

Submission on He Tauākī Kaupapahere Whānui: Heritage New Zealand Statements of General Policy

Manawatū District Council

- Manawatu District Council appreciates the opportunity to comment on the Draft Heritage New Zealand He Tauākī Kaupapahere Whānui Statements of General Policy 2024. As a small district council with limited financial resources, we face considerable challenges in balancing the need to protect buildings and sites with significant heritage values with the practicalities for owners with limited resources trying to maintain buildings which are often in a deteriorating condition.
- We support Heritage New Zealand's objective and emphasis on engaging with communities and local government, heritage owners and tangata whenua. We encourage diverse input as best practice.
- While supportive of the concept of incentives for private owners to conserve heritage, many smaller local authorities such as ours are not able to provide significant rates relief, loans or grants. Waiving of resource consenting fees also often proves insufficient to incentivise the maintenance or retention of built heritage that is in poor condition. We note too the move by central government to discourage councils from investing in what Ministers deem 'non-essentials' or 'nice-to-haves'. We therefore would be supportive of Heritage New Zealand advocating for greater heritage-support funding at central government level (such as the expansion of existing contestable funds).
- Although the Manawatū District Council supports efforts to improve New Zealand's climate change response and promote sustainability, we note that retaining heritage buildings is not always the greenest solution. Not all old buildings can be re-used, and many fall well short of modern insulation and energy efficiency standards. The concept of sustainability also has an economic element to it and some building owners argue that it is simply not economic to retain their building relative to other options. We suggest paragraph 116 be changed to say that retention of heritage buildings can be more sustainable approach to development.
- We support a nationally consistent approach to heritage protection, such as having a National Policy Statement on Historic Heritage, which provides clear and consistent policies across the country to ensure that all communities, regardless of their size or resources, are able to understand and adhere to common heritage protection standards.
- We support Heritage New Zealand's recognition that retention of all buildings (or retention on the same site or at the same location) is not always possible because of unacceptable risk. We recommend that guidance, possibly included in the suggested National Policy Statement, be prepared to help clarify when it may be appropriate for a building or site to be removed from the Heritage New Zealand list or from schedules in district plans.

7 March 2025

- With Amendment: The Manawātū District Council (MDC) supports communities being able to prioritise their heritage buildings. There is a significant number (approximately 45) of Category 2 protected Edwardian buildings within the Feilding Central Business District. Most of these buildings have little to no financial value. Typically, the Capital Value and the Land Value are the same or very close, with a nil Value of Improvements. It is not feasible to retain them all. During previous consultation, the community identified six clear favourites, and there are another four buildings that Council considers should be retained. This makes approximately 10 commercial buildings within the Feilding CBD that MDC would advocate should have more protection than the other Category 2 historic places, which pragmatically may need to be left for the market decide whether they are retained.