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By email: david@dhconsulting.co.nz

Tena koe,

**AFFECTED PERSON'S WRITTEN APPROVAL UNDER S95E OF THE RESOURCE MANAGEMENT ACT 1991
FOR A LAND USE CONSENT APPLICATION LUC25/0086 AT 8 GLASSWORKS ROAD, NETHERBY,
ASHBURTON**

1. Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation, and conservation of New Zealand's historical and cultural heritage.

Resource Consent

2. HNZPT has been identified as an affected party to the following activities which form the basis of a resource consent application:
 - Land use resource consent application LUC25/0086 at 8 Glassworks Road, Ashburton. The proposal involves seismic strengthening of buildings 1 and 2, part demolition of buildings 3 and 4, and partial deconstruction of the existing chimney to reduce its load/weight and improve structural stability.
3. In considering the proposed works, we have reviewed the following documents:
 - Application for Land Use Consent Malteurop New Zealand Ltd 8 Glassworks Road, Ashburton, prepared by David Harford Consulting Ltd, July 2025 – Updated August 2025, dated 01/09/2025, reference 24-411
 - Record of Titles for CB413/165 and CB11B/1091
 - Annexures A to J
4. The purpose of the resource consent application is to ensure buildings 1 and 2, which directly contribute to the overall heritage values of Glassworks, are retained, and for buildings 3 and 4 to be removed. The existing chimney, standing at a height of 38.4m is proposed to be decreased to reduce its load and increase its structural integrity.



5. While it is noted that a subdivision consent is also being sought concurrently, this Affected Party Approval, pursuant to S95A of the Resource Management Act 1991 (RMA), relates specifically to the land use resource consent application.

Heritage Status

6. Ashburton Glassworks (Former) was listed on the New Zealand Heritage List/Rārangi Kōrero as a Category 1 Historic Place on 22 June 2007 (List no. 7707). The site comprises a complex of industrial buildings and a chimney standing at a height of 38.4m, formerly used for the glassworks factory. Glassworks is an important landmark in Ashburton, representing architectural, technological, aesthetic, cultural and historical significance.
7. Constructed in 1928, the factory briefly housed the Southern Cross Glass Company, playing a notable role in New Zealand's short-lived glass manufacturing industry. Operations rapidly declined within a few months due to the impact of the Depression. In 1947, the building was subsequently repurposed, first as a plywood factory and later for grain storage, reflecting the site's evolving industrial use over time.
8. The principal section of the factory complex features a steeply pitched roof with a tall, glazed clerestory, a symmetrical façade, intricate brickwork and a 38.4m high flanking chimney. These elements combine to create an outstanding feature and recognisable landmark within the Ashburton townscape.
9. The chimney was also constructed in 1928 along with the original masonry building. Given the flat terrain of the immediate environment, the chimney has long been considered a prominent feature and landmark in Ashburton. Its height and visibility has offered many helpful uses such as guidance for the RAF base during World War II and assistance to local golfers.
10. The Glassworks building has undergone several modifications since its construction, including the addition of adjoining structures or buildings in c1930 and 1950s to enable its continued use.

Background

11. HNZPT was consulted in 2024 by the applicants regarding the proposed works which form the basis of this resource consent application. At the time of consultation, the applicants discussed with HNZPT staff their proposal to part demolish adjoining buildings 3 and 4, undertake seismic strengthening works to buildings 1 and 2, and fully demolish the flanking chimney.
12. HNZPT advised the applicants that it does not consider that the demolition of buildings 3 and 4 would generate adverse effects on the heritage values of Glassworks and its site, considering these buildings were later additions which are non-contributory to the masonry building's heritage values. Further to this, HNZPT advised that the removal of building 4 would actually have a heritage benefit as it will increase visibility of the original masonry building.
13. The proposed demolition of the chimney was of considerable concern to HNZPT as the extant chimney is a prominent landmark and historic feature within the site and to the Ashburton district. The seismic assessment confirmed that as no drawings can be found, the preparation of a detailed strengthening scheme for the chimney would require extensive intrusive investigations to establish the foundation size and structure, reinforcement lap lengths and compressive strength. Even with this costly investigation, there will still be doubt as to the construction e.g.



reinforcement content and the extent of chimney wall bars into the foundation. The applicants therefore sought to fully remove the chimney.

14. At the consultation site meeting HNZPT staff raised the option to deconstruct the chimney down to the level of the existing rim/collar, instead of full demolition. We advised that this approach would enable the bottom section of the chimney to be retained as a stabilised ruin, ensuring its survival and avoidance of a complete and irreversible loss of heritage values associated with the chimney.

Heritage Conservation

15. The proposal involves seismic strengthening of buildings 1 and 2, the removal of adjoining buildings 3 and 4, and reduction in height of the chimney.
16. Building 1 comprises the original Glassworks building, while the adjoining building 2 comprises the timber shed (room b). Buildings 3 and 4 to be demolished include the timber shed (room q) and railway siding roof and workshop.
17. HNZPT is generally supportive of seismic strengthening, so long as works are undertaken sympathetically, as they enhance the building's structural integrity, thereby contributing to its continued use and longevity.
18. In this instance, HNZPT is supportive of the proposal to seismic strengthen buildings 1 and 2 to achieve an NBS rating of 67%. HNZPT was advised in 2024 that buildings 1 to 4 had an NBS rating of 15%. The proposed methodology will be undertaken in a sympathetic manner that will not detract from, nor adversely affect, the heritage values of buildings 1 and 2. Much of the seismic strengthening methodology involves interior additions which HNZPT supports to prevent detracting from the building's external form or generating any adverse visual effects.
19. The removal of adjoining buildings 3 and 4 which also forms part of the application, does not generate significant concerns for HNZPT. HNZPT does not oppose this aspect of the proposal, consistent with the advice provided to the applicant in 2024 during their initial consultation with us.
20. Building 3 was constructed in the 1930s and comprises a timber construction with corrugated steel exterior cladding, while building 4 was constructed in the 1950s to create a workshop and a roof over the railway siding. During the 2024 consultation site visit, it was evident that building 3 had been unmaintained and had become derelict.
21. HNZPT recognises that later modifications to historic places often contribute to the overall story and life of the building and site, and reflects much of its use throughout its lifetime. However, HNZPT concluded that the adjoining buildings 3 and 4 are not contributory buildings to the heritage values of Glassworks and its site, regardless of its continued use and story, and the financial implication of restoring them could be detrimental to the overall project.
22. In regard to the works proposed to the chimney, HNZPT appreciates the applicant's reconsideration of their initial proposal for total demolition and supports the revised proposal to reduce its height, in line with our recommendations. As noted in items 12 and 13 above, HNZPT also considered broader aspects of the project, including the financial implications of all proposed works, and current safety concerns. Consistent with the advice provided in 2024, HNZPT supports



the updated proposal to deconstruct the chimney down to the collar to reduce its load/weight and ensure its stability. We accept that this is a compromise, but consider it to be a pragmatic approach that recognises the desire to return this significant heritage building to a safe and functional work environment, therefore ensuring its future, and the significant cost involved in achieving that.

23. HNZPT also recognises that the chimney is no longer in use, is not intended to be used, and is currently structurally unstable.
24. Reducing the height of the 38.4m chimney to the collar level offers a practical solution that addresses structural concerns while ensuring a significant portion of the original structure is retained, enabling the story of the original chimney to still be told. In doing so, it better upholds the protection of heritage values in accordance with Section 6(f) of the RMA.
25. HNZPT supports the applicants' proffered conditions to provide a Temporary Protection Plan, a Demolition Plan, and remedial works being undertaken for the newly exposed facades of the remaining buildings following demolition. HNZPT supports the imposition of conditions of consent, should consent be granted, regarding these items as the applicants have stated in their application.

Archaeology

26. An archaeological site under the Heritage New Zealand Pouhere Taonga Act 2014 is defined as any place occupied prior to 1900 that may provide archaeological information on the history of New Zealand. An Archaeological Authority is required for any works that may modify or destroy an archaeological site.
27. HNZPT notes that the existing buildings on-site were constructed after 1900. It is unlikely that any remains would be identified in any regard. Additionally, given the span of time across the 19th and 20th century, and the limited nature of actual cultural material, it would be difficult to establish if any deposits relate to the 19th century use of the area in plantation. As such, HNZPT is satisfied that an Accidental Discovery Protocol (ADP), imposed as an advice note on this resource consent, should consent be granted, would be appropriate for the application. HNZPT, therefore, supports the approach outlined within the application to follow an ADP.
28. Appendix A to this letter contains the current HNZPT ADP.

Affected Party Approval

29. This letter constitutes affected party approval pursuant to s95E of the Resource Management Act 1991.
30. Please note that the granting of this affected party approval under the Resource Management Act 1991 by Heritage New Zealand does not constitute or in any way prejudice its response to any application for an archaeological authority made under the Heritage New Zealand Pouhere Taonga Act 2014 in respect of any proposed or future works.

Thank you for consulting Heritage New Zealand on this matter.



HERITAGE NEW ZEALAND
POUHERE TAONGA

Ngā mihi,

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APPENDIX A



HERITAGE NEW ZEALAND
POUHERE TAONGA

Heritage New Zealand Pouhere Taonga Accidental Discovery Protocol

This protocol does not apply when an archaeological authority issued under the Heritage New Zealand Pouhere Taonga Act 2014 is in place.

Under the Heritage New Zealand Pouhere Taonga Act (2014) an archaeological site is defined as any place in New Zealand that was associated with human activity that occurred before 1900 and provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand. For pre-contact Māori sites this evidence may be but is not limited to, bones, shells, charcoal, stones etc. In later sites of European/Chinese origin, artefacts including but not limited to bottle glass, crockery etc. may be found, or evidence of old foundations, well, drains, or similar structures. Burials/kōiwi may be found in association with any of these cultural groups.

In the event that an unidentified archaeological site is located during works, the following applies;

1. Work shall cease immediately at that place and within 20m around the site.
2. The contractor must shut down all machinery, secure the area, and advise the Site Manager.
3. The Site Manager shall secure the site and notify the Heritage New Zealand Regional Archaeologist. Further assessment by an archaeologist may be required.
4. If the site is of Māori origin, the Site Manager shall notify the Heritage New Zealand Regional Archaeologist and the appropriate papatipu rūnaka of the discovery and ensure site access to enable appropriate cultural procedures and tikaka to be undertaken, as long as all statutory requirements under legislation are met (*Heritage New Zealand Pouhere Taonga Act, Protected Objects Act*).
5. If human remains (kōiwi) are uncovered the Site Manager shall advise the Heritage New Zealand Regional Archaeologist, NZ Police and the appropriate papatipu rūnaka and the above process under 4 shall apply. Remains are not to be moved until such time as papatipu rūnaka and Heritage New Zealand have responded.
6. Works affecting the archaeological site and any human remains (kōiwi) shall not resume until Heritage New Zealand Pouhere Taonga gives written approval for work to continue. Further assessment by an archaeologist may be required.
7. Where iwi so request, any information recorded as the result of the find such as a description of location and content, is to be provided for their records.
8. Heritage New Zealand Pouhere Taonga will advise if an archaeological authority under the *Heritage New Zealand Pouhere Taonga Act 2014* is required for works to continue.

APPENDIX A

It is an offence under S87 of the *Heritage New Zealand Pouhere Taonga Act 2014* to modify or destroy an archaeological site without an authority from Heritage New Zealand irrespective of whether the works are permitted or consent has been issued under the Resource Management Act.

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