

12 May 2017

Timaru District Council C/- enquiry@timdc.govt.nz

Dear Sir/Madam

# SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA: Timaru District 2045 Draft Growth Management Strategy

TO: Timaru District Council

FROM: Heritage New Zealand Pouhere Taonga

- 1. Thank you for the opportunity to submit on the Timaru District 2045 Draft Growth Management Strategy.
- 2. Heritage New Zealand Pouhere Taonga (Heritage New Zealand) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 for the identification, protection, preservation, and conservation of New Zealand's historic and cultural heritage. Heritage New Zealand is New Zealand's lead heritage agency.
- 3. Heritage New Zealand fully supports the council in adopting a planned approach to the long term development and form of the district, particularly its main centres.
- 4. Heritage New Zealand supports the strategic directions identified in the draft Growth Management Strategy, and considers that heritage matters span many of these directions to greater or lesser degrees. This is recognised in the draft Strategy which acknowledges the importance of maintaining the unique heritage of the district whilst planning for growth and development.
- 5. Heritage New Zealand supports the preferred development option of 'managed growth' which recognises the importance of reinforcing the existing centres, and avoiding unnecessary and inefficient peripheral expansion and out of centre development. It is considered that this approach provides opportunities to revitalise currently under-utilised areas of the Timaru CBD, which includes a high proportion of heritage buildings, and possibly other town centres as well.

### Town Centre Living Opportunities & Heritage Building Re-use

6. An opportunity that Heritage New Zealand considers could be more explicitly picked up on in the Growth Management Strategy is the diversification of the town centres, particularly the Timaru town centre – for inner city living above ground floor level. This opportunity is recognised and promoted in the *District Town Centres Study* 2016 which notes as follows in regards to Inner City Living:

'The accommodation of more residential and visitor accommodation uses (although not at ground floor level) would significantly increase the vibrancy of the centres, particularly after normal business hours. It would also increase the safety of the town centres, discouraging anti-social behaviour. From a commercial perspective residential and visitor accommodation uses would diversify the tenancy of the building and provide better returns for the landowner. The viability of small visitor accommodation has significant improved with the advent of website and apps such as Airbnb...

It is acknowledged that town centre living does not suit all. However, it does suit particular groups such as younger people without kids (including students), couples without children and people that do not have or want the use of a vehicle. There are many benefits of living in the town centre including direct access to shops, hospitality, services, limited need for a vehicle, proximity to work, no garden maintenance etc. The provision of more apartments in the town centres would address the shortfall in smaller residential properties that is currently in demand from Timaru's aging population that are looking to down size . . . '

- 7. Heritage building re-use above ground floor is one mechanism for achieving the 'housing choice' referred to in the Growth Management Strategy. Furthermore, diversification in building use would assist in making heritage building strengthening more viable. There are benefits to earthquake strengthening that go beyond the mere survival of individual buildings. Earthquake strengthening contributes to more resilient towns, providing for higher rates of economic and general community recovery in the event of an earthquake. Heritage building reuse also has benefits in terms of sustainability, through making the most of existing infrastructure.
- 8. Based on the above, Heritage New Zealand considers that the draft Strategy could be strengthened by including additional discussion on inner city living as a means of providing wider housing choice and more vital town centres.

Specific amendments could be as follows:

• P. 36 Building Resilient Communities

Add to list in right hand column – <u>'Promoting seismic strengthening of older building stock'</u>

• P. 39 Residential

Add following wording to section — <u>'Existing underutilised heritage building stock</u> provides opportunities for intensification of residential activity making use of existing infrastructure, and access to amenities and transportation options. It also provides greater diversity of housing opportunities, diversifies the inner city population and supports commercial activities such as restaurants and shops'

P. 66 Table 14 – new action

<u>Provisions within the Replacement District Plan to encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of older buildings, and inner city living.</u>

P. 86 G:1.1 District Plan Review – new wording

Consider ways in which the Replacement District Plan can encourage and incentivise seismic strengthening of heritage buildings, adaptive re-use of heritage buildings, and inner city living.

### **Cultural and Heritage Landscapes**

- 9. Strategic Direction 2 focuses on the importance of managing subdivision and land use in such a way as to protect outstanding natural landscapes. Timaru District also benefits from significant cultural and heritage landscapes, for example areas where there is a concentration of rock art sites. These landscapes are important because of their contribution to the knowledge and history of the district, as well as for the unique cultural tourism opportunities that they present. Heritage New Zealand considers that 'heritage and cultural landscapes' should therefore be recognised in the Strategy.
- 10. Heritage New Zealand requests that the following amendments be made to recognise heritage and cultural landscapes:
  - P. 9 Strategic Direction (2) Landscapes and Amenity
    - (i) Recognise and protect outstanding natural landscapes and natural areas <u>and</u> <u>heritage and cultural landscapes</u> in the district from inappropriate activities;
  - P.34 Landscape, Biodiversity and Amenity

Appropriate preservation of the natural character of the coastal environment, outstanding natural features and landscapes, and historic heritage <u>including cultural</u> and heritage landscapes.

P. 46 Action no A2.1

Provide protection for outstanding and amenity landscapes, <u>heritage and cultural</u> <u>landscapes</u> and areas of recognised natural character, including the coastlines, wetlands, lakes and rivers.

Support Agency Department of Conservation, Canterbury Regional Council, Forest and Bird, Fish and Game, QEII, Ngāi Tahu Papatipu Rūnanga, Te Rūnanga o Arowhenua, Te Rūnanga o Ngāi Tahu, Heritage New Zealand Pouhere Taonga.

### Conclusion

11. Heritage New Zealand is available to answer any queries Council may have regarding its submission. We remain as ever, able to offer further advice to Council and other owners of heritage items regarding heritage conservation.

Yours sincerely

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General Manager (Southern Region)

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