

# ICOMOS NEW ZEALAND

## TE MANA O NGA POUWHENUA O TE AO

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### **Submission to the Ministry for the Environment: Proposed NPS Urban Development Capacity – Consultation Document**

**July 2016**

#### **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 110 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 Capacity (NPS-UDC). We note that the policy is directed towards ensuring that land supply for housing and business is affordable and keeps pace with growth, and that a key theme underpinning the NPS-UDC is 'that planning decisions must actively enable growth and development in urban areas, and accommodate that in such a way as to maximise wellbeing now and in the future'.

To deliver sufficient urban development capacity, ICOMOS NZ endorses the establishment of a forward looking and informed planning approach that is directed towards ensuring affordable housing and employment land is made available to ‘enable people and communities to provide for their social, economic and cultural wellbeing’. We also support the co-ordination of planning decisions with infrastructure providers to ensure the aspirations of future land allocation is achievable.

Regardless, there are aspects of the proposed NPS-UDC that we consider could be made more explicit to ensure that effectively local authorities discharge their obligation to protect historic heritage in giving effect to the proposed NPS (i.e. s.6(f) RMA). These are as follows:

### ***Cultural Wellbeing***

ICOMOS NZ notes that one of the over-riding objectives of the NPS-UDC (OA1) is to:

‘Support effective and efficient urban areas that enable people and communities to provide for their social, economic and cultural wellbeing’

While this objective is laudable, we note that the further explanatory material in the discussion document frames an important component of cultural wellbeing, historic heritage, as a cost that decision makers for urban areas need to better understand when identifying urban allocation opportunities (pg.21).

Given the important contribution that historic heritage makes to our sense of cultural wellbeing, ICOMOS NZ is of the view that in progressing this objective an appropriate balance needs to be struck between accommodating existing and anticipated residential and business growth demand and mitigating the impact this could have on historic heritage, particularly in identified medium and high growth areas. Although it is recognised that this is a responsibility that is incumbent on decision makers in preparing plans (s.74 RMA) and considering the merits of consent applications (s.104 RMA), it is currently something that is not explicitly articulated in either the proposed NPS-UDC itself or the supporting discussion document.

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, ICOMOS NZ considers that an explicit acknowledgement should be inserted in the Preamble to the proposed NPS-UDC that reinforces that local authorities are also required to ‘recognise and provide for’ those matters set out in s.6 of the RMA in discharging their obligations under the policy, including the protection of historic heritage from inappropriate subdivision, use, and development (s.6(f)) and the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (s.6(d)).

### ***NPS-UDC – Supporting Guidance***

Alongside adoption of the NPS-UDC we note that the government also proposes to introduce a package of non-statutory guidance to assist local authorities implement the proposed policy. Amongst the information intended to be provided is how to balance the proposed NPS with other national direction or specific matters listed in section 6 and 7 of the RMA.

Given the importance of providing for sustainable urban growth, ICOMOS NZ strongly supports the preparation of an appropriate guidance package to assist local authorities deliver on this outcome.

Regardless, we observe that the discussion document is currently silent on the extent to which the government is committed to this course of action and the timeframe within which a support package might be introduced. To ensure the NPS-UDC is effectively implemented we maintain that it is imperative that appropriate guidance is released at the same time that the final version of the NPS is issued.

ICOMOS NZ notes, for instance, that identification of appropriate land by local authorities for future urban growth will necessitate a balance to be struck between the needs of people and avoiding, remedying or mitigating any associated adverse effects on historic heritage.

Given the tensions inherent in this exercise, we are concerned that in the absence of adequate guidance some local authorities may be inadequately equipped to assess market requirements alongside relevant heritage considerations when weighing up future growth opportunities. To address this we would anticipate, as a minimum, that supporting guidance would emphasise that in identifying suitable land for future growth local authorities would take into account the associative values of each area, including its heritage values and features, and avoid those areas where such values is clearly 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.

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