Civic Trust Auckland

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Feedback on: Planning for successful cities
   A discussion document on a proposed National Policy Statement on Urban Development (NPS-UD)

Background - Civic Trust Auckland

Civic Trust Auckland (CTA) is a non-profit public interest group, incorporated in 1968, with activities and interests throughout the greater Auckland region. The aims of the Trust include:

- Protection of natural landforms
- Preservation of heritage, in all its aspects
- Promoting protection of heritage value of sites, buildings, places or areas
- Encouragement of good planning for the city and region.
- Promotion of public interest in the environment

Civic Trust Auckland welcomes the opportunity to have a say on this national policy statement. While being mindful of the Government's stated objectives in proposing this National Policy Statement, our feedback is intended to provide comment through an historic heritage lens.

We recognise national policy statements are established and administered within the framework of the Resource Management Act, and we note the NPS-UD discussion document is co-signed by the Ministers for both Urban Development and for the Environment.
In the section of the discussion document headed *Context*, outlining the changes the Government is trying to achieve for our cities, and how the proposed NPS-UD fits in, there is the following reference to *historical* heritage:

> Well-functioning cities, with effective design and a strong sense of place, should improve physical and mental health, well-being and social functioning. They also recognise historical and cultural *heritage*, both in a broad sense and specifically by reflecting their history and the connections to place for tangata whenua.¹

In the section headed *Making room for growth*, it is suggested:

> The preamble to the NPS-UD would contain a wider description of things that contribute to quality environments. This could include:
>  * reflecting historical and cultural *heritage* in the urban environment ²

Those two abovementioned references to heritage are the only two references to heritage in the discussion document.

The purpose of a National Policy Statement is to state objectives and policies for matters of national significance that are relevant to achieving the purpose of the RMA.³

The RMA states that:

> In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:
>  * the protection of historic heritage from inappropriate subdivision, use, and development:**⁴

Civic Trust Auckland considers historic heritage is an integral part of the physical environment, and it considers the need to provide for historic heritage extends to the preparation of national policy statements. It does not consider the discussion document adequately addresses this matter, nor that the imperatives of RMA s.6(f) can be provided for by simply reflecting (the closely-worded) historical heritage in the preamble to the NPS-UD.

While the proposed NPS-UD would alter the relative position of various factors for consideration between NPS, s.6 and s.7 levels, the RMA is currently the subject of imminent review and there can be no certainty as to how the relative importance of those matters will be provided for. Furthermore, the Ministry of Culture and Heritage has recently undertaken a review⁵ of issues

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¹ Discussion document p.13
² Ibid p.27
³ RMA s.45
⁴ RMA s.6(f) Matters of national importance.
⁵ Civic Trust Auckland participated in MCH’s review
within New Zealand's heritage protection system, and one of the options discussed by Ministry officials was the prospect of a NPS on Heritage.

Since the demand for development capacity is not expected all at once, and the loss of historic heritage is effectively irreversible, Civic Trust Auckland consider the Ministers would be prudent to further review the discussion document to provide for this country's historic heritage.

We would be only too glad to provide further feedback as to our views on these matters.

Signature

[signature]

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