



30 April 2025

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Dunedin City Council
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Tēnā koe

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE DUNEDIN CITY COUNCIL LONG TERM PLAN 2025/2034

To: Dunedin City Council (DCC)

Name of submitter: Heritage New Zealand Pouhere Taonga (HNZPT)

1. Thank you for the opportunity to lodge a submission on the Dunedin City Council 2025/34 Long Term Plan.

Roles and Responsibilities of Heritage New Zealand Pouhere Taonga

2. Heritage New Zealand Pouhere Taonga is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historic heritage and cultural values. This includes cultural heritage, sites of significance to Māori and archaeological sites.

The specific parts of the application that this submission relates to are:

3. Providing for the identification, protection, preservation and conservation of historic heritage within DCC area which allows for the continued use and appreciation of that heritage.
4. DCC obligations under the HNZPTA regarding archaeological authorities.
5. Recognition of the adverse effects of climate change on historic heritage.
6. Provision of Council incentives to facilitate the retention and seismic strengthening of heritage buildings in Dunedin.

Proposed Initiatives

7. HNZPT acknowledges that Councils across the country are facing cost pressures and are having to make compromises. DCC has proposed a series of cost cutting measures to redirect funds towards investment into the Three Waters within the city.



8. The Long-Term Plan is a high-level document to provide direction for development and initiatives and funding within the Dunedin City. A number of projects have been referenced in the consultation document and HNZPT welcomes further consultation on each of these initiatives as details develop, including:
- Wastewater, Water supply and Stormwater projects (page 16 and 17 of Consultation Document).
 - Core transport infrastructure projects including renewing of transport assets, Princes Street bus corridor, Harbour efficiency improvements (page 19 of Consultation Document).
 - Te Awa Ōtākou – Peninsula Connection which includes the incorporation of a shared pathway on the sides of the harbour (page 20 of Consultation Document).
 - Kettle Park former landfill response to the effects of coastal hazards and climate change (page 34 of Consultation Document).
 - Municipal Chambers Restoration (page 39 of Consultation Document).
 - The removal of listed and scheduled building The Fortune Theatre (Former) at 231 Stuart Street from the Significance and Engagement Policy (page 43 of Consultation Document).
9. Works which relate to historic places, structures or areas should also be assessed for the potential impact on archaeology to ensure an archaeological authority is obtained if necessary. Historic heritage places require regular checks, maintenance and, ideally, an ongoing use, to ensure their longevity.

Archaeological Authorities

10. HNZPT notes that there are projects proposed within the Long-Term Plan consultation document which may require archaeological authorities pursuant to the HNZPTA. Under the HNZPTA an archaeological site is defined as any place in New Zealand that was associated with human activity that occurred before 1900 and provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand.
11. Archaeological sites are legally protected under sections 42(1) and 42(2) of the HNZPTA. An archaeological authority is required for any works that may modify or destroy an archaeological site, including demolition of a building constructed prior to 1900. It is an offence to undertake activities that may modify or destroy an archaeological site unless authorised by an archaeological authority issued under the HNZPTA.
12. The core infrastructure works outlined in the consultation document works include Three Waters Upgrades, Road and Transport Upgrades, Climate Change Mitigation in coastal erosion prone areas. These involve ground disturbance that could affect archaeological sites. These projects may



therefore require archaeological authorities to be obtained from HNZPT prior to works being undertaken.

13. HNZPT recommends that DCC undertake best efforts to avoid identified archaeological sites in close proximity to the proposed projects in the first instance. This would minimise costs and delays.

Climate Change

14. Climate Change is an increasingly threat to historic heritage. Extreme weather events and flooding will result in the loss of archaeology sites. Increased frequency and in of storm events, and coastal erosion will have an impact on heritage structures and buildings and riparian archaeological sites. The conservation and adaptive reuse of historic buildings, utilises embodied carbon, resulting in decreased emissions when compared to demolition and rebuilding. The conservation and adaptive reuse of historic heritage would also contribute to the fulfilment of DCC's waste minimisation goals.

Municipal Chambers restoration and 231 Stuart Street (Former Trinity Methodist Church and Fortune Theatre)

15. HNZPT strongly commends the initial work undertaken by DCC to restore the Municipal Chambers (Category 1 historic place), ensuring its preservation and ongoing use for future generations. DCC has engaged with HNZPT throughout the initial planning stages of the restoration and we strongly support the planned works.
16. HNZPT supports the proposed removal of 231 Stuart Street (Former Trinity Methodist Church) from DCC's list of strategic assets, however we urge that basic maintenance and security of the building is upheld. The Category 1 building represents a significant part of the development of the Methodism in Dunedin. Its transformation from a place of worship to a playhouse in 1977 was an example of an innovative and successful adaptive reuse of a redundant ecclesiastical building. This place has architectural and historical significance to the city. Since its closure as a theatre in 2018 the building has been vacant. Reconsideration of the future of this heritage asset – including potential sale – should enable renewed use of the building, which would be a preferred heritage outcome.

Heritage Incentives

17. Dunedin City is rich in built heritage. Some heritage buildings are of unreinforced masonry construction and will be subject to current legislation requirements for earthquake strengthening. As DCC is aware, financing maintenance and seismic strengthening of these buildings can be difficult for owners, particularly in the current economic climate.
18. HNZPT is impressed with DCC's Heritage Action Plan which supports owners of heritage assets to provide a key economic drawcard for Dunedin. HNZPT supports these initiatives:
 - Developing a database of historic places so building owners and community can have access to this information,



- Commissioning work to understand the economic value of the city's heritage,
 - Continuing to assess DCC historic places and identify buildings and places that are worthy of protection,
 - Simplifying support and guidance for heritage building owners,
 - Running information sessions for heritage building owners,
 - Exploring more financial support for heritage building owners.
19. Financial support for heritage building owners provides financial incentive for the upkeep and adaptive reuse of heritage structure, this would help the city meet its Climate Change and Carbon Neutral targets. The establishment of further incentives has a positive outcome for the region visually, economically and socially.
20. HNZPT continues to support greater funds allocation to the Dunedin Heritage Fund. The Fund has enabled many heritage restorations to be completed, and heritage buildings being adaptively reused. The fund continues to provide positive heritage outcomes for the city, enabling many heritage buildings to be saved from demolition by neglect.
21. DCC could explore options to include scheduled and listed buildings into the Rates Remission and Postponement Policy as an incentive for heritage building owners, on the basis heritage buildings are inhabited or tenanted. This would create a positive economic and social outcome for the city.
22. HNZPT reaffirms to DCC that our role is to provide advice to owners of heritage items, but also Local Territorial Authorities. HNZPT welcomes a closer working relationship with Council staff that benefits DCC, but also the region.

Heritage New Zealand Pouhere Taonga recommends:

23. Further to the priorities and proposed initiatives outlined in the Dunedin City Council Long Term Plan 2025-2029 consultation document, HNZPT recommends the following to protect and enhance the historic heritage of the city:
- Council retains the provisions and projects supported by HNZPT except where amendment is sought, as outlined in this submission.
 - Consultation is undertaken between the Council and HNZPT for infrastructure development and projects that may affect places or areas entered on the New Zealand Heritage List/Rārangi Kōrero.
 - Council is aware that archaeological authorities may be required for certain projects outlined in the Long-Term Plan so that any costs and time associated with this are anticipated and included in project budgets. Archaeological authorities are sought from



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HNZPT for any works that may modify or destroy an archaeological site as is required under the Heritage New Zealand Pouhere Taonga Act 2014.

- Council recognises the adverse effects of climate change on historic heritage and implements measures to prevent further degradation wherever possible.
- Council continues to actively manage heritage assets in its ownership to enable ongoing use, including restoration of the Municipal Chambers and rationalisation of the Trinity Methodist Church (Former) at 231 Stuart Street, with a focus on appropriate ongoing use.
- Council continues to strengthen its heritage incentive fund.
- Council continues to progress work on the Heritage Action Plan.

Heritage New Zealand Pouhere Taonga does not wish to be heard in support of our submission.

24. We are happy to answer any questions regarding our submission and are available to discuss these matters directly Council staff.

Ngā mihi

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