



Submission on the Consultation Draft of the Natural and Built Environment Bill

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1. Civic Trust Auckland (CTA) thanks the select committee for the opportunity to submit on the Consultation Draft of the Natural and Built Environment Bill.
2. Civic Trust Auckland (CTA) is a non-profit public interest group formed in 1968 with activities and interests throughout the greater Auckland region. It is a regular submitter on matters of interest to it, mostly at a local government level but also on occasion national matters where they affect the Auckland region. The aims of the Trust include the:
 - protection of natural landforms
 - preservation of heritage in all its aspects
 - encouragement of good planning for the city and region.
2. For all its good intentions, the Resource Management Act was complex and considered an obstacle to development and people's ability to provide for their economic well-being. At the same time, people and communities concerned with environmental degradation found that the RMA did not provide the desired protections that enabled them to provide for their social and cultural well-being.
3. In line with recommendations from the independent Resource Management Review Panel, the Government announced three new pieces of legislation to replace the RMA – the National and Built Environments Act (NBA); the Strategic Planning Act (SPA) and Climate Change Adaption Act (CAA).
4. This select committee process is dealing with the Consultation Draft of the Natural and Built Environment Bill (NBA), and since that caters generally well for the natural environment, CTA's comments are limited primarily to aspects of the Bill dealing with the built environment.
5. For a start, there is no definition of 'built environment', and considering the importance of this phrase in the title and purpose of the Bill, it is recommended that an inclusive definition of built environment should be added.

6. Further still, having appropriately defined both natural and built environment, where feasible throughout the text, the plain generic term 'environment' should be used, for we surely all want to protect the environment.
7. It would be helpful to provide English definitions for Māori terms used in the Bill.

Environmental outcomes

8. We support section 8(h) referring to cultural landscapes thus acknowledging layers of history, but cultural heritage should not be the only environmental outcome in section 8 with an ambiguous qualifier requiring the place be managed in an undefined way proportional to its value. That part of the clause should be removed.

Purpose of national planning framework

9. We consider that 'historical and cultural heritage' as referenced in the purpose of Heritage New Zealand Pouhere Taonga Act 2014, and 'historic heritage' as provided for under section 6(f) of the RMA since 2003, both fit well with the matters of national importance referred to in 10(a). Indeed there is considerable scope to enhance the efficiency and effectiveness of heritage recognition and protection across both central and local government, and that fits in well with the desirable consistency referred to in 10(b).

Topics that national planning framework must include

10. Historic/historical/cultural heritage, or whatever nomenclature may be adopted, if it reaches a prescribed threshold of significance, should be included in the list of topics the NPF 'must' have in section 13(1) of the NBA. Including it in 13(2), would not be adequate since there is no public mandate to consign heritage from a 'matter of national importance' to 'nice-to-have' status'.

Summary

11. "We need to build both up and out to meet the huge demand for housing, but there are ways to do that without losing the character of our communities. Our heritage should not be an either/or. We're a young country when it comes to built heritage and we should be doing everything we can to preserve what we have." While we acknowledge the housing issues, we also endorse the sentiments expressed above by Jacinda Ardern and therefore encourage the Select Committee to strengthen heritage provisions in the Natural and Built Environment Bill.
12. We look forward to the opportunity to speak in person to our submission.

Date of submission: 4 August, 2021

Signature:



Audrey van Ryn
Secretary, Civic Trust Auckland