# **Submission on:**

# CODC Long-term Plan 2021 - 2031



### **Background**

The Central Otago Heritage Trust (COHT) appreciates this opportunity to respond to the CODC's consultative document, *Framing Our Future*. In doing so, COHT notes that three of the five major proposals highlighted for public discussion and feedback may need heritage input at the decision-making stage and ongoing consideration from a heritage perspective during any future implementation.

COHT is obliged to represent the views of its member groups but within the timeframe, has been unable to canvass as widely as it wished. Where possible, this commentary will reflect member views.

As this consultative document is part of a statutory process, COHT also considers it necessary to address that process from a wider heritage perspective. The document makes only a passing acknowledgement of the underlaying strategic framework, so our comments reference the CODC Long Term Plan 2018 which establishes heritage as an essential component of our regional identity, recognises heritage as having regional value and sets high level heritage goals. For the purposes of further discussion, we choose to encompass these qualities or attributes within the term "strategic heritage considerations".

#### **Strategic Assessment - The CODC**

Other than the proposed Museum strategy, none of the key proposals appear to recognize the likelihood of heritage issues having to be considered during the planning and implementation process. Should they proceed, they will, necessarily, be subject to the CODC's District Plan's policy and regulatory provisions regarding heritage which we note were last amended in 2008; from COHT's perspective, they should be reviewed as soon as possible.

We understand that a review of the District Plan's key sections is scheduled to commence mid 2021 but heritage matters will not be addressed until 2022. Given that strategic heritage considerations are likely to be of considerable importance for any future planning and development, **COHT strongly encourages Council to give top priority to a review of Section 3**: Manawhenua, **Section 11**: Heritage Precincts **and Section 14**: Heritage Buildings, Places, Sites, Objects and Trees. Ideally, these should be collated in a new **Section: Heritage** and where appropriate, updated with new policies, objectives, criteria and rules, so that they then may inform the review of other Sections likely to be affected.

### **Planning Heritage's Future**

COHT queries why key heritage considerations have not been recognized in the consultation document and whether it might be due to a lack of in-house heritage planning expertise to anticipate heritage related problems early in the planning process?

COHT has previously advised the CODC of our intention to review the Central Otago Heritage Strategy later this year. An important part of that review will be a consideration of CODC's role regarding heritage, a process now likely to be influenced by decisions consequent on this LTP consultation. While not wishing to preempt that review, we do consider heritage management in Central Otago to be disadvantaged by the CODC's lack of heritage planning expertise and therefore strongly encourage the CODC to establish such capability and capacity.

# Strategic Assessment – Central Otago's Heritage Sector

COHT considers the public perception of 'heritage' to have undergone a major shift over the last ten years, a decade marked by a decline in the number of heritage volunteers and the eventual winding-up of 'Historic Places Central Otago', once an active and influential heritage watchdog.

Twenty years ago, 'heritage' was considered to be the domain of amateur volunteers enthusiastically uncovering historic artifacts, searching out and cataloguing old records and restoring remnant buildings. Over the intervening years heritage professionals have quietly taken over leading roles in what is now an increasingly complex industry which competes for project funding and consequently has heightened expectations of prudent governance and responsible management, both disciplines which few volunteers wish to assume.

Consequently, those heritage artifacts and restored stone buildings are now widely considered to be valuable 'assets' supporting a new tourist-oriented industry. This not-so-subtle re-orientation of the sector may be implicit in the 2018 LTP high level goal of establishing, "clear guidelines for accessing, managing and preserving heritage .... while also identifying tourism opportunities", but has yet to be acknowledged by the CODC as a key heritage consideration.

Not only is Central Otago's historic heritage now viewed as the foundation of our distinctive regional character, but it is also regarded by many as a resource which attracts new residents, underpins new businesses and a thriving tourist industry, thereby making a significant, quantifiable contribution to the Regions' prosperity and wellbeing.

Valuable resources, if they are to be sustained for the long-term, need to be carefully developed and managed. The costs associated with resource management in the government and private sectors are usually recovered from either the public purse or commercial users and private consumers; Central Otago's heritage sector is an outlier in this regard. Many heritage organizations continue to rely on their volunteer membership for management and fundraising activities, the latter pursuit often demanding greater effort and commitment than that required by their proposed project.

The increasing scale, complexity and cost of current heritage activities, e.g. the Otago Goldfields Heritage Trust's Heritage Inventory project, COHT's Oral History and MemoryBank projects, have all required the adoption of more efficient and effective management structures. In turn, the costs of managing heritage continue to rise exponentially, thereby requiring key players to review the way heritage is funded.

## **Sustaining the Heritage Legacy**

The District Plan provides some heritage protection by way of policies and rules preventing inappropriate use or development, but it cannot stem the continuing degradation of built heritage due to neglect or abandonment. Without adequate funding, it is impossible to repair and maintain heritage places and buildings, to store, preserve or adequately display artifacts or to train oral historians.

COHT acknowledges, with considerable appreciation, the CODC's grant which enables us to maintain a paid executive; we also acknowledge Council's limited ability to fund the successful delivery of outcomes or encourage further initiatives, leading to an everexpanding requirement for further financial assistance.

We have noted that heritage is credited with making a significant contribution to Central Otago's economy; it follows then, according to the generally accepted model, that those who benefit should in turn contribute. It is tempting to propose that the community (ratepayers) are the ultimate beneficiaries of the Region's tourist-driven prosperity, and should therefore contribute to heritage costs by way of their rates.

While COHT considers it imperative that an alternative source of heritage funding be identified, we do not yet understand the extent of the economic benefit conferred by heritage or how it is distributed within our community.

Accordingly, COHT recommends that CODC undertake a collaborative project that will allow us to see the sector more clearly, particularly in financial terms. An economic analysis should determine:

- a. the value heritage contributes (visitor numbers/average spend, heritage related employment) to Central Otago's economy each year;
- b. the annual cost of maintaining heritage buildings and providing heritage services;
- c. the opportunity cost of abandonment and/or neglect;
- d. the annual amount contributed by way of heritage grants and donations from all funding sources; and
- e. the total hours contributed by unpaid volunteers each year.

Ideally, the resulting report will identify whether ratepayers, businesses, visitors or some combination of, benefit from the heritage sector's efforts and what might then be a fair and acceptable impost on those beneficiaries.

#### **District Museum Function**

Having consulted with the District's museums, COHT has submitted feedback on their behalf, proposing as an alternative, that the District Museum Function be coordinated by an independent body representing the museum sector.

This 'By Museums For Museums' approach reflects the achievement of an important goal established during the 'Towards Better Heritage Outcomes' consultation process and considered by COHT as more likely to achieve the outcomes envisaged by the District Museum Strategy (currently under development).

#### **Cromwell Master Plan**

COHT applauds the proposal to create an Arts, Heritage and Culture Precinct. Undoubtedly, further consultation with parties will be required if this project is approved and that any resulting actions take sympathetic account of and is complementary to the Old Cromwell Heritage Precinct.

No doubt, any plans proposed for a new museum facility will be developed taking into account **the District Museum Strategy** that is currently under development.

### **Alexandra Riverside Park Trust Development**

COHT strongly supports this initiative and encourages the CODC use this opportunity to envelop the Riverside Park Trust's project within a broader vision of a Council - driven heritage and recreation development of the riverbanks/margins from the Alexandra Boat Ramp on the Clutha to the Shakey Bridge across the Manuherikea River.

COHT notes that the Otago Heritage Goldfields Trust's **Heritage Inventory Project** will shortly commence an archaeological investigation of the Manuherikea River's lower reach.

Thank you for this opportunity to provide feedback regarding the LTP. We do wish to speak to our submission at the relevant CODC meeting.

Kind regards

PP. M-J-16/12.

David Ritchie (Chair - Central Otago Heritage Trust)

24 April 2021