



Website:

www.historicplaceswellington.org

Email:

wgtn@historicplacesaotearoa.org.nz

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Overview

Historic Places Wellington (HPW) is an incorporated society which aims to identify and protect heritage places in the Wellington region.

It is encouraging to see MCERT already consulting on the highest level of national direction so soon after the enactment of the Planning Act 2026 and well in advance of local authorities needing to notify proposed plans. The introduction of the Resource Management Act 1991 (RMA) was a fiasco with over 80 local authorities left to devise their own policies and plans in the absence of any national direction or substantial guidance for a more than a decade.

Historic Places Wellington supports the overall approach of providing for significant historic heritage in a sub-theme in the National Policy Direction (NPD).

The National Policy Direction sits at the top of the hierarchy of planning instruments in section 14 of the Planning Act 2026. Each of the instruments listed in section 14(1) must implement the instruments above in the hierarchy.

Therefore, the NPD provisions for significant historic heritage will drive both national standards and plan provisions. The NPD is key to providing a framework for achieving the Planning Act goal to “protect from inappropriate development the identified values and characteristics of significant historic heritage” (s 13(1)(g)). The identified values and characteristics are to be identified and protected via local and regional planning instruments using methods set out in national instruments.

It is important to get this policy framework right, as it is at the top of the hierarchy of other instruments, Subtheme 5: Significant historic heritage should provide a framework for preparing lower order instruments: national standards, spatial plans and land use plans. It should also provide a framework for assessing planning consent applications.

We have set out modifications to Subtheme 5 in the table below to better achieve the policy intent. In some places the wording of the NPD appears to emphasise promoting development rather than enhancing the viability of significant historic heritage, and hence heritage values, through protection and providing for appropriate uses and activities such as maintenance, seismic strengthening, adaptive reuse. It is not clear in some cases whether development refers to these essential activities or development in the more general sense of significant activities on the site or nearby that are not aimed at improving viability and could affect the heritage values.

Development and protection of historic heritage are not incompatible. Adaptive reuse, respecting heritage values, gives new life to heritage places. Some examples of approaches to adaptive reuse are given in the Heritage New Zealand publication *Saving the Town* (2020).

The NPD does not provide local authorities with any direction on how to address any potential conflicts between development and protection of historic heritage values, nor how to manage any trade-offs. We hope that this will be addressed in guidance.

The NPD contains information boxes on indicative implementation through national standards and we hope that these standards will be in place in time to inform the first generation of land use plans. It will ensure consistent provisions that provide for the protection and where appropriate use and development of significant historic heritage, with controls on the effects, to ensure long term viability. We have set out suggested modification to the national standards for significant historic heritage in the table below.

Specific comments on Subtheme 5

Policy intent

The policy intent section starts out with a statement on the value of historic heritage, but could be read as emphasising enabling development rather than supporting long term viability as the key priority. We propose rewording this to prioritise viability.

Heritage practitioners universally would argue that ensuring viability includes maintenance, finding appropriate uses and often development or adaptive reuse to maintain and enhance the functionality and financial viability of heritage places. Demolition by neglect, abandonment of historic heritage places to the elements, vandalism and decay, mostly results in demolition unless an appropriate use can be found and systems (e.g. plan rules) are in place to support dedicated owners. Facilitating maintenance and adaptive reuse will go some way towards reducing demolition by neglect but unfortunately requiring that historic heritage places be maintained would require significant changes to the Building Act, which currently facilitates demolition of dangerous buildings.

Subtheme 5: Significant Historic Heritage: Directives

PV Directive 5.1: Identifying significant historic heritage:

While we agree that local authorities should use criteria, thresholds and methods in national standards, there must also be obligation in the Directive for local authorities to go out and identify potential significant historic heritage.

Also, we note that the proposed timeline has the appropriate national standards being developed in 2028. This may be too late to assist local authorities prepare their first plans.

PV Directive 5.2: Protecting significant historic heritage and enabling appropriate use and development

We support the directives a), c) and d) but there must be a directive to specifically identify significant historic heritage and the associated values and characteristics in plans, including regional spatial plans.

Directive b) needs to be reworded to prioritise the protection and ongoing viability of these places. It needs to be split up to distinguish between use and development of the place to ensure its viability and other use and development, for example new development on the site or on adjacent sites, that may impact the values and characteristics:

We support directive 5.2 c) and as noted above, local authorities will need guidance to assist managing potential conflicts and trade-offs.

We support directive 5.2 d) and this should be strengthened by requiring that these provisions should follow the requirements of a national standard, as discussed below.

National standards

An issue highlighted in every HNZPT survey of heritage rules in district plans is the variability: some rules unduly restricting activities that would enhance the viability of the place, others allowing a range of potentially damaging activities without controls on the impacts. There needs to be a national environmental standard, based on the recommendations in the HNZPT guidance, on appropriate policies and rules in land use plans. We support this one-off opportunity to ensure standard approaches.

We suggest that the proposed national standards for identifying significant historic heritage include a straightforward methodology for assessing heritage significance.

We also suggest, as we have proposed above, that the national standards distinguish between activities aimed specifically at enhancing the viability of the place and other activities that could create adverse effects on the heritage values.

System-wide Māori interests directives

We note that there is an emphasis in the directives on ***identified sites of significance to Māori***. For example: *SW-Directive 1.3: To protect and provide for sites of significance to Māori [in accordance with national standards]* suggests that these sites be mapped or otherwise identified. Thought will need to be given in national standards on how such sites are identified as several plans identify wide areas that contain sites, or hold information on sites on the understanding that it will not be made publicly available.

Topic	Suggested amendment/ addition	Discussion
Policy intent: “ <i>appropriate use, development and <u>conservation</u> of significant historic heritage can support its long term viability.</i> ”	“ <i>appropriate conservation, use, and development of significant historic heritage can support its long term viability.</i> ”	Despite the stated goal in the Planning Act of protecting heritage values from inappropriate development, the stated policy intent is weighted heavily towards development:
Policy intent: “ <i>it is not <u>intended</u> to constrain development</i> ”	Replace with “ <i><u>It does not constrain development or limit housing or economic growth.</u></i> ”	The current wording gives the wrong impression: Historic heritage protection is not <u>intended</u> to constrain appropriate development. Rare high-profile cases where a development is declined because of unacceptable effects on significant historic heritage values give the wrong impression that this is often the case.
PV-Directive 5.1 Identifying significant historic heritage 5.1 a)	Add at the beginning: a) <i><u>Local authorities must identify significant historic heritage and assess the values and characteristics and risks to these places and revisit this each time a new plan is proposed.</u></i>	This directive needs to be split into a) a directive to identify values etc, and b) using criteria, methods, etc in national standards. The requirement for local authorities to identify heritage within their districts needs to be spelt out clearly.
PV-Directive 5.1 Identifying significant historic heritage 5.1 b)	The existing text becomes b)	We support the use of setting out standard criteria, thresholds and methods in national standards
PV Directive 5.2 Protection, use, development 5.2 a)	New section before 5.2 a) “ <i><u>identify and describe significant historic heritage and the values and characteristics and assess the values and characteristics and risks to these places and revisit this each time a new plan is proposed.</u></i> ”	This new section would require that the information from the new 5.1 a) is explicitly described in the plan
PV Directive 5.2 Protection, use, development 5.2 b)	Replace 5.2 b) with (i) <i><u>Enable appropriate use and development of significant historic heritage only where this contributes to the ongoing viability of these places and where adverse effects on identified values and characteristics can be managed to acceptable levels</u></i> (ii) <i><u>Manage the impact of use and development of activities, on the heritage site or adjacent sites, that do not contribute to the ongoing viability of the place and that may result in adverse impacts on the heritage values and characteristics</u></i>	This needs to distinguish between work done explicitly to enhance the viability of the place, and activities that could reduce the viability of the place or have impacts on the heritage values.

Topic	Suggested amendment/ addition	Discussion
PV Directive 5.2 Protection, use, development 5.2 c)	Supported	National standards need to set out standard policies, methods and rules to achieve this and to ensure consistency between plans. Local authorities will need guidance to manage potential conflicts and trade-offs.
PV Directive 5.2 Protection, use, development 5.2 d)	Supported Consider adding a reference to a rules framework within the national standards	National standards need to set out standard policies, methods and rules to achieve this and to ensure consistency between plans.