
EARTHQUAKE RESILIENCE PROGRAMME- UPDATE ON BUILT HERITAGE AND CITY RESILIENCE

1. Purpose of report

This report updates the Committee on the heritage and city resilience workstream within the Earthquake Resilience work programme. In particular, it reports on analysis of earthquake-prone heritage buildings, findings from the District Plan Heritage List Review and identifies issues for further discussion in a Councillor workshop.

2. Executive summary

Councillors have previously agreed to a suite of actions in response to the Canterbury earthquakes, progressed under a specific city resilience business unit set up in 2011.

Changes to the District Plan to more proactively manage earthquake prone heritage buildings, and in particular high risk features, were a key foundation of the early work on a District Plan response. Councillors also agreed to a full review of the heritage list to help inform decisions about the nature and extent of our heritage listings, and possible ranking. Heritage reports are now complete. Further analysis is now being done on assessing the list from a resilience perspective.

The number of earthquake-prone heritage buildings now stands at **179** - 134 individually listed heritage buildings and 45 heritage area buildings (April 2014). This number has been reducing and is expected to drop further as building owners undertake strengthening works. However, the costs of earthquake strengthening for individual building owners and the wider economic implications for the city continue to be a significant issue.

The Committee has previously agreed to delay making key policy decisions around district plan changes until legislative responses have been made by Central Government. The Council has also been waiting for determinations on the Harcourts¹ resource consent application to indicate how the current district plan heritage provisions are performing given they have only been fully operative for two years. There is also a growing level of debate about whether the Council's current regulatory settings give sufficient weight to public safety, natural hazard and economic resilience issues.

¹ Harcourts Building (former T&G Building) 1926-1928 Heritage Ref 185

A range of approaches are available to the Council in responding to these issues. A Councillor workshop is recommended to work through the issues and options with a specific objective of setting the policy direction for Long Term Plan funding decisions, a possible District Plan change, and a review of the Council's Heritage Policy.

3. Recommendations

Officers recommend that the Transport and Urban Development Committee:

1. *Receive the information.*
2. *Note the progress made within the built heritage and city resilience workstream under the Earthquake Resilience programme.*

Approach to Built Heritage and City Resilience

3. *Agree to hold a workshop in August 2014 to consider options for addressing built heritage, natural hazard and economic resilience issues.*
4. *Agree to bring back to the Committee proposed changes to the District Plan that reflect the outcomes of the workshop.*

4. Background

In September 2011, following the Canterbury earthquakes, Councillors agreed to take a broad approach to addressing earthquake-prone buildings and city resilience. An Earthquake Resilience business unit was established to manage this work and oversee the assessment and strengthening of Council's building portfolio. One key workstream involves examining the Council's management of built heritage in light of the imperative to address public safety and increase city resilience.

4.1 *Earthquake prone heritage buildings*

For some time Wellington has maintained a policy of encouraging heritage building owners to strengthen buildings. This is evident in the current and earlier versions of the Heritage Policy, in the Earthquake Prone Buildings Policy, and in its grants schemes and district plan provisions. The total number of formally identified earthquake-prone heritage buildings has fluctuated over the years depending on building legislation current at the time and the process of rolling out assessments to areas of the city beyond the Central Area.

When updating councillors two years ago, before seismic building assessments had been completed, **249** heritage buildings had been identified as being actually or potentially earthquake prone and were prioritised for assessment under the *Heritage Listings Review*. The number of heritage buildings that actually made the Council's formal Earthquake Prone Buildings List peaked at around **183** in the middle of 2013.

All seismic building assessments for heritage buildings are now complete:

- The total number of earthquake-prone buildings in the city is **645** (April 2014)

- There are **134** individually listed heritage buildings and **45** heritage area buildings formally identified as earthquake-prone (**179** in total or 28% of all EQP buildings)
- The majority of earthquake prone heritage buildings are spread across the Central Area and Suburban Shopping Centre Heritage Areas – **116** compared with **63** outside heritage areas
- There are **548** buildings, **49** objects and **36** Heritage Areas listed in the District Plan (totalling approximately 830 built heritage items).

A list of the earthquake-prone heritage buildings is attached as Appendix 1.

Proactive work with the Built Heritage Incentive Fund (BHIF) over the last year has focused on informing building owners about the Council's role in assisting heritage building owners to strengthen their buildings. Since the Canterbury Earthquakes, **\$988,277** has been awarded in grants from the Wellington City Council's Built Heritage Incentive Fund for projects aimed at improving the seismic performance of 51 heritage buildings.

We expect the numbers of earthquake prone heritage buildings to keep falling. More strengthening schemes are underway or have been completed but have not yet obtained their Code Compliance Certificate (required for a building to come off the List of Earthquake Prone Buildings).

Building Act changes have been proposed which seek to strike a balance between reasonable timeframes for strengthening, heritage values, and the costs to communities from the earthquake prone building problem. This Committee recently approved the Council's submission on the proposed changes (8 April 2014).

Proposed changes to the Resource Management Act that might have more specifically addressed the balance between heritage values and natural hazards have not yet been introduced.

The Central Government legislative response to the Canterbury earthquakes has been developing in the same period as this Council's earthquake resilience work programme and has also been a reason for earlier Committee resolutions to wait before taking any affirmative policy decisions around district plan changes. We have also been waiting for determinations on the Harcourts resource consent application to indicate how the current district plan heritage provisions are performing given they have only been fully operative for two years. One of the outcomes of this process has been growing debate within the public arena for the reasonableness of the Council's regulatory role in the management of built heritage as natural hazard resilience and economic resilience increase in weight as objectives for Wellington.

4.2 Working with building owners

The resource consents, heritage and resilience teams continue to work constructively with building owners seeking to earthquake strengthen and develop their heritage buildings. There has been one resource consent application to fully demolish a heritage building since the Canterbury earthquakes (Harcourts), although a number of building owners have been

awaiting the Harcourts decision as to what steps they will take to remedy an earthquake prone building situation. A lot of movement by tenants to vacate buildings that do not meet higher seismic ratings (67% NBS or above) has put a lot of pressure on earthquake prone building owners.

Proactive work with building owners outside the building and resource consent process by the Heritage Team has also been underway, particularly in the Cuba Street and Newtown Shopping Centre Heritage Areas. A change to the Built Heritage Incentive Fund (BHIF) criteria to prioritise strengthening of earthquake-prone heritage buildings has been reflected in the grants awarded over this financial year, although grants were being awarded for seismic strengthening prior to this change. The grants awarded under the BHIF do not always relate to buildings formally identified as earthquake prone under the Building Act but involve projects aimed at improving seismic performance. For heritage buildings it is more important to achieve a higher seismic rating if the outcome in an earthquake is to preserve as much of the building as possible, not just meet public safety expectations.

The owners of approximately 95 individually listed heritage buildings are currently being contacted to enable a clearer understanding of the specific development and financial constraints on building owners and on progress made with their strengthening plans. This will help inform decisions on the heritage plan change and on Long Term Plan funding decisions.

4.3 Heritage list review

Work has been underway since early 2012 on reviewing the District Plan Heritage List of buildings, objects and heritage areas against criteria agreed to by the Council in 2007 (the 'Listings Criteria'). The review initially prioritised 249 earthquake prone or potentially earthquake prone heritage buildings. These were the heritage buildings that fell within the Earthquake Prone Building Policy and therefore had or were in the process of being assessed under that policy by the Seismic Assessment Team. They are typically, but not exclusively, unreinforced masonry buildings (URMs).

The Listings Review was then extended to all buildings, objects and areas on the List and has involved assessing 548 building listings, 49 object listings and 36 Heritage Area listings (the latter including a review of every building within a heritage area). A report has been completed on every building and object listing with a view to these becoming the foundation for a new digital Heritage Inventory on the Council's website.

The results of the review can be summarised as follows:

- Overall the District Plan Heritage List has a high level of integrity in terms of heritage values (most places meet the listings criteria).
- There are some errors and anomalies that need correcting and improvements that can be made to the way in which places are listed in the District Plan.
- Reviewing the list has exposed the need to relook at how places are identified and described, particularly given the increase in the number of heritage areas in the city.

- Reviewing the list has raised a number of questions. For example, how to identify and manage facades – those that are specifically identified as parts of existing buildings that have heritage values, and those where this is the only part of the building that remains after redevelopment.
- When assessed against the Thematic Framework², there are imbalances in the heritage places represented on the heritage list from a thematic perspective.
- Wellington’s significant stock of heritage resources is, on the whole, being well maintained. However, there are still 179 heritage buildings on the List of Earthquake Prone Buildings.

Further analysis is now being done on assessing the list from a resilience perspective.

4.4 High risk features

‘High Risk Features’ on buildings are items that represent falling hazards like chimneys, veneers, gables, parapets, cornices, canopies and ornamentation, water tanks, tower like appendages, fire escapes, lift wells, facades, plaster and other heavy renders. Internal alterations to heritage buildings, including seismic strengthening, are usually ‘Permitted Activities’ unless they are visible from the exterior of the building. However, works involving modification of the exterior of a listed heritage building or heritage area building require resource consent. The removal or replacement of the elements described above therefore requires resource consent. Whilst the purpose of the rule is to ensure that effects on the heritage values of the building are assessed, this was seen initially as a potential impediment to owners remedying dangerous elements in a timely fashion.

Councillors have already considered how the District Plan, in addition to changes to the Building Act, can be utilised as a way of responding specifically to high risk features. A plan change is still required to implement broadly agreed actions.

5. Discussion

The District Plan currently seeks to promote the conservation and sustainable use of Wellington’s built heritage and discourage demolition unless there is no reasonable alternative. Three fundamental themes surrounding built heritage and the resilience response for Wellington have emerged:

1. **Public Safety:** How many earthquake-prone heritage buildings are there in Wellington and where they are located, are they on key transport or pedestrian routes?
2. **Heritage Values:** If a significant seismic event happened in Wellington, which heritage buildings would we want to save? Would we sacrifice the protection of any heritage buildings or parts of them in favour of resilience?

² Thematic Study of Wellington’s Heritage Places, February 2013

3. **What does Resilience mean?** Is the City's approach to heritage the correct one in the drive towards a resilient city – what is the place of heritage buildings in an economically as well as seismically resilient city?

Each of these questions requires reconsideration of the current district plan approach to heritage but what the response is depends on how resilience is interpreted and the balance sought between the conflicting tensions at play.

Councils have difficult roles as they are required to administer different pieces of legislation relating to the built environment. In particular for heritage and city resilience, the Building Act, Resource Management Act and Historic Places (proposed Heritage New Zealand) legislation all have an impact on how the Council fulfils its regulatory functions. This tension has been evident in the Harcourts resource consent application but exists for all earthquake prone buildings.

5.1 The heritage list and ranking

The Heritage List Review was intended to verify the integrity of every building, object and area on the district plan heritage list but also to form the basis of a discussion about what the list looks like in a city resilience context, the merits of a ranking system and whether new thinking about the built heritage stock would result in a different approach to its management.

A ranking system is a method that could either be introduced into the District Plan or sit outside the district plan (to prioritise financial assistance for the strengthening of earthquake-prone heritage buildings for example). Choosing to take a ranking approach in the district plan would be a significant change compared to the current approach. Any change that affects the heritage list will be subject to the district plan change process under the Resource Management Act. The use of a ranking system to prioritise financial assistance and other non-statutory methods would require consultation as part of the Long Term Plan process.

In the last update to Councillors (February 2013) Councillors were presented with options as to how ranking the heritage list might look. These options are reproduced in Appendix 2 with a short summary reflecting completion of the listings review. The decision then was to defer any policy decisions about ranking and other district plan changes until there was clarity around the Government's legislative direction, the listing review was complete, and a conclusion had been reached on the Harcourts resource consent application process. The review is complete and proposed Building Act changes are now known. Resource Management Act changes have not been progressed as yet.

The High Court has referred the decision on Harcourts back to the Environment Court. This leaves this application unresolved although it is clear what the scope of the outstanding issues are (reasonable assessment of alternatives and the extent to which consideration for public safety should influence the decision). Aside from what the actual decision will be, the Harcourts application has been a focus for debate around the balancing of public safety with heritage values and

the additional economic costs faced by earthquake prone heritage building owners.

5.2 Options for a workshop discussion on built heritage and city resilience

Given the wide ranging considerations needed for addressing built heritage and city resilience, some high level approaches have been identified for resolving the tensions between built heritage protection, natural hazards mitigation and economic resilience. These approaches are intended to form the foundation of a workshop discussion.

Potential Approaches to Addressing Wellington’s Built Heritage and City Resilience

Approach	Description	Comment
1. Existing framework	<ul style="list-style-type: none"> • Work with current tools to promote resilience in heritage buildings (advocacy, financial incentives, district plan) • Rely on implementation of existing regulatory framework in the District Plan to achieve strengthened buildings and manage any demolitions • Retain access to grants for EQ strengthening through the BHIF or equivalent fund (other financial initiatives continue to be developed) • Identify list of most valued Heritage Buildings for disaster preparedness 	<p>This approach would avoid extended and uncertain public processes involving significant council resources and legal costs. However, there is also a risk in this approach not providing enough clarity to building owners, the public, and the commercial market as to the Council’s priorities in relation to EQP heritage buildings.</p> <p>Changing legislation and Harcourts decision may force the Council’s hand to change existing framework.</p> <p>Costs would be spread across individual building owners (raising finance to strengthen, consenting and construction costs etc) and ratepayers (BHIF, Resource Consent Reimbursement Fund, proposed financial incentives in the draft 2014/15 Annual Plan), future LTP funding).</p> <p>The costs of this approach to Council are not as significant as other approaches. However, there</p>

Approach	Description	Comment
		is still a potential cost to the city in not acting proactively and therefore leaving uncertainty in the community and business sector.
2: Resilient heritage	<ul style="list-style-type: none"> • Proactively promote resilience and heritage as joint outcomes • Recognising public safety more explicitly in the district plan • Investment being made through range of financial mechanisms to proactively get earthquake prone heritage buildings off the EQPB List • District Plan changed to provide greater clarity for applications involving high risk features and seismic strengthening • District Plan changed to specifically address demolition of EQP heritage buildings • Consider specific policy on where retention of facades only would be acceptable • Identifying list of most valued Heritage Buildings for disaster preparedness 	<p>This approach focuses on non-regulatory and regulatory methods so that no one solution is relied on. It would potentially require the commitment of significant public (and therefore ratepayer) investment over a long period of time. Whilst this could be programmed out over the 10 year lifetime of the next Long Term Plan (and the one following), there would need to be some clear thinking around how to strategically invest so as to achieve other outcomes such as vitality and economic stimulus alongside 'resilient heritage'.</p> <p>Consider built heritage from a location and hazards perspective.</p> <p>A district plan change would carry the risk of litigation and time delays (changes to objectives, policies, rules and list) but may be easier to defend from a RMA perspective.</p> <p>Costs spread across buildings owners (raising finance to strengthen, consenting and construction costs etc) and ratepayers to fund the plan change process (also likely to be litigation with this approach).</p>
3. Public safety	<ul style="list-style-type: none"> • An entirely public safety focused policy • Change the District Plan to allow for EQP heritage buildings to be 	This approach would provide a clear direction to building owners and the community as to the Council's priorities around public safety and resilience. However, it

Approach	Description	Comment
	<p>demolished as well as strengthened</p> <ul style="list-style-type: none"> • Actively working with building owners to achieve one or other outcome as quickly as possible • Potentially removing EQP buildings from the heritage list (i.e. not subject to heritage rules) • Could still identify list of most valued Heritage Buildings for disaster preparedness 	<p>would be difficult to implement as it would require a district plan change to alter the heritage list/introduce new rules which would be the subject of significant public interest.</p> <p>This approach would be inconsistent with the Council's current policy to recognise some heritage buildings carry an EQP risk, and to therefore support them to be strengthened. However, it would remove the pressure on Council's financial resources to fund its way out of the situation.</p> <p>There is a potential equity issue where other heritage building owners have already invested in strengthening when an option to demolish is introduced.</p> <p>Costs would fall on building owners to engage in the formal plan change process to remove buildings from the District Plan Heritage List but mostly on ratepayers for the Council to defend this approach (likely to be significant opposition = litigation costs).</p>
<p>4. Public safety and economic resilience</p>	<ul style="list-style-type: none"> • Remove obstacles to redevelopment of built heritage in favour of new, safer buildings that also contribute to stimulation of the Wellington economy. • Manage built heritage to be defined more by economic benefits rather than heritage protection 	<p>This approach would be a bold departure from the status quo but could have direct benefits in the response of building owners to redevelopment opportunities in Wellington.</p> <p>It would provide a clear direction that extends beyond public safety to a broader idea of city resilience and stimulation of activity to support economic growth.</p>

Approach	Description	Comment
	<ul style="list-style-type: none"> • Remove buildings from the heritage list that would be better redeveloped in favour of economic stimulus objectives • Alternatively, consider a facades only approach to retain some character but allow for redevelopment • Identify a list of most valued heritage buildings for disaster preparedness although this would also require some level of regulatory protection through the District Plan 	<p>However, it would be difficult to implement. It would require a significant district plan change which would be welcomed by some members of the development community, would be the subject of significant public interest and likely result in an adverse public reaction.</p> <p>This approach would be inconsistent with the Council's current policy to recognise some heritage buildings carry an EQP risk, and to therefore support them to be strengthened. However, it would remove the pressure on Council's financial resources to fund its way out of the situation.</p> <p>There is a potential equity issue where other heritage building owners have already invested in strengthening (and in some cases received grants to do so) when an option to demolish is introduced.</p> <p>Costs would fall on building owners to engage in the formal plan change process to remove buildings from the District Plan heritage list but mostly on ratepayers for the Council to defend this approach (likely to be significant opposition = litigation costs).</p>

A full analysis of options for changing the district plan will be required as part of the plan change process. In addition to the matters identified in section 5.2 above, careful consideration will need to be given to Council's legislative and organisational obligations (Resource Management Act, Heritage legislation, Regional Policy Statement, Towards 2040: Smart Capital, and the proposed Spatial Plan ('Plan Wellington')). The Council's Heritage Policy 2010 would also need to be reviewed to be brought into line with any change in approach to the management of Wellington's built heritage.

6. Next steps - Councillor workshop

The built heritage, public safety and economic resilience issues raised in this paper are complex. Policy to address these issues could be significant. A councillor workshop is proposed to discuss the various issues and agree options for the management of built heritage through the District Plan. The workshop could also involve consideration of possible Long Term Plan funding options.

7. Conclusion

A key outcome of the heritage review process was to ensure the District Plan heritage list had integrity and fulfilled the Council's responsibilities under the Resource Management Act. However, the examination of the effectiveness of our current approach to built heritage coming out of the earthquake-prone building problem has highlighted a need to reconsider whether this current approach will deliver a resilient city. Options for how to approach this issue from an economic resilience perspective as well as public safety have been presented as a foundation for a workshop for Councillors to debate the options further.

Contact Officer: *Claire Gregory, Senior Advisor District Plan*

SUPPORTING INFORMATION

1) Strategic fit / Strategic outcome

The report supports Council's overall vision of Wellington Towards 2040: Smart Capital which seeks to have infrastructure that creates a secure and resilient city. It particularly focuses on the People Centred City that is healthy, vibrant, affordable and resilient, with a strong sense of identity and 'place'.

The report relates to Action Area 2 (Buildings and Energy) of the Climate Change Action Plan.

2) LTP/Annual Plan reference and long term financial impact

The earthquake resilience project is contained in the Council's Long Term Plan.

3) Treaty of Waitangi considerations

N/A

4) Decision-making

This paper does not include significant decisions. The report sets out a number of options and reflects the views and preferences of officers and those with an interest in promoting city resilience in an earthquake event.

5) Consultation

a) General consultation

Formal consultation will be required as part of any district plan change process. Individual building owner consultation is occurring as part of the resilience programme.

b) Consultation with Maori

N/A

6) Legal implications

Potential legal risks for Council have been identified as part of this work programme.

7) Consistency with existing policy

This report discusses certain policy positions which are different or additional to existing policy. This is necessary for exploring the appropriate response to city resilience.

Appendix 1

(List of Earthquake Prone Heritage Buildings – Separate Sheet)

Appendix 2

Heritage List Ranking Options

Option 1 – Status Quo

It is no longer entirely appropriate to call this a Status Quo option as there is much more now known and updated about the heritage building stock on the heritage list as a result of the heritage list review. Gaining an appreciation for the rarity of a building, for example, can be more readily captured by reference to the new research.

This option does not provide a system for understanding the relative importance of one building against another. For earthquake prone heritage buildings, as with all buildings, this would mean that they remain listed in the District Plan as is. The District Plan would not identify whether one building was more significant than another. Any resource consent process would continue to be assessed on the merits of the proposal with the additional benefit of more up to date information about each item. This is essentially current practice and there has been no impediment to buildings being strengthened under this current practice. However, making no other changes in the way of policies and specific rules for the assessment of proposals involving earthquake prone heritage buildings would mean that guidance on how to assess such applications would remain weak in the Plan.

In a post-event scenario, this option does not provide any guidance on which buildings are more important to save than others, although such a list can be maintained outside the District Plan. The information obtained from the Listings Review now provides us with the basis for establishing a list of nationally significant places for inclusion in a Heritage Disaster/Emergency Management Plan which is a required action within the Council's Heritage Policy (September 2010).

Option 2 – Rationalise the Heritage List

With the research and updated information that is now available for every building, object and area on the list, corrections, tidy-ups and improvements can be made to deliver a list with integrity. It would be understood that everything remaining on the list after this review met the listings criteria and was recorded in an accurate and meaningful way. This is the option that a review of the list is expected to provide and would confirm the list for the next 10 years.

For earthquake prone heritage buildings, the same scenario as that outlined above in *Option 1* would apply.

In a post-event scenario, this option also does not provide any guidance on which buildings are more important to save than others, although such a list can be maintained outside the District Plan. The information obtained from the

Listings Review now provides us with the basis for establishing a list of nationally significant places for inclusion in a Heritage Disaster/Emergency Management Plan which is a required action within the Council's Heritage Policy (September 2010).

Option 3 – National and Regional Ranking System

This option was intended to reflect the initial advice from the New Zealand Historic Places Trust (now Heritage New Zealand Pouhere Taonga) as an appropriate resilience response. What the effect of doing this is to categorise the whole of the heritage list into two categories – A higher category of International/Nationally significant buildings and a secondary category of Regionally/Locally significant buildings. The review has delivered the information on which to base such a system with a preliminary analysis of the List under this scenario indicating up to 50 buildings could fall into the higher category with the remainder falling into the regional/local category. The advantage of this system is that significance is clearly identified in the District Plan List which is a common reference point for understanding the heritage places of Wellington, not just the mechanism for triggering resource consent.

The effect of introducing a two-tier categorisation of the list would mean revising the objectives, policies and rules in the District Plan to reflect this type of approach to the list. Whilst the Restricted Discretionary approach currently taken could be retained, there would be a need to alter the policies and assessment criteria to reflect the two-tier approach. There would also be a need to evaluate whether a non-complying or full discretionary rule should be introduced for modification and demolition of the Category A buildings. The potential risk of this approach is that the second tier diminishes in value which, from a resilience point of view, may be a way of recognising some earthquake prone buildings could either be modified more significantly for strengthening purposes, or that it might be appropriate to lose them to achieve greater public safety outcomes. However, there would remain a question as to how non-EQP buildings in the second tier would be managed and assessed. This would involve taking a wider policy approach on economic resilience as well as public safety which is recommended as part of a workshop discussion on the role of regulation through the district plan.

Option 4 – Wellington Significance Ranking System

This option also involves dividing the heritage list into two categories based on whether the buildings are very significant or significant to Wellington. A preliminary assessment of the list based on this approach indicates there would be around 80 very significant buildings in this version of the list. The remainder would have 'significant' status.

As with Option 3, Option 4 has the advantage of clearly identifying relative importance in a document referred to by the public. Again, this also means that the policy approach in the Plan would need to change to reflect this different context for buildings in a resource consent process. Whilst the Restricted

Discretionary approach currently taken could be retained, there would be a need to alter the policies and assessment criteria to reflect the two-tier approach. There would also be a need to evaluate whether a non-complying or full discretionary rule should be introduced for modification and demolition of the very significant buildings.

As with Option 3, the potential risk of this approach is that the second tier diminishes in value which, from a resilience point of view, may be a way of recognising some earthquake prone buildings could either be modified more significantly for strengthening purposes, or that it might be appropriate to lose them to achieve greater public safety outcomes. However, there would remain a question as to how non-EQP buildings in the second tier would be managed and assessed. This would involve taking a broader policy approach to resilience.

Option 5 – Numeric Ranking System

This system involves giving every building or object a score based on a standard evaluation procedure. As the methodology for the review of Wellington's district plan heritage list was based on already adopted listings criteria, a scoring approach was not taken. The experience of other authorities using such a system is that it can be problematic to assign scores for subjective assessments and these are then contestable through a plan change process. Any system will be subject to challenge if introduced through a plan change but it is considered that this is an option with no real advantage for tackling the resilience issue.

Option 6 – Qualitative Grouping System

In February 2013, Councillors were presented with a copy of the newly completed Thematic Heritage Study of Wellington's Heritage places. It provides a basis upon which places on the heritage list can be looked at in quite a different way – by theme rather than relative significance.

The review of the list included the capture of this information for each place under the four identified themes of People and the Environment, Developing Economies, Governing and Building Social & Cultural Life. Preliminary analysis of this information indicates that:

- It reveals some significant imbalances in the numbers represented in each theme on the list - the vast majority of places on the heritage list fall within the 'People and Environment' theme
- The dominant sub-theme by a long way is Migration/Immigration
- Some places do not fit into any of the existing themes or subthemes identified so there may be a need to add new ones

Looking at the list in this way following the review of all buildings, objects and areas potentially lends support for a new policy approach to the management of Wellington's heritage places. It doesn't directly address resilience issues except to indicate which buildings might be underrepresented and therefore more important to strengthen and retain, and the converse. From a Resource Management Act (RMA) perspective, this could present issues given the Act

doesn't provide a mechanism for relative significance but requires recognition and provision for the protection of *all* "historic heritage" from inappropriate subdivision, use and development as a matter of national importance (the case with all options). This is a reason why councils' have historically used the Historic Places Act registration classifications. However, the thematic approach is also one receiving more attention in terms of the management of heritage being more meaningful to the community's sense of place rather than based on nationally established criteria.

To implement a thematic approach would also require a policy and rule restructure of the heritage provisions that concentrated on thematic outcomes more than individual significance.

Option 7 – Ownership Profile System

Rather than an option in its own right, when this option was discussed by Councillors in February 2013, it was considered the benefit of this option was as a potential overlay over other options given that ownership may not be such a credible basis by itself for ranking under the RMA. Certainly, it is relevant information when considering non-statutory initiatives such as financial incentives as well as, for the Council, a way of demonstrating leadership in resilience by having a strengthening programme for Council owned EQP heritage buildings.

A decision to introduce any ranking system into the district plan is a significant one as it would be a departure from a deliberate current policy to not rank the heritage list. However, the review has provided the Council with ways of looking at the list that could be utilised in a full review of the policy approach for heritage buildings, or be used outside the district plan to assist with advocacy and financial assistance. In either case, very careful thought would need to be given to the costs and benefits of using ranking as a tool for the management of Wellington's built heritage.