

ICOMOS NEW ZEALAND
TE MANA O NGA POUWHENUA O TE AO
INTERNATIONAL COUNCIL ON MONUMENTS AND SITES
CONSEIL INTERNATIONAL DES MONUMENTS ET DES SITES
CONSEJO INTERNACIONAL DE MONUMENTOS Y SITIOS

P O Box 90 851 VICTORIA STREET WEST, AUCKLAND 1142, NEW ZEALAND. WWW.ICOMOS.ORG.NZ

Submission to the Environment Committee: GPS-HUD

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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.

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 was published 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.

ICOMOS New Zealand has 150 members made up of professionals with a particular interest and expertise in heritage issues, including architects, engineers, heritage advisers, archaeologists, lawyers, and planners. ICOMOS New Zealand members are experienced and qualified heritage professionals, many of whom have worked thousands of hours in New Zealand's planning system. Many have also worked in heritage overseas.

Scope of this submission

ICOMOS NZ welcomes the opportunity to comment on the Government Policy Statement on Housing and Urban Development currently before the Ministry of Housing and Urban Development.

We note that a key driver behind the Statement is a desire to change the ways our cities develop in order that they can 'make room for growth and thrive', and for this to 'happen at a scale and pace so everyone in New Zealand can live in healthy and safe homes in sustainable communities and have opportunities to achieve success'.

While ICOMOS NZ acknowledges the unprecedented growth pressures many of our cities are currently experiencing (e.g. unaffordable housing, rising land prices, infrastructural deficits, inadequate transport choice), we would caution that embarking on ‘transformational urban development projects’ to accommodate growth should not be at the expense of compromising our rich and diverse historic and cultural heritage, particularly as this provides:

- Present and future residents with a tangible link to their past and positively contributes to their sense of local and neighbourhood identity
- New neighbourhoods with a degree of character and distinctiveness that contributes positively to their urban quality and helps support the regeneration and sustainable cultural, social and economic functioning of residents, thereby enhancing the quality of their everyday lives and overall well-being

To this end we identify the following in response to the discussion document in relation to cultural heritage:

Historic Heritage

The NPS-UD has a “qualifying matter” relating to heritage (Part 3.32(1)(e)) recognising that the policy could not over rule the s.6 “Matters of National Importance” contained in the existing RMA legislation, which includes:

“(f) the protection of historic heritage from inappropriate subdivision, use, and development.”

Heritage is a matter of **national importance** and it should be referred to in the document. HPW calls for the similar insertion of **historic heritage** into the GPS-HUD. A Policy which does not recognise heritage is ultra vires the parent legislation.

Heritage buildings should be retained, respected and protected as a precious cultural resource, with a great many societal, economic and environmental benefits.

The General Policy needs to recognise the important role of heritage in urban development.

Heritage buildings are important for urban **wellbeing**, and provide an important sense of identity and place. Heritage buildings are critical to maintaining mental health and memory.

Adaptive Reuse of Old Buildings for Housing

Adaptive reuse of heritage buildings and areas can contribute hugely to **intensified housing** - eg Dunedin commercial centre and the Guardian Building in Auckland.

Adaptive reuse of existing buildings (including heritage listed buildings) represents a major opportunity to deliver new affordable housing in an environmentally, socially, culturally and economically sustainable manner.

Refurbishing existing buildings for use as housing is very often a significantly cheaper option than building new housing from scratch.

Recent research by Historic England (2019) cites the potential double benefit of reduced carbon emission in the built environment and the delivery of new dwellings through the adaptive reuse of existing buildings for use of housing.

The research illustrated that between 2010-2018 “...there were 60,400 more pre-1919 homes than there were 8 years prior, as a result of the conversion of existing historic homes into multiple dwellings and through the conversion of non-domestic historic buildings into homes.”

In the UK over 12% of all new housing in England in 2018/19 resulted from change of use from a non-domestic use to residential. (Historic England (2019)). It also cited the additional environmental benefits of this adaptive reuse strategy, including reducing other negative environmental impacts such as waste production, resource depletion, water pollution, land-take, erosion and health impacts.

Old Buildings Are Climate Friendly

Heritage (&old) buildings have embodied energy that mean restoring or repurposing them is a **climate friendly** action. MBIE's 'Whole-of-Life Embodied Carbon Emissions Reduction Framework' (August 2020) recommends the introduction of 'whole-of-life' embodied carbon analysis, which will mean that the carbon reduction benefits of reusing and recycling existing buildings can assist in achieving New Zealand's target of becoming carbon neutral by 2050.

The Building Research Association of New Zealand (BRANZ) notes that:

"The construction and demolition industry is one of the largest waste-producing industries in New Zealand. Construction and demolition waste may represent up to 50% of all waste generated in New Zealand, with 20% of the waste going to landfill and 80% going to cleanfill sites.

Disposing of these materials to landfill means that, as well as not being recovered for further use, they are contributing to adverse environmental effects. These include harmful chemicals leaching into soil and waterways, plus methane emissions into the air, as the waste breaks down and rots."

By providing calculations of the whole life-cycle-cost - the total timeframe of the building's life, the materials it is constructed from, and the energy used during construction - we establish the true carbon footprint of a building. This can then be translated into a financial cost that is inherent in the building, which would be a true comparison for the cost of building replacement. The replacement building would need to provide a better outcome for it to be considered a better "cost" decision – culturally, environmentally as well as financially. How the materials are manufactured, how long will they last, the energy consumption they require to function, how they are maintained, the labour taken to construct, what happens to these materials when they are discarded, etc.

It is also worth noting that our built heritage is made in materials that we would not be able to source or afford in the present time – solid stone masonry, kauri, rimu, for example. In calculating the costs as noted above, it would be clear that an entire house built out of Kauri would be out of reach to us all, which begs the question of why you would send this material from an existing build to landfill and consider that environmentally sustainable?

The Royal Institute of British Architects (RIBA) have recently come out in support of the adaptive reuse of existing buildings (saying that we should refurbish old buildings rather than scrap them), as a key enabler in driving down carbon emissions deriving from the built environment, citing the significant negative environmental impact of building demolitions.

Similarly, the UK's 'RetroFirst' campaign (developed by the Architects Journal) champions the reuse and refurbishment of existing buildings as a means to reduce carbon emissions and waste from the building sector. The campaign targets three means of reform: tax (reverse VAT rates so that renovation works are charged at 5% and new build is charged at 20%), policy (promote the reuse of buildings and materials through changes to planning and building regulations) and procurement (start by requiring all publicly-funded commissions to consider refurbishment before demolition and rebuild).

Heritage Incentives

HPW calls for the government to look at a range of initiatives, including direct funding and tax initiatives, to incentivise and support private sector investment in the adaptive reuse of existing buildings in order to deliver more sustainable and affordable housing. These strategies could assist government in delivering its key focus of increasing housing supply and affordability, relatively quickly.

Efficient Use of Infrastructure : Old Buildings

Consistent with international studies, new infrastructure costs tend to be higher for 'greenfield' developments on the urban fringe than for 'infill' or 'brownfield' development in existing urban areas. This reflects the fact that existing urban areas often, but not always, have existing infrastructure with spare capacity or the ability to be adapted or expanded. ('The costs and benefits of urban development', M R Cagney (2019)).

4 Murphy, L. (2015). The politics of land supply and affordable housing: Auckland's Housing Accord and Special Housing Areas. *Urban Studies* 10.1177/0042098015594574

Aesthetics and Beauty

Far from beauty and quality being a luxury, it's clear they are key to unlocking community consent for development and housing.

The importance of aesthetics and beauty (often reflected in historic heritage and other old buildings), is important for urban development. The English government, for example, has a new focus on urban aesthetics as a means of encouraging housing intensification and increased supply of housing.

Brownfields First

Unregulated sprawl is unsustainable and a backward step for Aotearoa/New Zealand.

Releasing more rural greenfield land for more sprawling suburban housing will just perpetuate the problem of high land costs, gobbling up more and more valuable land, whilst making our cities less efficient. This may also have the counterproductive effect of offsetting high costs from housing into high costs for food production by using fertile lands for housing instead of produce.

Existing suburban hubs, many of which remain at 1 or 2 storeys, have capacity to increase density, where jobs can be located with satellite offices or branches of a larger business, and therefore reduces the need for individualised transport on already exhausted main arterial routes in and out of our major centres.

There is a great deal of under-utilised land in our major cities used as car parks and poor return commercial buildings. Adaptively reusing them should be the first priority for urban development. In addition, the pandemic has shown us that the office typology is much more flexible than previously thought, and as such has shown a decline of activity in the urban centres. This effectively allows for the reuse of existing building structures into much needed affordable housing.

English planning laws have had a "brownfields first" clause for some years and Aotearoa/New Zealand should consider the use of this within in the GPS-HUD.

Sustainable development should underpin urban development in Aotearoa/New Zealand as it does in England and Australia.

The GPS-HUD should be focussed on creating sustainable, attractive, liveable communities.

Freeing up more land for development is vital, but this should focus primarily on brownfield land and redeveloping existing low density sites (that are well located) - brownfields.

ICOMOS NZ wishes to thank the Committee for the opportunity to raise the matters outlined within this submission. If helpful, we would also be happy to appear before the Committee to further expand on the matters raised.

ICOMOS New Zealand
secretariat@icomos.org.nz