Schedule of Historic Heritage. Chapter D17 states that works appropriate to historic heritage (including maintenance, repair, use, development, or adaptation) should be encouraged and supported through regulatory and non-regulatory incentives. These include:

- (a) reducing or waiving consent application costs;
- (b) granting consent to infringement of the development standards for underlying zones and Auckland-wide rules where this does not result in significant adverse effects [supports heritage outcomes];
- (c) providing funding, grants and other incentives;
- (d) providing expert advice; or
- (e) providing transferable development rights.⁷⁰

For this indicator, the four main historic heritage incentives used through the AUP are examined in the rough order of most-commonly-used to least-commonly-used: expert advice and guidance; grants; regulatory incentives; and resource consent fee waivers.

4.4.1 Measures and Analysis

4.4.1.1 Expert advice and guidance

Free expert advice and guidance is offered by heritage specialists in the Auckland Council Heritage Unit to support applicants considering work on historic heritage places. This advice and guidance can be in the form of emails, phone calls, online guidance, and public talks and workshops. This kind of guidance and advice can be highly effective. They can:

- ensure owners of historic heritage places are well informed about choices

⁶⁹ Auckland's Heritage Counts (2021), p.14.

⁷⁰ AUP, D17.3 Policy (5).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- enable problem-solving and opportunity-spotting by the council
- improve public understanding about heritage
- help forge a better relationship between council staff and owners.⁷¹

The number of requests received by the Heritage Unit has not been recorded. However, approximately 10 requests are received by the Heritage Information and Advice Team each week. These relate to a variety of matters, not only to do with historic heritage, such as:

- Community heritage
- Cultural Heritage Inventory
- Heritage Orders
- Heritage Controls
- Information
- Insurance
- Land Information Memorandum
- Media/communications
- Nominations for places/features to be protected
- Special Character Areas
- Scheduled places
- Scheduled tree - pruning/removal
- Trees - location
- Trees - protection status.

Enquiries relating to built heritage, archaeology or cemeteries are passed on to relevant heritage specialists. In many cases as well, applicants directly contact heritage specialists. Applicants can gain a large amount of information from specialist advice. However, there is a limit to how much advice can be provided. Typically, advice is supposed to be around 15 minutes.

Between November 2016 and May 2021, Heritage Unit staff gave over 85 talks which encouraged good heritage outcomes. These included presentations, lectures, workshops, trainings, panels, walking tours, videos, podcasts, radio/TV interviews and conference presentations. They were given to a variety of audiences, including: mana whenua, the general public, heritage specialists, historical societies, school students, university students, other council departments and council contractors. Examples of these include:

- “Managing Auckland’s (Historic) Cemeteries” – Presentation to specialists (Heritage Planners Conference)
- “Monument Repair Restoration and Memorialisation: The Good the Bad and the permitted activity standard” – Presentation to Auckland Monumental Mason and Cemeteries Management, and Friends of Waikumete
- “Historic Heritage Management” – Presentation to Council Maintenance Contractors
- “Building walls, breaking barriers: Ihumatao stone wall restoration project” – an Our Auckland video presentation for the general public
- “Researching your house” – Presentation to the general public
- “Funding for Heritage” – Seminar for Heritage place owners
- “Stop the rot: Repairs and maintenance of historic homes” – Presentation for the general public and heritage place owners

⁷¹ Murray, C, D, Bade, and M. Seabrook-Davison (2014). *Review of Heritage Incentives for the Auckland Council*. Auckland Council and Market Economics, p.26.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- “Conservation Plan Implementation: through the lens of a council officer” – Lecture for the University of Auckland
- Internal training for Auckland Council resource consent planners and compliance staff.

Likewise, the Heritage Unit have produced over 20 pieces of guidance between November 2016 and May 2021 encouraging good heritage outcomes. Examples include:

- *Strategic Heritage Asset Management Plan* (2018) for council staff for the stewardship of council’s heritage buildings
- *Methodology and guidance for evaluating Auckland’s historic heritage* (2019) for heritage specialists evaluating historic heritage places
- Guidance on Parks and Heritage management (2019) for the council Community Facilities department
- Heritage guidance on specific historic heritage places for events staff (2019)
- Heritage guidance for council compliance teams (2019).

The [Auckland Council heritage website](#) contains information for the public on Tāmaki Makaurau Auckland’s heritage, including guidance and advice for resource consent applications. Table 9 below shows the webpages on the website and the number of page views (external to Auckland Council) between 2017 and 2021.⁷²

Table 9. The number of webpage views from the Auckland Council heritage website (Jan 2017- Dec 2021)

Webpage title	Total page views (excl. internal)					Total (2017-2021)
	2017	2018	2019	2020	2021	
Check if there are heritage controls on your property	N/A	126	3,345	4,972	5,510	13,953
Tāmaki Makaurau / Auckland's heritage	248	1,520	1,651	2,492	7,812	13,723
Our heritage	1,462	3,400	2,597	2,402	2,324	12,185
Search the Cultural Heritage Inventory	233	1,104	1,272	1,345	1,320	5,274
Legislation that protects our heritage	78	429	557	567	657	2,288
Heritage advice and consenting process	71	442	450	588	637	2,188
Heritage funding and grants	92	533	566	483	437	2,111
Protecting our heritage	97	214	273	332	336	1,252
What the heritage schedules are	N/A	33	453	374	298	1,158
Auckland's Heritage Counts programme	N/A	N/A	299	300	437	1,036
Heritage projects	85	298	324	161	154	1,022
Our heritage priorities	67	225	196	137	145	770
Heritage surveys and evaluations	N/A	N/A	5	251	407	663
How to nominate for heritage protection	N/A	11	144	195	196	546
Te Kāhu - focus on heritage newsletter	13	67	93	71	134	378
Mana whenua cultural and historic heritage places	N/A	10	100	82	75	267
How to evaluate Auckland's historic heritage	N/A	N/A	N/A	66	96	162
First World War centenary commemorations	18	49	N/A	N/A	N/A	67

⁷² The years with N/A show that the webpage was not in existence at that time.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

There were over 17,693 page views of the Auckland Council Heritage webpage in 2020-21. That is an increase of 38 per cent from 2019-20 and 66 per cent since 2016-17. Figure 22 below shows the general increase in page views of the website since November 2016. “Page views” represent each time a user visits a page. In this way, a single user loading the same page five times in a single session will generate five page views. “Unique page views” are calculated on a session basis, meaning if the same user loads a page five times in a given session, it is only calculated as one unique page view. The data shows that the website is being used increasingly often for information and guidance on Tāmaki Makaurau Auckland’s heritage.

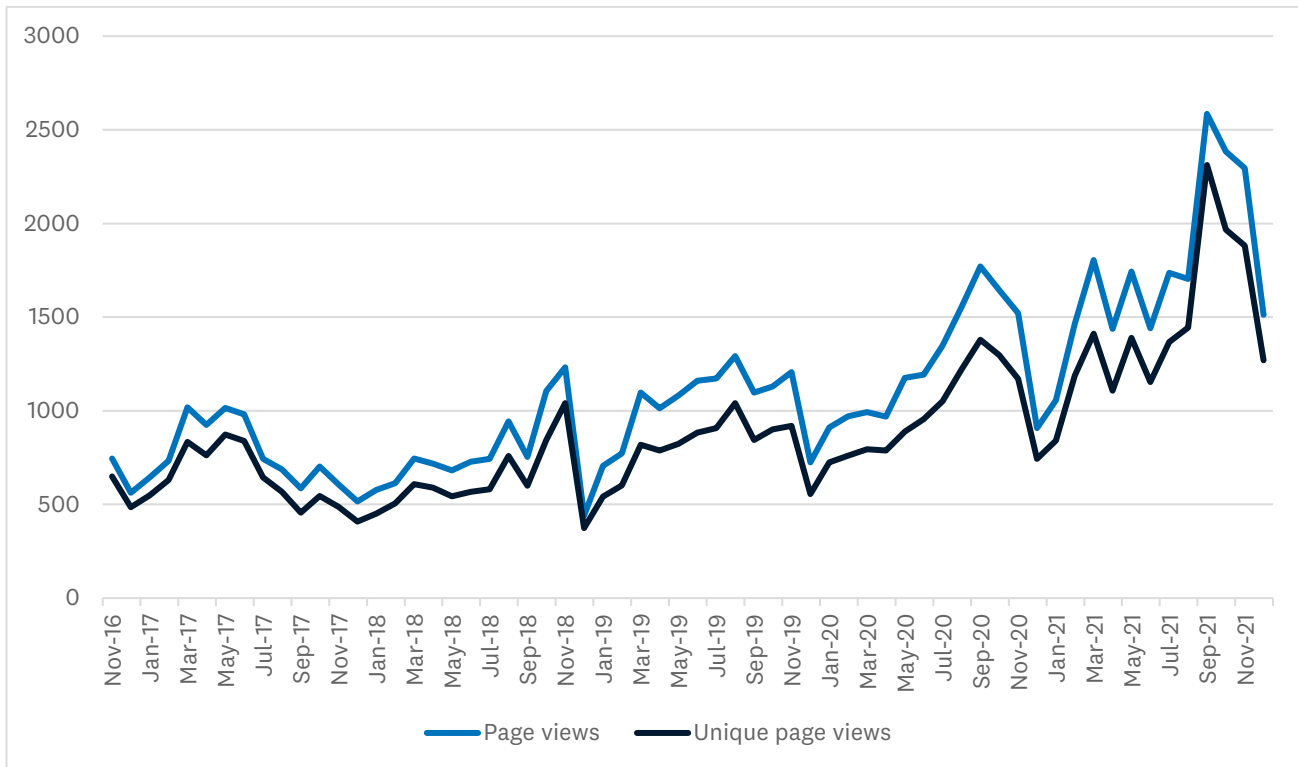


Figure 22. Page views of the Auckland Council Heritage webpage (Nov 2016 - Jul 2021)

4.4.1.2 Historic heritage grants

Auckland Council runs a [Community Grants programme](#), which includes regional grants and local board grants.⁷³ The regional grants programme is split into six key activity areas, one of these being historic heritage. The local board heritage grants are managed by each local board, with decisions made based on the priorities of their local board plans. Applications for either type of grant are not limited to scheduled historic heritage places but can also include non-scheduled places (if the place may have regional significance for its heritage value in the case of regional historic heritage grants, and if the place fits into a priority heritage area for local board historic heritage grants).

For both regional and local board heritage grants, heritage specialist advice is sought to determine whether an application will have positive outcomes for heritage. Their advice has great bearing on whether the application is successful and whether a grant is awarded. However, the final decision is made by the Planning Committee (regional grants) and local boards (local board grants).

If a grant is awarded to a project, once the project is complete, the applicants are obliged to provide all receipts, photos, and an accountability report of the project.

⁷³ Auckland Council (2014). *Community Grants Policy*, accessed from: <https://www.aucklandcouncil.govt.nz/plans-projects-policies-reports-bylaws/our-policies/docscommunitygrantspolicy/community-grants-policy.pdf>

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Regional historic heritage grants programme

The Regional Historic Heritage Grants Programme aims to incentivise best practice, increase understanding and encourage community involvement in the care of our regionally significant heritage sites and places.⁷⁴

The following activities, projects and programmes are listed in the *Community Grants Policy* (2014) as suitable for regional historic heritage grant applications:

- work to protect or enhance the structural integrity of buildings – e.g. re-piling, re-roofing, electrical or plumbing work
- work to protect or enhance the structural integrity of land with scheduled heritage buildings – e.g. drainage works, retaining walls
- restoration of heritage features, including landscaping
- re-painting of heritage buildings in approved colours
- works to enable public access to scheduled historic heritage places including sites of significance to tangata whenua
- public information or interpretation materials
- professional services and advice including heritage conservation plans, maintenance plans, feasibility studies, business cases or other documentation to assist with future or additional works.

Table 10 shows the uptake of regional historic heritage grants since 2016-17. Between 2016-17 and 2021-21, 21 applications were funded through the regional historic heritage grants programme, totalling \$246,384 (averaging \$11,733 per application). The grants fund has been over-subscribed over this period, with 91 grants being applied for (and only 23 per cent of these being funded). This is because the fund is not large enough to award grants to all applications, so some projects must be prioritised over others. Prioritisation includes considering the extent to which the application is a good heritage outcome, the ability of applicants to deliver the work proposed, and other current funding priorities. Grants may also not be awarded if the application is not filled in correctly, does not have enough information or detail, or because it is ineligible.

Table 10. Auckland Council Regional historic heritage grants (2016/17 - 2020/21)

Year	Applications approved	Amount granted
2016-17	7	\$80,744
2017-18	8	\$82,000
2018-19	6	\$83,640
2019-20	0	\$ -
2020-21	0	\$ -

Note that one round of funding (2019-20) was not awarded due to the fund not being deemed “essential” under the Auckland Council Emergency COVID-19 budget. At the time of writing, the 2020-21 round had not been awarded due to changed grant timeframes.⁷⁵ This is why it appears two years have not been funded.

⁷⁴ Auckland Council (2014). *Community Grants Policy*, p.53.

⁷⁵ Previously the applications and decisions were made before the start of the financial year (the round would open in March and the successful applicants would get the grant money in the new financial year in July). Now, however, the whole round is run within a calendar year (opening in October and distributing grant money in March/April).

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

In July 2019, Auckland Council’s Environment and Community Committee unanimously supported increasing the Regional Historic Heritage Fund from \$84,000 to an amount of up to \$500,000.⁷⁶ The fund now totals \$500,000 each year.

On average (excluding three outliers where only between 0.5 and 3 per cent of the total cost of the projects were funded by the grant), 33 per cent of a project applied for through the regional historic heritage grants programme was funded by the grant, with the balance (67 per cent) funded by the applicant. In other words, excluding the outliers, on average, for every \$1 of grants, a further \$2 was funded by the applicant. This has meant that the fund has enabled \$377,000 from applicant contributions towards good outcomes for historic heritage places. This increases to nearly \$7,500,000 if the outliers are included.

Figure 23 shows the breakdown of type of activities funded through the regional historic heritage grants programme. The majority (66 per cent) relate to refurbishment, repairs, and restoration.

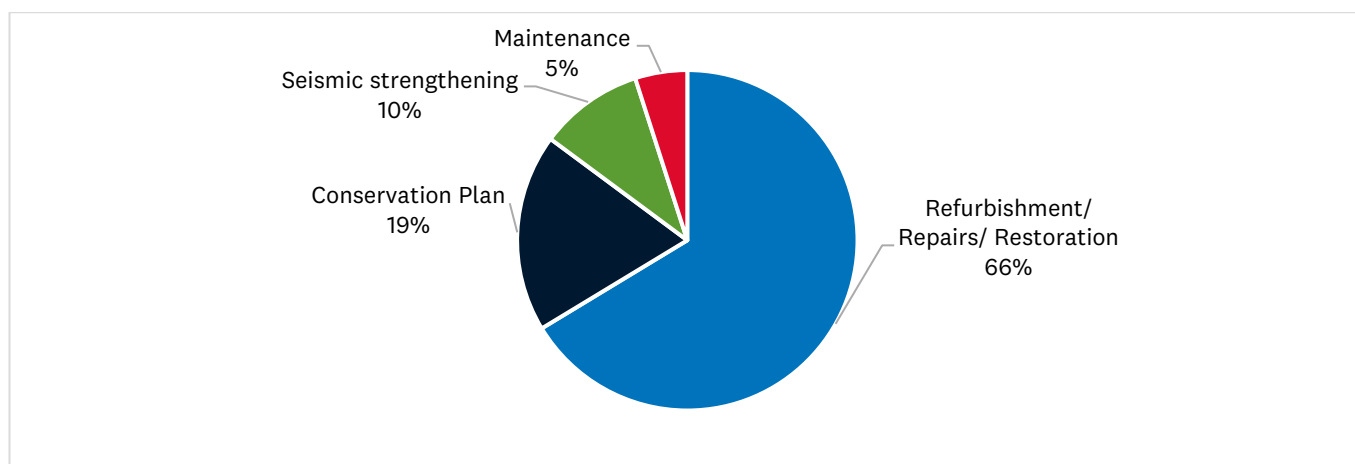


Figure 23. Type of work funded through the regional historic heritage grants programme (2016-17 to 2020-21)

Every application that was funded related to a scheduled historic heritage place. As shown in Figure 24, a greater proportion of Category A and A* places were funded than their total representation in the Schedule of Historic Heritage.

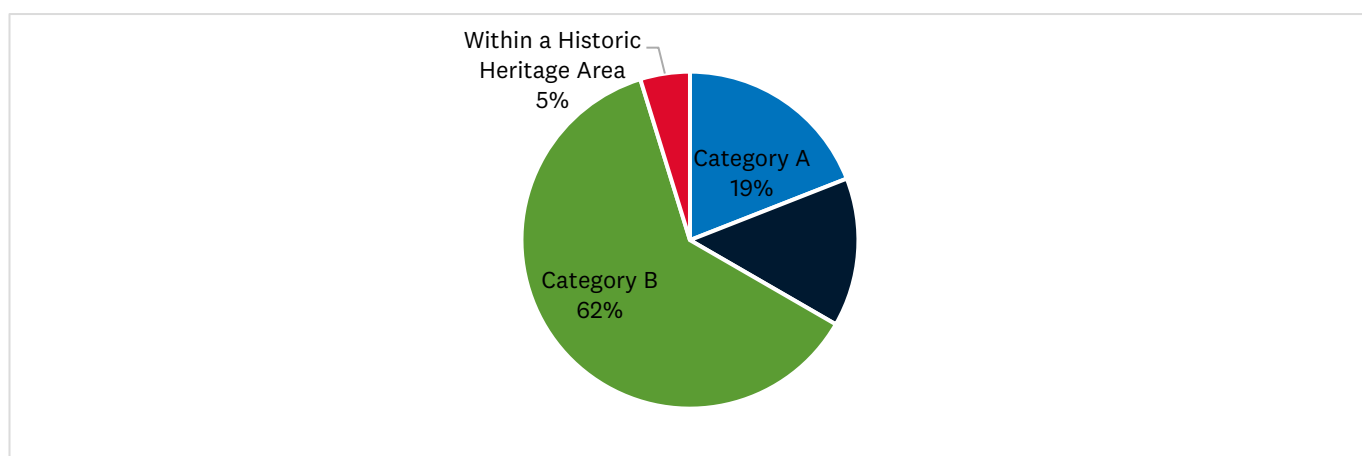


Figure 24. Category of historic heritage place funded through the regional historic heritage grants programme (2016-17 to 2020-21)

⁷⁶ Auckland Council (2019). Councillors vote to increase Regional Historic Heritage Grants Fund. <https://ourauckland.aucklandcouncil.govt.nz/news/2019/07/councillors-vote-to-increase-regional-historic-heritage-grants-fund/>

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Figure 25 shows the types of historic heritage places funded through the programme. There are a variety of historic heritage places, but a large dominance of built heritage places. Churches and other religious buildings have a greater proportion funded (24 per cent) than the proportion of this type in the Schedule of Historic Heritage (7 per cent). This is also the case for Cemeteries (14 per cent compared to one per cent in the schedule). Notable types of places not funded include Māori- and European-origin archaeology.

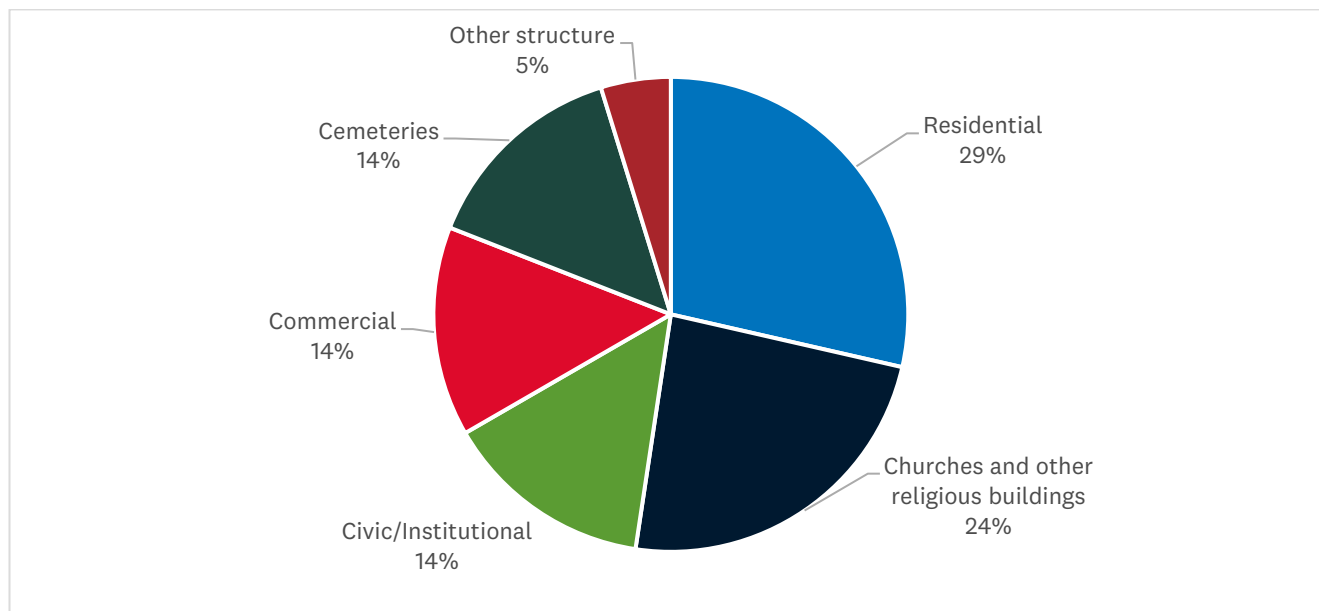


Figure 25. Type of heritage place funded through the regional historic heritage grants programme (2015-16 to 2020-21)

Local Board grants

Between 2016-17 and 2020-21, 120 applications were funded through local board historic heritage grants, totalling \$458,541 (averaging \$3,821 per application) (Table 11). Like the regional historic heritage grants, these are generally over-subscribed, but with a higher proportion awarded: approximately 80 per cent of grants applied for were awarded over this period.⁷⁷

Table 11. Auckland Council Local Board – local grants towards heritage (2015/16 - 2020/21)

Year	Applications approved	Amount granted
2016-17	16	\$90,927
2017-18	25	\$105,686
2018-19	26	\$92,536
2019-20	27	\$78,124
2020-21	27	\$91,268

Local board historic heritage grants are managed through individual local boards. The number and amount of historic heritage grants given are determined by the priorities of each local board plan. As shown in Table 12, all local boards apart from Aotea / Great Barrier, Ōtara-Papatoetoe and Puketāpapa have awarded at least one historic heritage grant between 2016-17 and 2020-21. Albert-Eden and Franklin local boards have the highest number of applications awarded and Franklin Local Board has the highest amount granted out of all the local boards.

⁷⁷ The 80 per cent figure is estimated from an analysis of approved and declined local board historic heritage grants from 2016-17, 2017-18 and 2018-19, which showed 79 per cent were approved. Data from 2019/20 and 2020/21 was not available.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Table 12. Local board historic heritage grants by local board (2016-17 to 2020-21)

Local board	Number awarded	Amount granted
Albert-Eden	17	\$ 41,846
Aotea / Great Barrier	0	\$ -
Devonport-Takapuna	9	\$ 22,798
Franklin	17	\$ 103,037
Henderson-Massey	2	\$ 5,000
Hibiscus and Bays	6	\$ 16,758
Howick	9	\$ 46,014
Kaipātiki	3	\$ 24,082
Māngere-Otāhuhu	1	\$ 1,000
Manurewa	2	\$ 13,050
Maungakiekie-Tāmaki	1	\$ 7,000
Ōrākei	6	\$ 40,740
Ōtara-Papatoetoe	0	\$ -
Papakura	5	\$ 16,500
Puketāpapa	0	\$ -
Rodney	2	\$ 9,692
Upper Harbour	1	\$ 20,000
Waiheke	5	\$ 12,323
Waitākere Ranges	13	\$ 23,249
Waitematā	11	\$ 32,486
Whau	10	\$ 22,966

Unlike regional historic heritage grants (in which 100 per cent relate to physical works), local board historic heritage grants had a substantial proportion which related to works other than physical work. As shown in Figure 26, just under half of all local board historic heritage grants related to physical works (such as restoration, refurbishment, maintenance, repairs and conservation plans), while 39 per cent related to historical interpretation (including the publication of books/pamphlets, exhibitions and displays, and heritage trails). Other types of grants related primarily to equipment (such as shelving, artifact storage, and lighting).

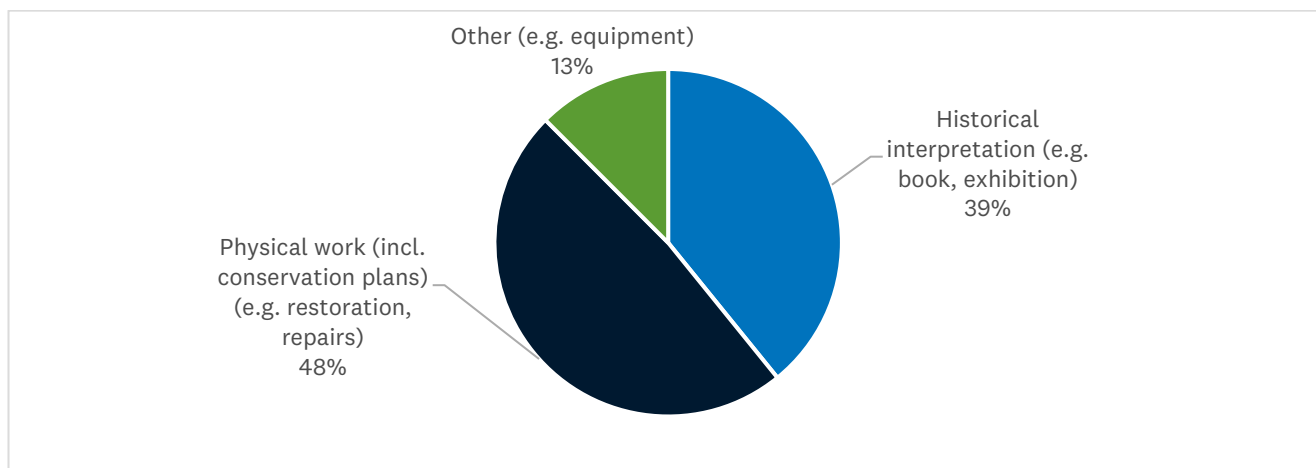


Figure 26. Type of work local board historic heritage grants were granted for (2016-17 to 2020-21)

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

As such, over half of all the local board heritage grants do not relate to scheduled places or to work that is not specified in the AUP. Due to the number of grants and a lack of detailed information on some of them, it was not possible to identify whether each grant awarded related to a scheduled place. However, a conservative estimate is that approximately 40 per cent of those local board historic heritage grants were awarded to applications relating to scheduled historic heritage places.

4.4.1.3 Regulatory incentives

Through the AUP, resource consent planners have the discretion to incentivise applicants to choose appropriate heritage works by granting consent to infringe development standards for underlying zones and Auckland-wide rules. This regulatory incentive has been used successfully on occasion and is an effective tool to incentivise good heritage outcomes. One example is by being lenient to the height-in-relation-to-boundary rules if there is a good outcome for heritage. In other words, an applicant may be able to build a house that is wider or taller than the permitted “envelope” if the proposed design represents a good heritage outcome. This means the applicant is able to infringe the rule without being subject to a stricter activity status (e.g. RD vs D, or P vs RD). One issue regarding this incentive is that although it is cited in D17.3(5)(b), the policy does not cascade down to matters of discretion or assessment criteria. There is also no reference in the zone provisions to this.

Transferable development rights (TDRs) are another regulatory incentive that can be used to incentivise good heritage outcomes in the AUP. TDRs are described in Chapter H8 Business – City Centre Zone. They are only available in the city centre zone and relate to both historic heritage and special character buildings. The purpose of the incentive is to encourage the retention and enhancement of scheduled historic heritage (and identified special character buildings) by enabling those buildings to sell or transfer their unrealisable floor space to another site.⁷⁸ In order for a TDR to be used, the applicant requires a conservation plan to be required for the historic heritage place, including a programme of works to guide ongoing regular maintenance and cleaning.

Since the AUP became operative, the TDR incentive has been used fewer than five times. Anecdotal evidence has suggested its effectiveness is limited, but it is still an important part of the suite of incentives offered to promote good heritage outcomes.

4.4.1.4 Resource consent application fee waivers

Auckland Council does not have an official policy on resource consent application fee waivers for historic heritage places. Resource consent fee waivers are set on a case-by-case basis. Anecdotal evidence suggests that fee waivers can be highly effective in incentivising good heritage outcomes, as cost can be a large barrier for most applicants.

Some good outcomes have been observed relating to cemeteries. Fee waivers have been an effective way to get “buy-in” from applicants, particularly (because of standards not being specified) when the need for a resource consent may be overly onerous on the applicant.

4.4.2 Findings

The four incentives identified in the AUP and discussed in this section are overall effective in encouraging the protection, management, and conservation of historic heritage places. Free heritage advice and guidance (oral and written) can be hugely effective in encouraging good heritage outcomes (and discouraging inappropriate works to heritage). Over \$700,000 has been granted through regional and local historic heritage grants contributing to good heritage outcomes for historic heritage places. Regulatory

⁷⁸ H8.6.13

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

incentives are not used as widely as other incentives but are important tools alongside other incentives. Likewise, resource consent application fee waivers have been successfully used, particularly for cemeteries.

4.4.3 Recommendations⁷⁹

Despite the effectiveness of the incentives, there are some recommendations to improve their effectiveness. Two relate to the AUP:

- Review the TDR incentive as a whole to make it more usable and to consider if it could be extended beyond the central city area, especially with the growing demand of intensification and development in town and metro centres.
- Address the cascade of D17.3(5)(b) to matters of discretion or assessment criteria, and linkages to zone provisions to enable stronger support for the regulatory incentive to grant consent to infringe development standards for underlying zones and Auckland-wide rules where this does not result in significant adverse effects.

And two are outside of the AUP:

- Finalise the Resource Consent Application Fee Waiving Policy to encourage positive heritage outcomes.
- Strengthen the link between local board historic heritage grant priorities and the activities and places provided for in the historic heritage provisions and schedule of the AUP.

⁷⁹ These recommendations will need to be tested fully through an RMA Section 32 assessment, be considered alongside other recommendations from other topics and the Plans & Places Department work programme.

5.0 Summary and conclusions

This report has examined how effective and efficient the objectives, policies, rules, and other methods of the AUP have been in meeting the outcomes intended by the Regional Policy Statement – B5.2 Historic Heritage. The two objectives in Chapter B5.2 are listed below:

1. Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.
2. Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.

These were analysed through four indicators. The findings of these are summarised below.

Recommendations are flagged as high, medium or low:

High	<p>Investigate a plan change as a priority.</p> <p><i>It is considered that the plan issue should be addressed earlier than plan review stage. The issue has adverse implications on plan outcomes.</i></p>
Medium	<p>Further investigate at plan review stage (2026)</p> <p><i>The issue needs to be further investigated, however adverse implications arising from the issue are not seen as critical to achieving intended plan outcomes.</i></p>
Low	<p>Further monitoring advised.</p> <p><i>A plan issue may or may not be identified. A greater time period is needed to observe trends in data.</i></p>

5.1 Indicator 1. Significant historic heritage places are identified and evaluated

Overall, Indicator 1 has confirmed that the AUP is effective in enabling significant historic heritage places to be identified and evaluated. Since the AUP became operative in November 2016, the council Heritage Unit has identified 661 places of heritage interest, prioritised and evaluated 76 of these, and 71 of those evaluated met the criteria and thresholds to be scheduled.

This indicator has also highlighted geographical areas and types of places which may need more prioritisation in the future to identify and evaluate Tāmaki Makaurau Auckland’s significant historic heritage. However, these findings may be more reflective of the priorities of the Auckland Council (including those of the Heritage Unit), and the communities it serves, during this period than the effectiveness of the AUP.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

5.1.1 High priority recommendations - investigate a plan change as a priority

None.

5.1.2 Medium priority recommendations - further investigate at plan review stage (2026)

None.

5.1.3 Low priority recommendations - further monitoring advised

None.

5.1.4 Other recommendations - outside of AUP monitoring process

- Identify and evaluate high priority places in local boards which have had the least investigation since the AUP came into effect such as: Howick, Hibiscus and Bays, Kaipātiki, and Manurewa.
- Identify and evaluate types of places (if high priority) which have had the least investigation since the AUP came into effect such as: Māori-origin archaeology and European-origin archaeology.

5.2 Indicator 2. Significant historic heritage places are protected through the Schedule of Historic Heritage.

Indicator 2 has shown that a significant number of historic heritage places (2,278) are protected in Tāmaki Makaurau Auckland through the Schedule of Historic Heritage, and that they consist of a wide variety of typologies and are located throughout the region. Although a notable number have been added to the Schedule of Historic Heritage since the AUP became operative in part in November 2016, there is a variance in the 50 added in terms of their geographical spread and typology.

Reviews of the Schedule of Historic Heritage have resulted in hundreds of historic heritage places having their scheduling refined. These changes have created greater consistency, resulting in a more robust Schedule of Historic Heritage and aligning identified values with management. However, many recommendations from the archaeological review (2016-2018) have not yet been implemented.

5.2.1 High priority recommendations⁸⁰ - investigate a plan change as a priority

None.

5.2.2 Medium priority recommendations - further investigate at plan review stage (2026)

- Prioritise the findings of the archaeological review and consider different options for recognising and managing archaeological places that may be removed from the Schedule of Historic Heritage (such as adding them to Schedule 12 Sites and Places of Significance for Mana Whenua, where appropriate).
- Work side-by-side with Schedule 12 Sites and Places of Significance to Mana Whenua nominations and potentially concurrently schedule places in Schedule 14 Schedule of Historic Heritage.

5.2.3 Low priority recommendations - further monitoring advised

None.

⁸⁰ These recommendations will need to be tested fully through an RMA Section 32 assessment, be considered alongside other recommendations from other topics and the Plans & Places Department work programme.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

5.2.4 Other recommendations - outside of AUP monitoring process

- Conduct more investigation and evaluation of places in local boards which have not any places added to the schedule since the AUP came into effect such as: Devonport-Takapuna, Kaipātiki, Hibiscus and Bays, Waitākere Ranges and Māngere-Ōtāhuhu.
- Conduct more investigation and evaluation of types of places which have not had any places added to the schedule since the AUP came into effect such as: Māori-origin archaeology and European-origin archaeology.
- Prioritise work with mana whenua to understand how and when to use criterion C in the scheduling of historic heritage places.

5.3 Indicator 3. Inappropriate development, subdivision and use of significant historic heritage places, or within historic heritage areas, is avoided, remedied or mitigated.

Overall, for built heritage, archaeology, and cemeteries, the objectives, policies, and rules of the plan generally lead to an avoidance, or at least mitigation or remediation, of “inappropriate” outcomes for scheduled historic heritage places. Across all types of heritage, the best outcomes came from early engagement between the applicant and the heritage specialists, including through informal advice and guidance or pre-application meetings.

Points where there have been inappropriate outcomes relate to inconsistencies with interpretations of rules and thresholds; definitions; a lack of strength in the rules; general errors/anomalies in the Schedule of Historic Heritage, and absence of heritage specialist input into resource consents.

5.3.1 High priority recommendations⁸¹ - investigate a plan change as a priority

- Correct further errors and improve the robustness of the Schedule of Historic Heritage, particularly including:
 - the column indicating additional rules for archaeological sites or features
 - the extent of place
 - exclusions.

5.3.2 Medium priority recommendations - further investigate at plan review stage (2026)

- Add in policy directions in all statements of significance for historic heritage areas (to better assist the application of historic heritage area rules).
 - Clarifying the management of archaeological values in historic heritage areas, such as a column in D17.4.2 Activity Table - Activities subject to additional archaeological rules
- Redefine “archaeological site” (to be broader than the pre-1900 definition).

⁸¹ These recommendations will need to be tested fully through an RMA Section 32 assessment, be considered alongside other recommendations from other topics and the Plans & Places Department work programme.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

- Refine provisions for historic heritage areas, particularly regarding the inclusion of features and activities in the road reserve in the activity tables for historic heritage areas.
- Add standards for digital billboards close to or on scheduled historic heritage places.
- Address the policy cascade issue of B2.2 Policy 8, which, if clarified/included in Chapter D17, has the potential to enable effective avoidance and mitigation measures relating to the impact on historic heritage places of adjacent development.
- Investigate methods to avoid the issue of “demolition by neglect”.
- Addressing the earthworks definition to avoid E11 and E12 contradicting the permitted activity standards in D17.
- Address Table D17.4.2 (A26) (Removal of trees greater than 3m in height or greater than 300mm girth) being a discretionary activity, even when earthworks are not involved, and the lack of an activity standard.
- Introduce a permitted activity standard for new headstones, restoration-type work and also body burials where the applicant wants a plaque (as opposed to a headstone).

5.3.3 Low priority recommendations - further monitoring advised

- Continue to monitor enforcement of rules/conditions, particularly relating to cumulative effects.

5.3.4 Other recommendations - outside of AUP

- Create a systematic process of collecting data for the RCD – BHIT spreadsheet, including data relating to the outcome of the resource consent.
- Adapt the RCD – CHIT spreadsheet to use columns like the RCD – BHIT spreadsheet in order to record the resource consent application number, the heritage advice and application outcome.
- Continue to improve the processes of collating the RCD – PP data to minimise errors and gaps in resource consents data.
- Promote and have further guidance on pre-application meetings and other online tools/advice for applicants.
- Provide refresher training for consent planners around when heritage specialist input is required when processing a resource consent.
- Define and/or provide guidance/training on the terms and concepts below to improve interpretation internally and externally:
 - demolition calculations
 - when a modification is a new building or structure
 - the status of contributing properties within a historic heritage area
 - the role of AUP archaeological provisions compared to the provisions of the *Heritage New Zealand Pouhere Taonga Act 2014*
 - how to reduce the impact of designations works on archaeological sites and improve outcomes for historic heritage
 - Clarifying the management of archaeological values in historic heritage areas, such as a column in D17.4.2 Activity Table - Activities subject to additional archaeological rules.
 - the relationship between zones and overlays, to help with an understanding of the appropriate development potential of a subject property.

5.4 Indicator 4. Protection, management and conservation of historic heritage places, including retention, maintenance and adaptation, are encouraged.

This indicator focussed on how incentives identified in the AUP encourage protection, management, and conservation of historic heritage places. The measures of this indicator found that expert advice and guidance, grants, regulatory incentives, and resource consent fee waivers were all overall effective in encouraging the protection, management, and conservation of historic heritage places.

5.4.1 High priority recommendations⁸² - investigate a plan change as a priority

None.

5.4.2 Medium priority recommendations - further investigate at plan review stage (2026)

- Review the TDR incentive as a whole to make it more usable and to consider if it could be extended beyond the central city area, especially with the growing demand of intensification and development in town and metro centres.
- Address the cascade of D17.3(5)(b) (granting consent to infringement of the development standards for underlying zones and Auckland-wide rules where this does not result in significant adverse effects) to matters of discretion or assessment criteria, and linkages to zone provisions to enable stronger support for the regulatory incentive to grant consent to infringe development standards for underlying zones and Auckland-wide rules where this does not result in significant adverse effects.

5.4.3 Low priority recommendations - further monitoring advised

None.

5.4.4 Other recommendations - outside of AUP

- Strengthen the link between local board historic heritage grant priorities and the activities and places provided for in the historic heritage provisions and schedule of the AUP.
- Finalise the Resource Consent Application Fee Waiving Policy.

⁸² These recommendations will need to be tested fully through an RMA Section 32 assessment, be considered alongside other recommendations from other topics and the Plans & Places Department work programme.

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Appendix A. Breakdown of historic heritage places added during the development of the AUP (2014-2016)

Table 13. Breakdown by local board of historic heritage places added during the development of the AUP (2014-2016)

Local Board	Places added during the development of the AUP
Devonport - Takapuna	40
Waitematā	34
Kaipātiki	20
Ōrākei	10
Albert - Eden	6
Hibiscus and Bays	6
Franklin	4
Maungakiekie - Tāmaki	3
Henderson - Massey	1
Upper Harbour	1

Table 14. Breakdown by type of historic heritage places added during the development of the AUP (2014-2016)

Type of historic heritage place	Places added during the development of the AUP
Residential	38
Commercial	32
Civic/Institutional	29
Churches and other Religious Buildings	10
Other Structures	10
Military	5
Industrial	1

Appendix B. Chapter B11 Monitoring and environmental results anticipated

Chapter B11 in the AUP sets out the monitoring and environmental results anticipated (ERA) of a regional policy statement. B11 is not exhaustive, and an ERA is not listed for every objective in the RPS. Chapter B11 explains:

Environmental results anticipated identify the outcomes expected as a result of implementing the policies and methods in the regional policy statement and provide the basis for monitoring the efficiency and effectiveness of those policies and methods as required by section 35 of the Resource Management Act 1991.

Environmental results anticipated are not additional objectives, policies or rules: they are indicators to be used when assessing progress towards achieving the objectives in the regional policy statement. These indicators should be used:

- to assess the condition of the environment;
- to identify changes to that condition;
- to diagnose the causes of environmental problems; and
- to guide future changes to objectives, policies and methods’.

Table B11.4 Historic heritage and special character (B5) outlines ERAs for three objectives contained in Chapter B5. Two of these objectives relate specifically to historic heritage and are discussed further below.

Reference	Objective	Indicators
B5.2.1(1)	Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.	The total number and distribution of scheduled significant historic heritage places increases over time.

This B11 indicator was amended in this monitoring report to better measure the outcomes of the objective.

The indicator worded above cannot alone accurately measure the outcomes sought by this objective. An increase in the total number of scheduled historic heritage places within Tāmaki Makaurau Auckland is a positive outcome, and for this reason, this indicator, along with the geographical distribution of scheduled historic heritage places, has been retained as a monitoring measure. However, as written, this indicator assumes that the only action required for a positive outcome for significant historic heritage in Tāmaki Makaurau Auckland is to add more places to the Schedule of Historic Heritage. Adding places to the schedule is only a first step in the protection of a historic heritage place from inappropriate subdivision, use and development. The protection also subsequently happens through the implementation of the rules in the AUP as well as through advocacy, education, and incentives.

Amending the identification of scheduled historic heritage places so that their management more closely reflects their values, should also be considered a positive outcome. Removing places from the schedule which are discovered to not meet the criteria and thresholds included in B5.2.2 is desirable as it also ensures the Schedule of Historic Heritage is robust. These actions would not be considered if this B11 indicator alone was retained.

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

This indicator also does not specifically consider the evaluation of places with potential historic heritage significance, which is a key component of identification.

This indicator focuses specifically on the first part of the Objective, which is to identify and protect (i.e. add to the Schedule of Historic Heritage) significant historic heritage places. It does not measure the extent of which significant historic heritage places are specifically protected from inappropriate subdivision, use or development.

Reference	Objective	Indicators
B5.2.1(2)	Significant historic heritage places are used appropriately, and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.	The identified values of significant historic heritage places are protected from inappropriate subdivision, use and development over time.

This indicator has also been revised to more accurately measure the outcomes sought. This indicator has a strong relationship with Objective B5.2.1(1) and is essentially the “missing” protection half of the indicator discussed above.

While the indicator does have connections to Objective B5.2.1(2), the outcomes sought by the objective (protecting and managing places) and the indicator (protecting identified values) could have greater alignment.

As with the previous B11 indicator, this indicator focuses primarily on the first half of the objective. The indicator does not measure how appropriate use, protection, management, and conservation are achieved through the provisions of the plan.

Appendix C. Heritage surveys in Auckland (2010-2021)

The following list contains heritage surveys undertaken between 2010 and 2021. The list is not exhaustive. There may be other surveys conducted that have not been listed.

Although these surveys are extensive, they are not all comprehensive. Some may focus on one type of heritage (such as heritage buildings) more than other types of heritage (such as archaeology). In addition, archaeological survey techniques (based on visual inspection and minor sub-surface testing) cannot necessarily identify all sub-surface archaeological features, or detect wāhi tapu and other sites of traditional significance to Māori, especially where these have no physical remains.

Many of the reports can be found here: <https://www.aucklandcouncil.govt.nz/arts-culture-heritage/heritage/Pages/heritage-surveys-and-evaluations.aspx>

Name of survey	Area covered	Driver for the work	Scope	Year	Local Boards covered
North Shore Heritage Themes Mapping	Former North Shore City Council boundaries	Legacy Council	Thematic Study	2010	Devonport-Takapuna, Kaipātiki, Hibiscus & Bays, Upper Harbour
Quay Park HHA	Quay Park area of city centre	City Centre Master Plan	Built	2012	Waitematā
Mangere Town Centre Heritage Survey	Māngere town centre	Regional Programme	Built and Archaeology	2012	Māngere-Ōtāhuhu
Otāhuhu Heritage Survey	Ōtāhuhu town centre and surrounds	Regional Programme	Built and Archaeology	2012	Māngere-Ōtāhuhu
Albert-Eden Heritage Survey	Local board area	Local Board funding	Built and Archaeology	2013	Albert-Eden
Balmoral Heritage Survey	Balmoral suburb	Local Board funding	Built	2013	Albert-Eden
Albert-Eden Local Board Sub Area Survey	Mt Eden Road, Point Chevalier	Local Board funding	Built	2013	Albert-Eden
Onehunga Heritage Survey	Onehunga suburb	Regional Programme	Built and Archaeology	2013	Maungakiekie-Tāmaki
Puketāpapa - Mt Roskill Heritage Survey	Selected areas in Puketāpapa Local Board	Local Board funding	Built	2014	Puketāpapa
Pt Chevalier Heritage Survey	Point Chevalier suburb	Local Board funding	Built	2014	Albert-Eden
Manukau Harbour Heritage Assessment	Northern coastline of Manukau	Local Board funding	Archaeology	2014	Puketāpapa

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Karangahape Road Heritage Survey	Karangahape Road	Regional Programme	Built	2014	Waitematā
Pukekohe Heritage Survey	Pukekohe town centre and suburb	Regional Programme	Built	2014	Franklin
Papatoetoe Heritage Survey	Papatoetoe old town and suburb	Regional Programme	Built	2014	Ōtara-Papatoetoe
Ardmore Road, Wanganui Avenue, Albany Road and Trinity Street Historic Heritage Area	Herne Bay suburb	Regional Programme	Built	2015	Waitematā
Three Kings Heritage Study	Three Kings suburb	Local Board funding	Built and Archaeology	2015	Puketāpapa
Waikowhai Coast Heritage Study	Waikōwhai coast (Manukau Harbour)	Local Board funding	Built and Archaeology	2015	Puketāpapa
Mangere Bridge -Mangere East and Favona Heritage Survey	Māngere Bridge, Māngere East	Local Board funding	Built	2016	Māngere-Ōtāhuhu
Multiple for Whenuapai Structure Plan	Whenuapai Future Urban Zone	Structure Plan	Built and Archaeology	2016	Henderson-Massey
Auranga Stage B1: Archaeological Assessment	Auranga - Drury West Future Urban Zone	Structure Plan	Archaeology	2016	Franklin
Pre-1944 Overlay Survey	Pre-1944 overlay	Proposed Auckland Unitary Plan	Built	2016	Throughout region
Waiuku Historic Heritage Area Evaluation	Waiuku Town Centre	Regional Programme	Built	2017	Franklin
Historic Heritage Topic Report for Drury Structure Plan	Drury Future Urban Zone	Structure Plan	Built and Archaeology	2017	Franklin
Preliminary Historic Heritage Assessment Pukekohe-Paerata Structure Plan	Pukekohe - Paerata Future Urban Zone	Structure Plan	Built and Archaeology	2017	Franklin
Historic Heritage Topic Report for Silverdale Dairy Flat Business Area Structure Plan	Silverdale-Dairy Flat Future Urban Zone	Structure Plan	Built and Archaeology	2017	Upper Harbour
Warkworth Structure Plan	Warkworth Future Urban Zone	Structure Plan	Built and Archaeology	2017	Rodney
Upland village HHA survey	Parts of Remuera Road, Upland Road and Minto Road, Remuera	Regional Programme	Built	2018	Waitematā
Water Heritage Thematic Study	General region	Watercare	Built	2019	Throughout region

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

Heritage Asset Management Programme – heritage buildings condition survey	General region	Regional Programme	Built	2019	Throughout region
Historic cemeteries survey	General region	Regional Programme	Archaeology	2019	Throughout region
Aotea / Great Barrier Island Historic Heritage Survey	Aotea / Great Barrier Island Local Board area	Regional Programme	Built and Archaeology	2019	Aotea / Great Barrier
Glenfield Centre Plan	Glenfield centre	Area Plan	Built and Archaeology	2020	Kaipātiki
Waitakere Ranges Heritage Area Survey	Waitākere Ranges Heritage Area	Waitākere Ranges Heritage Area legislation	Built and Archaeology	Ongoing (annual)	Waitākere Ranges

Appendix D. Questions for discussions with Heritage Implementation specialists

1. Are there any particular weaknesses in the objectives/policies/rules in the AUP which have led to poor heritage outcomes? What are some examples? Here are some general themes I have taken from the issues log:
 - Historic heritage areas – Rules too general/unclear; no controls relating to fences; activity table does not include features/roads; exclusions issues; archaeological controls
 - Unable to control paint colour (which can have a negative effect)
 - Issues with seismic strengthening and retention of chimneys (when interior is excluded)
 - Clarity as to when a modification becomes a new building
 - The calculation of percentages for greater or less than 30% modifications.
 - Cemeteries: Permitted standards for cremated remains; standard for ash insertion in grave ledgers.
 - Standards for maintenance of trees
 - General errors/abnormalities in the Schedule 14.1
 - Overly onerous: RC required for a non-historic structure when it is not an exclusion (but should be); signage standards; invasive testing for seismic upgrade; removal of rubbish bins within an EOP.
2. What are your thoughts on Policy B5.2.2(8) (development adjacent to HH places)? – It has no policy cascade and does not trigger any rule. It is unclear how it is implemented since it relates to places adjacent to scheduled places (not scheduled places themselves). Has it ever been cited used? Billboards?
3. Despite any identified weaknesses, do you think the policies/rules in the AUP are effective and efficient in meeting the B5.2 objectives? Why/why not?
 - (1) *Significant historic heritage places are identified and protected from inappropriate subdivision, use and development.*
 - (2) *Significant historic heritage places are used appropriately and their protection, management and conservation are encouraged, including retention, maintenance and adaptation.*
4. Have there been/are there discrepancies between your advice and the final planning advice? If so, what are the reasons? Are there any typical examples?
5. Do pre-application meetings generally lead to better outcomes in heritage resource consent applications? Are there any typical examples?
6. How are regulatory (e.g. transferable development rights, waivers of zone provisions) and non-regulatory (e.g. grants, RC fee waivers, free advice) incentives used to attain good heritage outcomes?
7. In your experience, how effective are consent conditions? Are you aware of many compliance investigations? Any typical examples?
8. How are adverse effects mitigated for? Any typical examples?

Te Aroturukitanga o te Mahere ā-Wae ki Tāmaki Makaurau

ISBN 978-1-99-110139-6 (PDF, Online)

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