

**BEFORE THE INDEPENDENT HEARINGS PANEL AT WELLINGTON CITY I MUA NGĀ
KAIKŌMIHANA WHAKAWĀ MOTUHAKE NGĀMOTU**

**UNDER THE Resource Management Act 1991
IN THE MATTER OF the hearing of submissions on the Proposed Wellington City Plan
(Hearing Stream 1)**

**STATEMENT OF EVIDENCE OF EVA FORSTER-GARBUTT AND CHESSA
STEVENS ON BEHALF OF WELLINGTON HERITAGE PROFESSIONALS**

Introduction

1. This Statement of Evidence is given on behalf of Wellington Heritage Professionals in accordance with our submission on the Proposed Wellington City District Plan dated 22 September 2022. The members of this group selected us to compile this Statement for Hearing Stream 1 based on our relevant expertise.
2. Where one or other of us has greater expertise in a specific area addressed in this Statement, we have provided a greater degree of input. We have both jointly drafted this statement and both agree with all matters raised in it.
3. Our evidence will address the following matters:
 - a. Definitions of:
 - i. 'archaeological site'; and
 - ii. 'maintenance and repair'.
 - b. The strategic direction content proposed for:
 - i. capital city;
 - ii. historic heritage and sites and areas of significance to Māori; and
 - iii. sustainability, resilience and climate change.

Qualifications: Eva Forster-Garbutt

4. I am a PhD candidate at the School of Architecture and Design Innovation, Victoria University Wellington, and a heritage consultant providing archaeological and heritage services.
5. Prior to this I was a senior heritage advisor at Wellington City Council (2018-2021), and had some involvement in the district plan review process, and a branch manager and principal archaeologist at New Zealand Heritage Properties, Dunedin (2015-2018), as well as holding positions in the archive and museum sector in New Zealand over the last twenty years.
6. I hold a Master of Arts (with Distinction) in Principles of Conservation (University College London, London), and a Bachelor of Arts with Honours (First Class) in Archaeology (University of Otago). I am a Winston Churchill Memorial Trust Fellow (2019), having completed research on how to improve the practice of buildings archaeology in New Zealand.

7. I am a member of the New Zealand Archaeological Association, Historic Places Wellington, and a Board Member of ICOMOS New Zealand.
8. My areas of expertise are: archaeology (practice), heritage conservation (principles), heritage management (under the RMA and HNZPT Acts).

Qualifications: Chessa Stevens

9. My full name is Francesca Louise Stevens. I practise under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
10. I hold a Master of Arts with Distinction in Conservation Studies from the University of York, United Kingdom, where I was recognised as the highest achieving student with the Duncan Gillard Memorial Medal.
11. I hold a Bachelor of Architecture with Honours from Victoria University of Wellington, New Zealand.
12. I hold a Bachelor of Arts degree from Victoria University of Wellington, New Zealand.
13. I am a Registered Architect with the New Zealand Registered Architects Board.
14. I am a member of the Executive Board and Co-Secretary of ICOMOS New Zealand (the International Council of Monuments and Sites).
15. I am a member of Historic Places Wellington and Heritage New Zealand Pouhere Taonga.
16. I have approximately fourteen years' experience in architecture, specialising in heritage and historic buildings.
17. The areas of my expertise are: heritage conservation (principles and practice); assessment, management, alteration and adaptation of historic buildings, structures and sites (practice); and heritage management generally (under the RMA).

Code of Conduct

18. We confirm that we have read the Expert Witness Code of Conduct set out in the Environment Court's Practice Note 2023. We complied with the Code of Conduct in preparing this evidence and agree to comply with it while giving evidence. Except where we state that we are relying on the evidence of another person, this written evidence is within our areas of expertise, being the areas identified above. We have not omitted to consider material facts known to us that might alter or detract from the opinions expressed in this evidence.

Definition of “Archaeological Site”

19. To ensure that Wellington’s historic heritage is protected from inappropriate subdivision, use and development,¹ and the District Plan objective HHSASMO1 ‘significant buildings, structures, areas, and sites that exemplify Wellington’s historical and cultural values are identified, recognised and protected’ is achieved, the definition of ‘archaeological site’ needs to be changed for scheduling purposes.
20. The current definition of ‘archaeological sites’ in the proposed District Plan is the same as the definition in the *Heritage New Zealand Pouhere Taonga Act* (HNZPTA) 2014. This definition defines archaeological sites as evidence of human activity that occurred prior to 1900, can be investigated using archaeological methods,² and provides, or can provide, evidence relating to the history of New Zealand.
21. We acknowledge that as some parts of the District Plan refer to archaeological sites in the context of the requirements of the HNZPTA this definition is necessary in those instances.
22. The Resource Management Act 1991 (RMA) includes archaeological sites within its definition of historic heritage and does not further define them with a date. The RMA also requires all persons exercising functions and powers under it to recognise and provide for the protection of historic heritage as a matter of national importance.
23. The HNZPTA definition of archaeological sites is for the purposes of that Act, in particular the archaeological provisions. In our view, the District Plan is unlikely to comply with s6(f) of the RMA if it uses the definition of an archaeological site in the HNZPTA, as the scope of places protected would be unnecessarily limited to those of a certain age.
24. The *ICOMOS New Zealand Charter* 2010 also acknowledges that archaeological sites are a part of the definition of a ‘place’ as defined in the charter, being “any land having cultural heritage value in New Zealand, including areas; cultural landscapes; buildings, structures, and monuments; groups of buildings, structures, or monuments; gardens and plantings; archaeological sites and features; traditional sites; sacred places; townscapes and streetscapes; and settlements.”
25. Archaeological sites should not be treated differently to other types of heritage places, which do not have a date limit applied to them. Within the District Plan, archaeological sites should be scheduled based on the same assessment criteria as all other heritage places, with added emphasis on the extent to which the place

¹ Per section 6f of the Resource Management Act 1991 which sets out that the protection of historic heritage (including archaeological sites) from inappropriate subdivision, use and development must be recognised and provided for as a matter of national importance.

² “Investigation using archaeological methods” being defined in the *HNZPT Archaeological Policy* (2015) as “... techniques used in the course of archaeological study to record, describe and investigate archaeological sites, such as manual and electronic surveys, visual inspections, site survey, mapping, surface collection, probing, augering, cleaning down existing exposed sections, test pitting, trenching, excavation and the removal of physical fabric and samples for laboratory analysis, post-excavation analysis and report writing.”

proposed for scheduling can provide evidence relating to the history of New Zealand using archaeological methods. This will ensure that the District Plan objective HHSASMO1 'significant buildings, structures, areas, and sites that exemplify Wellington's historical and cultural values are identified, recognised and protected' is achieved.

26. We note that the Section 42A report prepared for Hearing Stream 1 does not address submissions made with respect to the definition of archaeological sites and the definition has been retained as notified.
27. In our view, a new definition of 'scheduled archaeological site' should be added to the plan to the following, being the definition in the HNZPTA but omitting the pre-1900 cut-off date:

'Archaeological Site' means:

Any place in New Zealand, including any building or structure (or part of a building or structure), that:

- *was associated with human activity; and*
- *provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand; and*

includes a site for which a declaration is made under section 43(1) of the HNZPT Act.

28. This will ensure that historic heritage is protected in accordance with s6(f) of the RMA in terms of scheduling purposes, and aligns with the definition of 'archaeological sites' as per the HNZPTA. Any reference in the District Plan to archaeological sites other than scheduled sites, will need to clarify that the definition in the HNZPTA applies in that instance.

Definition "Maintenance and repair"

29. To ensure that Wellington's historic heritage is protected from inappropriate subdivision, use and development, the definition of "maintenance and repair" needs to be changed.
30. The definition of "maintenance and repair" in the proposed plan with respect to the Historic Heritage chapter provides a detailed list of activities and resulting outcomes that should not all fall under this definition, as the intent of this is to avoid or minimise impacts to historic heritage.
31. In our experience working with the "maintenance and repair" provisions of the current District Plan, the wording of this definition is critical when determining whether a proposed activity on a scheduled heritage item does or does not meet this definition, which as per the current, and proposed, rules is a permitted activity.

32. It is our professional opinion that the definition of “maintenance and repair” in the plan should align with the description of “preservation” in the *ICOMOS New Zealand Charter* which is as follows:
- a. Preservation of a place involves as little intervention as possible, to ensure its long-term survival and the continuation of its cultural heritage value.
 - b. Preservation processes should not obscure or remove the patina of age, particularly where it contributes to the authenticity and integrity of the place, or where it contributes to the structural stability of materials.
 - i. Stabilisation: Processes of decay should be slowed by providing treatment or support.
 - ii. Maintenance: A place of cultural heritage value should be maintained regularly. Maintenance should be carried out according to a plan or work programme.
 - iii. Repair: Repair of a place of cultural heritage value should utilise matching or similar materials. Where it is necessary to employ new materials, they should be distinguishable by experts, and should be documented.
 - c. Traditional methods and materials should be given preference in conservation work.
 - d. Repair of a technically higher standard than that achieved with the existing materials or construction practices may be justified only where the stability or life expectancy of the site or material is increased, where the new material is compatible with the old, and where the cultural heritage value is not diminished.
33. According to the Charter, “Preservation means to maintain a place with as little change as possible”.
34. We therefore propose the following changes to the definition of “maintenance and repair”:
- a. ‘Demolition of a structural element’ should be added as an additional point under “In addition to the above, maintenance and repair of built heritage must not result in any of the following.” This reflects the approach in the current District Plan.
 - b. The term ‘surface treatment’ appears to be covered by the sub-points b), c) and d) and should be excluded from the definition to avoid any ambiguities.
 - c. Sub-point h) in the definition should be removed. We are not opposed to double glazing windows in heritage buildings per se; however, as double glazing is not appropriate at all historic heritage items, it should not be a permitted activity.

Definition of “Reconstruction” and “Restoration”

35. We support the inclusion of these definitions in the plan.
36. In our view the use of the *ICOMOS New Zealand Charter* definition is highly appropriate because the Charter is proposed to be included in the District Plan by reference and it is the main standard for heritage conservation in New Zealand.

Definitions “Wāhi tapu” and “Wāhi tīpuna”

37. We support the proposal to amend these definitions to align with the HNZPTA definitions because this will ensure these places are more easily able to be scheduled and protected after they have been recognised by HNZPT.

Strategic Direction “Capital City Strategic Objectives CC-O2”

38. For clarity, objective 6 should specify the types of values and characteristics that should be identified and protected.
39. Therefore, in our view, the following wording should be adopted: “6. Values and characteristics that are an important part of the City’s identity and sense of place, including historic heritage, the natural environment and sites and areas of significance to mana whenua, are identified and protected.”

Strategic Direction “Historic Heritage and Sites and Areas of Significance to Māori”

40. In our view the introductory text should be amended to reflect the contribution that heritage makes to the liveability of the city. Local and overseas research has shown that heritage contributes to positive economic, environmental, social, and cultural wellbeing outcomes.
41. We therefore support the following change: “Historic and cultural heritage provides a connection with those who lived before us. It helps us define who we are and contributes to our sense of place and to the liveability of the City. Once destroyed, it cannot be replaced. It is a fundamental part of the wellbeing of people and communities.”

Strategic Direction “Sustainability, Resilience and Climate Change SRCC-O3”

42. In our view, a fourth bullet-point should be added to these objectives to recognise the contribution that reusing existing buildings and conserving heritage places can make to Wellington’s resilience to climate change.
43. The author of the Wellington City Council s42A report has provided feedback on this point, stating that:

I do not agree with Wellington Heritage Professionals [412.26] that a fourth clause be added regarding the benefits of retaining buildings. While I agree that there are some environmental benefits of retaining existing buildings – I consider that these are largely social and cultural benefits to do with those that have significant value, rather than any substantial environmental benefit from embodied carbon. I consider that increasing density, including by replacing

buildings, within the existing urban area close to factors that contribute to a well-functioning urban environment has greater environmental benefits. The social and cultural benefits of retaining significant heritage buildings are addressed at a strategic level in the HHSASMW - Historic Heritage and Sites and Areas of Significance to Mana Whenua chapter.

44. It is our position that heritage and character can make a significant contribution to achieving Wellington's, and New Zealand's, climate change goals by:
- a. reducing emissions and waste through sustainable resource use; and
 - b. mitigating the effects of climate change through building community cohesion and resilience.

This position is founded upon evidence from a range of sources, examples of which are outlined below.

45. Approximately 20% of the country's carbon footprint is made up by the building sector, through the production of materials, construction procedures, and the use of buildings after construction.³ Further, approximately 50% of New Zealand's waste results from construction and demolition;⁴ and disposing of this waste to landfill results in both methane emissions and the leaching of chemicals into soil and waterways. Retention of existing buildings, including heritage and character buildings, will reduce the need for new construction, thereby reducing production of new materials and the generation of construction waste.

46. The New Zealand Green Buildings Council's May 2020 report, 'A Green Recovery' states that New Zealand will not meet its carbon targets without a deep improvement of existing homes. This aligns with the 2007 findings of the New Zealand Business Council for Sustainable Development's research project examining how to make New Zealand's homes more sustainable. This project concluded that the greatest potential for improvement was in upgrading New Zealand's existing housing stock. Kate Raworth's bestseller *Doughnut Economics* similarly states that we need to retrofit existing buildings in order to transform the economy into one that is regenerative by design.

47. The evidence for the environmental benefits of retaining existing building stock is strong. In 2016, the US National Trust Preservation Green Lab released a report titled 'The Greenest Building' which concluded that:
- a. Building reuse typically offers greater environmental savings than demolition and new construction.
 - b. It can take between 10 to 80 years for a new energy efficient building to overcome, through efficient operations, the climate change impacts created by its construction.
 - c. The majority of building types in different climates will take between 20-30 years to compensate for the initial carbon impacts from construction.

48. There is also international evidence that historic buildings can be energy efficient:

³ NZGBC, <https://www.nzgbc.org.nz/climate-change-and-building-pollution> (accessed 08/02/2023)

⁴ BRANZ, <https://www.branz.co.nz/sustainable-building/reducing-building-waste/> (accessed 08/02/2023)

- a. Heritage Victoria and RMIT carried out research on a variety of heritage building typologies in 2012
 - b. Historic England's 2019 Heritage Counts research shows that the carbon emissions of historic buildings can be reduced by over 60% by 2050 through refurbishment and retrofit.
49. Research by American economist Donovan Rypkema and others has shown that refurbishing buildings instead of demolishing them and building again from scratch typically generates more jobs, comparable energy consumption, and far less use of water and new materials.⁵
50. The value of cultural heritage and its transmission for 'making cities and human settlements inclusive, safe, resilient and sustainable' is an integral part of the UN Agenda 2030 and the new international policy for Disaster Risk Reduction 2015–2030. This is because cultural heritage supports the building of a community able to prevent, cope with and recover from disturbances and/ or disasters.
51. Recent research by PhD candidate Rachel Paschoalin, Victoria University Wellington,⁶ has assessed the application of international guidelines on energy retrofit for heritage buildings in the New Zealand context. This research underpins emerging approaches in the field of energy retrofit for historic buildings within the New Zealand context, presenting innovative approaches to guide the retention of heritage buildings to reduce environmental impacts.
52. We therefore support the addition of a fourth bullet-point to SRCC-O3 reading "Recognise the environmental benefits of retaining buildings, and conserving historic heritage".

Eva Forster-Garbutt
8 February 2023

Chessa Stevens
8 February 2023

⁵ Crawford, K et al (2014) *Demolition or Refurbishment of Social Housing? A review of the evidence*. London: UCL Urban Lab and Engineering Exchange.

⁶ Paschoalin, Rachel (2021) *Energy renovation of historic buildings in New Zealand: Towards a holistic method for reducing environmental impact*. Wellington: Victoria University of Wellington [PhD thesis].