Introduction

ICOMOS is an international non-governmental organisation of heritage professionals dedicated to the conservation of the world's historic monuments and sites. The organisation was founded in 1965 as a result of the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice in the previous year. ICOMOS is UNESCO’s principal advisor in matters concerning the conservation and protection of historic monuments and sites. The New Zealand National Committee was established in 1989 and incorporated in 1990.

ICOMOS New Zealand has 99 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners.

In 1993 ICOMOS New Zealand published the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. A revised ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value was approved in September 2010 and is available on the ICOMOS New Zealand website.

The heritage conservation principles outlined in the ICOMOS New Zealand Charter are based on a fundamental respect for significant heritage fabric and the associative or spiritual values of the place, conserved where necessary to ensure long term survival and the continuation of cultural heritage value, with the use of modern technology and materials where justified to ensure sustainable management and lasting stability.

Scope of this submission

ICOMOS NZ welcomes the opportunity to comment on the proposed NPS Urban Development (NPS-UD). We note that the policy aims to ‘enable growth by requiring councils to provide development capacity to meet the diverse demands of communities, address unnecessary regulatory constraints, and encourage quality urban environments. It will ensure growth is strategically planned and leads to well-functioning cities that contribute positively to people’s well-being’.
While ICOMOS NZ generally endorses this aim, we strongly consider that growth should not be at the expense of our rich and diverse historic and cultural heritage. Within the context of ‘well-functioning’ cities historic and cultural heritage provides residents with a tangible link to their past as well as contributing to their sense of regional, local and neighbourhood identity. It also provides such cities with a degree of character and distinctiveness that contributes positively to the quality of their urban environment and helps support the regeneration and sustainable cultural, social and economic functioning of residents, thereby enhancing the quality of their everyday lives and overall well-being.

It is therefore concerning to note that reference to historic and cultural heritage occurs only twice in the discussion document – in the contextual discussion on why successful cities are important to NZ (pg.13) and the discussion centred around the description of ‘quality urban environments’ (pg.27) – with specific reference being notably absent in the proposed objectives and policies.

In light of this we consider that there are aspects of the proposed NPS-UD that could be further reinforced to ensure that greater recognition is given to the role that historic and cultural heritage plays in creating high quality, well-functioning cities by those responsible for giving effect to the proposed NPS (and by extension s.6(f) of the RMA). These are as follows:

**Future Development Strategy (FDS)**

The proposal summary (pg.21) indicates that changes are proposed to strengthen and clarify the FDS requirements to more effectively guide long-term planning, including:

- how they will enable a quality urban environment
- identifying locations for intensification based on demand for housing, and proximity to services, amenities, infrastructure and employment

The rationale for these changes further indicates that the proposed provisions are designed to:

- identify where urban development should be avoided (e.g. sites of significance to Maori including wahi tapu, highly productive land, areas of significant indigenous biodiversity)

Although we note that sites of significance to Maori (including wahi tapu) are identified as areas where urban development should be avoided, no similar reference has been made to heritage buildings/areas.

We note that this intent is given effect to in proposed Policy P1D, which would require every FDS to identify:

- e) areas where evidence shows urban development must be avoided

While it could be inferred that this policy would extend to include sites and areas with recognised historic and cultural heritage values, the current drafting of this policy is interpretively ambiguous. To redress this situation we recommend that Policy P1D(a) is amended to specify a range of circumstances where avoidance would apply (i.e. areas where evidence shows urban development must be avoided, including: …), including any sites or areas of identified or potential historic or cultural heritage value.

**Describing ‘quality urban environments’**

The central consideration of ‘achieving the features and functionality of quality urban environments’ in making room for growth is supported, as is the inclusion of historical and cultural heritage in a suggested descriptor of key contributors to quality environments.

However, ICOMOS NZ is concerned to note this description is intended to be incorporated in the Preamble, particularly as this aspect of the NPS would have no legal weight.
As the concept of ‘quality urban environments’ is a foundational principle of the proposed NPS-UD we recommend that Objective O2 is extended to incorporate the matters outlined in the associated rationale (p.g.27), including the positive contribution historic and cultural heritage makes to creating a quality urban environment.

**Ensuring plan content provides for expected levels of development**

We support the suggestion that major urban centres include zone descriptions in their district plans to describe the anticipated type and nature of development within each zone, and an associated requirement that development is consistent with the outcomes sought.

This approach could be particularly helpful in zones where there is a high concentration of individual places of historic and cultural heritage or identified heritage areas as it provides a basis to inform and underpin the inclusion of heritage related objectives/policies/rules in plans and greater clarity/certainty to respective communities regarding the nature and extent of protection anticipated.

**Providing for intensification**

While the intent of Objective 07 and Policy P6A is laudable, given the important contribution that historic and cultural heritage makes to our sense of cultural wellbeing ICOMOS NZ is of the view that in progressing this objective and policy an appropriate balance needs to be struck between accommodating existing and anticipated residential demand and mitigating the impact this could have on heritage resources.

The decisions we make concerning where and how cities grow will have a profound influence on the perceptions of subsequent inhabitants and users of the historic/cultural heritage value they attribute to these areas and their settings. Although urbanisation provides economic, social and cultural opportunities that can enhance the quality of life and character of cities, unmanaged or ill-considered change in urban density and growth can undermine the sense of place, the integrity of the urban fabric and the identity of communities.

Consequently, we recommend that Policy P6A should be amended to include the following qualifier:

- e) no evidence of existing or projected characteristics or constraints that would suggest that urban development should be avoided (e.g. historic heritage value, natural hazards)

**Providing for greenfield development**

The need for local authorities to be responsive to development opportunities in ‘out of sequence’ greenfield locations or those that are outside identified urban development areas is acknowledged, particularly in centres that are experiencing high residential growth pressures.

However, in formulating an appropriate policy response ICOMOS NZ is of the view that adequate consideration needs to be directed towards ensuring that enabling provision for such opportunities does not result in the unintentional loss or damage of historic and cultural heritage resources within greenfield areas, particularly archaeological sites and sites of significance to iwi/hapu.

Although we note in the example policy that one of suggested pre-conditions is that enabled development ‘would not have adverse effects on protected areas or areas identified for restoration’, the suggested wording appears to have a ‘natural’ environmental bias (e.g. protected natural areas) as opposed one that also embraces historic and cultural heritage considerations. To redress this situation we recommend inclusion of an additional qualifier as follows:

- e) Development enabled by the plan change avoids any sites or areas of identified or potential historic or cultural heritage value
**Guidance and Implementation Support**

We note that as part of delivering the NPS-UD the government proposes to ‘include a comprehensive programme to work with and support local authorities to give effect to it’, with this likely to comprise guidance documents, technical support, and ongoing face-to-face support and engagement with local authorities. This proposal is strongly supported.

Regardless, we observe that the discussion document currently lacks detail around the form of the programme and the timeframe within which it is intended to be introduced. To ensure the NPS-UD is effectively implemented ICOMOS NZ maintains that it is imperative that appropriate guidance is released either at or around the same time that the final version of the NPS is issued.

We note, for instance, that identification of appropriate land by local authorities for future urban growth will necessitate a balance to be struck between meeting development demands and avoiding, remedying or mitigating any associated adverse effects on historic and cultural heritage.

Given the tensions inherent in this exercise, we are concerned that in the absence of suitable guidance some local authorities may be inadequately equipped to properly assess development requirements alongside relevant heritage considerations when weighing up future growth opportunities.

To address this we recommend, at a minimum, that supporting guidance is developed that reinforces that local authorities take into account the associative values of proposed areas, including their heritage values and features, in identifying suitable land for intensification and future growth and advises avoidance where such values are demonstratively evident.

ICOMOS NZ wishes to thank the Ministry for the opportunity to raise the matters outlined within this submission, and would be happy to assist if there is any aspect of this submission you would like to explore further.