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## **GPS-HUD Submission by Historic Places Wellington (HPW)**

Historic Places Wellington is a not for profit society dedicated to the preservation of historic places in the wider Wellington region. We aim to promote the identification, protection and conservation of historic places and to inform, advise and educate the public of their significance. Where possible, we work cooperatively with local councils, Heritage New Zealand Pouhere Taonga and other organisations concerned with the preservation of historic heritage.

The case for new housing is more important than ever, but it is also more difficult to achieve than ever. There are numerous factors, but removing planning constraints on height limits and on sprawl are two that are proposed in the NPS-UD and in this GPS-HUD.

HPW supports an increase in construction of affordable housing by Kainga Ora and the increase of public funding for papakainga and other Māori housing initiatives.

### *Insert Historic Heritage*

The NPS-UD has a “qualifying matter” relating to heritage (Part 3.32(1)(e)) recognising that the policy could not over rule the s.6 “Matters of National Importance” contained in the existing RMA legislation, which includes:

“(f) the protection of historic heritage from inappropriate subdivision, use, and development.”

Heritage is a matter of national importance and it should also be referred to in the GPS-HUD document.

HPW calls for the insertion of historic heritage into the GPS-HUD. A policy which does not recognise heritage is ultra vires the current parent legislation.

Heritage buildings should be retained, respected and protected as a precious cultural resource, with a great many societal, economic and environmental benefits.

The General Policy needs to recognise the important role of heritage in urban development. Heritage buildings are important for urban wellbeing, and provide an important sense of identity and place. Heritage buildings are critical to maintaining wellbeing and identity, and memory.

## *Adaptive Reuse of Old Buildings for Housing*

Adaptive reuse of heritage buildings and areas can contribute hugely to intensified housing – e.g. Dunedin commercial centre.

Adaptive reuse of existing buildings (including heritage listed buildings) represents a major opportunity to deliver new affordable housing in an environmentally, socially, culturally and economically sustainable manner.

Refurbishing existing buildings for use as housing is very often a significantly cheaper option than building new housing from scratch.

Recent research by Historic England (2019) cites the potential double benefit of reduced carbon emission in the built environment and the delivery of new dwellings through the adaptive reuse of existing buildings for use of housing.

The research illustrated that between 2010 and 2018 “...there were 60,400 more pre-1919 homes than there were 8 years prior, as a result of the conversion of existing historic homes into multiple dwellings and through the conversion of non-domestic historic buildings into homes.”

In the UK over 12% of all new housing in England in 2018/19 resulted from change of use from a non-domestic use to residential. (Historic England (2019)). It also cited the additional environmental benefits of this adaptive reuse strategy, including reducing other negative environmental impacts such as waste production, resource depletion, water pollution, land-take, erosion and health impacts.

## *Old Buildings Are Climate Friendly*

Heritage (and old) buildings have embodied energy that mean restoring or repurposing them is a climate friendly action. MBIE’s ‘Whole-of-Life Embodied Carbon Emissions Reduction Framework’ (August 2020) recommends the introduction of ‘whole-of-life’ embodied carbon analysis, which will mean that the carbon reduction benefits of reusing and recycling existing buildings can assist in achieving New Zealand’s target of becoming carbon neutral by 2050.

## *Adaptive re-use is a waste friendly activity.*

The Royal Institute of British Architects (RIBA) have recently come out in support of the adaptive reuse of existing buildings (saying that we should refurbish old buildings rather than scrap them), as a key enabler in driving down carbon emissions deriving from the built environment, citing the significant negative environmental impact of building demolitions.

Similarly, the UK’s ‘RetroFirst’ campaign (developed by the Architects Journal) champions the reuse and refurbishment of existing buildings as a means to reduce carbon emissions and waste from the building sector. The campaign targets three means of reform: tax (reverse VAT rates so that renovation works are charged at 5% and new build is charged at 20%), policy (promote the reuse of buildings and materials through changes to planning and building regulations) and procurement

(start by requiring all publicly funded commissions to consider refurbishment before demolition and rebuild).

### *Heritage Incentives*

HPW calls for the government to look at a range of initiatives, including direct funding and tax initiatives, to incentivise and support private sector investment in the adaptive reuse of existing buildings in order to deliver more sustainable and affordable housing. These strategies could assist government in delivering its key focus of increasing housing supply and affordability, relatively quickly.

### *Efficient Use of Infrastructure: Old Buildings*

Consistent with international studies, new infrastructure costs tend to be higher for 'greenfield' developments on the urban fringe than for 'infill' or 'brownfield' development in existing urban areas. This reflects the fact that existing urban areas often, but not always, have existing infrastructure with spare capacity or the ability to be adapted or expanded. ('The costs and benefits of urban development', M R Cagney (2019)).

Murphy, L. (2015). The politics of land supply and affordable housing: Auckland's Housing Accord and Special Housing Areas. Urban Studies  
10.1177/0042098015594574

### *Aesthetics and Beauty*

Far from beauty and quality being a luxury, it's clear they are key to unlocking community consent for development and housing.

The importance of aesthetics and beauty (often reflected in historic heritage and other old buildings), is important for urban development. The English government, for example, has a new focus on urban aesthetics as a means of encouraging housing intensification and increased supply of housing.

### *Brownfields First*

Unregulated sprawl is unsustainable and a backward step for Aotearoa/New Zealand.

Releasing more rural greenfield land for more sprawling suburban housing will just perpetuate the problem of high land costs, gobbling up more and more valuable land, whilst making our cities less efficient.

There is a great deal of under-utilised land in Wellington city used as car parks and poor return commercial buildings. Adaptively reusing them should be the first priority for urban development.

English planning laws have had a "brownfields first" clause for some years. Aotearoa/New Zealand should have something similar in the GPS-HUD.

Sustainable development should underpin urban development in Aotearoa/New Zealand as it does in England and Australia.

By contrast the Government's Urban Growth Agenda "aims to remove barriers to the supply of land and infrastructure and make room for cities to grow up and out."

Urban sprawl is at odds with the modern approach to planning and contributes to problems of distance from employment and inequality.

The GPS-HUD should be focussed on creating sustainable, attractive, liveable communities.

Freeing up more land for development is vital, but this should focus primarily on brownfield land and redeveloping existing low density sites (that are well located) - brownfields.