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## Submission on Napier City Proposed District Plan

### Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

**To:** Napier City Council - Planning Unit

**Date received:** 15/12/2023

**Submission Reference Number #:**191

This is a submission on the following proposed plan (the **proposal**): Napier City Proposed District Plan

**Submitter:**

Napier City Council Community Strategies

**Address for service:**

Tania Diack  
Napier City Council  
215 Napier South Napier 4110  
New Zealand

**I wish to be heard:** Yes

**I am willing to present a joint case:** Yes

Could you gain an advantage in trade competition in making this submission?

- **No**

Are you directly affected by an effect of the subject matter of the submission that

(a) adversely affects the environment; and

(b) does not relate to trade competition or the effects of trade competition

- **N/A**

## Submission points

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**Point 191.1**

**Section:** SCHED3 - Historic heritage items

**Sentiment:** Amend

**Submission:**

Reasons:

Item #100 Petane Grange, located at 45 Eskdale Drive, was significantly impacted by Cyclone Gabrielle and is located within a Category 3 site, meaning it is unsafe for ongoing residential use and occupation. Demolition of the structure under the current provisions of the PDP would require resource consent. It is therefore sought to either remove the item from the heritage listing, or alternatively, amend the policies and assessment criteria for demolition of heritage items impacted by natural hazards as sought in the following submission points.

**Relief sought**

Relief:

Delete Item#100 Petane Grange from Schedule 3 – Historic heritage items, or alternative relief.

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**Point 191.2**

**Section:** HH - Historic heritage

**Sub-section:** Policies

**Provision:**

HH-P3: Continued use

Provide for the continued use and adaptive reuse, structural upgrade, and upgrading of historic heritage where it:

- a. Encourages their retention, restoration, and maintenance;
- b. Does not compromise heritage values, and/or
- c. Provides for the continued appreciation of identified heritage values.

*Relates to HH-O2*

**Sentiment:** Amend

**Submission:**

Reasons:

Policy HH-P3 addresses demolition and partial demolition of scheduled heritage sites. The current policy enables consideration of "serious and immediate threat to property, people or services". However, there is no consideration of demolition to mitigate the high risk of natural hazards over the medium-long term, for example the application of Category 3 to land where there is serious risk to life from future flood events. This should be a relevant consideration in assessment of resource consents to demolish heritage buildings in these areas.

**Relief sought**

Relief:

Amend the wording of Policy HH-P3 to enable consideration of longer term as well as immediate serious threats from natural hazards.

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**Point 191.3**

**Section:** HH - Historic heritage

**Sub-section:** Assessment criteria

**Provision:**

**HH-AC6: Demolition of a Group B heritage item HH-R8**

*Effects on heritage and streetscape values*

- a. Whether the demolition or partial demolition of any heritage item identified as Group B would compromise:
  - i. The heritage values of adjoining heritage items;
  - ii. The integrity of the historic streetscape or identified heritage group, and
  - iii. The value of the city's historic heritage.
- b. Whether adaptive reuse has been adequately considered as an alternative to demolition.
- c. The economic and social benefits to the owner and the wider public through retention of heritage items.
- d. Whether the heritage item in its current state poses a safety risk, including loss of life, in the event of an earthquake and safety alterations are not an option.
- e. Where the retention of the facade only is proposed, the extent to which the demolition of the remainder of the building affects the heritage values inherent within the building or structure.

**Sentiment:** Amend

**Submission:**

**Reasons:**

Assessment criteria HH-AC6 addresses demolition and partial demolition of Group B scheduled heritage sites. The current criteria enables consideration of whether the heritage item in its current state poses a safety risk, including loss of life, in the event of an earthquake. However, there is no consideration of potential safety issues from buildings and property from other natural hazards, such as high intensity rainfall events. For example, occupation and use of heritage scheduled residential buildings within Category 3 would cause serious risk to life from future flood events. This should be a relevant consideration in assessment of resource consents to demolish heritage buildings in these areas.

**Relief sought**

**Relief:**

Amend the wording of Assessment criteria HH-AC6 to enable consideration of the effects from all natural hazards, not just earthquakes as currently drafted.