

Oral submission on Variation 2, Dunedin City Council 2GP
Presented by David Murray on 13 September 2021

Tēnā koutou

E noho ana au kei roto i te taumarumaru o Kāpuka-taumāhaka

E mihi ana ki ngā tohu o nehe, o Ōtepoti e noho nei au

Ko David Murray ahau

Tēnā koutou katoa

Thank you for taking the time to hear my submission this afternoon.

Variation 2 aims to, and will, make significant changes to the framework for residential development in our city. Change is desirable and necessary; densification is necessary; this process is necessary, but I'm here to urge that the changes be within a framework that mitigates adverse effects on built heritage. The plan variation as presented does not offer this, and does not make an attempt to.

Dunedin is celebrated for its built heritage, of many types and eras, and we're fortunate to have it. We don't need to debate its value here because it is affirmed by the 2GP itself, which states:

"Dunedin's heritage is central to its identity and is protected and celebrated as a core value of the city, through the heritage conservation and retention of important heritage items, and the maintenance and active use of built heritage."

and also:

"The elements of the environment that contribute to residents' and visitors' aesthetic appreciation for and enjoyment of the city are protected and enhanced. These include built heritage."

These are commitments the city has adopted and should live up to. There's no suggestion of overtly changing them, but there is a real risk they will be undermined by development pressures and changed rules. It is my view that these commitments cannot be lived up to without some additional provisions or amendments.

It can certainly be debated where the line is drawn on what's worth protecting, but while there can be tension between built heritage and intensification, to view these two things as necessarily in opposition is a false dichotomy. As one writer recently pointed out 'heritage isn't just an obstacle ... it has a diverse range of benefits to many communities and many more individuals'. Approached in the right way, it helps with economic and social wellbeing.

And let's be clear, though some would portray heritage advocacy this way: literally nobody, certainly not myself, is suggesting it's desirable to save every old house. That's just a straw man.

I saw the housing development in Caversham announced in the ODT last week and welcome it – it looks great to me. But future developments might not all have such happy results. Under the plan as proposed, some of the best suburban and residential heritage will survive more by luck than good management. The problem with a *laissez-faire*, sort of market-rules approach to built heritage, is not so much that it results in the destruction of old buildings, but that it is indiscriminate about which buildings it destroys. Some of the best may be lost while poorer examples remain. A developer will look at a site and how many square metres of building they can fit on it and the return on their investment – the possible heritage merits of what’s already on the land will often not come into it at all. Such an approach will also encourage a less balanced approach to preserving places that represent different aspects of the city’s history and culture, beyond the colonial and earlier twentieth century showpieces.

Since the RMA reforms of the 1990s, the city’s heritage planning has often served it well, but development pressure has been focussed on the central city and so unsurprisingly the planning has been focussed on this same area. More recently, the Warehouse Precinct rejuvenation is a great example of a success story that balances protections with incentives.

But in terms of residential and suburban heritage, heritage provisions fall short, and the gaps are going to catch up with us when they start meshing with changes such as those proposed in Variation 2.

Nearly three quarters of all heritage scheduled buildings are in the CBD, in which I include City Rise and North Dunedin below the town belt and as far as the Gardens.

Only about a quarter (27%) of scheduled buildings are outside the CBD, and this includes suburbs such as Mornington, Maori Hill, Roslyn, Caversham, and St Clair, known for their characterful older houses and history. The only heritage precincts outside these areas are commercial ones Caversham and Port Chalmers, and the small Windle residential settlement at Belleknowes. Even in precincts “character-contributing” buildings within precincts have little protection, as the recent demolition of the Scribe’s building has shown.

I think many people would be surprised that in Maori Hill the grand total of buildings with heritage provisions or protection under the 2GP is just one. Caversham? Three. Mornington? Four. St Clair? Two. Mosgiel? Three. Roslyn has an unusually high number (!): Eight..

Norman Ledgerwood’s book on the celebrated architect R.A. Lawson identifies thirteen surviving houses by that designer within Dunedin. Only two of these are scheduled heritage buildings – there’s nothing to prevent the demolition of the rest, at least not on heritage grounds.

I also note that seven pre-1940 suburban churches have been demolished in Dunedin in just the past four years. [St Bernadette’s, Mosgiel Baptist, St Clair Presbyterian, Glenroy Primitive Methodist, Mornington Baptist, Hillside Road Methodist, St James Presbyterian]. In some cases, I would have no personal objection, but was heritage significance or value even assessed from a

preservation perspective? Not in any required sense – in most cases any heritage assessment was solely archaeological.

The section 42A report acknowledges that work on the schedule of heritage buildings is likely to be incomplete. It also describes it as a ‘work in progress’ but if that ‘progress’ proceeds at the same rate it has for the past 20 years, things aren’t looking too good. Only about twenty buildings have been added to the list in that time. In the last 10 years, by comparison, the Wellington City Council has added 76.

The process is also opaque – not many know how it works. The last time the Dunedin City Council actively and explicitly asked for nominations for additions to the scheduled heritage buildings list was seventeen years ago (it did not through the 2GP process) and it then did little to follow up on or assess the suburban nominations it did receive. It does not offer online advice about nominating a place. In contrast, Wellington City Council Me Heke Ki Pōneki invites nominations [through its website](#), and [recently actively sought](#) nominations of buildings and importantly also sites of cultural significance.

Retaining old buildings is good for sustainability – they can store energy and become carbon reservoirs. The greenest building – or potentially the greenest building - is often the one already built. Concrete, for example, is a destructive material, and if the cement industry were a country, it would be the third largest carbon dioxide emitter in the world. Built heritage objects are embodied energy. Encouraging reuse in conjunction with densification is the right way to go. A good example can be seen in St David Street, where a larger structure has been built behind an existing house.

I reiterate this isn’t about preserving the every old house, what I’m pointing out is that the cream of the crop is at risk. I can certainly think of more than two examples of heritage homes in St Clair likely to meet a high criteria. But two is the number represented at present. Many of these buildings can be warm, healthy homes suitable for modern living. But potentially, some might go when in a better framework, poorer examples could have gone in their place.

Heritage issues were of course looked into with the 2GP, but the variation is changing the ballpark, and that means the heritage provisions need carefully looked at if they are to meet the heritage objectives as stated in the 2GP.

The Section 42A report outlines some of the likely impacts on heritage: including increasing the economic feasibility of demolition and replacement, and incompatibly designed buildings. Recent development in Mosgiel already gives a bit of an advance view of what’s likely to happen elsewhere in Dunedin, and demolitions there in recent years have included the grand home Maranatha, and the former Presbyterian Manse of 1886.

The Section 42A report acknowledges that, “in providing more opportunities for development in the suburban areas of Dunedin, there is an associated risk of the loss of buildings with heritage

values that are not currently protected by the Plan provisions”. It also states of currently unscheduled buildings that “in some instances, both individually and collectively, their heritage values will be significant, which contribute to the broader, distinctive built heritage character that Dunedin is renowned for”. Again to quote from the report “many older buildings will not meet the criteria to be a scheduled heritage building, but that should not detract from the fact that some would”.

Of course Dunedin needs to cater for future population growth and housing demand, and address issues of supply and affordability. Planning for this should go hand-in-hand with further identifying and protecting the best individual and collective heritage sites. There’s a balance to be struck: having 89 heritage scheduled houses outside the CBD, 20 of those in Port Chalmers, with no further heritage housing provisions in these areas, I suggest does not strike the right balance.

It is interesting to compare Dunedin with Wellington, where a new spatial plan has been controversial. Even with reductions in protections there, Wellington will still have more protection of residential heritage than Dunedin. This despite our reputation as a heritage city.

The Section 42A report includes some good constructive recommendations that I urge you to endorse, including:

- further evaluating the option of adding a blanket provision to manage effects on heritage values from the proposed rule changes
- introduction of consent requirements for demolition of buildings older than a specified age requiring a heritage assessment prior to demolition to ensure that there would not be effects on significant heritage values. This could be done for all areas affected by Variation 2 or some subset based on areas of higher risk.

I also urge more than the quantity of ‘work in progress’ of the past 17 years in terms of assessing potential additions to the schedule of heritage buildings, and precincts, as a counterbalance to new pressures. The process for the public to contribute to this should also be more transparent.

Our best built heritage will be eroded if it is not safeguarded in an appropriately targeted way. Let’s not forget, we’re not starting with a full complement of the best buildings ever put up in this city. There have been waves of demolition in the past, particularly in the 1960 s and 70s. Many of those demolitions are not lamented. But the quality of many of the examples lost then should serve as a warning. Densification and new building can occur in a way that minimises the loss of the best built heritage and sites of cultural significance. Overlooking the gaps created or exacerbated by Variation 2 would be a lost opportunity.

Ngā mihi ki a koutou. Thank you.