

ICOMOS NEW ZEALAND
TE MANA O NGA POUWHENUA O TE AO

INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
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Submission to the Wellington City Council:
Planning for Growth

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Introduction

ICOMOS is an international non-governmental organisation of heritage professionals dedicated to the conservation of the world's historic monuments and sites. The organisation was founded in 1965 as a result of the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice in the previous year. ICOMOS is UNESCO's principal advisor in matters concerning the conservation and protection of historic monuments and sites. The New Zealand National Committee was established in 1989 and incorporated in 1990.

ICOMOS New Zealand has over 100 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners.

In 1993 ICOMOS New Zealand published the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. A revised ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value was approved in September 2010 and is available on the ICOMOS New Zealand website.

The heritage conservation principles outlined in the ICOMOS New Zealand Charter are based on a fundamental respect for significant heritage fabric and the intangible values of heritage places.

Scope of this submission

ICOMOS NZ recognizes the need to plan for growth and change in Wellington, taking into account transport, infrastructure, open space and climate change issues, along with provision for character and heritage values, as outlined in the Planning for Growth Issues and Opportunities Report. We thank the Wellington City Council for the opportunity to submit on this matter.

ICOMOS NZ considers that the heritage and character of Wellington is of national interest, as it is a main centre which makes an important contribution to New Zealand's historic heritage. In light of this ICOMOS NZ would like to offer the following suggestions to help inform the Council's spatial planning and upcoming review of the District Plan in regard to heritage and Character Area protection.

Our comments below are based on the foundational document that underpins the conservation and management of historic heritage in New Zealand, the ICOMOS New Zealand Charter for the Protection of Places of Cultural Heritage Value. The Charter is available online here <https://icomos.org.nz/charters/>

General Comments

As identified in the Issues and Opportunities Report (p.3), ICOMOS NZ agrees that heritage is a valuable asset that can support positive outcomes, that it is not incompatible with higher density housing and is not a barrier to change. ICOMOS NZ agree with the statement that retaining and reusing heritage makes good environmental sense (p.13).

ICOMOS NZ considers that Scenarios 1 and 2 are incompatible with these statements made in the Issues and Options Report, and would like to see a more nuanced approach in which the retention of heritage and character values is provided for as a baseline.

Whereas the Issues and Opportunities Report acknowledges that a balance is sought between overlapping and potential conflicting issues, the four scenarios put forward appear to pitch some outcomes against others as opposing or mutually exclusive.

ICOMOS NZ notes that heritage is well accepted and documented as making an important contribution to city identity and sense of place, community connectedness, inclusivity, resilience, sustainability and wellbeing (social, economic, environmental, and cultural), and that heritage and character retention therefore aligns with the aims of Our City Tomorrow Planning for Growth and the vision and principles of the Issues and Opportunities Report (p.7).

ICOMOS NZ agrees that it is a challenge to maintain valued character while enabling new development (p.11), and is uncertain as to whether the four scenarios presented will assist the Council in resolving how the balance could be achieved. ICOMOS NZ agrees that well designed contextual development is a method for achieving higher density and maintaining character, and are interested to learn if analysis has been undertaken of whether this is currently encouraged or provided for with the current regulatory and non-regulatory measures in place.

ICOMOS NZ notes that heritage places and areas can be built into emergency planning, to enhance community resilience and support community emergency response and recovery (p.13), and that this is done in other countries such as Japan, and is provided for in the Sendai Framework.

ICOMOS NZ supports the re-evaluation of the character areas in order to determine the effectiveness of the current protection, and to inform the future District Plan review.

ICOMOS NZ supports continuing to protect the character of Newtown, Mt Cook, Mt Vic, Thorndon, The Terrace, Holloway Road, Aro Valley and Berhampore.

ICOMOS NZ does not support removing or reducing the protection of the character in Newtown, Mt Cook, Mt Vic, Thorndon, The Terrace, Holloway Road, Aro Valley and Berhampore.

ICOMOS NZ considers if new development (including higher buildings) is well designed to be compatible with the character areas, their character will be able to be maintained.

ICOMOS NZ observes that the four scenarios and the public survey questions suggest that positive heritage/character and transport outcomes are opposed, and mutually exclusive. ICOMOS NZ recommends that a more nuanced approach is taken, particularly given that more sustainable modes of transport are likely to be more widely available in the future. ICOMOS NZ also notes the environmental and sustainability benefits of heritage retention.

ICOMOS NZ understands that there are archaeological sites and sites of significance to Māori within the Character Areas, and on the Miramar Peninsula. It also understands there are heritage sites of significance on the Miramar Peninsula. Archaeological sites and sites of significance to Māori do not appear to have been given sufficient consideration. It is not clear in the documentation provided how the protection for these values and sites will be achieved alongside accommodating new growth.

ICOMOS NZ Charter

ICOMOS NZ agrees with the statements made in the Heritage section of the Issues and Opportunities Report regarding the breadth of heritage, its importance and value and the impetus to protect it, and notes the relevance and guidance of the ICOMOS NZ Charter, 2010 in the identification, protection and adaptation of built heritage. In its definition of place, the ICOMOS NZ Charter, 2010 recognises a broad range of heritage types, including areas and groups of buildings, structures, or monuments.

ICOMOS NZ recommends that the charter principles be incorporated into the philosophy and practice of heritage protection and management. Relevant considerations for intensification of heritage and character areas in the context of the Charter include:

3. Indigenous cultural heritage

The indigenous cultural heritage of tangata whenua relates to whanau, hapu, and iwi groups. It shapes identity and enhances well-being, and it has particular cultural meanings and values for the present, and associations with those who have gone before. Indigenous cultural heritage brings with it responsibilities of guardianship and the practical application and passing on of associated knowledge, traditional skills, and practices.

The Treaty of Waitangi is the founding document of our nation. Article 2 of the Treaty recognises and guarantees the protection of tino rangatiratanga, and so empowers kaitiakitanga as customary trusteeship to be exercised by tangata whenua. This customary trusteeship is exercised over their taonga, such as sacred and traditional places, built heritage, traditional practices, and other cultural heritage resources. This obligation extends beyond current legal ownership wherever such cultural heritage exists.

Particular matauranga, or knowledge of cultural heritage meaning, value, and practice, is associated with places. Matauranga is sustained and transmitted through oral, written, and physical forms determined by tangata whenua. The conservation of such places is therefore conditional on decisions made in associated tangata whenua communities, and should proceed only in this context. In particular, protocols of access, authority, ritual, and practice are determined at a local level and should be respected.

ICOMOS NZ recommends early consultation with Iwi regarding sites of significance to Maori within the Character Areas and Miramar Peninsula and suggests further work is required to identify potential risks to and impacts on Māori heritage and taonga within other areas marked for growth.

9. Setting

Where the setting of a place is integral to its cultural heritage value, that setting should be conserved with the place itself.

ICOMOS NZ recommends that protection of the settings of character areas (eg street treatments, landscaping, plantings and open space), archaeological sites, heritage places, cultural landscapes and sites of significance to Māori are taken into consideration when planning for intensification.

21. Adaptation

Alterations and additions may be acceptable where they are necessary for a compatible use of the place. Any change should be the minimum necessary, should be substantially reversible, and should have little or no adverse effect on the cultural heritage value of the place. Any alterations or additions should be compatible with the original form and fabric of the place, and should avoid inappropriate or incompatible contrasts of form, scale, mass, colour, and material. Adaptation should not dominate or substantially obscure the original form and fabric, and should not adversely affect the setting of a place of cultural heritage value. New work should complement the original form and fabric.

ICOMOS NZ recommends that the Charter guidance regarding adaptation be applied to planning for intensification and to inform regulatory and non-regulatory measures for any potential infill housing provisions within character areas.

Conclusion

Overall, it is apparent that some heritage advice and input into the project has been provided to WCC, however, based on the publicly available information, this advice does not appear to be extensive nor has it been given sufficient weight in relation to other factors.

ICOMOS NZ considers that the heritage and character values of Wellington, which residents value, and which contributes to community wellbeing, city identity and sense of place should be given more weight in the decision making process.

ICOMOS NZ recommends that any heritage advice obtained by WCC should be integrated into the project in a more holistic approach which seeks heritage and character retention as a baseline rather than an option or an opposing factor to other matters.

We agree that heritage and character retention is not incompatible with higher density housing and is not a barrier to change. The challenge is not whether heritage and character can be retained whilst accommodating necessary growth – it is how it will be retained as the city grows. The publicly available information does not provide a clear sense of how compatibility between heritage/character values and intensification will be achieved, and ICOMOS NZ does not consider that removing character protection would provide an appropriate basis for integrating higher density housing in to heritage and character areas.

ICOMOS NZ considers more analysis is required to enable the Council to make an informed decision on how to provide for the protection and adaptive reuse of Wellington's valuable and irreplaceable Character Areas whilst also accommodating growth. It is also vital to ensure sufficient identification of and provision for archaeological sites, cultural landscapes and sites of significance to Māori within areas earmarked for potential growth.

We hope that these suggestions constructively assist the review process, and ICOMOS NZ would be happy to provide further elaboration on the Charter or the matters raised above if desired.

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