



*Patron:*  
*His Excellency The Hon*  
*Anand Satyanand, PCNZM*  
*Governor General of New Zealand*

Our Ref: 33002-094

15 April, 2009

Freepost 178  
Draft Long Term Council Community Plan 2009-19  
Christchurch City Council  
PO Box 237  
Christchurch 8140

Also by email: [ccc-plan@ccc.govt.nz](mailto:ccc-plan@ccc.govt.nz)

Dear Sir/Madam,

**Christchurch City Council Draft Ten Year Plan 2009-2019 (Long Term Council Community Plan)**

Thank you for the opportunity to submit on the Christchurch City Council (Council) draft 2009-2019 Long Term Community Plan (LTCCP).

The NZHPT supports the proposed budgets that contribute to heritage protection in the city, as dispersed throughout the draft LTCCP document.

**Community Outcomes**

The New Zealand Historic Places Trust (NZHPT) supports the inclusion of Community Outcome 'An attractive and Well Designed City'. One of the measures or standard of success for this Community Outcome is that 'our heritage is protected for future generations'.

It is important to note that these measures relate to the number of heritage items demolished or removed from the [current] heritage list. The measures do not relate to the loss of heritage that is not on the heritage list.

In this regard the NZHPT acknowledges Council has completed work on researching additional listings for Council's heritage inventory. However the NZHPT is concerned these sites have not yet been included in the District Plan. The NZHPT reiterates that the New Zealand Archaeological Association (NZAA) recorded sites, and sites of significance to Maori should be provided increased protection by rules in the District Plan as a matter of priority. The NZHPT recommends the work on further listings and associated protective mechanisms be prioritised in the 'programme of research and documentation' for heritage protection that will be defined by July 2009, and completed by June 2015' (p196-197, volume 1).

From an NZHPT perspective, if our heritage is to be protected for future generations, then the number of buildings and sites protected by the District Plan must steadily increase, not remain static.

## **City Planning and development – Heritage Protection**

The NZHPT supports inclusion of the new performance measures for Heritage Protection (p194,196, volume 1). Specifically working toward a consistent approach for heritage protection and that asset management plans include heritage conservation principles and priorities, are in place for all Council owned restricted heritage assets.

The NZHPT would like to be advised on the 'programme of research and documentation' for heritage protection that will be defined by July 2009, and completed by June 2015' (p196-197, volume 1).

The NZHPT supports Council's plans for key assets in terms of renewals and replacements that heritage assets will be strengthened and restored throughout the life of the plan (p198, volume 1), and that in terms of increased demand land will be purchased for urban renewal and to provide a strategic land bank throughout the life of the plan. In regard to the later, the NZHPT seeks that strategic acquisition of heritage properties is included in the scope for urban renewal.

The NZHPT supports the intention of Council to undertake ongoing work and implementation of a range of heritage initiatives (policy, grants, acquisition) over the interim. In addition the NZHPT advocates that Council expand a flexible wide-ranging targeted incentives approach to assist owners and landowners of historic heritage that could include a wide-ranging approach, for example transferable development rights relating to the preservation and protection of historic heritage. The NZHPT has previously communicated with Council that: "Sustainable urban development approaches need to carefully incorporate environmental and cost and benefit analysis. This approach should promote the development of incentive-based system where owners of historic places feel supported by the planning system to preserve while allowing for development to be transferred to other appropriate environments. Importantly, the public benefit of heritage owned by private individuals and companies should be acknowledged" (McClellan, R. NZHPT, 11/2008).

The NZHPT supports the retention of the amount allocated by Council for heritage grants. The NZHPT notes there is provision for heritage grants to be administered differently. In this regard the \$1.2m in Heritage grants (which existed previously) has been transferred from City Planning and Development – Heritage Protection to Community Support – Community Grants (which as gone from \$5.4m in 2008/09 to \$10.2m in the 2009/10 plan).

In keeping with the statement (p194,volume 1) on what Council is trying to achieve for heritage protection, the NZHPT recommends that a new initiative is created within Council to provide a cross-Council approach with a mandate to work pro-actively with developers/owners of heritage listed buildings as the opportunities arise to promote adaptive re-use of heritage buildings – demolition should be the last resort. The NZHPT suggests there may also be a role for Vbase Limited to provide economic analysis and entrepreneurial input into those discussions as an incentive to owners.

The NZHPT advocates that if Council staff had a mandate to work alongside the developer there is an increased likelihood that economically viable solutions may arise that have win-win outcomes for heritage as a public good, and also for the developer as 'manager' of this heritage resource.

## **Proposals for Investigating Maori and Archaeological Heritage**

In a 9 October, 2008 letter to the NZHPT from Christchurch City Council's Tony Marratt responding to NZHPT's submission on the Christchurch City Council's draft 2008 Annual Plan, it was noted that "proposals for investigating Maori, archaeological heritage and providing a consistent approach to heritage are suggested for the 2009-19 LTCCP".

The NZHPT seeks clarification from Council regarding how the proposals for investigating archaeological and Maori heritage are provided for in the 2009-19 LTCCP?

Specifically, the NZHPT would like to see improved capacity of the internal Council planning and management provisions for archaeological and Maori heritage. The NZHPT recommends that Council employ an archaeologist to endorse Council commitment to a process of continuous improvement of internal processes relating to the management of archaeological sites. The NZHPT envisages that a contracted archaeologist could also input to a comprehensive review of City Planning provisions, internal processes and regulatory planning for archaeological sites.

The NZHPT recommends that Council allocate specific resources for a Maori Heritage adviser. As a suggestion, the Maori Heritage adviser could sit within Council's Heritage Planning team or with Mahaanui Kurataiao Ltd.

## **Urban Development Strategy**

The NZHPT is supportive of the principle of the Councils' City Planning work in terms of collaborating with, maintaining and implementing the Urban Development Strategy for Greater Christchurch developed in 2007 (UDS), and preparing planning strategies, studies and overall structure plans and more detailed outline development plans.

Sustainable management of historic heritage requires heritage infrastructure to be a core element of an integrated management approach to intensification. The NZHPT therefore considers it essential that the actions relating to Historic Heritage, Cultural Heritage and Urban Design within that Strategy and Action plan are prioritised and implemented. The NZHPT advocates for Council to take a coordinator or leadership role for matters relating to Historic Heritage, Cultural Heritage and Urban Design within the UDS, and dedicate staff time to work alongside staff from Selwyn District, Environment Canterbury and Waimakariri District Councils to progress work on the Regional Cultural Heritage Strategy and develop a technical working party, identified as action 6.8.4 in the UDS. Additionally resources need to be set aside to commence the actions identified in 6.7.4 Tangata Whenua section of the UDS. The NZHPT submits that Christchurch City Council advocate for these actions to be prioritised within the UDS work, and implemented. The NZHPT is able to provide staff support to the UDS partners for actions 6.8.4 and 6.7.4.

As communicated previously the NZHPT considers that inappropriate modification and destruction of historic heritage is a significant issue for the City and the greater Christchurch. In this regard, the NZHPT would welcome involvement on the Greater Christchurch Urban Development Strategy (UDS) Strategic Partners' Forum. The NZHPT understands the forum is undergoing a process of reorganization and would welcome an update on this.

## **Integrated Approach to Heritage Planning**

The NZHPT is supportive of the recently created position of Team Leader for Urban Design and Historic Heritage, and sees the potential of that role as providing an essential link with the City Planning and Regulatory teams for continuous improvement of an integrated approach to heritage planning and management in the City. The NZHPT looks forward to early engagement and close cooperation with the concerned appointee.

## **Urban Growth, Central City Revitalization and Intensification**

The NZHPT advocate that to enable sustainable management of urban communities, urban design must be closely aligned with historic heritage. This alignment is to ensure that urban design-related initiatives promote heritage conservation and do not compromise historic heritage objectives. The NZHPT has also promoted drawing on international best practice for a comprehensive planning approach to the management of historic urban environments. This approach means that management is not limited to a number of rules in a district plan, but that historic urban environments require a strategic approach to deal with the wide range of threats and risks.

The NZHPT has reiterated a best practice approach, and would like to see this promoted in terms of new community centres and replacement housing stock. Specifically, the NZHPT advocates for the consideration of adaptive reuse of existing building and housing stock, rather than demolition of buildings to make way for new developments. Increased residential density puts pressure on residential heritage. As Council is aware there is also environmental benefit from the rehabilitation of heritage and/or character properties. The reuse of heritage buildings supports urban intensification, and generates less energy and carbon than new construction. The NZHPT supports Council including such assessment in the cost-benefit analysis of options for new community centres and replacement housing stock. Such work could include a survey of key vacant buildings within a relevant area. Identification of such buildings supports the principle of sustainable development in terms of alignment of urban design with historic heritage.

The NZHPT staff contributes technical advice to the Akaroa Design and Appearance Committee. Similarly, the NZHPT has previously offered to provide such technical support to the City Urban Design Panel regarding proposals that involve or impact on historic heritage. The NZHPT would like to reiterate our offer to Council.

The NZHPT staff are available to assist with early input to draft Terms of Reference for significant Council projects.

## **Financial Policies**

The NZHPT supports the benefit of protecting heritage items and values to the community as a whole as is reflected in the rationale of Council's financial policy about funding sources for heritage protection (p55, volume 2). The NZHPT supports the financial policy for the Cultural and learning services: Art gallery and museum (p64, volume 1), and the financial policy for Parks, open spaces and waterways: Garden and heritage parks (p73, volume 1).

## **Major Projects**

The NZHPT supports Council plans to contribute to a number of significant heritage projects, including the seismic strengthening of the Arts Centre, and the conservation of the Christchurch Music Centre. The NZHPT will continue to provide expert advice as required.

## **Maori Capacity to Contribute to Decision-Making Processes of Council**

The NZHPT supports Council's commitment to a service and funding agreement with Mahaanui Kurataiao Ltd to provide services and engage in contractual relationships with the Council on behalf of six Ngai Tahu Runanga (p218, Volume 2). The NZHPT has a full time Maori heritage adviser who is available to provide input on a range of Maori heritage issues to Council as requested.

## **Heritage Volunteers**

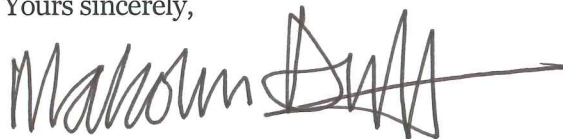
The NZHPT through its Canterbury Branch Committee and membership has a strong volunteer base. There is an opportunity for Council to draw on the knowledge and expertise within the NZHPT and volunteer base to help educate, inform and promote heritage to the community. The NZHPT would welcome efforts from Council to establish a community-based Heritage Forum to draw on this expertise. It would also function as a means of bringing together, in a more unified manner, the various heritage interests in Christchurch City. In this regard, the NZHPT considers that it would be appropriate to further advance the capacity of Council's community development staff to work in conjunction with Council's heritage staff proactively with the community on heritage projects.

## **Conclusion**

Further, the NZHPT acknowledges that Council does a great job of initiating and contributing to celebrations of heritage within the City, and supports this continuity.

The NZHPT would like to be heard in support of this submission.

Yours sincerely,



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