

Submission to Heritage New Zealand *Pouhere Taonga*

Re: Guidelines for Assessing Historic Places and Historic Areas on the New Zealand Heritage List / Rārangi Kōrero

31 MAY 2017

Introduction

The Institution of Professional Engineers New Zealand (IPENZ) is the lead national professional body representing the engineering profession in New Zealand. We have approximately 19,600 members, including engineering students, practising engineers and senior members in positions of responsibility in business. IPENZ is non-aligned and seeks to contribute to the community in matters of national interest, giving an informed view on important issues, independent of any commercial interest.

As the lead engineering organisation in New Zealand, IPENZ has responsibility for advocating for the protection of New Zealand's engineering heritage. A key element of protecting engineering heritage is to ensure the contribution it has made and is continuing to make to our modern society's development is widely recognised and appreciated. Profiling engineering heritage is also a means of ensuring society has an understanding of engineering and of the engineering profession's value.

Submission

IPENZ appreciates the opportunity to comment on Guidelines for Assessing Historic Places and Historic Areas on the New Zealand Heritage List / *Rārangi Kōrero* (“the Guidelines”).

IPENZ supports the intent of the Guidelines and believes they will be a useful resource for heritage assessors, heritage owners and local government officers.

We generally support the content of the guidelines. We have some comments in relation to details set out in the Guidelines, as set out below:

- We note the inclusion of technological value in the same category as aesthetic value and architectural value on page 9. We suggest technological value can also be aligned with scientific value because of its ability to demonstrate and educate. Technological value is not dependent upon aesthetic, architectural or sensory characteristics. We suggest clarification is required because technological significance has commonalities with scientific significance.
- We note the inclusion of cultural value on page 9 and appreciate that this derives from the Heritage New Zealand Pouhere Taonga Act 2014 (the Act). Two very similar terms ‘cultural significance’ and ‘cultural heritage significance’ are commonly used in International Council on Monuments and Sites (ICOMOS) charters in New Zealand and Australia, where they refer collectively to all of an item’s assessed values. We recommend that acknowledgement is made of this distinct difference to avoid confusion. We question whether it is necessary to include cultural value when it is not a term that aligns with internationally recognised guidelines.
- We note the inclusion of cultural, social, spiritual and traditional significance as stand-a-lone criteria. We understand that, in accordance with section 66(1) of the Act, Heritage New Zealand Pouhere Taonga may enter any historic place or historic area in the New Zealand Heritage List/Rārangi Kōrero if it is satisfied that the place or area has aesthetic, archaeological, architectural, cultural, historical, scientific, social, spiritual, technological, or traditional significance or value. However, we question whether it is necessary to list these as stand-a-lone criteria within the Guidelines given the significant overlap between them. Merging these criteria in the Guideline would make it easier for heritage advisors and officers to identify significance. If this is not possible then we recommend Heritage New Zealand *Pouhere Taonga* provides clearer explanations of each criterion and how they differ, to enable users of the Guidelines to understand the differences and what is expected of them and their assessments. In particular, social value and cultural value have many commonalities. We recommend that the Guidelines are amended to provide clarity when assessing these values.
- We note and support the comment on page 11 of the Guidelines that ‘age is important, but is only one factor’ in determining a place’s or area’s significance. We support protection of relatively new/recent heritage as well as that of older heritage places, items and areas. We recommend the addition of this point in the Guidelines.
- We note that the Guidelines include both integrity and intactness as threshold indicators. It seems from the definition of integrity on page 9 as ‘the wholeness or intactness of a place,’ that intactness is counted twice: firstly as part of integrity and then again in its own right. We recommend that the Guidelines are amended to provide clarity as to what each indicator means and what heritage assessors are expected to present in their assessment reports.
- We note and support the comments on page 12 regarding aesthetic qualities of places and areas. We support comments that aesthetic value refers not only to look but also touch, feel, smell and taste. We suggest that the list of aesthetic qualities set out in bullet points on page 12 of the Guidelines is amended to include more non-visual considerations to further emphasise the fact that visual impact is only one aspect for consideration. For example ‘How does the place make people feel?’ could be added to the list.

- We note that a place of archaeological significance needs to be as intact as possible (page 19 of the Guidelines). While we appreciate this may be the case in general, we would suggest that there may be cases where damage may be of interest, for example, after an earthquake.
- We support the inclusion of methods of construction under architectural significance. We suggest that this wording is reflected throughout the relevant section in the Guidelines, including in the bullet point lists on pages 24 and 25.
- We note and support the scientific significance criterion. We suggest areas created or changed by earthquakes may be potential heritage areas or places in this criterion in the future.
- We note and support the inclusion of technological significance. We encourage Heritage New Zealand *Pouhere Taonga* to include engineering explicitly in the wording of this section (pages 49-53 of the Guidelines) to ensure New Zealand's engineering heritage is considered and protected where appropriate.
- We note and support the section 66(3) criteria as set out on page 92 of the Guidelines. We note that in describing criterion (g): 'the technical accomplishment, value or design of the place,' the Guidelines suggest technical accomplishments could include a technical breakthrough, creative solution or innovative construction technique. We suggest 'innovative engineering design' is also included to ensure engineering heritage items are given appropriate consideration.

Conclusion

IPENZ appreciates the opportunity to make this submission and is able to provide further clarification if required.

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