



Survey on strengthening New Zealand's protection system for heritage buildings

Ministry for Culture and Heritage June 2018

Why we are consulting

There is concern that the preventable and irreversible loss of heritage buildings is occurring in New Zealand. The Ministry for Culture and Heritage is undertaking an assessment of New Zealand's system for protecting heritage buildings to inform work on how our system could be enhanced.

To help inform this assessment, the Ministry for Culture and Heritage is consulting with stakeholders i.e. organisations involved in identifying, managing, advocating for, and protecting heritage buildings. We want to hear your views on how heritage buildings are recognised and protected in New Zealand, and how our protection system may be improved.

How to have your say

Please complete this survey and send your responses to the Ministry for Culture and Heritage by **15 July 2018**. You can:

- 1) Email the completed survey to: survey@mch.govt.nz
- 2) Post the completed survey to:

Heritage Survey
Ministry for Culture and Heritage
PO Box 5364
Wellington 6140
New Zealand

What happens next?

The Ministry will also be hosting a series of targeted workshops to support the survey.

The Ministry will present the findings of the stakeholder consultation in a report, with an analysis of options to strengthen the system for protecting heritage buildings. This report will be provided to the Minister for Arts, Culture and Heritage by the end of September 2018, and will provide the Minister with a basis for making decisions on policy direction in this area.

The Ministry will hold all information you provide in confidence but may be required to release information if subject to a request under the Official Information Act 1982.

Indicative timeline

An indicative timeline is set out below:

Date	Milestone
15 June	Surveys sent to stakeholders for completion
15 July	Stakeholders send back their responses
July - August	Stakeholder workshops to share feedback and discuss options
28 September	Report provided to Minister for Arts, Culture and Heritage

Further Questions

If you have any questions you can contact survey@mch.govt.nz

Background

The assessment that the Ministry is undertaking relates to heritage buildings. That is, buildings in New Zealand that have an enduring value to their communities. This includes buildings with existing heritage recognition as well as buildings that are not currently recognised within our heritage system but are likely to be recognised, by a community or experts, as having heritage values worth protecting.

New Zealand has an established heritage system involving different organisations, most notably Heritage New Zealand Pouhere Taonga (Heritage New Zealand) and territorial local authorities (councils). Other organisations have important roles and responsibilities in relation to the management of historic heritage.

Our focus is on how existing systems may be improved to better provide protection for heritage buildings. We are interested in hearing your views specifically on the following aspects of the heritage protection system:

- Identification of heritage buildings
- Protection of heritage buildings
- Heritage protection mechanisms
- Crown management of heritage buildings
- Buildings with heritage value for Māori
- Responsibilities and incentives for owners of heritage buildings

We have structured this survey under different headings. There is no expectation that you respond to every heading, as some may not apply to you.

Before you begin the survey

We would appreciate if you could identify your interest in completing the survey:

For example are you a private owner of a heritage building, territorial local authority, advocacy organisation?

ICOMOS New Zealand/Te Mana o Nga Pouwhenua o Te Ao is a professional organisation for the support and advancement of individuals and organisations engaged in the conservation of places of cultural heritage value in New Zealand.

Identification of heritage buildings

Heritage New Zealand administers the New Zealand Heritage List / Rārangī Kōrero (the List). Places on the List have statutory recognition of their heritage values, but the List does not provide automatic protection. That protection is afforded primarily through the scheduling of buildings on a District Plan. New Zealand operates what could be described as a hybrid system of identification (through Heritage NZ) and protection (via councils).

Heritage New Zealand has a Statement of General Policy that guides how it administers the List.¹ Due to the thorough process required to list a building, only a limited number of places are added to the List every year.

Māori buildings are often not identified on the List, but may be identified on specific iwi management plans. These places are addressed in a later section, however we welcome your comments here also.

Some organisations have their own non-statutory identification processes (such as the Rail Heritage Trust of New Zealand) which can support future listing with Heritage New Zealand.

Please indicate the extent to which you agree or disagree with each of the following statements about the **identification of heritage buildings in New Zealand**.

Please tick [✓] one response per statement.

Q1	The Heritage New Zealand listing process aligns effectively with council scheduling processes.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>There is neither temporal nor content alignment between the two processes.</i></p> <p><i>As District Plans are only required to be reviewed every 10 years, and often are not reviewed for longer, it can take a decade or more for buildings added to the New Zealand Heritage List to be considered for inclusion in territorial authority schedules.</i></p> <p><i>The criteria for assessing heritage values and the thresholds that must be met are different between TAs and HNZ. During TA scheduling processes, additional matters may be taken into account such as owner attitude and/or effects on owners.</i></p>						

¹ More information on the policy can be viewed at <http://www.heritage.org.nz/resources/statements-of-general-policy>

Q2	The way the Heritage New Zealand listing process works is clear.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>The process as defined in the HNZPT Act (and as explained on their website) is reasonably clear. However, it is not a good process, particularly when compared against other similar jurisdictions such as Australia or the UK.</i></p> <ul style="list-style-type: none"> <i>The current system is confusing due to its structure. Our system, where the national heritage agency identifies heritage places but has no regulatory power over them, is anathema to the heritage protection systems in other Westminster-style democracies.</i> <i>It is not clear how HNZ prioritise places for assessment once nominations have been received.</i> <i>Current listing reports generated are unnecessarily complex and are not fit for purpose, while older listings often do not have reports (ie no details at all).</i> <i>Those who ultimately decide on additions to the list are not required to have heritage expertise.</i> 						

Q3	Having more than one system for recognising and protecting heritage buildings makes the process of protecting heritage buildings too complex.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>It is important to note that we currently have more than one system for recognising heritage buildings, but we do NOT have more than one system for protecting them.</i></p> <p><i>It is evident that a layered system for recognising and protecting heritage buildings – ie one in which both central and local government have the authority to protect – is not too complex as this is common in other countries.</i></p> <p><i>In particular, we note the Australian system where, in some states, there are five layers of heritage protection, eg in Victoria where there are world heritage, commonwealth heritage, national heritage, state heritage, local body heritage lists that function harmoniously in parallel.</i></p>						

Q4	It's acceptable for some heritage buildings to <u>not</u> be identified by Heritage New Zealand.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
					✓	
<p>Comment:</p> <p><i>Refer to comments above.</i></p> <p><i>It is acceptable for buildings that are significant at a local level not to be listed with HNZ (assuming that they are the body that recognises nationally significant heritage).</i></p>						

Q5	How, if at all, could the Heritage New Zealand listing process be improved to make it more effective, and ensure that community members participate in the process?					
	<p><i>To improve the process:</i></p> <ul style="list-style-type: none"> • <i>Address the backlog of nominations.</i> • <i>Consistency in listing reports – including review of all buildings for which there is not report.</i> • <i>Reduce complexity of reports and ensure that they all follow the same format.</i> <p><i>To ensure community participation:</i></p> <ul style="list-style-type: none"> • <i>Improve the ability to be heard as part of the nomination process after initial HNZ assessments have been made, particularly if regulatory protection is conferred by the NZ Heritage List.</i> • <i>Ensure information about the listing process is available and easily accessible.</i> 					

Protection of heritage buildings

Under the Resource Management Act 1991, councils establish schedules of heritage places within their District Plans, which have associated rules that protect and manage those places against demolition and inappropriate development. When preparing a District Plan, councils must take the New Zealand Heritage List into consideration, but they are not required to automatically protect buildings on the List.

Councils have different approaches for identifying, assessing and protecting buildings. Updating their heritage schedules may only happen when the District Plan is updated which may only occur every 10 years, meaning there are limited opportunities to ensure protections are in place for buildings.

Please indicate the extent to which you agree or disagree with each of the following statements about councils' **protection of heritage buildings in New Zealand**.

Please tick [✓] one response per statement.

Q6 It's acceptable for different councils to use different approaches to identify, assess and protect heritage buildings.

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓				

Comment:

There should be a national guidance document as this helps practitioners, advocacy groups, building owners and the general public to engage with and understand heritage processes.

Having national guidance gives credence to the fact that the protection of historic heritage from inappropriate subdivision, use and development is a matter of national importance under the RMA.

However, there also needs to be acceptance that each council (and individuals within the council) will have their own interpretation of a set of national guidelines and how they should be applied.

Q7 Councils need more guidance on best-practice methods for protecting heritage buildings.

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
				✓	

Comment:

Information, if available, is currently fragmented.

Ideally, guidance on all methods for protecting heritage available to councils would be accessible in one central location, with regular updates provided. Guidance should include examples.

Q8 The council scheduling process ensures the timely protection of heritage buildings.

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
✓					

Comment:

The only time-based requirement on councils is to review their District Plan every ten years. However, this is not seem to be monitored as many councils are in breach of this requirement.

Outside of this there are no requirements on councils to review/ad to/update their schedules, or the policies and rules that protect them.

The result is that a building listed by HNZPT (for example) may not be considered for scheduling in the District Plan for ten years or more, and therefore remains unprotected for this period.

Q9 The council scheduling process works well for Māori heritage buildings.

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
		✓			

Comment:

Relatively few buildings of significance to Maori are scheduled. This may reflect cultural preference to manage things at an iwi-hapu-whanau level, or may reflect iwi's lack of trust in the regulatory process.

There is also ambiguity about what "Maori heritage buildings" are - are they structures of significance to iwi? Are they buildings used by iwi? More robust criteria are needed to give effect to section 6e of the RMA – places of significance to iwi may have huge cultural and traditional significance but very low architectural, technological or other significance. Council criteria focus primarily on tangible significance.

Q10 The Heritage New Zealand listing process helps councils in their decision-making on protecting buildings.

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
			✓		

Comment:

It provides a good starting point for Councils, especially those that have limited capacity or capability to identify heritage places within their area. However, regional policy statements often mandate an entirely different set of criteria for assessing heritage significance than those used by Heritage NZ. This is an unnecessary duplication.

Q11 How, if at all, could the council scheduling process be improved to make it more effective?

- *It should be more closely monitored by central government*
- *There should be penalties for councils that do not meet legislated review requirements*
- *Central government could also provide incentives for councils to comply with the established processes, for example grants to undertake heritage studies and schedule reviews, and funding to employ heritage professionals*
- *Centralised database for listed and scheduled items for efficiency*
- *National policy statement to provide a standardised set of assessment criteria*
- *Guidance from central government on how to apply standards of assessment*

Heritage protection mechanisms

There are other mechanisms that can be used to ensure the protection of heritage buildings.

Heritage New Zealand, through its legislation, has the ability to negotiate a heritage covenant on a property. Heritage covenants are voluntary agreements which are agreed to by a property owner for the purpose of protecting and conserving a historic place, historic area, wāhi tūpuna, wāhi tapu, or wāhi tapu area.

The RMA also enables the use of Heritage Orders by Heritage Protection Authorities (Ministers of the Crown, councils and Heritage New Zealand). Heritage Protection Authorities can require a Heritage Order to protect the special heritage qualities of a place or structure. A Heritage Order must then be included in a District Plan.

Heritage Orders are not commonly used. Covenants are more often employed but the voluntary nature of this mechanism may limit its efficiency in some cases. Some people think there should be more ways for regulators to enforce the maintenance of heritage buildings.

Please indicate the extent to which you agree or disagree with each of the following statements about **heritage protection mechanisms**.

Please tick [✓] one response per statement.

Q12	There is enough guidance available on how heritage protection mechanisms can be used to protect buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
Comment: <i>There is limited guidance available, and it may be prepared by people or organisations often with limited qualifications or expertise, or by people who have a vested interest in protection mechanisms having limited success. Where it is available it is difficult to source (refer above comments) – there is no one place where all the available heritage protection mechanisms are detailed and examples are provided.</i>						

Q13	Heritage protection mechanisms are currently being used appropriately to protect buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>Heritage Orders are virtually never used.</i></p> <p><i>It is evident that current heritage protection mechanisms are not being used appropriately to protect buildings when Category I places such as Aniwanuiwa Visitor's Centre are demolished or under threat of demolition like the former Wellington Teacher's Training College.</i></p> <p><i>The scheduling process is not being used appropriately either. Buildings that should be scheduled (including buildings on the NZ Heritage List) are not; and buildings that are scheduled are subject to different levels of protection depending on the council.</i></p>						

Q14	More heritage protection mechanisms are needed.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
					✓	
<p>Comment:</p> <p><i>There is insufficient interim protection – more interim protection mechanisms are needed.</i></p>						

Q15	How, if at all, could the <u>existing</u> heritage protection mechanisms be improved to make them more effective?					
	<p>Comment:</p> <ul style="list-style-type: none"> <i>When a place is proposed for listing or scheduling it needs to have interim protection.</i> <i>If a place is listed it should automatically be scheduled.</i> <i>When a place is scheduled the objectives, policies and rules should be sufficient to protect it</i> <p><i>In other more evolved jurisdictions understanding the heritage values of a place is seen as essential when planning for development. So much so that in Victoria, developers are pursuing heritage listing in order to get development certainty. In the UK, certificates of immunity from assessment are offered for places that are assessed and do not reach the threshold for listing. This also offers certainty for developers.</i></p>					

Crown management of heritage buildings

The Crown owns many significant heritage buildings that are managed through a number of central government and local government organisations.

The Ministry administers the Policy for Government Departments' Management of Historic Heritage 2004.² The Policy, agreed to by Cabinet, outlines a best-practice framework for the management of historic heritage in government ownership. This policy has not been updated since 2004.

When land and buildings leave Crown ownership through the Crown Land Disposal process, Heritage New Zealand assesses the significance of any historic heritage values of the place on departmental land prior to disposal, and may recommend measures for protection of significant historic heritage in the national interest. This assessment is not binding.

Some publicly-owned heritage buildings are not identified or protected by Heritage New Zealand or councils and the management of publicly-owned heritage buildings differs between organisations.

Please indicate the extent to which you agree or disagree with each of the following statements about **Crown management of heritage buildings**.

Please tick [✓] one response per statement.

Q16	The Policy for Government Departments' Management of Historic Heritage 2004 provides useful guidance for protecting Crown-owned heritage buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
					✓	
Comment: <i>It uses the ICOMOS NZ Charter as the basis for its recommendations.</i>						

Q17	The Crown Land Disposal process works well to protect heritage buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
Comment: <i>It is a good process in theory; however, in practice, if the recommendations of HNZPT are not adopted then outcomes for heritage are generally poor. For example, Karori Teacher's College Campus.</i>						

Q18	It's acceptable for some publicly-owned heritage buildings to not be identified by Heritage New Zealand or protected by councils.					

² The policy can be found at <https://mch.govt.nz/research-publications/our-research-reports/policy-government-departments-management-historic-heritag>

Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
			✓		
<p>Comment:</p> <p><i>We acknowledge that government ownership should mean that significant buildings are conserved and maintained. However, a set out in the policy for government departments, such bodies should be setting a good example as stewards of heritage and, therefore, should support and promote heritage identification and protection.</i></p>					

Q19

Having heritage buildings in public-ownership is a good way to protect them.					
Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
✓					
<p>Comment:</p> <p><i>Just take a look around the publicly owned buildings across the country!</i></p> <p><i>For example, Ministry of Justice buildings including Hamilton Courthouse, Ministry of Education buildings, and Correctional facilities such as Mt Eden Prison.</i></p> <p><i>It is also evident that the Crown Land Disposal process does not sufficiently protect heritage values.</i></p>					

Q20

It's acceptable for publicly-owned heritage buildings to be managed in different ways, depending on which organisation owns them.					
Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
			✓		
<p>Comment:</p> <p><i>The same principle applies here as for councils following national guidelines but having different interpretations of those guidelines.</i></p>					

Q21	How, if at all, could Crown management of heritage buildings be improved to make it more effective?
<p><i>They could follow the Policy for Government Departments!!!</i></p>	

Responsibilities and incentives for private owners of heritage buildings

The majority of listed and scheduled heritage buildings are in private ownership, meaning private owners bear the majority of the responsibility and additional costs for maintaining heritage buildings. Owners of heritage buildings also face particularly high costs for earthquake strengthening their buildings.

A number of heritage buildings in private ownership have public value. For this reason there are some incentives to support private owners to maintain heritage buildings. However, these incentives might not be sufficient or appropriately targeted. When maintenance of heritage buildings is deferred, heritage fabric can be permanently damaged.

Please indicate the extent to which you agree or disagree with each of the following statements about **responsibilities and incentives for private owners of heritage buildings**.

Please tick [✓] one response per statement.

Q22	Heritage building owners have enough information about their responsibilities to care for their buildings as outlined in the Building Act 2004					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>Heritage building owners are not subject to explicitly special responsibilities under the Building Act.</i></p> <p><i>They are, in fact, subject to special privileges under the “as near as reasonably practicable” provision.</i></p> <p><i>However, this provision – and the reasons why it exists - is not well understood by building owners, their consultants, or in some cases by councils.</i></p>						

Q23	The current responsibilities of private owners are appropriate given the costs of owning a heritage building.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
		✓				

<p>Comment:</p> <p><i>In many cases, the costs of owning a heritage building are the same as the costs of owning a building that is not protected.</i></p> <p><i>Central government should provide more financial incentives to heritage building owners where costs are higher, especially where costs are increased by central government legislation eg: earthquake-prone buildings.</i></p>					

Q24	There are sufficient financial incentives available to support private owners to maintain and upgrade heritage buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
<p>Comment:</p> <p><i>Refer comments above.</i></p>						

Q25	There are <u>non-financial</u> incentives available that effectively support private owners to maintain and upgrade heritage buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
<p>Comment:</p> <p><i>There are some non-financial incentives available but these are not widely publicised or understood, or used.</i></p>						

Q26	If there was increased protection for heritage buildings, costs for managing heritage buildings would likely increase. Who should pay for these costs? This could include central government, councils, private owners or others.				
<p>Comment:</p> <p><i>Why would costs for managing likely increase? We are not convinced that one would equal the other. Increased protection may well lead to cost savings, especially in the long run.</i></p>					

Q27	What suggestions, if any, do you have for monitoring the management of privately-owned heritage buildings to better support the active maintenance of heritage buildings?				
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Councils and government agencies should have the ability to impose repair orders on heritage buildings under the Building Act on the basis of its heritage status, and to require that repairs be carried out in accordance with good conservation practice.

Buildings with heritage value for Māori

Māori have their own indigenous architectural and artistic traditions which are informed by Te Ao Māori and the interdependent relationship between matauranga, ancestral association and the natural world. Marae and marae buildings express these attributes directly and carry specific cultural traditions and meaning through the construction technology, materials, and cultural practices. Other forms of buildings such as churches, houses, community places, and commercial and government buildings can also form a wider cultural heritage significance for Māori.

Māori buildings are especially valued by their kaitiaki, this may be hapū, iwi or pan-tribal Māori organisations. Māori buildings are unique to New Zealand and have a special place in the cultural heritage of all New Zealanders.

While many Māori buildings have cultural heritage significance, relatively few (including historic marae buildings) are listed on the New Zealand Heritage List/ Rarangi Korero or scheduled on District Plans. This is partly because Māori communities often do not seek to publicly identify their buildings of significance within the existing heritage system.

Current building regulations, on fire safety and earthquake-prone building issues, impose firm obligations on building owners in New Zealand. These regulations can create issues for traditional Māori whare due to their specific construction and materiality, and can result in outcomes that compromise or reduce the cultural and heritage values of these buildings.

Please indicate the extent to which you agree or disagree with each of the following statements about **buildings with heritage value for Māori**.

Please tick [✓] one response per statement.

Q28	Councils and kaitiaki need more guidance and support about options for protecting and recognising Māori heritage buildings.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
				✓		
<p>Comment:</p> <p><i>Clarification is needed on what is considered a "Maori heritage building". Far greater emphasis on intangible values such as traditional and cultural significance is required.</i></p> <p><i>The implications of scheduling and outcomes need to be made clearer for iwi Maori, especially in relation to their role in the process.</i></p>						

Q29	Marae buildings should have recognition within our heritage system for their cultural value.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
					✓	
	<p>Comment:</p> <p><i>Incredibly important as part of the story of New Zealand.</i></p>					
Q30	Current building regulations take the cultural values of Māori buildings into account appropriately.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
	✓					
	<p>Comment:</p> <p><i>Regulations focus almost entirely on tangible aspects and values; very little account is taken of cultural and traditional significance</i></p>					

The New Zealand heritage protection system as a whole

Please tick [✓] one response per statement.

Q31	The New Zealand heritage protection system as a whole currently recognises and protects the buildings that New Zealand communities and experts value.					
	Strongly disagree	Slightly disagree	Neither agree nor disagree	Slightly agree	Strongly agree	Unsure
		✓				
	<p>Comment:</p> <p><i>The current HNZ list is an inventory that has been added to on an ad-hoc basis, as opposed to a selective best of. Generally, there is no selection along thematic lines. There has been minimal work (or circulation/advocacy/advertising of work done by HNZ to councils/other agencies) to list places that exemplify the stories we're wanting to tell, the themes to represent those stories, the places that best exemplify those themes.</i></p> <p><i>Schedules can be better at this, where they are not just extracted solely from the HNZ list, but where there has been proper investigation and review in the context of community values as well as professional evaluation.</i></p>					

Q32 There are different values associated with protecting heritage buildings. What in your view are the most important of the following? Please rank from most important (1) to least important (4).

Economic benefits	
Existence for future generations	
Sense of place / identity	
Understanding of the past	

Comment:

Environmental sustainability and environmental amenity (including aesthetics) have not been included in the above.

All of these “values” are interrelated and cannot be ranked as they are situation-specific.

Q33 What are the most important issues that need to be addressed within New Zealand’s system for recognising and protecting heritage buildings?

- *Ensuring that places of heritage value are protected*
- *Making it logical and easy to understand and apply*
- *Improving mechanisms of enforcement*

Attitudes towards heritage protection need to change. Central government can help with this, through policy, by promoting the benefits of heritage, and through leading by example.

Q34 What aspects are working well within New Zealand’s system for recognising and protecting heritage buildings?

It would be reasonable to conclude from the above that there are very few, if any, aspects of the current system that are working well.

Q35 What aspects cannot be changed within New Zealand’s system for recognising and protecting heritage buildings?

Existing protection mechanisms can all be changed, but the current level of protection cannot be reduced. It is already too low.

Q36 Are there any other comments you would like to make on New Zealand’s system for recognising and protecting heritage buildings?

The current system is dysfunctional. We should be looking at functional systems and following their example. There is no need to reinvent the wheel, nor is this an insurmountable problem.

Thank you for completing this survey. Your responses will contribute to the Ministry's work on strengthening New Zealand's protection system for heritage buildings.

You can:

- 1) Email the completed survey to: survey@mch.govt.nz; or
- 2) Post the completed survey to:

Heritage Survey
Ministry for Culture and Heritage
PO Box 5364
Wellington 6140
New Zealand