



# Feedback



23 August 2019

Waitaki District Council Plan Review

Historical Heritage Chapter – Draft Provisions

Connecting People & Advancing Business

[www.otagochamber.co.nz](http://www.otagochamber.co.nz)

## INTRODUCTION

Thank you for inviting our feedback on the Draft Historical Heritage Chapter of the Waitaki District Council District Plan Review. The North Otago branch of the Otago Chamber of Commerce welcomes the opportunity to continue to work with Council in their review of the District Plan in relation to heritage buildings and areas.

As has been the case to date, our contribution will be focussed on developing a plan that supports “what is good for business”. In considering this we believe that the prosperity of the district is dependent on population growth and that jobs are essential to this. Successful business is required to create jobs which pay staff a remuneration that allows for them to live sustainably in our community.

In considering what’s good for business we are also very aware that good businesses need to make a social contribution. We have many businesses that provide considerable support to the community and our community needs this to continue. In other words – what’s good for business is far from being just about private profit.

We support the revitalisation of our heritage zones, encouraging mixed use of these properties to develop a vibrant heritage area. Vibrant areas attract people and people generate business.

## GENERAL OVERVIEW

In comparing the current draft provisions for the Historical Heritage Chapter with the February Draft Heritage Buildings proposal, we are pleased to note the following improvements:

- The draft provisions enable and facilitate earthquake strengthening – we welcome the provisions added in here to reduce the cost and time involved for property owners to earthquake strengthen heritage buildings;
- The plan takes into consideration the relative heritage value of alterations – interior alterations are required to retain as far as possible significant architectural features – we assume that if a building interior doesn’t have such features (e.g. some of those with the grand facades but poor interiors) this won’t be an issue.
- A range of incentives are proposed to encourage the sustainable use of historic heritage items including: rates rebates; resource consent fees waived; relaxation of rules; and an awards scheme – in addition to the Waitaki Heritage Fund.

It should be noted that the documentation received did not include Appendix 1, the schedule of Protected Historic Heritage, we assume this is still in development. It is unclear whether the “listed heritage buildings” referred to in the document are only those listed by HNZ or if they also include Council listings. Also without Appendix 1 it is unclear which buildings/areas are covered by this document.

We have fully reviewed the document and in the following section provide comment on the specific objectives, policies and rules proposed in the draft Historical Heritage Chapter.

In preparing this submission we considered how these policies and rules might be applied to some successful revitalisation projects such as the Opera House, BNZ and Farmers buildings. We felt some aspects of each of those projects would not be possible under these rules.

We encourage Council to test these rules on real examples.

## OBJECTIVES

The Chamber supports the objectives of the Historical Heritage Chapter of the District Plan to:

1. Protect the District's heritage – this is what makes the region special and unique in New Zealand, attracting visitors and events to the region as well as celebrating our heritage.
2. Use & Adaptive Reuse of heritage items – we want our heritage buildings to be adapted to house residents or businesses. We want our heritage buildings to be “living” and an integral part of the region's development, not sitting vacant and neglected.
3. Enhancement & Restoration – we encourage the enhancement or restoration of our heritage properties where possible. However, not where the costs are prohibitive or the scale of the project too large.
4. Archaeological Sites - it is important to identify these sites wherever possible to preserve them from inappropriate development and use.

The adaptive reuse of heritage buildings will be essential to maintaining a vibrant retail CBD. Retail activities have significantly changed in recent years and more disruption is expected. We would like to see the policies and rules more open to adaptive reuse than they appear in the draft chapter.

## POLICIES

1. HH-P1: we look forward to the opportunity to review the Schedule of Protected historic heritage in due course.
2. HH-P2: the extension and modification of heritage buildings nature should be included as an activity under this policy – provided the work is sensitive to heritage values.
3. HH-P3: this policy is confusing as its labelled earthquake strengthening and then addresses the risk of natural hazards (we assume all natural hazards) but then goes back to earthquake. This section needs to work for the wharves and breakwater at risk from the sea every day and gradual sea level rise. Also with global warming increasing the risk of flooding, all heritage buildings affected by Oamaru creek flooding will need to make adaptations to protect themselves.
4. HH-P4: section v on avoiding or minimising internal alterations seems quite restrictive. If we want to encourage the use & adaptive reuse of a building this wording may be too limiting. We prefer wording that states that internal alterations need to be in fitting with the style and design of the heritage components of the property.
5. HH -P5: encourage restoration – this should be under the proviso that the restoration costs are not prohibitive of development.
6. HH-P6: we need to have a step between restoration and demolition, for example retaining the façade and developing a new building behind. Such scenarios mean that we can have quality modern work and retail spaces (paying good rents which support the owners' investment) in a heritage environment. Perhaps point (iii) could state “retaining all or part of the heritage item would impede productive use of the site or would impose an unreasonable financial burden on the owner”.
7. HH-P9: we suggest this policy includes the amalgamation of titles as well as subdivision.
8. HH-P10: in our other submission on the draft District Plan we have recommended the design guidelines remain as guidelines – this has more flexibility than imposing standards.
9. HH-P11 - we support the council providing a range of incentives for improved outcomes for heritage values. We encourage the Waitaki District Council to adopt a revised rates

remission policy to allow rates remissions for historic properties to be implemented as soon as possible.

## RULES

1. HH -R1: it may not always be possible to replace materials with the same as original materials. We recommend that the wording should be changed to replacing materials with materials as close as possible to the original materials.
2. HH-R2: needs to be expanded to all natural hazards (see 6 above)
3. HH\_R3: this is very specific, will heat pumps still be in use 10 years from now? Would it be better to be more generic covering the effects around modernising utilities?
4. HH-R4: flexibility is key here, a restoration in fitting with the original design of the building may be more feasible than a full restoration to the original design.
5. HH-R6: the current sign rule works and does not need changing. Signs have always been part of business – even in the 1850's. They should be allowed subject to rules and minimum consent requirements.
6. HH-R8: it is unclear what within the “setting of” means, does it just relate to neighbouring buildings or within a certain distance. Perhaps this needs to be more specific?
7. HH-R8 & HH-R14: does the 15m2 and 40m2 apply to new buildings and structures or just carparks? Wording perhaps needs some clarification.
8. HH-R17: the lighting rule seems very restrictive and doesn't take into account some sign lighting that may be fitting or enhance the style of the building.

## ASSESSMENT

We support in general the proposed assessment methods and matters set out in the District Plan, with the following amendments:

1. Part 4 (i) – make it clear that this section applies to the CBD only. This consideration is not required for a residential property or commercial property outside the CBD.
2. Part 4 (k) vi – we support this as long as demonstrating the conservation principles of icomos does not require expensive and time consuming conservation reports.
3. Part 4 (q) needs to consider amalgamation of titles.

In addition we believe that this section needs to be more accommodating of adaptive reuse. The assessment method needs to consider the economic reality of not just the cost of the work, but the ability to attract a tenant that will want the space and pay a commercial return for the investment provided.

## NON REGULATORY METHODS

We recommend HH-M5 change to “develop a heritage incentives policy for entering owner / developer agreements that could include the waiver of any fees or remission of rates.” There may be a time when waiving demolition of subdivision fees may be in everyone's best interest.

The funding for local government is currently under review and legislation keeps changing, Having a heritage incentives policy outside of the district plan provides greater flexibility to work with changes in funding.

## CONCLUSION

The Chamber's feedback is provided in the positive spirit of developing a partnership with Council that supports and encourages business friendly innovation and growth for the benefit of all Waitaki residents. It is submitted on the basis that it provides feedback and the opportunity to further engage with the Council on a number of issues.

We are committed to joining and working with the Council to achieve our shared objective of attracting and encouraging the development of business opportunities in Waitaki.