



Submission of Civic Trust Auckland

Heritage New Zealand Pouhere Taonga (HNZPT) Draft Statements of General Policy (October 2024)

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Introduction

Civic Trust Auckland (CTA) is a non-profit public interest group formed in 1968 with activities and interests throughout the Auckland region. Its aims include the protection of natural landforms and the preservation of heritage in all its aspects.

CTA is a regular submitter on matters of interest to it, both to Auckland Council and to central government. We made submissions on HNZPT's policy guidelines in 2015, and we welcome the opportunity to do so again. We note that the latest iteration has been refined and reduced in size but still addresses policy under the same major headings as previously, namely:

- Statutory role of advocacy for historical and cultural heritage
- Administration of the archaeological provisions of the Heritage New Zealand Pouhere Taonga Act 2014
- Administration of the NZ Heritage List/Rārangi Kōrero
- Administration of the National Historic Landmarks List/Ngā Manawhenua o Aotearoa me ōna Kōrero Tūturu
- Management and use of historic places owned, controlled or vested in Heritage New Zealand

Reducing the document is to be commended for its simplicity and legibility.

For the sake of clarity, excerpts from HNZPT's policy document are italicised and set to the left-hand margin, with CTA's comments indented and below.

Kupu Whakataki Introduction

Objective: Engagement is central to all the work of Heritage New Zealand Pouhere Taonga

Heritage New Zealand Pouhere Taonga works to a Stakeholder Engagement Framework focused on three broad groups: Tangata Whenua, Tangata Tiriti and the government. These groups encompass all the people we work with: hapū and iwi, owners, businesses, developers, government agencies, local government, and many more.

Comments:

The HNZPT Act 2014 contains a definition for 'Tangata Whenua' though not one for 'Tangata Tiriti', and notwithstanding this policy document provides a definition of 'Tangata Tiriti', CTA suggests the three broad groups referred to above be cited as "Tangata Whenua, New Zealanders of non- Māori origin, and the government."

The expression 'many more' is undefined and perhaps section 4(c) of the Act could provide a useful basis for clarification.

Tauākī Hapahapai Advocacy Statement

Background

This Statement guides our work offering technical conservation advice and participating in resource consent processes and government policy development. It encompasses activity under a wide range of legislation .. but especially the environmental and land-use legislation that currently regulates protection of cultural heritage.

Comment:

HNZPT notes the policies proposed reflect current legislative provisions and do not seek to anticipate any future legislative changes. Given the legislative reform currently underway is likely to affect heritage significantly, and though HNZPT expects there will be opportunities for it to participate in these reforms, and a review of these policy documents is not required for another 10 years, the possibility of an earlier review as provided by HNZPT Act 2014 s.18(1) could be made explicit even if only in a footnote.

OBJECTIVE: Heritage New Zealand Pouhere Taonga honours te Tiriti/the Treaty and implements Tapuwae, the Māori Heritage Council Statement on Māori Heritage

Recognising all values

- 1.1 *Heritage advocacy by Heritage New Zealand Pouhere Taonga recognises the relationships of people to places in understanding our bicultural history and communicates this mātauranga/knowledge, especially to children and younger New Zealanders to pass on to future generations.*
- 1.2 *Heritage New Zealand Pouhere Taonga recognises the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tūpuna, wāhi tapu, and other taonga, including the exercise of kaitiakitanga, and advocates for the understanding and protection of values assigned to cultural heritage through these relationships.*

Comment:

Under the heading of 'recognising all values', paragraph 1.2 expressly addresses the recognition of Māori values and in order to be fully inclusive we suggest the words 'our bicultural' in paragraph 1.1 be replaced by the word 'their'.

OBJECTIVE: Engagement is central to all the work of Heritage New Zealand Pouhere Taonga

Setting priorities

1.9 *Heritage New Zealand Pouhere Taonga sets priorities for its advocacy work after considering:*

- a) *the potential impact on cultural heritage locally, regionally, and nationally, and*
- b) *how to make the greatest difference to the broadest range of stakeholders, and*
- c) *in the case of individual places:*
 - i) *their relative significance as indicated by entry on the List and status as a Landmark, or other formal identification of heritage value such as a District Plan schedule, and*
 - ii) *the need to support local authorities in their work to protect and conserve cultural heritage places.*

Comment:

There are many Category 2 places on the List that have not been reviewed for a long time but which upon review are often found to have greater significance than previously understood. Some provision in the wording could be made to reflect the need for the information being considered by HNZPT to be up-to-date.

OBJECTIVE: Heritage New Zealand Pouhere Taonga practice heritage recognition, conservation, and protection outcomes

Incentivising cultural heritage conservation

1.14 *Heritage New Zealand Pouhere Taonga recognises the significant costs of conserving cultural heritage expended by private owners in the public interest and accordingly advocates for:*

- a) *local authorities to provide incentives for cultural heritage conservation, including rates relief, loans and grants, fee waivers, and dispensations from planning provisions where this would result in better heritage outcomes, and*
- b) *public bodies generally to provide financial support for owners, and*
- c) *the creation of contestable funds for significant at-risk cultural heritage.*

Comments:

HNZPT should include central government amongst those to whom it advocates for heritage incentives.

HNZPT should develop a policy position that upon removal of heritage places from council heritage schedules, a betterment tax should be levied and which could in part be channelled to the protection of heritage.

National direction and planning documents

1.21 *Heritage New Zealand Pouhere Taonga advocates for national direction in heritage management through planning documents and guidance prepared under the RMA, including the development of a National Policy Statement under the RMA.*

Comment:

CTA notes that the Ministry of Culture and Heritage has already engaged with some 250 parties in the development of 'Strengthening protections for heritage buildings (October, 2018)', a report on issues within New Zealand's heritage protection system. We encourage HNZPT to encourage the Ministry to reactivate that work stream towards the development of an NPS-Heritage, with some urgency given the imminence of changes to the NPS-Urban Development.

Scheduling in District Plans and Regional Coastal Plans

1.24 *The criteria in section 66 of the HNZPT Act should be used as the basis for scheduling historic places and historic areas in Plans, and the relevant requirements in the HNZPT Act should be the basis for scheduling wāhi tūpuna, wāhi tapu and wāhi tapu areas.*

Comment:

CTA consider that heritage values should logically be able to be measured in consistent manner across the country, and alignment of council heritage schedules across the country with HNZPT's List would be the logical basis of that, provided appropriate resourcing of the List was made available.

Monitoring and evaluation

1.38 *Periodically, Heritage New Zealand Pouhere Taonga will publish an assessment of local authority performance in heritage management against the policies in this Statement and will work with councils to improve performance if needed.*

Comment:

We consider it would be reasonable to commit to review the performance of local authority performance on a ten yearly basis.

Tauākī Rārangī Kōrero List Statement

OBJECTIVE: Engagement is central to all the work of Heritage New Zealand Pouhere Taonga

Setting and communicating priorities

Comment:

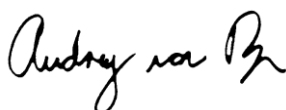
We note HNZPT does a good job promoting the properties it owns, and we suggest that there be some policy provision for the promotion of the wide range of items on the List that are privately owned but which together also comprise our shared heritage.

ENDS.

Thank you for the opportunity to provide input on HNZPT's Statements of General Policy and we welcome the opportunity to speak to these points if the opportunity presents itself.

Date of submission: 14 March 2025

Signature:



Secretary, Civic Trust Auckland