

## Stephen Davis

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**From:** phil.barry9@icloud.com  
**Sent:** Friday, 4 April 2025 10:40 AM  
**To:** District Plan Review Team  
**Cc:** Neil McGrath; Mark Blackham; Neil Kemp  
**Subject:** [EXTERNAL] Submission on HCC Proposed District Plan  
**Attachments:** VHG Submission on HCC Proposed District Plan 040425.pdf

**Categories:** Steve

Dear sir/madam

Please find attached a submission from the Voluntary Heritage Group on HCC's proposed District Plan.

We could not gain an advantage in trade competition through this submission.

Our members are directly affected by an effect of the subject matter of the submission.

We wish to be heard in support of this submission.

If others make a similar submission, we do not wish to present a joint case with them at the hearing.

Yours sincerely

*Philip Barry*

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[https://www.facebook.com/voluntaryheritage/?\\_rdr](https://www.facebook.com/voluntaryheritage/?_rdr)

<https://voluntaryheritage.wordpress.com/>



Councillor Brady Dyer  
Chair  
District Plan Review Committee  
Hutt Council

By email: [district.plan@huttcity.govt.nz](mailto:district.plan@huttcity.govt.nz)

4 April 2025

#### **SUBMISSION ON ADDITIONAL HERITAGE LISTINGS IN THE PROPOSED DISTRICT PLAN**

This is a submission from the Voluntary Heritage Group (VHG) expressing our concerns and recommendations regarding the 72 additional heritage designations in Hutt City Council's proposed District Plan.

The VHG is a nationwide group that was founded by Hutt residents and has many members who are resident in the Hutt. The VHG and its members are committed to supporting the heritage designation of private property by Councils only when the property owner has given their expressed written consent. Heritage designation imposes numerous constraints and burdens on the property owner, and it is only right that the property owner's consent should be obtained before any such designation applies.

Hutt City Council's Proposed District Plan adds 72 properties to the Council's already long list of heritage designated properties. The proposed newly heritage-designated properties include 16 private residences, 19 commercial properties and 37 other properties (such as churches, halls, wharves and school buildings). We acknowledge the Council is proposing the removal of 21 properties from its current heritage list. But the addition of 72 newly heritage designated properties places considerable burden on the owners of those properties.

Heritage listing imposes significant ongoing costs and problems for property owners (refer Annex One). Evidence we have previously provided the Council shows insurers will charge increased premiums (eg, + 25% or more), impose higher excesses, and may refuse to provide cover for the additional costs in repairing heritage-designated properties (refer Annex Two). Research indicates that heritage listing reduces the value of a property by 10 to 30 percent.

The empirical evidence of reduced values for heritage-designated properties is reinforced by anecdotal evidence provided by real-estate agents who have reported that many potential buyers lose interest when they learn that a property is heritage listed. This reflects the increased significant costs and the lack of development prospects, as heritage rules mean the owner cannot make many changes to their house. It is also because heritage properties require considerable and regular maintenance and will be subject to strict rules which can act as a deterrent for potential buyers once they factor in cost and time.

The Hutt City Council already maintains a substantial list of heritage properties relative to other councils. On a per capita basis, Hutt City is in the top third of councils for the number of residential properties it heritage designates in its Plan.<sup>1</sup>

Designating additional properties as heritage is particularly inappropriate at the current time when the central government is reviewing the Resource Management Act (RMA) and has announced it will be introducing to the House before the end of this current year fundamental reform of the RMA that will be based on the protection of property rights.

In these circumstances we request that Hutt City Council not designate any more properties as heritage in the final District Plan unless the owner of the property has agreed in writing to that designation. Failing this, we particularly ask that the property of any owner who has submitted against the proposed designation be removed from the list.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P Barry', with a long horizontal flourish extending to the right.

Philip Barry  
Convenor  
Voluntary Heritage Group

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<https://voluntaryheritage.wordpress.com/>

<https://www.facebook.com/voluntaryheritage>

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<sup>1</sup> Refer <https://www.tdb.co.nz/wp-content/uploads/2022/09/TDB-Advisory-Voluntary-Heritage-Group-Councils-Heritage-Policies-2022.pdf>

## Annex One



### The Costs of Heritage Listing

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A Council heritage designation imposes substantial costs on the home-owner.

These costs include:

- 10% to 30% reduction in the value of the home.
- Substantial ongoing costs and problems for property owners.
- Insurers charging increased premiums (25% or more), increased excesses and refuse to provide cover for the additional costs in repairing heritage homes.
- Significant restrictions on what a home-owner can and can't do with their property. Once a property is heritage-listed, the owner has to get the Council's special consent to:
  - make any changes to the exterior of their home
  - change a window frame
  - take a chimney down to remove any risks from earthquakes
  - add a solar panel to help mitigate climate change
  - any other meaningful modifications to their home
- Having to seek Council approval to modify a heritage-designated property: a process that is costly, grossly time consuming and where success is by no means guaranteed.
- Not being able to develop or intensify their property in the way that their neighbours are able to.

Currently the Council can decide unilaterally to list someone's home as a heritage property, whether the home-owner wants it or not.

The Voluntary Heritage Group wants the Council to adopt the following policy:

***"That a property should only be added to the District Plan as heritage-designated with the express written consent of the property owner."***

# Annex 2: Impact on insurance premiums

**From:** Debbie Hutton <[debbie@albanyins.co.nz](mailto:debbie@albanyins.co.nz)>

**Sent:** Friday, 21 May 2021 7:50 am

**Subject:** Heritage designation

Morning [REDACTED]

I've now had 3 responses from our 3 domestic insurers as follows;

## Ando

Each property is taken on a case by case basis & would largely depend on what the class 2 designation entails. Please advise what the implications are on the client as part of the class 2 designation regard to the property, it's appearance etc?

## NZI

There are commonly three types of classification they may be given if Heritage/Council NZ designated – list can be found [Search the List | Heritage New Zealand](#);

- HNZ or council designated Category 1 & 2 – for places of special or outstanding historical or cultural significance or value
  - We require a satisfactory builders report and also a valuation taking into account the cost to re-build to council spec.
  - If accepted, higher excess will be imposed and minimum 25% loading
- Historic Area/precinct – groups of related historic places such as a geographical area with several properties or sites, or a cultural landscape. Emphasis is on the significance of the area in Wellington.
  - We require a satisfactory builders report and also recommend a valuation taking into account the cost to re-build to council spec.
  - If accepted, higher excess will be imposed and minimum 25% loading
- Council Character Area
  - If within the Wellington region and meets pre-1935 criteria then;
    - o Satisfactory builders report and valuation required.
  - If within the Wellington region and does not meet pre-1935 criteria then declined.
  - Anywhere else in NZ requires referral to us and provided it is a normally acceptable risk, the character area would generally not play into our underwriting decision.

## Vero

In regards to the heritage Question If the home is pre 45 rewired , Re- gibbed and Heritage it would be rated as such no increase in the premiums but the following terms would apply

"Where the home is registered with the New Zealand Historic Places Trust, we will not pay for any additional costs or fees required to comply with any heritage covenant(s) that apply to the property"

So, 3 different responses. Although Ando still need to know exactly what heritage status it would fall under in order to confirm their underwriting stance, which is the one you particularly are trying to place your property with Vero, as they don't like insuring much in the Wellington region.

I trust that this assists you. If you can provide more information, I can approach Ando again for you.

Please note, effective 15 March 2021 our Disclosure & Regulatory requirements have changed. To view our Disclosure Statements, Terms of Business and other Regulation Documents please follow this link;

[Disclosure & Regulation Documents \(albanyins.co.nz\)](#)

Best regards,



DEBBIE HUTTON

DIRECTOR

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