Transforming the Resource Management System: Opportunities for Change Issues and Options Paper

Thank you for the opportunity to comment on the issues and options paper. Historic Places Canterbury (HPC) is affiliated with Historic Places Aotearoa (HPA). Our principle mission is to promote the preservation and documentation of historic places in Canterbury and to promote the education of the public in its appreciation of heritage values. While we are fully supportive of efforts to make the resource management system more responsive to changing environmental and social needs we will limit our comment to matters which affect heritage.

Section 6 of the RMA includes the protection of historic heritage from inappropriate subdivision, use and development as a matter of national importance. Although in practice the RMA has all too often failed to adequately protect heritage, HPC believes that it is vital that historic heritage continues to be recognised as a matter of national importance. We welcome the indication from Cabinet that the core principles of Part 2 are to be retained. We would support amendments which resulted in stronger statements of environmental and heritage values and which promote a more outcomes-based approach to planning. We would also support explicit recognition of te ao Maori within the legislative framework. We also believe there is merit in exploring the development of a separate statement of principles for the built environment. This would help to focus greater attention on the ways in which planning for the natural environment and the built environment may differ (although we believe that planning for the built environment must still take place within an overall framework of maintaining the health of the natural environment.) Any statement of fundamental principles for the built environment must recognise the national importance of heritage, both Maori and Pakeha. There is often a tendency to think of heritage in terms of built fabric or archaeological sites. However, for Maori, heritage will often reside in a landscape feature which for Pakeha would more usually be associated with protection of the environment, and heritage landscapes may involve a mixture of built and natural features. It is important that this cross-over of values is recognised within any principles developed for the built environment. Conflict is especially likely to arise with planning for urban expansion or infrastructure development. The example of Ihumatao illustrates the complex interconnections which can exist between natural, cultural, heritage, archaeological and landscape values.

Heritage protection in New Zealand is largely focussed on individual places, notwithstanding the power to create heritage areas. For this reason, heritage landscapes have gone largely unprotected. Another aspect of our history which has been poorly protected under the existing system is the protection of neighbourhoods that are representative of different stages of urban development. HPC believes it is important that the best examples should be identified and preserved. This might have been achieved within the scope of protection of amenity in s. 7 of the RMA, but the reality is that urban development pressures all too often have led to the destruction of many areas which should potentially have been protected. Permission for one out-of-scale building quickly leads to loss of more existing buildings as amenity for neighbouring properties is lost. Clear direction in a national policy statement directing councils to take into the account the importance of identifying and
putting in place rules to help protect the best or most representative examples of such areas would be helpful. However, we believe the most useful change of direction from the current planning process would be to legislatively mandate wider use of spatial planning. HPC believes that adoption of spatial planning would not only allow better strategic planning for urban intensification and expansion but would equally allow for identification and protection of those areas which are the best and most intact examples of the various stages of the development of our towns and cities or are important cultural landscapes. Multiple benefits - social, economic, cultural and environmental - would potentially arise from wider use of spatial planning including greater certainty and consequently fewer appeals, as well as greater consistency of planning documents where more than one planning authority is involved in creation of a spatial plan. However, successful spatial planning must be predicated upon all stakeholders having adequate opportunity to participate in the process of developing the spatial plan.