

3 July 2006

Re: Proposed District Plan Change 43: Heritage Provisions

This submission is from the Wellington Architectural Centre, a group which represents both professional and non-professionals interested in architecture and design, and in the promotion of good design in Wellington.

1) Support for the Proposal

The Wellington Architectural Centre strongly supports the proposal to strengthen the regulatory controls for the protection of the City's historic heritage. We support the redrafting of the objectives and policies to emphasise the protection of historic heritage. We also support the proposal to make additions and alterations to listed heritage buildings a Discretionary Activity. We support the proposal to make the demolition or relocation of listed buildings or objects a Discretionary Activity (Unrestricted).

2) Discussion

We strongly commend the council for reviewing the effectiveness of its heritage policy, and for acknowledging the need to address the finding that the current District Plan is not achieving its aim of protecting heritage values. We consider that the proposals will improve the current District Plan, but we also suggest the following.

a) Contemporary heritage

We consider that the proposals are too focussed on heritage as historic. The suggestion that there is a need to provide a "balance between heritage protection and development" (p. 6) assumes that all heritage is historic. The policy needs to acknowledge that good development might positively contribute to Wellington's heritage stock - both in terms of smart reuse of existing historic heritage and in the production of new architectural heritage. Both the heritage policy and the broader District Plan should, in our opinion, aim for achieving new building as new heritage.

b) Financial Incentives and Heritage Advocacy

In principal we support the intention of new financial incentives to support heritage but would like more detail regarding this. We consider that unless sufficient funds are put forward such a programme is unlikely to be successful. We endorse the proposal that the council will continue a level of heritage advocacy, but consider that, even if this is not the key thrust of the Council's heritage policy, that this proposed advocacy must be explicitly outlined with a formal commitment to specific activities and goals to monitor the success, funding levels, and effectiveness of this advocacy re: public and building industry education.

c) Facadism

We are concerned that there is still a privileging of the public facade or elevation over a more comprehensive interest in the building as heritage (p. 11). It is this attitude that has meant that many culturally valuable interiors of buildings have been gutted, and that the rear service sides of buildings (and stables and other utility buildings behind street buildings) have been demolished. A comprehensive survey of inner city buildings would be useful to determine the rarity (and hence need for protection) of different buildings and building fragments (A similar project beyond the inner city is also suggested - but considered secondary).

d) Heritage Areas

While we appreciate the aim of heritage areas to "ensure the group values of buildings are not undermined by individual consents" (p. 3), we are cautious that such an approach may undermine the value of the new architecture in such precincts, and are



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wary that such new developments will err towards the side of caution and mimicry rather than assertive architecture in its own right.

e) Continued Work on Heritage List

We applaud the council's continued work to identify and document further buildings and objects worthy of inclusion in the District Plan's Heritage List, and support the focus on mid Twentieth Century Buildings. We are willing to assist, if possible, in the research of buildings designed by members and former members of the Wellington Architectural Centre.

Recommendations

We recommend that the council:

- 1) survey all city buildings to ascertain what interiors of buildings currently exist which deserve heritage protection, and implement protection immediately where relevant.
- 2) establish new heritage areas which recognise industrial architecture (e.g. the Hannah Shoe Factory Precinct), Brutalist Architecture (e.g. Wellington Teachers Training College).
- 3) make available the heritage inventory of listed buildings and objects on the council website.
- 4) put forward a strategy to address those buildings worthy of protection which, due to limited resources (or other reasons), are not listed in the District Plan. The Historic Places Act, for example, recognises all sites occupied prior to 1900 as deemed to be an archaeological site, and hence required to have archaeological reports, and recording occur as part of the process of resource consent. The council needs to similarly have some provision to examine the existing building fabric (especially the interior) prior to alterations, additions or demolition of building. Perhaps the Heritage Provision should require that listed buildings and buildings which exhibit specific heritage values (e.g. rarity, work of a significant architect, etc.) are covered by the proposed heritage provisions. We consider that there is a need to anticipate situations which have meant that buildings such as Plischke's Cashmere Rd Hall can be demolished simply because they are not listed, despite having significant architectural and heritage value.
- 3) establish a mechanism to explicitly recognise excellent contemporary architecture as heritage, and consider establishing an heritage precinct for excellent contemporary architecture. Consideration should be given to Wellington buildings which are recognised by National N.Z.I.A. awards, or international awards (e.g. Oriental Bay?). These should be taken into account in the Built Heritage Policy.
- 4) determine that heritage can not be used as a lever to achieve private property gains to the detriment of Wellington's cityscape and urban design (e.g. 10 Alpha St).
- 7) provide regular seminars and lectures for developers, architects and others involved in the building industry about heritage issues, and best practices in heritage development etc. and these should be designed to accommodate industry requirements for continuing education. We would be happy to advertise such seminars etc. to our members.
- 8) consider strategies to develop an appreciation of Wellington's architecture and built environment by the public. For example regular tours of significant Wellington architecture (e.g. Parliamentary Precinct), and perhaps of specific architects' work (e.g. Chapman-Taylor, Thomas Turnbull, Gray Young, Bill Toomath, Jim Beard). These might be organised through Absolutely Wellington, Wellington Tourism etc in conjunction with NZHPT, School of Architecture, VUW, School of Design, Massey University, Interior Design Programme, Weltec, Wellington City Gallery, Wellington Art Deco Society, NZIA, NZILA, and the Wellington Architectural Centre, for both locals and tourists.
- 9) work with the Futuna Trust to ensure long term viability for public access and ownership of Futuna Chapel.

Conclusion

We strongly support the council's aim to recognise and protect Wellington's built environment. We consider that heritage is an important and critical part of safeguarding Wellington's long-term identity and cherishing the vibrant relationships between old and new urban fabric. The city is, as the council itself recognises in the Urban design

Design, "an ever-changing environment," and we support the council's aims to both ensure quality heritage remains a vital and relevant part of Wellington, and to continue to debate contemporary thinking about the importance of heritage for the city.

Yours sincerely

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