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RMA Review Issues  
Ministry for the Environment  
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WELLINGTON

Historic Places Wellington  
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Historic Places Wellington (HPW) is a registered charity that promotes the identification, protection and conservation of historic places in the Wellington region for the benefit of the community and the general public.

### **RMA Review Issues**

HPW welcomes the opportunity to comment broadly on issues relating to the RMA Review.

### **Heritage Protection**

HPW supports the existing identification in s.6(f) of the RMA of the protection of historic heritage from inappropriate subdivision, use and development as a matter of national importance.

However, that has proven an insufficient protection for important heritage which has been destroyed recently. Two “category one” Heritage New Zealand listed complexes in Wellington have been or are being demolished in the past 12 months; Erskine College Main Block (former), and the former teachers college at Karori.

The former fell victim to the misguided Special Housing Areas initiative of a previous government and HPW welcomes the proposed repeal of that legislation under which important protections were swept aside.

There has been a worrying trend by some owners of built heritage to leave protected buildings until they become a public safety risk and the courts have begun to order demolition in those cases, taking the view that safety is paramount. This “demolition by neglect” is reasonably common in New Zealand and is used by property owners to circumvent other protective measures flowing from s.6(f).

In some cases developers purchase land on which a heritage building sits at a low cost with this in mind. The market has priced in the heritage limitations, but the owner seeks a windfall profit by pushing for heritage protections to be lifted or modified.

### **Spatial Planning**

HPW supports spatial planning as a mechanism for local government to be clearer about where development is appropriate and where it is not. The reintroduction of such a mechanism provides another tool to help good planning decisions. For example in Wellington there are specific areas unsuitable for development given their heritage character. The Thorndon suburb is a good example where spatial planning is useful to avoid inappropriate development of heritage precincts.

New Zealand’s bold experiment with the RMA has not been totally successful for heritage protection. We lag behind Australia in the tools we have for this. In many regards s.6(f) was itself a compromise between protection and “inappropriate” development. Development, in our opinion, already has good support under the existing compromise.

Please do not hesitate to contact me about this matter.

Yours sincerely

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(Chair, Historic Places Wellington)  
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