



9<sup>th</sup> May 2017

Heritage New Zealand Pouhere Taonga  
PO Box 2629  
Wellington 6140

For the attention of Joanna Barnes-Wylie, Registrar

Dear Joanna

**FEEDBACK ON DRAFT GUIDELINES FOR ASSESSING HISTORIC  
PLACES AND HISTORIC AREAS ON THE NEW ZEALAND HERITAGE  
LIST/RĀRANGI KŌRERO**

Historic Places Aotearoa commends Heritage New Zealand Pouhere Taonga (HPNZPT) for preparing the guideline.

This document is long overdue and should aid in providing consistent heritage assessments by professionals across the heritage sector and in particular assessment against the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA).

**General Comments**


1. The document is too long. We believe that a document of 40-50 pages should be achievable. The length of the document appears to be caused by the document trying to cover too many aspects of the topic. For example, the document covers both the assessment criteria as well as the preparation / writing of heritage assessments.  
Reducing the number of fully illustrated examples would assist and extra examples could be provided by weblinks to the List.
2. Consideration should be given to splitting the document into at least two documents to assist in providing more clarity on the topics covered. The first document would address the assessment criteria under Section 66(1) and 66(3). A second document could cover the writing up of the assessment and the appropriate language etc.
3. The document is too prescriptive and framed as a very "Authorised Heritage Discourse."

4. The guidelines come across as overly negative and repetitive - the numerous examples of what to avoid could be reframed more positively and provided as principles.
5. We do not see the need to provide the Oxford English Dictionary meaning of words.
6. The guidelines do not deal well with historic areas. We would suggest that this be framed up as a separate document.
7. Provide a Summary matrix for Section 66(1) Criteria. There is a summary provided for Section 66(3) Criteria.
8. Assessing degrees of Significance is discussed in the document. While the HNZPTA does not consider a sliding scale of heritage value for each criteria, as such, it is useful to consider when undertaking value assessments in terms of a sliding scale from "Outstanding/Special" - Moderate - Low - Negative. Values of Outstanding and Special clearly relate to Category I items, but the others relate to Category II items and the last item, Negative, may impact on the overall heritage assessment.  
During the recent Golden Bay Grandstand Environment Court case it aided the expert witnesses to consider each of the elements of the building in this fashion, although the terms for Outstanding and Special were assessed as High.
9. The second to last paragraph on page 4 needs to be reviewed as it appears to be missing commas or words between "anything" and "any".

Thank you for the opportunity to comment on this Guideline.

Historic Places Aotearoa would welcome to opportunity to work with Heritage New Zealand Pouhere Toanga on further developing this and subsequent guidelines.

Yours faithfully

A handwritten signature in black ink, appearing to read 'James Blackburne', with a stylized flourish at the end.

James Blackburne  
President Historic Places Aotearoa Inc