Submission on
NATIONAL POLICY STATEMENT - URBAN DEVELOPMENT

This submission is made by Historic Places Aotearoa Inc. (HPA) which welcomes the opportunity to comment on the proposed National Policy Statement on Urban Development (NPS-UD).

The reasons for making this submission are that HPA promotes the preservation of historic places in Aotearoa New Zealand. HPA also has an interest to promote the education of the public in the appreciation of heritage values. HPA is a key stakeholder in the consultation process and answerable to its affiliated regional societies and associated membership.

HPA has reviewed the NPS-UD and considered the impact the proposed statement will make with respect to this country's heritage buildings.

HPA has a particular interest in the subject of this NPS-UD, as it has the potential to dramatically change the distinctive heritage character of sections of New Zealand cities and towns.

Too often in New Zealand demolition of heritage buildings to create higher density urban environments is seen as the only solution. Other countries deal with heritage buildings in a more considered and constructive manner, including many European cities.
HPA is concerned that the proposed National Policy Statement on Urban Development (NPS-UD) risks undermining the protection of historic heritage from inappropriate development which is a matter of National Importance under section 6(f) of the Resource Management Act 1991 (RMA).

The proposed NPS-UD will require high growth cities to make room for growth regardless of their plans and rules designed to protect historic heritage from inappropriate development. The NPS-UD will require those plans and rules to be changed if they hold up development and intensification - even inappropriate development.

While HPA is not opposed to development, or intensification per se, it is opposed to inappropriate development which undermines heritage protection and has the potential to destroy heritage buildings and character areas in New Zealand cities.

By using the lesser term “reflecting” heritage in the scope of what constitutes a quality urban environment, the NPS-UD undermines the RMA’s existing standard.

The NPS-UD must acknowledge heritage in a more positive and definitive manner and, in advancing intensification, ensure that it is not at the expense of heritage and associated heritage protection measures.

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