

2 March 2018

Hon. Eugenie Sage
Minister of Conservation
Parliament
New Zealand
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Tēnā koe Minister

We are writing to you to highlight a number of areas that we consider to be important in your Conservation portfolio.

Firstly, congratulations on your recent appointment as Minister of Conservation. We are writing to you to highlight a number of issues that we consider important in your Conservation portfolio.

As you may know the Architectural Centre has a long history of advocating for a better environment through good design. For example, the Centre has been involved in heritage advocacy, since its founding in 1946. Examples of this over the years include: Old St Pauls (1966), the Public Trust Building (1975), the State Insurance Building (1988), Erskine Chapel (1992), Futuna Chapel (2002-3), and Gordon Wilson Flats (2015-17).

Our interests coincide with the Department of Conservation responsibilities to preserve and protect natural and historic heritage, safeguarding the options of future generations. The following comments address a combination of both natural and historic, which we consider to be important to address:

- (a) **Support urban natural heritage initiatives**, including green corridors, daylighting streams, and predator-free areas. These kind of initiatives become increasingly important as calls to densify cities, in order to enable more effective infrastructure (e.g. transport) and liveability, come into effect.
- (b) **Review the requirements for the description of heritage trees in District Plans.** For sustainability, as well as heritage, reasons, trees are important to retain. We need to develop ways of designing our urban environments which protect and retain existing trees and increase the number of trees. In this regard we support the repeal of RMA s76(4A) etc which requires only trees specifically identified to be protected in a District Plan. We also look forward to an urban component to the one billion trees planting project.
- (c) **Discuss** with the Minister for the Environment and Minister for Climate Change, **a requirement for energy-use calculations to be included in applications for building and resource consents**, with the phasing in of maximum energy-use regulations.
- (d) **Implement a National Policy Statement (NPS) on Historic Heritage** to provide better guidance on heritage issues at the Regional Policy Statement, and District Plan, levels of the Resource Management Act hierarchy. A NPS on Historic Heritage would go some way to strengthen the heritage policy function of the Department of Conservation.



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- (e) **Normalise the use of Heritage Orders.** The RMA makes provision for heritage orders (RMA ss187-198), which provide the strongest level of heritage protection in the country, but are infrequently used. The legislation recognises the legitimacy to set aside land for heritage purposes in the same way that it is appropriate to set aside land for public works. There appears to be a heistancy among Heritage NZ and city councils and the Crown to use Heritage Protection Orders. This is in distinct contrast to our cultural relationship to designations (the equivalent mechanism to set aside land for infrastructure) - NZTA appears to use these as a normal part of their business - as they should.
- (f) Consequently, we strongly encourage you as Minister to normalise the use of Heritage Protection Orders as a key mechanism to protect our country's historic heritage. Currently the buildings with heritage orders in Wellington are: Plimmer House (1872-74), St James Theatre (1912), Old BNZ Buildings (1883-84; 1904), Public Trust Building (1908), the Prime Minister's Residence (1862-73), Erskine College & Chapel (1906 & 1929-30). We note that:
- (i) there is a distinct lack of mid- and late-twentieth-century buildings, with no modernist buildings protected under this mechanism, and
 - (ii) Heritage Protection Orders are immediately effective as soon as a notice of requirement is submitted to a council, providing incredibly effective protection for sites at short notice when, for whatever reason, insufficient protection has been provided, yet the bodies charged with protecting historic heritage seemingly fail to understand this use.
- (g) We also recommend that the Department **undertake research on the economic, sustainability, heritage, place-making and cultural benefits of adaptive re-use of historic heritage resources.** The embodied energy of making buildings are discarded with every demolished building. While there are many valid reasons for demolition and re-building on a site, it appears to us that there is a distinct lack of public knowledge in relation to what is lost in demolition. Organisations, such as Place Economics in America, have done analysis on the economics of historic heritage retention (e.g. that economic benefits of heritage buildings are communal, while costs accrue to individual owners), but there appears to be a lack of work combining analysis from a heritage economics perspective and a sustainability/energy-use perspective, as well as the benefits to place-making, tourism and urban design that retention of heritage buildings can effect.

Thank for you considering our comments above. As a group which has broad interests relating to the built environment we have also sent letters to the Minister for Arts, Culture and Heritage and the Minister for Climate Change, and will be writing in the near future to the Minister for the Environment, the Minister for Building and Construction, the Minister of Transport and the Minister of Housing and Urban Development. Copies of these letters, and any replies, are posted on our website at: <http://architecture.org.nz/submissions/>

We look forward to you making a real difference in the appreciation of, and support for, Aotearoa's natural and historic heritage. If we can assist in anyway please let us know.

ka nui ngā mihi


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