

BEFORE THE INDEPENDENT HEARINGS PANEL

IN THE MATTER OF: Two applications for land use consent, pursuant to section 9(3) RMA for 114 Adelaide Road, Wellington

APPLICANT: Lakhi Maa Ltd, IPG Corporation Ltd

CONSENT AUTHORITY: Wellington City Council

SECTION 42A REPORT OF CHESSA STEVENS – HERITAGE ASSESSMENT

Dated 3 November 2021

Introduction

Qualifications

1. My full name is Francesca Louise Stevens. I practice under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
2. I have the following qualifications and experience relevant to the evidence I shall give:
 - (a) I hold a Master of Arts with Distinction in Conservation Studies from the University of York, United Kingdom.
 - (b) I hold a Bachelor of Architecture with Honours from Victoria University of Wellington, New Zealand.
 - (c) I hold a Bachelor of Arts degree from Victoria University of Wellington, New Zealand.
 - (d) I am a Registered Architect with the New Zealand Registered Architects Board.
 - (e) I am a member of the Executive Board and Co-Secretary of ICOMOS New Zealand (the International Council of Monuments and Sites).
 - (f) I have approximately fourteen years' experience in architecture, specialising in heritage and historic buildings.
3. I have prepared this evidence on behalf of the Wellington City Council (WCC) to assess the heritage effects of two Resource Consent Applications relating to the former Tramway Hotel building, 114 Adelaide Road, Newtown, Wellington, being SR No. 464277 and No. 490717.

Expert Witnesses – Code Of Conduct

4. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that

might alter or detract from the opinions that I express, and that except where I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.

Background

5. I am regularly engaged by WCC to provide heritage advisory services relating to Resource Consent Applications.
6. I was engaged by WCC to provide heritage advisory services for a pre-application meeting relating to the Tramway Hotel in March 2020. This pre-application meeting did not relate to the current Resource Consent Applications, but marks the beginning of my involvement with the building.
7. Prior to this, WCC Senior Heritage Advisor, Moira Smith, had provided heritage advice relating to previous Resource Consents for works affecting the building, including a Resource Consent for partial demolition works that was granted in February 2018 (SR No. 394118).
8. The Resource Consent Application to demolish the Tramway Hotel was received by WCC in May 2020, at which time I was again engaged by WCC to provide heritage advisory services in the capacity of a council officer.
9. This Application was put on hold following a request for a pre-application meeting from the Applicant in July 2020. The purpose of this pre-application meeting was to explore alternative options for development of the site that would not involve demolition. The meeting was held on 21 July 2020, and I attended as heritage advisor for WCC.
10. The Application to demolish was notified in October 2020. The hearing was tentatively scheduled for late March 2021, but was postponed when the Applicant advised that they would be submitting a separate Application for Resource Consent to modify the building.
11. The Resource Consent Application to modify the Tramway Hotel was received by WCC in May 2021, at which time I was invited by WCC to

continue in my role as heritage advisor regarding all consents relating to the building. The Applicant requested that this Application be fully notified.

12. The above sequence of events means that I have not issued any kind of formal assessment of effects for either of the Applications. However, the Applicant has received advice following pre-application meetings, and Requests for Information relating to both Applications that have been prepared by me.

Scope of Evidence

13. My assessment considers the following matters:
 - (a) The heritage significance of the Tramway Hotel.
 - (b) How the works proposed under each Resource Consent Application do, or do not, conform to the assessment criteria given in the Wellington City District Plan (WCDP).
 - (c) How the works proposed under each Resource Consent Application do, or do not, conform with heritage best practice.
 - (d) Whether there is sufficient justification for the negative effects that the works proposed under each Resource Consent Application may have on the building.
 - (e) Whether there is sufficient mitigation for the negative effects that the works proposed under each Resource Consent Application may have on the building.

Description of the Building and Site

14. The subject site is rectangular in shape, approximately 20 metres by 15 metres, and generally flat. It is positioned on the corner of Adelaide Road and Drummond Street, an area which is characterised by predominantly 1-3 storey modern commercial buildings along Adelaide Road, with a few multi-storey modern residential buildings also present along Drummond Street.

15. The extant Tramway Hotel building was designed by James O’Dea – a prominent Wellington Architect most well-known for his buildings constructed along the length of Cuba Street - and constructed in 1899 by J. Hunter. It replaced an earlier timber hotel built on the same site that had burned down in 1898. At the time of construction, the building was owned by Charles Plimmer, fourth son of John Plimmer, “the father of Wellington”.
16. The building is two storeys, and sits hard up against the street edge on both Adelaide Road and Drummond Street.
17. The original parapet was removed in 1942 following the Wairarapa earthquake.
18. The hotel exterior was altered by the 1960s, when the ground floor elevations were clad with blue ceramic tiles, and the first-floor elevations were painted, (and possibly rendered or plastered). The building was also enlarged in 1969.
19. In the 1990s, the ceramic tiles and rendered finish applied to the exterior were removed.
20. In 2000 a building on the site, believed to be the 1969 extension, was demolished; and in 2001 a multi-unit student accommodation building was constructed in this location.
21. In 2011, the building was served a Section 128 notice by the WCC to denote that the building was earthquake prone and would have to be strengthened or demolished. Strengthening work has not taken place during this time and the building remains vacant and in a severely dilapidated state.
22. In 2018, a Resource Consent for partial demolition of the building was granted (SR No. 394118). The Decision Report refers to the review undertaken by Moira Smith which states:

In summary, the work will not significantly detract from the values for which the Tramway Hotel was listed. The demolition works are confined to parts of the building that have little heritage value and the new works can be considered to be temporary and will enable the securing and

part-strengthening of the Tramway Hotel. This means that I can support the application on heritage grounds.

My assessment assumes that the extent of partial demolition that was defined in SR No. 394118 is excluded from the scope of works defined in Applications SR No. 464277 and 490717 as it has already been approved.

Heritage Status of the Building and Site

23. The building is scheduled in the WCDP as the '1899 Adelaide Hotel' (6/397).
24. Neither the existing building, nor the site, is listed with Heritage New Zealand Pouhere Taonga (HNZPT).
25. There is a recorded archaeological site on the subject property, R27/444, which refers to the original hotel building built on the site in 1878, converted from a block of shops built previously in 1876-1877. The site is therefore protected under the Heritage New Zealand Pouhere Taonga (HNZPT) Act 2014. The surrounding area is known to have been occupied from as early as the 1860s.

Heritage Significance of the Building and Site

26. The WCC Heritage Inventory describes the heritage values of the building as follows:

- (a) *Aesthetic*

- i. *Architectural*

The building is a good representative example of a late Victorian hotel. The building's principal facades form a well-articulated composition in a commercial Classical style. The building retains much of the original Classical detailing including external rendered mouldings around the windows and doors, sash windows and panelled doors, and rendered pilasters.

- ii. *Townscape*

The scale, form and visual interest of the building's exterior detail contrast with the commercial and industrial buildings on Adelaide Road. The building provides a transition between the commercial development in Adelaide Road and the period housing in Drummond Street. The building occupies a prominent corner site

(b) Historic

i. Association

The building has a long history as a local hotel and has some historic value for its association with liquor licensing laws, and with the recent gentrification of Newtown.

ii. Association

The building has some historical value for its association with Charles Plimmer, a member of an early Wellington settler family, and with the McParland's (McPharland's), a local family of bakers / publicans.

(c) Scientific Value

i. Archaeological

The site has archaeological value for the pre- 1900 human activity on site.

ii. Educational

The building is a rare surviving example of typical late Victorian Hotel, and the original plans, sections and elevations survive.

(d) Social Value

i. Identity - Sense of Place - Continuity

The building has remained (relatively) unchanged on the site for over 100 years and contributes to the sense of place and continuity for the changing townscape of Adelaide Road, Newtown

ii. Public Esteem

The building was a local hostelry for Newtown and Mt Cook until the 1970s although in later years it gained a reputation as a 'trouble spot'.

(e) Level of Cultural Heritage Significance

i. Authentic

The building is a good representative example of a late Victorian hotel, two storied and located on a prominent corner site. Although altered externally by the removal of plaster and parapet features, it otherwise retains and authenticity of form, allowing hotel design of the time to be understood, particularly since the original drawings survive.

ii. Rare

The building is a rare surviving example of typical late Victorian Hotel.

iii. Representative

The building is a good representative example of a late Victorian hotel.

iv. Local - Regional - National - International

Local association with Plimmer & McParland families. Local and regional value as a surviving example of late Victorian Hotel.

Reports and Material Considered

27. As part of preparing this statement of evidence, I have read the following reports and correspondence for SR No. 464277:
- (a) Application Form, Description of Proposal and Assessment of Effects on Environment, prepared by Spencer Holmes, dated May 2020;
 - (b) Record of Title;
 - (c) Assessment of Environmental Effects prepared by Ian Bowman, Architect and Conservator, dated May 2020;
 - (d) Notice of Intention to seek orders under s133AS of the Building Act 2004, served on Lakhi Maa Ltd by Meredith Connell, 29 November 2019;
 - (e) Originating Application for orders under section 133AS of the Building Act 2004, prepared by Meredith Connell, dated 18 December 2019;
 - (f) Email correspondence between Mark Pattermore, WCC Manager City Consenting & Compliance, Stephanie Steadman, WCC Programme Delivery Manager, and Dennis Parbhu, Director of Lakhi Maa Ltd, between 15 August and 13 September 2019;
 - (g) WCC Built Heritage Incentive Fund Past Allocations between March 2017 and February 2019;
 - (h) Concept Restrengthening Estimate for 114 Adelaide Road, prepared by Maltbys, 4 March 2020;
 - (i) Market Valuation (as if complete) for 114 Adelaide Road, prepared by Colliers International, dated 28 April 2020;
 - (j) Seismic Capacity and Strengthening Review for the Tramway Hotel at 114 Adelaide Road, prepared by Silvester Clark consulting Engineers, dated April 2020;

28. As part of preparing this statement of evidence, I have read the following reports for SR No. 490717:
- (a) Cover letter to Application prepared by Spencer Holmes, dated 13 May 2021;
 - (b) Application Form, Description of Proposal & Assessment of Effects on Environment, prepared by Spencer Holmes, dated May 2021;
 - (c) Record of Title;
 - (d) Resource Consent Application Drawing Set for “Adelaide Project”, 114 Adelaide Road, Newtown, including separate site plan, prepared by IPG Property Investment and Silicon Engineering Consultants Ltd, dated 22 April 2021;
 - (e) Architectural Design Statement for 114 Adelaide Road, Newtown, prepared by IPG Property Investment, dated 22 April 2021;
 - (f) Feasibility Report for 114 Adelaide Road, Newtown, prepared by IPG Property Investment, dated 22 April 2021;
 - (g) Traffic Design Statement for 114 Adelaide Road, Newtown, prepared by IPG Property Investment, dated 22 April 2021;
 - (h) Waste Management Plan for 114 Adelaide Road, Newtown, prepared by IPG Property Investment, dated 22 April 2021;
 - (i) Earthworks Assessment on Resource Consent Application, prepared by WCC, dated 24 March 2017;
 - (j) Heritage Assessment and Impact Assessment for 114 Adelaide Road, prepared by DPA Architects, dated April 2021;
 - (k) Wind Assessment for 114 Adelaide Road (Revised Design), prepared by WSP, dated 26 March 2021.
 - (l) Documents received in response to a s92 Request for Further Information:

- i. Revised Heritage Assessment and Impact Assessment for 114 Adelaide Road, prepared by DPA Architects (still dated April 2021);
- ii. Letter re: Construction Methodology Confirmation and Existing Building Condition, prepared by Silvester Clark Consulting Engineers, dated 8th August 2017;
- iii. Revised Resource Consent Application Drawing Set for “Adelaide Project”, 114 Adelaide Road, Newtown, prepared by IPG Property Investment and Silicon Engineering Consultants Ltd, dated April and July 2021.

29. In preparing this evidence, I have also used the following documents:

- (a) Wellington City District Plan (WCDP);
- (b) Heritage New Zealand Pouhere Taonga’s (HNZPT’s) *Sustainable Management of Historic Heritage Guidance Series*:
 - i. *Information Sheet 12: Alterations and Additions to Historic Buildings*;
 - ii. *Information Sheet 14: Partial Demolition of Historic Buildings*;
 - iii. *Information Sheet 15: Demolition of Historic Buildings*;

Site Visit

30. I visited the site in March 2020. I was not given access inside the building at this time, so was only able to undertake an inspection from the outside.

Legislative Requirements

31. The rules of Chapter 21A of the Operative WCDP apply to both Applications. Any modification to any listed heritage building or object which is not a Permitted Activity, or the demolition or relocation of any listed heritage building or object, is a Discretionary Activity (Restricted) in respect of

historic heritage (21A.2.1.1) and design, height, siting, coverage, bulk and massing of buildings (to the extent that these affect historic heritage) (21A.2.1.2).

32. The rules of Chapter 21D of the Operative WCDP apply to Application SR No. 490717. Any signs on heritage buildings and sites on which listed heritage buildings are located which are not a Permitted Activity are Discretionary Activities (Restricted) in respect of sign design, location and placement (21D.3.1.1), area height and number of signs (21D.3.1.2), illumination (21D.3.1.3), fixing and fixing methods (21D.3.1.4).
33. The Heritage New Zealand Pouhere Taonga Act 2014 also applies.

Assessment of Effects on Heritage for SR No. 464277

Description of the Proposal

34. The proposal is for complete demolition of the former Tramway Hotel building at 114 Adelaide Road, leaving a vacant site. No new development on the site is proposed as part of the Application, so it is assumed that the site will be left vacant.

Applicant's Assessment of Environmental Effects as it Relates to Heritage

35. The Applicant's Assessment of Environmental Effects for SR No. 464277 (complete demolition) was prepared by Ian Leary of Spencer Holmes, and refers to the Assessment of Environmental Effects prepared by Ian Bowman.
36. In section 3.2 of his Assessment, Mr Bowman identifies reasons for undertaking the demolition as follows:

The hotel has been vacant for some time and Ian Leary advises that there are no viable economic alternatives, see Section 5 Alternatives Explored. He also advises that the applicant has explored options to strengthen the building and none have been found by him to be viable either economically or able to be consented.

37. Mr Bowman then goes on to cite the findings of Silvester Clark's Seismic Capacity and Strengthening Review (April 2020), also submitted with the Resource Consent Application, presumably as justification for the Applicant's position that there are economic alternatives:

The strengthening works will be costly to construct and, in our opinion, are likely to exceed the cost to demolish the existing URM building and reconstruct with an equivalent sized modern building.

Even if this building was strengthened, due to the nature of the URM structure, it would still be prone to damage in a moderate to significant seismic event.

Regardless of the strengthening scheme selected this building would have functionality limitations due to the current layout and shape.

38. In section 5 of his Assessment, Mr Bowman discusses alternatives to demolition that have been explored by the Applicant as follows:

An alternative comprising the retention of street elevations of the hotel and the construction of a six-storey tower behind the facades was explored in 2016.

Ian Leary notes other options that have been explored as follows:

- "Strengthening as is: Not economically viable – Cost v value grossly unequal. – Major disruption to the building to save it.
- Additions and alterations - Strengthening work carried out with adding additional floors. – Hotel proposed – WCC heritage have advised no modifications (increase in floors) would be supported.

- Sale to another party: Current/viable offers are dependent on buyers being able to find viable economic uses – only recently buyer withdrew after consultation with WCC heritage officers.”¹

39. Mr Bowman does not extrapolate on Mr Leary’s comments with regards to the reasons why the proposal to demolish the building is the “best option”.

40. In section 6 of his Assessment, Mr Bowman rates the level to which the proposal complies with the applicable WCDP criteria and the HNZPT *Sustainable Management of Historic Heritage Guidelines* as “does not comply” and the magnitude of the effects of the proposed demolition as “major adverse”.

41. Nowhere in his Assessment does Mr Bowman give his support for demolition of the building. Instead, he concludes by stating that:

The applicant has provided engineering, construction costing and valuation evidence that the strengthening of the building without significant increased floor area, is not economically viable. I have assessed a previous option for adding four floors to the building and am now aware of the option assessed in this report for demolition. I am not aware of other options that could be explored for the existing building and site.

42. In his Assessment, Mr Leary states:

In reviewing the report and conclusions of Mr Bowman, I accept that the Former Tramway Hotel has Moderate Heritage value and that the proposal to demolish that building will have a significant effect on the heritage values of the building itself (by removing them) and the heritage effects in respect to the subject building are significant, but are moderate with respect to the overall heritage values of the city.

¹ Mr Bowman cites an email from Ian Leary on 11 May 2020 as the source of these comments.

43. Mr Leary contends that this is not surprising, because:

The assessment criteria and the heritage rules, are “setup” to place the emphasis on the preservation of heritage buildings. Therefore, with a proposal for demolition, it is not surprising that it would be assessed against the relevant criteria and found to be inconsistent with those criteria which seek the preservation or enhancement of the heritage qualities.

44. Despite agreeing that adverse effects of the proposal on the environment will be more than minor, Mr Leary, on behalf of the Applicant, takes the position that these effects are unavoidable:

Overall, the intent of the District Plan is to maintain historic heritage. In this case however the owner is obligated to undertake strengthening works which are economically and practically not viable.

The applicant cannot avoid the strengthening works required by WCC’s building resilience officers. They are aggressively seeking compliance and threatening to undertake the work and charge the applicant for the costs. But if those costs are not viable to the applicant, they are not going to [be] viable for Council to undertake. Council will not be able to recoup its costs through rating charges or possession of the building, as the value of the work will exceed the value of the building.

The situation must be considered one where the reasonable alternatives to demolition are not available.

45. I agree with the Assessment of Mr Bowman that the proposal to demolish the building “does not comply” with the WCDP or HNZPT Guidelines; and that the magnitude of the effects of the proposed demolition would be “major adverse”.
46. I do not agree with the Assessment of Mr Leary that no reasonable alternatives to demolition are available. This is evidenced in part by the Applicant’s second Resource Consent Application to alter the building (SR No. 490717, discussed further below).

Assessment of Effects on Heritage Values

47. Assessment criteria 21A.2.1.3 to 21A.2.1.22 of the WCDP have assisted my consideration as to whether the effects of the proposal are acceptable. I have also referred to the objectives and policies given in Chapter 20; Heritage New Zealand Pouhere Taonga's (HNZPT's) *Sustainable Management of Historic Heritage Guidance Series Information Sheet 15: Demolition of Historic Buildings*; and the *ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value*.
48. For efficiency, I have only addressed the criteria for which Mr Leary has provided an explanation in his Assessment, not including those criterion that he has identified will not be met, and not including those that are not applicable in this case.

21A.2.1.8 ***The extent to which the work is necessary to ensure structural stability, accessibility, and means of escape from fire and the extent of the impact of the work on the heritage values of the building. The Council will seek to ensure that in any case every reasonable alternative solution has been considered to minimise the effect on heritage values.***

49. The building at 114 Adelaide Road is deemed to be earthquake-prone (less than 34% of the new building standard or NBS) by WCC. Silvester Clark's Seismic Capacity and Strengthening Report, prepared for the Applicant, confirms this, identifying multiple parts of the structure that achieve a rating of less than 34%NBS.
50. Two notices have been issued to the building owner by WCC confirming the requirement for seismic works to be undertaken: the first under s 124 of the Building Act in June 2013; and the second under s 133AL of the Building Act in May 2019. The building owner (the Applicant) has failed to meet its obligations to carry out seismic work on the building before the deadline required under these notices.

51. Action is required in order to bring the building into compliance. Mr Leary has therefore correctly identified in his Assessment that the Applicant does not have a “do nothing” option; although it is evident that nothing has been done since the Applicant was served the first notice in June 2013.

52. Mr Leary states:

The decision to demolish the building is largely driven by [the] fact that Council are taking action to take possession of the building and carry out strengthening work, which ultimately will be uneconomic for both the owner and Council itself.

53. The Applicant’s position that undertaking strengthening work is uneconomic is based on costing prepared by Maltby’s for one proposed preliminary strengthening scheme prepared by Silvester Clark, and comparison of this costing with an estimated market valuation for the strengthened building prepared by Colliers International (in April 2020). Mr Leary states:

The preliminary strengthening concept was developed by Silvester Clark and was costed at \$6,138,000. The value of the strengthened building based on 70% of NBS is \$2,550,000 + GST (if any). The financial option of strengthening the building is therefore grossly uneconomic.

54. According to Mr Leary’s Assessment, the reason for costing only one preliminary strengthening scheme is that Silvester Clark confirmed that other alternative strengthening options were not practicable or viable. However, this is not borne out in Silvester Clark’s Seismic Capacity and Strengthening Report, which states:

There are other options that could be used to strengthening this building, but all methods of strengthening will have similar significant construction challenges.

55. Neither the costing prepared by Maltby’s nor the market valuation prepared by Colliers were peer reviewed for accuracy.

56. According to Mr Leary, the Applicant has considered other alternatives to demolition, including making alterations and additions to the building, selling the building, and applying for funding to supplement the costs of strengthening.

57. With regards to additions and alterations, Mr Leary states:

The applicant has considered making additions and alterations to the building to increase its floor area and therefore value, to make the strengthening works financially viable. Consultation with WCC Heritage officers confirmed that this would not be supported to a level which is likely to be economically viable.

However, no evidence is provided in the Application to corroborate this statement. This point is further discussed in paragraph 69 below.

58. With regards to the possibility of selling the site, Mr Leary States that no purchasers have been found. However, there is no evidence that the Applicant (owner) has attempted to market and sell the site.

59. With regards to funding, Mr Leary states:

The applicant has considered seeking funds for heritage preservation, such as the WCC Built Heritage Fund. The avenues for funding for private owners are limited.

60. While I agree that the options for funding are limited, there is no evidence that the Applicant has actively applied for any funding.

61. Mr Leary contends that:

Given that there must be something done in a short period of time, the applicant has considered all options and can, on available evidence, only make one decision. The decision must be to demolish the building. The criterion requires that *Council will seek to ensure that in any case every reasonable alternative solution has been considered to minimise the effect on heritage values*. If there can only be one decision and this has been successfully demonstrated, then the proposal must be consider[ed] to be consistent with the criterion.

62. I do not agree that the Applicant has demonstrated that only one decision can be made in this case. I believe that multiple alternatives to demolition remain open to the Applicant.

63. Referring to the Seismic Capacity and Strengthening Report prepared by Silvester Clark, Mr Leary states:

The report effectively outlines removal of the ground floor, large parts of the second floor and areas of the roof to allow machinery access to undertaken [sic.] ground beams and piling to secure foundations.

Potentially there is demolition of the parts of the main façade to allow access of this machinery. The works (if it were economically feasible) will be very disruptive of the heritage fabric of this building and would require substantial replacement of original elements.

64. I agree that the preliminary strengthening scheme proposed by Silvester Clark is very invasive, and would involve the removal and replacement of significant heritage fabric. However, it is my opinion that other seismic strengthening options remain open to the Applicant.

65. Further, while the scheme proposed by Silvester Clark would have a negative impact on the heritage values of the building through the removal of significant heritage fabric, it would enable some fabric to be retained, which would be a better outcome than outright demolition.

66. The issue of site access for machinery has already been addressed as part of SR No. 394188 which allowed for partial demolition of the building to enable site access.

21A.2.1.10 *The extent to which the work is necessary to enable the continued use of the building.*

67. I acknowledge the Applicant's position that it is not possible to use the building at present given its earthquake-prone status. However, demolition of the building would not enable its continued use, and therefore I do not consider this criterion to be relevant.

21A.2.1.11 ***Whether professional heritage or conservation advice has been obtained from the NZHPT or any other professionally recognised expert in heritage conservation.***

68. Mr Leary states that:

Expert heritage advice was obtained when considering development options for the site, which involved additions and alterations to the building. Ultimately, I understand that WCC Heritage advisers have indicated that they would not support additions and alterations to the building. The Heritage officers have not supported any additional floors to the building. Correspondence from WCC planners indicates that it may be possible to add a floor to the building. This option would still not make the proposal economic.

69. The statement that WCC heritage advisors would not support additions or alterations to the building is untrue, as evidenced by the feedback that was issued to the Applicant during the pre-application process. Further, the Application has not provided any evidence to support the statement that the addition of one storey (or other similar intervention) would not be economic.

70. Architect and conservator Ian Bowman has assessed the effects of the proposed demolition on behalf of the Applicant and has determined that demolition will have a major adverse effect on the heritage values of the building. The proposed demolition goes directly against this assessment.

21A.2.1.12 ***Whether work is in accordance with a conservation plan prepared for the building or object and peer reviewed by the Council.***

71. There is no known conservation plan for the building or the site. However, complete demolition of the building could not be in accordance with any conservation plan.

21A.2.1.13 ***Whether the site has or is likely to have significant archaeological values, and whether the effects on those***

values by the proposal can be adequately avoided, remedied or mitigated.

72. Under the HNZPT Act, both the building and the land encompassed within the boundaries of 114 Adelaide Road meet the definition of an archaeological site.
73. Demolition of the building will destroy its archaeological values, and the Application has not proposed any method of remedying or mitigating the loss of these values.
74. The Application acknowledges that there will be a requirement for an Archaeological Authority (incorrectly described in Mr Leary's Assessment of Environmental Effects as an "archaeological permit") for demolition of the building and works affecting the site.

21A.2.1.14 ***Whether there is any change in circumstances that has resulted in a reduction of the building's heritage significance since the building was identified in the plan***

75. There have been no changes in circumstances that have resulted in a reduction of the building's heritage values since it was identified in the WCDP.
76. I acknowledge the Applicant's position that there have, however, been changes in the legislation relating to earthquake-prone buildings, and building standards generally, since the building was identified in the WCDP; and that this needs to be considered.

21A.2.1.15 ***The extent to which the building has been damaged by fire or other human generated disaster or any natural disaster.***

77. The building has not been damaged by fire or other disaster. However, it should be noted that the building has been damaged as a result of neglect.

21A.2.1.21 *Whether adaptive reuse of a listed building or object will enable the owners, occupiers or users of it to make reasonable and economic use of it.*

78. Mr Leary contends that:

As discussed above, the owner/applicant is obligated by other legislation (the Building Act) to strengthen the building. The analysis of the costs of strengthening the building clearly demonstrate that it is uneconomic to strengthen the building without undertaking significant additions to the floor area of the building to attain an economic return. Otherwise it is not possible to make reasonable and economic use of the building. As the building is not economic to strengthen and it is not possible to make reasonable use of the building, demolition can be considered consistent with the criterion.

79. I disagree with this statement for the following reasons:

- (a) The Applicant has not demonstrated that it is not possible to make reasonable and economic use of the building once it is strengthened. The Applicant has provided an estimate of costs to strengthen the building based on one preliminary design, and compared that to an estimated market value of the building once strengthened, and argued that the resulting difference in these figures demonstrates that it is not economical to strengthen the building. No information about reasonable and economic use of the building – for example, the income stream(s) that may be generated from letting accommodation or venues within the building - is provided in the Application. It is my view is that there are ways to strengthen the building so that the owner can make a reasonable economic use of it, but that these have not been investigated by the Applicant.

- (b) The criterion clearly stipulates that it relates to adaptive reuse. As the proposal is not for adaptive reuse, it cannot be considered to be consistent with the criterion.

21A.2.1.22 ***The public interest in enhancing the heritage qualities of the City and in promoting a high quality, safe urban environment.***

80. In relation to this criterion, Mr Leary states:

In this case there are potentially mutually exclusive interests at play. Given the economic issues with strengthening the building, it is not possible for the applicant/owner to carry out the strengthening works to preserve the heritage qualities of the building and therefore promoting a safe urban environment.

If the consent to demolish is approved, then there will be heritage qualities lost to the city. If the consent is declined, the risk to public safety is continued.

The proposal to demolish the building cannot be consistent with both arms of this criterion, but given the lack of options available to the applicant due to Council's own action, the effects are unavoidable.

81. I disagree with these statements for the following reasons:

- (a) It is possible to strengthen the building, as evidenced by the Seismic Capacity and Strengthening Report included in the Application.
- (b) If the consent is declined, it remains open to the Applicant to address the existing public safety risks in other ways.
- (c) It is possible to retain the building and to make it safe. The two aspects of this criterion are not mutually exclusive.

Policy 20.2.1.2 ***To discourage demolition, partial demolition and relocation of listed buildings and objects while:***

- ***Acknowledging that the demolition or relocation of some parts of buildings and objects may be appropriate to provide for modifications that will result in no more than an insignificant loss of heritage values; and***

- ***Giving consideration to total demolition or relocation only where the Council is convinced that there is no reasonable alternative to total demolition or relocation.***

82. With regards to Policy 20.2.1.2, Mr Leary states:

In this case, the building must be strengthened. But the strengthening work is beyond the means of the owner to achieve. The costs of strengthening will be more than double the cost of the finished building.

The option of extending the building (to a sustainable level) in order to preserve the overall heritage values of the main façade of the building has been rejected as an option by WCC officers.

There are no other funding options available which would reasonably be able to breach the substantial funding gap between the strengthening costs and final value of the building.

Therefore, without funding, there is no option to strengthen the building as it currently stands. Therefore whilst the proposal is inconsistent with the requirement of the objective to protect historic heritage, the applicant has demonstrated that there is no reasonable alternative to demolition.

83. I agree that the building must be strengthened, and I acknowledge that the cost of the strengthening work required may be beyond the building owner's financial means. However, that does not mean there are no reasonable alternatives to demolition.
84. It is incorrect to say that options to extend the building have been rejected by WCC officers, as evidenced by pre-application advice provided to the Applicant.
85. As already acknowledged, there are a limited number of funding options available to the Applicant. However, the Applicant has not demonstrated that they have exhausted these options.

86. I do not agree that the Applicant has demonstrated that there are no reasonable alternatives to demolition.

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Demolition of Historic Buildings***

87. I agree with Mr Bowman's assessment that the proposal does not comply with any of the guidelines presented in this document.

Matters Raised in Submissions and Response to Submission Points

88. I have reviewed the eleven submissions received on the Application for Resource Consent to demolish the building at 114 Adelaide Road. All submissions oppose the application, noting that:

- (a) While the submission of April Tatnell states "I/we support the application" the comments support retaining and strengthening the building; and the decision that they would like the WCC to make is given as follows:

Keep the existing building, strengthen it and reuse it to meet the housing shortage in New Zealand.

- (b) The submission of the Newtown Residents' Association approves retention of the north and east façade with a new building behind for the purposes of housing, although they did not make a submission on SR No. 490717.

89. Generally, the submissions identified the following reasons for opposing the Application:

- (a) The building has aesthetic, historic and social values that should be preserved and protected.
- (b) Demolition would be inconsistent with the WCDP.
- (c) It is the only significant heritage building left in this part of Adelaide Road.

- (d) The market valuation is flawed because it is based on the building being operated as office space.
- (e) The Applicant has had plenty of time to act to strengthen the building.
- (f) If strengthened and restored, the building could provide social amenity for local residents and/or contribute to local housing.

90. I agree with all of these points.

Conclusion

91. The proposed demolition of the former Tramway Hotel at 114 Adelaide Road will have a significant adverse effect on the heritage values of the building, which is permanent, irreversible, and cannot be mitigated in any way. Accordingly, the proposal is **not supported** on heritage grounds.

Recommendations for Conditions and Advice Notes

92. Notwithstanding the conclusion reached above, should the panel approve the Application for complete demolition, the following conditions and advice notes are recommended for inclusion, subject to further discussion with Planning and Urban Design Officers.

93. **Condition 1:** Prior to any works commencing on the site, the consent holder must submit a documentary record of the building to WCC and receive approval for this record from the Compliance Monitoring Officer and Heritage Advisor. The record will include (as a minimum):

- (a) the address or location of place;
- (b) the name and contact details of who prepared the report;
- (c) a written description of the place including an independently researched historic narrative;
- (d) an assessment of heritage significance of the place and of the existing building fabric;

- (e) a written description of the reasons for undertaking the recording;
- (f) a description of the recording methodology;
- (g) measured floor plans, ceiling plans, roof plans, and external elevations of the building in its current form;
- (h) plans and sections (as necessary) to record the building structure and interaction of building elements and spaces;
- (i) comprehensive written description of the structural elements;
- (j) comprehensive written description of the exterior;
- (k) comprehensive written description of each space within the building;
- (l) comprehensive written description of the building's development over time;
- (m) comprehensive photography of the building before commencing work, and during the works as they are carried out, using a digital SLR with good lenses and a high megapixel count (10+ MP):
 - i. the camera should be set to record using a raw file format which should not be modified (though jpgs can be taken at the same time);
 - ii. all images should be labelled and referenced on a set of scale drawings accurately showing the location and direction of each shooting position;
 - iii. a contact sheet of images should be provided with the documentary record, and the raw files provided individually in digital format in conjunction with the record.

One copy of the completed photographic record will be placed on the property file and the second stored with the Council's Heritage Team.

94. **Condition 2:** Prior to any alteration or demolition works commencing on the site, the consent holder must obtain an assessment of significance and condition of all existing building fabric, and submit to the Compliance Monitoring Officer and Heritage Advisor a Heritage Management Plan for the works to WCC and receive approval for this plan from the Compliance Monitoring Officer and Heritage Advisor. The plan will (as a minimum):
- (a) identify historic fabric to be salvaged from the building for recycling or reuse;
 - (b) set out protocols for recording historic fabric;
 - (c) detail the methodology for construction including the methodology for salvaging and recovering historic fabric without damaging it;
 - (d) set out protocols for storing historic materials to be salvaged, and identify an appropriate storage area;
 - (e) set out protocols for communication paths and responsibilities of the consent holder to ensure that adverse effects, including accidental damage, are appropriately avoided or mitigated, and any issues that arise onsite are immediately notified to the correct party.
95. **Condition 3:** Prior to alteration works, demolition works and/or earthworks commencing, a detailed Heritage Interpretation Work Programme Plan, (the “Interpretation Plan”) prepared in consultation with an appropriately qualified professional, must be submitted to and approved by the Compliance Monitoring Officer and Heritage Advisor. The plan must identify what interpretation outcome is being proposed, the various work streams that will be undertaken to achieve this outcome, by whom these will be carried out, and by when it will be completed. The interpretation outcome must:
- (a) recognise the heritage values of the Tramway Hotel and site, including the architecture of the hotel, the proprietors and selected excerpts of the hotel’s colourful history and presence in Newtown over the years;

- (b) include early photographs of the building, relevant people/events and building plans;
- (c) be easily locatable and accessible by the public both physically onsite, and online.

Note: The interpretation could be museum-style information signage, artwork showing historical scenes, copies of newspaper clippings in an exhibition-type display, re-use of salvaged materials / heritage fabric with identifying notations, naming of new building/s, website/pages or some other approved medium, or a combination of these. The WCC Heritage Report for the Tramway Hotel will be made available to the resource consent holder as an information source to fulfil this condition.

Within 6 months of the Code Compliance Certificate being issued, the consent holder must fulfil the recommendations of the Interpretation Plan to the satisfaction of the Compliance Monitoring Officer in conjunction with the Heritage Advisor.

96. **Suggested Advice Note:** Work affecting archaeological sites is subject to a consent process under the Heritage New Zealand Pouhere Tāonga Act 2014. An archaeological authority (consent) from HNZPT) must be obtained for works to proceed if there is potential for an archaeological site to be modified or destroyed. It is illegal to modify or destroy an archaeological site without obtaining an archaeological authority. The Applicant is advised to contact HNZPT and/or commission an archaeological assessment prior to works commencing.

Assessment of Effects on Heritage for SR No. 490717

Description of the Proposal

97. The proposal is for demolition of the existing building, except the north and east facades fronting onto Drummond Street and Adelaide Road respectively; and construction of an eight-storey hotel building behind the façades.

98. A new basement (approximately 3.4m deep) will be excavated below the building and will contain a dedicated car park. The ground floor will incorporate vehicle access, loading and rubbish areas, the hotel main reception and a hospitality space. The floors above will be hotel rooms.
99. The tower is set back from the retained historic façades by 3m. Partial reconstruction of parapets to these façades is included in the proposal. The hotel rooms on the second floor have access to the roofspace created by the setback.

Summary of Applicant's Assessment of Environmental Effects as it Relates to Heritage

100. The Applicant's Assessment of Environmental Effects for SR No. 490717 (additions and alterations) was prepared by Ian Leary of Spencer Holmes, and refers to the Heritage Assessment and Impact Statement prepared by DPA Architects.

101. Mr Leary states:

This application is intended to be considered in conjunction with the application for demolition which has already been notified. Effectively, this application is giving Council the option to consider 3 separate options with respect this building...

Option 1: Approve the new building as set out in this application;

Option 2: Decline the new building and approve demolition;

Option 3: Decline both applications: - the result would be the building stays as it is and the final outcome is unknown. The owner cannot obtain funding to strengthen the building, is not allowed to demolish it. WCC Resilience Office may/may not obtain orders to strengthen the building and charge the land owner but overall the costs of the works will exceed the value of the land. This will become immediately apparent to WCC once the work were to begin and faced with the likelihood of not recovering costs, the WCC are unluckily to proceed with the works. Therefore the end result is unknown.

102. Having identified these three options, Mr Leary’s approach to assessing the effects of the proposal (option 1) is compare it with option 2 (the Application for complete demolition that is assessed above) and option 3 under the assessment criteria given in WCDP Rule 21A.2.1.
103. While I agree with Mr Leary that no “do nothing” option exists in this case, I do not agree that the three options he identifies in his Assessment are the only three options that are open to the Applicant. Further, I do not agree that it is appropriate to assess the Application in comparison to demolition or “Option 3”, for reasons that I discuss further in paragraph 113 below.
104. The Heritage Assessment and Impact Statement prepared by DPA Architects does not include an independent assessment of the building’s heritage significance. Section 6 of the Assessment refers to the values that have been identified in the WCC Heritage Inventory.
105. Similarly, the Heritage Assessment and Impact Statement does not provide an inventory of historic fabric. It provides a detailed physical description of the north and east facades, and outlines some of the changes that have occurred to the building over time; however, it does not describe the remainder of the exterior in any detail, and refers to comments made by Mr Bowman with regards to the interior as it was not accessed, and therefore not assessed, by the author.
106. In assessing the impact of the proposal on heritage values, the Heritage Assessment and Impact Statement states:

It is considered that the new structure will have no more than a minor impact on the hotel’s heritage values. It is also considered that any negative impacts will be mitigated by the following factors:

- The protected facades of the hotel, a relatively rare Wellington example of a turn of the century hotel and one of the few heritage buildings in this section of Adelaide Street [sic.], will be preserved for the future.
- The facades of the hotel will be strengthened to enable them to resist future seismic events.

- Where practicable, the building will be restored to its earlier form as seen in the reconstruction of the parapet and cornice moulding.
- The hotel will essentially continue to be used for the purpose for which it was built and a viable use for the building will ensure that that it survives for the future.
- The new use of the building will activate this area of Adelaide Road and produce a vibrancy and vitality in the area.
- The proposed new building has been carefully designed to harmonise with the existing building through a sensitive use of appropriate materials and proportions of openings in the facades.
- The scale and proportion of the new building has been carefully considered and setbacks provided to ensure that it does not dominate the historic hotel.

107. I do not agree that the proposal will have a “no more than minor” impact on the building’s heritage values; nor do I agree that the retention of the façades with a *partially* reconstructed parapet, and the proposed setback of the tower are adequate mitigation for the impact that the proposal will have on the heritage values of the building.

108. The Heritage Assessment and Impact Statement concludes by stating that:

The present application provides the best chance that the hotel has of surviving for the benefit of present generations and those to come. If resource consent cannot be obtained for the current proposal, the only other option is likely to be demolition which will mean that all traces of the 120 year old Tramway Hotel building will be lost forever.

109. I do not agree with this statement, which is speculative. If the proposal is not approved, I believe that other options remain open to the Applicant.

Assessment of Effects on Heritage Values

110. Assessment criteria 21A.2.1.3 to 21A.2.1.22 of the WCDP have assisted my consideration as to whether the effects of both SR No. 464277 and 490717 are acceptable. I have also referred to the objectives and policies given in Chapter 20; Heritage New Zealand Pouhere Taonga's (HNZPT's) *Sustainable Management of Historic Heritage Guidance Series Information Sheet 15: Demolition of Historic Buildings*.
111. I note that criterion 21A.2.1.4 requires the extent to which proposals meet the provisions of any relevant Design Guide addressing additions or alterations to buildings of heritage significance to be assessed. In this case, the relevant Design Guide is the Centres Design Guide (CDG).
112. Assessment criteria 21D have assisted my consideration as to whether the effects of the SR No. 490717 are acceptable.
113. Critical to my assessment are the following points:
- (a) The effects of the proposal must be considered against the WCDP requirements on its own merits, not in comparison to other proposals.
 - (b) An option to retain any part of the building that is considered to have heritage significance or to be historic fabric will necessarily offer a better outcome than an option for complete demolition in terms of heritage values. Therefore, the proposal will always be preferable to complete demolition from a heritage perspective. However, complete demolition is not the benchmark against which the proposal needs to be assessed. The proposal needs to be assessed against the requirements of the WCDP.
 - (c) For reasons (a) and (b) above, I have not assessed Application SR No. 490717 against the proposal to demolish that is presented in Application SR No. 464277.
 - (d) The Applicant's position on "Option 3" is entirely speculative.

(e) For reasons (a) and (d) above, I have not assessed Application SR No. 490717 against “Option 3”.

21A.2.1.3 *The extent to which the work significantly detracts from the values for which the building or object was listed.*

114. The former Tramway Hotel building at 114 Adelaide Road has been listed by WCC in recognition of its aesthetic, historic, scientific, and social values.
115. With regards to aesthetic values, the proposal will ensure retention of the two principal façades of the building which are recognised as being its most prominent architectural feature. The proposal includes partial reconstruction of a parapet to these façades. The positive effect of introducing a new parapet to the building could be improved if the parapet was built to the original height and included ball finials in accordance with the original building design. This is demonstrated by schematic design options 1 and 4 provided in the Feasibility Study. A full reconstruction of the parapet would remove the need for a glass balustrade with solid handrail which otherwise detracts from the partial parapet being proposed.
116. The building’s scale and position on a prominent corner site are critical to its aesthetic values. These values will be diminished by the demolition of the building beyond the north and east facades and construction of the proposed tower, which draws attention away from the retained façades. The tower changes the way that the building sits within the townscape as the two-storey form is overshadowed by the tower, disrupting the scale of the building and reducing the visual prominence of the facades.
117. With regards to historic values, retention of the façades will ensure that a visual connection with the building’s past remains, albeit that this will be distorted by the demolition and new tower behind. By enabling the site to be used once again for hospitality and accommodation, the proposal will restore an important link between the site and its past.
118. With regards to scientific values, the proposal will detract from the archaeological values of the building itself (which is an archaeological site under the HNZPT Act definition) and the site as it will result in destruction

of archaeological fabric both above and below ground. The proposal will also detract from the educational values of the building, which are largely derived from its intactness as an overall design, as only two building façades will remain.

119. The building has remained largely unchanged on this site for over 100 years. It contributes to a sense of place and continuity in a townscape that has changed considerably in this time. Although the current condition of the building is poor, it is still held in high esteem by many people in the general public, as evidenced by some of the submissions received in response to the notified Resource Consent Applications relating to the site. The proposal will detract from these social values by changing the building and the way that it is read within the townscape. While some members of the public will welcome development on the site, others will see the proposal as negative, and this will impact on the degree to which the building is held in public esteem.
120. The building is considered to be a rare and representative example of a two-storied late Victorian hotel that retains authenticity of form and much of its original building fabric. Demolition of the building beyond the north and east façades will necessarily detract from the building's rarity and authenticity. It will no longer be an intact example of a Victorian hotel.

21A.2.1.4 ***The extent to which proposals meet the provisions of any relevant Design Guide Addressing additions or alterations to building of heritage significance.***

O2.1 To recognise the unique qualities of every urban setting and respond to and enhance these with new development.

O2.2 To maintain or enhance the quality of the settings of individual heritage buildings including those in heritage areas.

121. The unique qualities and character of Adelaide Road are identified in Appendix 5 of the Centres Design Guide. Generally, the proposal is consistent with the diversity of building types and uses in the area, variable

positions of building frontages, and rectilinear forms. The proposal is not consistent with the building heights that are typical in the area which are predominantly between one and five storeys, although it is noted that the development of higher buildings in the area is anticipated. A reduction in the height of the proposed tower would likely present a solution that is better aligned with the unique qualities of the surrounding setting.

122. With regards to the setting of the heritage building itself, I refer to my comments in paragraph 151.

O3.1 To complement existing patterns of alignment, and achieve a positive scale relationship with adjoining buildings and public spaces.

O3.2 To respect the setting of heritage items and identified heritage areas.

123. With regards to scale relationships and setting, I refer to my comments in paragraphs 132 to 137.

O5.1 To ensure that façade and building top design is coherently resolved.

O5.2 To ensure that additions and alterations to heritage buildings maintain the heritage values of those buildings, their setting and any associated heritage area.

O5.3 To facilitate multiple and changing buildings uses, except where such change adversely affects the heritage values of heritage buildings.

124. With regards to the design of the proposed tower, including its façades, I refer to paragraphs 138 to 147.

125. With regards to the impact of the proposed additions and alterations on heritage values, I refer to paragraphs 114 to 120.

126. With regards to the effect of the proposal on setting, I refer to paragraph 151.

127. With regards to building use, I refer to paragraph 168 to 169.

O6.1 To achieve qualities of visual interest and physical robustness consistent with demands arising from the building's location.

O6.2 To respect and conserve original heritage fabric.

128. At present, the design of the tower is flat and box-like, and is not particularly visually interesting. While I acknowledge that this is a deliberate feature of the proposal, intended to reduce the impact of the tower on the retained façades, finer detailing may result in a more visually interesting composition that does not compete with the historic façades. This is discussed further in paragraphs 138 to 147. Should consent be granted for this proposal, conditions will be required to ensure that finer points of detail are appropriately addressed.

129. With regards to conserving original heritage fabric, I refer to paragraphs 147 to 150 and 153 to 158.

21A.2.1.5 *The nature, form and extent of the proposed work and the extent to which the work:*

- ***retains the main determinants of the style and character of the building or object in respect of buildings, particularly the street elevation. The Council seeks to ensure that the modifications to street elevations are kept to a minimum and, if possible, not altered at all. If necessary, preference shall be given to altering rear or secondary elevations.***

130. The street elevations of the existing building will be retained, and the proposed partial reinstatement of a parapet to these elevations will, if properly executed, help to restore some of the building's original style and character.

131. However, the style and character of the building overall will be altered by the proposed demolition beyond these facades and construction of the

eight-storey tower. This is discussed further in paragraphs 138 to 147 below.

- ***respects the scale of the original building or object.***
The Council seeks to ensure that new work is not visually dominant, particularly where roof additions are proposed.

132. The eight-storey tower that is proposed to be constructed behind the north and east facades is dramatically different to the scale of these façades. At approximately 26m high, it is also well in excess of the height limit for this area, which is given in the WCDP as 18m.
133. The division of the tower into two visually different forms, the proposed 3m setback of the tower behind the retained façades, and the setback of the top floor from the body of the tower, serve to *reduce* but not to *prevent* the tower from being visually dominant over the retained facades. The solid tower is the dominant feature of all 3D schematic views presented in the Application, including from both directions on Adelaide Road, across Adelaide Road, and from Drummond Street.
134. A reduction in height to the permitted 18m (or close to 18m) and a greater setback – preferably one that allows the existing building to be retained “in the round” - would increase the likelihood that a tower behind the historic building could be read as a separate building, rather than as an addition dropped on top of the existing building.
135. Although also well over the height limit, the glazed portion of the tower in the southeast corner of the proposed development is more successful than the solid portion of the tower as it reads more easily as being a separate building. It has a distinctly different form and materials from the retained façades, extends to ground level, and is separated from the retained façade on Adelaide Road by a negative break at first floor level.
136. The relative success of this part of the design is somewhat diminished by the solid south wall that presents a tall and monolithic face to Adelaide Road when approaching from the south. While it is acknowledged that a

blank wall on this side of the development is necessary to allow for future development on the adjacent site, methods of reducing the impact of this wall by changing the form or texture of the cladding, should be considered. This can be addressed under a Condition.

137. The signage proposed for this wall is discussed further in paragraphs 191 to 193 below.

- ***is sympathetic in form, proportions, materials, colours and the and patina of materials of the existing building or object.***

138. The Heritage Assessment and Impact Statement states:

The form of the new building above the hotel has been carefully considered to ensure it complements the historic building without dominating it...

139. I do not agree that the form of the new building complements and does not dominate the retained facades. That the tower becomes the dominant aesthetic feature of the site is evidenced by the 3D schematic views provided with the Application.

140. The Heritage Assessment and Impact Statement states:

The lower five levels [of the tower] above the hotel have been designed to reflect but not attempt to imitate or replicate the historic building. The walls will be formed from precast concrete panels, painted or stained in a colour to be sympathetic to the brickwork found on the hotel. The windows in the new structure will be in the form of openings in a solid wall to reflect the building below and their proportions, rhythms and spacings will also reflect the windows in the hotel.

141. I agree that the design of the tower does not attempt to imitate or replicate the historic building. The form, proportions, materials and colours being proposed contrast starkly with the existing building. In this respect, the tower is not sympathetic to what will remain of the existing building.

142. The monolithic concrete surfaces of the tower façades have no relationship with the highly articulated Italianate Classical style of the retained historic facades, except perhaps for the colour which is to be “sympathetic to the brickwork”.
143. The corner of the tower is square, which presents as a very different form to the angled corner of the historic building. The floor to ceiling windows proposed for the corner make little difference to the way that the corner is perceived.
144. The small windows of the tower, while generally taller than they are wide, do not relate to the proportions of the windows in the historic façade. Similarly, the floor to ceiling windows and doors being proposed have very different proportions to the historic windows.
145. The position of windows and doors in the historic façade is detailed in the Heritage Assessment and Impact Statement. The Adelaide Road elevation presents in three sections of different widths with differently spaced windows, while the Drummond Street façade presents in five sections of different widths with differently spaced windows. The angled corner of the building presents as its own defined elevation. The building elevation drawings and 3D schematics provided in the Application clearly demonstrate that the windows in the proposed tower are completely different to the historic façade in the way that they are sized, separated or grouped. Therefore, I cannot agree that the proportions, rhythm and spacing of the tower windows reflects those of the historic façade.
146. The Heritage Assessment and Impact Statement states:
- The additional level containing four penthouse suites will have walls that are proposed to be entirely glazed. The north and west walls of this level will be set back a further two metres from the floors below. As a result, this level will not be seen from ground level, except possibly from a distance...

I agree that the 3D schematic views provided in the Application indicate that the top level of the proposed tower will not be highly visible from Adelaide Road.

- ***avoids the loss of historic fabric and the destruction of significant materials and craftsmanship.***

147. The Heritage Assessment and Impact Statement states, on numerous occasions, that the north and east facades of the building are “the most significant”. The author dismisses any potential significance that the interior fabric may have, stating that “little now remains of the hotel’s original internal fitout” despite not having been into the building. At no point does the Heritage Assessment and Impact Statement provide evidence or independent assessment to support the statement that the remaining facades of the building “are without heritage value”.
148. As the Heritage Assessment and Impact Statement has not provided an inventory of the building’s historic materials or an assessment of their significance, it has not demonstrated that the fabric being proposed for demolition – being the entire building beyond the north and east facades - is not historic or significant.
149. Unless or until such an assessment is undertaken, it must be assumed that the proposed demolition of the building beyond the north and east facades will necessarily result in the loss of historic fabric and the destruction of significant materials.
150. No detail is provided in the Application regarding the extent of fabric retention or techniques for conserving and restoring the north and east façades, except for a note in the Architectural Design Statement that the glass in the existing windows on the first floor will be taken out and replaced with double glazing. While the extent of fabric retention and techniques for conserving and restoring the facades can be managed through conditions, it is important to note that retention of the two façades does

not mean retention of all historic or significant fabric that those façades encompass.

- ***maintains the relationship of the building or object with its setting.***

151. The setting of the retained façades will be changed by the introduction of the tower behind. At present, buildings in the vicinity of 114 Adelaide Road are generally between one and four storeys, with five-storey buildings located further up Drummond Street. An eight-storey tower in this location will disrupt the existing low-rise townscape.

- ***respects the historic or other values for which the building is listed***

152. Refer to discussion in paragraphs 114 to 120 above.

21A.2.1.6 ***Whether the restoration of former architectural design elements maintains a high standard of authenticity. The Council will require evidence of the design of missing elements.***

153. The proposal includes partial reconstruction of a parapet on the north and east elevations. Drawings provided in the Application indicate that the intention is to reconstruct this parapet using “precast panels with butt joints”. The design as shown in the drawings does not authentically replicate the original parapet of the building in its entirety, but only the lower part which includes a moulded cornice and a truncated upstand. Above this, it is proposed to add a glazed balustrade with a stainless-steel rail.

154. The reasons for this are explained on drawing sheet A-013:

Parapet form derived from initial parapet structure [sic.]. Height of 3.5m has been reduced to 1.3m to enable sight lines from hotel rooms at level 02 to surrounding streets.

300mm glass balustrade included in parapet [sic.] design to further increase sightlines above original cornice.

155. The truncated parapet design being proposed does not provide the same high standard of authenticity that reconstruction of the complete original parapet would.
156. Further, a full reconstruction on the north and east façades may provide some mitigation to the dominating effects of the proposed tower behind, as demonstrated in schematic design options 1 and 4 in the Feasibility Study.
157. The drawings submitted with the Application are contradictory on the matter of the window on the chamfered northeast corner. The floor plans show a door, while the elevations show a window. The original drawings and historic photographs confirm that there was a window in this position, and that it has been replaced with a door at some point after the 1970s. If a window is going to be reinstated on this corner, it will need to follow the original design and the design of remaining original windows in order to achieve a high level of authenticity.
158. Regardless of the above, a condition will be required to ensure that any reconstruction maintains a high level of authenticity, should Resource Consent be granted. The Applicant may expect to change the design as it is currently being proposed.

21A.2.1.7 *Whether the removal of existing unsympathetic additions to a building or object can be achieved without altering the significance of the building or object.*

159. I agree with the Heritage Assessment and Impact Statement that the existing timber-framed parapet on the north and east facades is an unsympathetic addition and its removal can be achieved without altering the significance of the facades.
160. The proposed demolition of the building beyond the north and east façades may include the removal of other unsympathetic additions to the building,

but this has not been analysed or assessed in detail in the Application documents.

21A.2.1.8 ***The extent to which the work is necessary to ensure structural stability, accessibility, and means of escape from fire and the extent of the impact of the work on the heritage values of the building. The Council will seek to ensure that in any case every reasonable alternative solution has been considered to minimise the effect on heritage values.***

161. I agree with the statement made in the Heritage Assessment and Impact Statement that the proposed work is fundamentally necessary to ensure that the building remains structurally stable.

162. Mr Leary's Assessment of the proposal in relation to this criterion is the same as his Assessment for SR No. 490717. Therefore, I refer to my comments in paragraphs 49 to 51 regarding the current condition of the building; to paragraphs 53 to 56 and 58 to 60 in relation to alternatives considered by the Applicant; and to paragraphs 63 to 64 in relation to the degree to which strengthening the existing building would result in the loss of historic fabric.

163. In addition to reiterating the points from Assessment for SR No. 490717, Mr Leary makes the following statements:

The proposal will ensure the structure is secure and in the applicant's view, this is the only reasonable option. Information submitted with application shows that the building will still make a loss. The applicant is accepting of that *reasonable* loss.

164. Putting aside the inconsistencies between this statement and statements made regarding alternative options in the Assessment of Environmental Effects for SR No. 490717, I believe alternatives other than the façade retention and new tower that are being proposed remain open to the Applicant.

165. While it is outside my area of expertise, I note Mr Leary's statement regarding the forecasted "loss" rely on the financial analysis provided in the Feasibility Study. This analysis indicates that an addition of approximately 2,300m² net is required for development on the site to make a net financial gain. On this basis, the proposal does not achieve economic viability as it creates only 1,740m², and leaves a resulting difference between the cost of the works and the market value after the works of \$1.148M. The figures presented in the Feasibility Study are not explained in detail, and they have not been independently peer reviewed.
166. The Feasibility Study presents six options for retaining the north and east facades and adding a tower to the site to create the additional area that the Applicant believes is required. While these options cannot be considered an assessment of "every reasonable alternative" it is a useful demonstration of what effect different tower forms may have on the historic facades of the building. All options present as dominant by virtue of their height, bulk and mass.

21A.2.1.9 *Whether in respect of work involving listed interiors or listed interior items, the original plan form of the building, the primary spaces and their sequential layout, and any significant architectural features and significant finishes are respected or conserved.*

167. Although the interior of the building at 114 Adelaide Road is not listed, I note that this does not mean the interiors are not significant. I refer back to my comments in paragraph 147 regarding the paucity of assessment with regards to the existing interiors.

21A.2.1.10 *The extent to which the work is necessary to enable the continued use of the building.*

168. I agree with the statement made by Mr Leary that "no practical or economic use of the site is available without strengthening the building" and the statement made in the Heritage Assessment and Impact Statement that

intervention is “essential if the building is to survive and continue to be used”.

169. I do not agree that the proposal presents the only option for enabling continued use of the building.

21A.2.1.11 *Whether professional heritage or conservation advice has been obtained from HNZPT or other professionally recognised expert in heritage conservation.*

170. The Applicant has engaged Dave Pearson Architects Ltd to provide advice in relation to the proposal, and prepare the Heritage Assessment and Impact Statement included in the Application.

171. The Heritage Assessment and Impact Statement states that “it is intended to seek advice from HNZPT” indicating that this had not taken place at the time that the Assessment was prepared. However, it is evident from their submission on the Application made by HNZPT that the Applicant has not sought this advice.

172. HNZPT’s submission on the Notified Resource Consent Application clearly states that they do not support the proposal and request that the Application be declined. In the event that the Application is approved, HNZPT have suggested four key amendments that may reduce the negative impact of the proposal.

21A.2.1.12 *Whether work is in accordance with a conservation plan prepared for the building or object and peer reviewed by the Council.*

173. There is no known conservation plan for the building. I note that the Heritage Assessment and Impact Statement states:

Once resource consent for the project has been obtained, a conservation plan may be prepared to guide the detailed work on the building.

174. As the purpose of a conservation plan is to inform decisions about the management of a building, it is advised that the Applicant commission a conservation plan before proceeding with any further works to the building.

21A.2.1.13 *Whether the site is likely to have significant archaeological values and whether the effects on those values by the proposal can be adequately avoided, remedied or mitigated.*

175. As discussed in paragraph 72 above, both the building and the land encompassed within the boundaries of 114 Adelaide Road meet the definition of an archaeological site.

176. Demolition of the building beyond the north and east facades, and the extensive excavation works required for the basement, will have a significant negative impact on the archaeological values of the site. The Application has not proposed any method of remedying or mitigating these negative impacts.

177. The Application acknowledges that there will be a requirement for an Archaeological Authority (incorrectly described in the Assessment of Environmental Effects as an “archaeological permit”) for demolition of the building and works affecting the site.

21A.2.1.14 *Whether there is any change in circumstances that has resulted in a reduction of the building’s heritage significance since the building was identified in the plan.*

178. I refer back to my comments in paragraphs 75 and 76.

179. With reference to the Heritage Assessment and Impact Statement contention that “although there appears to have been internal damage, the interior is not protected” I refer back to my comments in paragraph 167.

21A.2.1.15 *The extent to which the building has been damaged by fire or other human generated disaster or any natural disaster.*

180. I refer back to my comment in paragraph 77.

21A.2.1.16 *Whether it is necessary to save the building from damage or destruction arising from ground subsidence, flooding or other natural disaster.*

181. I agree with the Heritage Assessment and Impact Statement that intervention is necessary to strengthen the building to increase its resilience to earthquakes. However, demolition of the building beyond the north and east façades is not necessary to improve the building's seismic performance, as demonstrated by alternative strengthening schemes discussed in Silvester Clark's Seismic Capacity and Strengthening Review.
182. The construction of a new tower is not necessary to save the building from destruction.

21A.2.1.21 *Whether adaptive reuse of a listed building or object will enable the owners, occupiers or users of it to make reasonable and economic use of it.*

183. I do not consider the proposal to be an adaptive reuse of the existing building as the extent of proposed demolition means that the building is effectively new.
184. I acknowledge the statement made in the Heritage Assessment and Impact Statement that the proposal is for a hotel and associated hospitality space which is consistent with the building's original use.
185. With reference to my comments in paragraphs 163 to **Error! Reference source not found.**, while I agree with Mr Leary's statement that the owner/Applicant is obligated to strengthen the building, I do not agree with the statement that:

The analysis of the costs of strengthening the building clearly demonstrate that it is uneconomic to strengthen the building without undertaking significant additions to the floor area of the building to attain a return. Even the increase proposed does not make a positive return, but the applicant can consider it as an option.

186. However, I acknowledge that it is likely that an addition will be necessary as well as seismic strengthening to enable reasonable and economic use of the building.

21A.2.1.22 *The public interest in enhancing the heritage qualities of the City and in promoting a high quality safe urban environment.*

187. With regards to this criterion, the Heritage Assessment and Impact Statement states:

The project has been designed to ensure there will be a high quality, safe urban environment by structurally upgrading and refurbishing what is currently an earthquake prone and deteriorating valued historic building and providing a safe, restored building for the benefit of future generations.

188. I do not agree that the proposal upgrades and refurbishes the building. It upgrades and refurbishes two façades, while the majority of the building is demolished and replaced with a much larger building.

189. Mr Leary reiterates the position taken in his Assessment for Environmental Effects for SR No. 464277 that this criterion presents two mutually exclusive interests, I refer to my comments in paragraph 81.

190. Mr Leary continues by stating that the proposal sets out to achieve both of the arms of this criterion, but that “it is not possible in the applicant’s view, to preserve the whole building while achieving the safety of the city”. While I acknowledge that strengthening the existing building would require interventions that would result in the loss of historic fabric, I believe it remains open to the Applicant to strengthen the building in ways that would require less demolition than is being proposed.

21D.3.1.5 *The extent to which any sign including supporting structures detracts from the heritage significance or values of a heritage building or object.*

- 21D.3.1.6** *Whether any sign detracts from the architecture of the building including decorative detailing, structural divisions, windows or doorways.*
- 21D.3.1.7** *Whether additional signs will result in clutter.*
- 21D.3.1.8** *The extent to which the quality of the design of the sign and the standard of graphics complement the building or object.*
- 21D.3.1.9** *Whether the means of fixing the sign to a listed building or object including associated cabling or wiring for illuminated signs will adversely affect the heritage fabric and heritage values of the listed building or object.*
- 21D.3.1.10** *Whether intensity of illumination will adversely affect the heritage values of the Building or object.*
- 21D.3.1.11** *The extent to which signs comply with the Design Guide for Signs.*

191. These comments relate to the LED sign proposed for the south elevation. There may be other signage proposed but no details are included in the Application. The assumption is therefore that any such signs would comply with the WCDP Rules, or that a separate application for such signage will be made.

192. The proposed LED sign is separated both horizontally and vertically from the historic building facades. It is not fixed directly to the building, and will not directly impact on any of the building's physical features. In the context of the overall proposal, therefore, it is unlikely that the sign will have a more than minor impact the heritage significance of the heritage building, other than to draw attention away from the building.

193. With regards to Design Guide compliance, I refer to the report of the Urban Design officer.

Policy 20.2.1.2 *To discourage demolition, partial demolition and relocation of listed buildings and objects while:*

- ***Acknowledging that the demolition or relocation of some parts of buildings and objects may be appropriate to provide for modifications that will result in no more than an insignificant loss of heritage values; and***
- ***Giving consideration to total demolition or relocation only where the Council is convinced that there is no reasonable alternative to total demolition or relocation.***

194. In his Assessment of Environmental Effects, Mr Leary reiterates the comment made in his Assessment for SR No. 464277 that:

The option of extending the building (to a sustainable level) in order to preserve the overall heritage values of the main façade of the building has not been supported as an option by WCC heritage officers.

With regards to this statement, I refer to my comments in paragraph 84.

195. Mr Leary continues:

This application is being formally sought to test the option as to whether a consent can be obtained for an extension of the building.

The WCC has in itself, accepted that there are financial grounds for the demolition of historic heritage and has proposed the demolition of the Main Old Building. The WCC are trying to argue that the Main Old Building is not a specific heritage building but it is in a heritage area and WCC planning and heritage officers have advised me that the same protections apply.

The proposed level of development does not quite make it to being economically positive for the owner, so it is clear that a smaller building would not be more economically viable.

The introduction of the LED billboard to the southern façade is a further attempt to raise the value of the building/hotel business to a higher level to make it more financially viable.

The consideration of both the demolition and building extension currently, it considered the only way to enable the determination of the *reasonable* options.

The preservation in part of the heritage façade, given the financial implications is consistent with the objective and related policy.

196. With regards to testing the option as to whether a consent for extension can be obtained, WCC have engaged multiple pre-application meetings and conversations with the Applicant and, through this process, have proposed some options that would likely be supported through Resource Consent. The outcome of the current Application cannot be considered as a test of whether or not support for any other options for building additions would be successful.
197. Mr Leary's statements regarding the Municipal Office Building, which he incorrectly identifies as the "Main Office Building", are not relevant to this Application.
198. With regards to the comments regarding economic viability, I refer to my comments in paragraphs 163 to **Error! Reference source not found.** and 185.
199. With regards to signage, I refer to my comments in paragraphs 191 to 193.
200. I do not agree with the implication made by Mr Leary that the only reasonable options that are open to the Applicant are total demolition, or the partial demolition and new tower that are being proposed.
201. In this case, the extent of demolition being proposed will result in a significant loss of heritage values.

Policy 20.2.1.3 ***Promote the conservation and sustainable use of listed buildings and objects while ensuring that any modification avoids, remedies or mitigates, effects on heritage values of the listed buildings or objects and where relevant:***

- *ensures that modifications to the main elevations are minimised, or if possible are unaltered;*
- *any modifications respect the scale of the building or object; and*
- *any modifications maintain the relationship of the building or object with its setting.*

202. I refer to my discussion above. I do not agree with Mr Leary's Assessment that the proposal is consistent with this policy.

Policy 20.2.1.4 ***Protect the heritage values of listed buildings and objects by ensuring that the effects of subdivision and development on the same site as any listed building or object are avoided, remedied and mitigated.***

203. The proposal does not ensure that effects on the listed building are avoided or remedied. Some mitigation is offered, but this is not sufficient to reduce the impact of the proposal to minor or less than minor.

Policy 20.2.1.9 ***Ensure that signs on listed heritage buildings or objects (or sites on which they are located) or within Heritage Areas do not adversely affect heritage values and qualities and avoid unnecessary or inappropriate signage.***

204. I refer to my comments in paragraphs 191 to 193. The LED signage proposed for the south elevation may be considered unnecessary and inappropriate, but it is unlikely that it will be read in direct association with the retained façades of the heritage building.

Policy 20.2.1.11 ***Avoid, remedy or mitigate the adverse effects of development on the archaeological values of any site.***

205. I refer to my comments in paragraphs 175 to 177. Applying for an Archaeological Authority for the proposed works will not avoid or remedy the adverse effects that the proposal will have on the archaeological values of the building and site.

***HNZPT Sustainable Management of Historic Heritage Information Sheet 14:
Partial Demolition of Historic Buildings***

206. *Information Sheet 14* notes that façade retention is not consistent with best practice conservation principles and is not advocated by HNZPT. Nevertheless, this document provides recommendations on ways reduce the impact that façade retention is likely to have on the heritage values of a building, some of which the proposal achieves, and some of which it does not.
207. The proposal does:
- (a) Include active repair and maintenance of the façade, retaining original elements and detailing, insofar as this is detailed in the Application.
 - (b) Avoid running floors or ceilings horizontally across window openings on the retained façade.
 - (c) Ensure that views through the façade are to the building interior, not to open sky or another building.
208. The proposal does not:
- (a) Retain at least one room depth of the *original structure or original materials* beyond the façade. The Heritage Assessment and Impact Statement presents the 3m setback of the tower as “equating to approximately the depth of the original first floor bedrooms” but this is not retention of the original structure or original materials.
 - (b) Entirely conceal the new building behind the façade. The ground and first floors of the new building are concealed behind the north and east facades, but the remainder of the new building (being the tower) is not.
 - (c) Retain the original roof form. The roof of the existing building will be entirely removed. The 3m setback between the first and second floors is proposed for balcony space and, therefore, there is no opportunity to retain or reconstruct the historic roof form.

209. The level of detail required to confirm whether or not the proposal avoids unnecessary modifications to the façade is not provided in the Application.

***HNZPT Sustainable Management of Historic Heritage Information Sheet 12:
Alterations and Additions to Historic Buildings***

210. *Information Sheet 12* notes that it is good practice for a conservation plan to be prepared “to inform and guide” alterations to historic buildings. I refer to my comments in paragraph 174 above.
211. I consider the proposal to be an addition, as opposed to an alteration, to the historic building, and therefore consider the checklist for assessing appropriate external additions to buildings provided in *Information Sheet 12*. However, I note that items on the checklist for external alterations have relevance to the treatment of the façades that are proposed for retention and have informed the recommended conditions below.
212. In general, the proposal does not comply with the checklist for assessing appropriate external additions to buildings:
- (a) While the tower is set back from the retained facades, this setback is not significant enough to mitigate the dominance of the tower, and does not retain the roof elevation.
 - (b) The tower is not compatible with the retained facades in terms of materials, scale, size, proportions, mass, height, texture, or configuration.
 - (c) While the tower is certainly distinguishable from the historic façades, it is not generally harmonious and sympathetic. I do not agree with the Heritage Assessment and Impact Statement that the tower references the historic building sufficiently in its design. The tower is obvious and visually obtrusive.
 - (d) The tower is of a substantially greater height than the original building. I do not agree with the Heritage Assessment and Impact Statement that the tower does not become the dominant feature from key views

of the building. While setting back the top level of the tower may reduce the perceived height of the tower slightly, it does not remedy the tower's overall dominance. A further reduction in height would likely address this issue.

- (e) The tower is not compatible with the original design and detailing of the facades. The tower is of a much larger scale, and will be built in very different materials.
- (f) The tower does not maintain the rhythm, orientation and proportions of the retained façades. This could be addressed through changes to the design that better reflect the rhythm of the historic facades, or by adopting the same approach to design that is taken in the southeast corner across the tower as a whole.
- (g) The tower behind the retained façades is not designed in a way that clearly separates it from the original building. Rather, it appears to have been planted on top of the building. An increase in the setback, preferably to retain the existing building "in the round" would likely resolve this issue.
- (h) The proposal does not avoid permanent damage to historic fabric.

Matters Raised in Submissions and Response to Submission Points

- 213. I have reviewed the twenty submissions (including one late submission) received in relation to Application SR No. 490717. Twelve submissions oppose the Application, while seven support the Application, and one is neutral.
- 214. The neutral submission does not relate to effects on heritage values.
- 215. For submissions in opposition to the proposal, I have extracted the key points made by the submitters that are relevant to historic heritage values, and noted where I agree.

In Opposition to the Proposal		
	Submission Point	Reviewer's Comment
(a)	A conservation plan should be used as a process before or concurrent with design development.	I agree, and refer to my comments in paragraphs 148 to 149 and 173 to 174.
(b)	The proposed partial demolition should be limited to parts of the building that have been identified in a conservation plan or heritage assessment as having no significance, being non-contributory, or intrusive.	
(c)	The proposed partial demolition should be informed by the concept of greater or total conservation benefit.	
(d)	Demolition is a permanent adverse effect for which there is no mitigation.	I agree.
(e)	The level of adaptation is at the extreme and is a new building which dominates the two storey facades and does not include retaining the form (including the roof) of the historic building.	I agree with these points, as identified in my comments in paragraphs 130 to 146 and 208 to 212.

In Opposition to the Proposal		
	Submission Point	Reviewer's Comment
(f)	The application does not contain adequate documentation on building condition, options and preliminary costings, impacts of strengthening, or fabric that could be retained.	I agree, and this has been noted throughout my assessment.
(g)	The design is "facadism" which is opposed for inappropriate level of heritage destruction.	I agree, and refer to my comments in paragraph 206.
(h)	There is insufficient volume of separation between old and new.	I agree. An increased setback, particularly to retain the existing building "in the round" would reduce the negative impact
(i)	The scale & bulk of the tower is too great.	I broadly agree with these points, as identified in my comments in paragraphs 130 to 146 and 210 to 212.
(j)	The design is also inappropriate (including fenestration and materials).	
(k)	Window treatment etc is poor & insufficient quality demonstrated.	

In Opposition to the Proposal		
	Submission Point	Reviewer's Comment
(l)	Demolishing everything but the north and east facades cannot have a positive impact on the heritage values of the building. The "building" as it is will not continue to exist. This applies regardless of whether the new building beyond the façades will be used as a hotel or not.	I agree, and this has been noted throughout my assessment.
(m)	The northern and eastern elevations are monolithic and of low quality, fenestration has no relationship with heritage façade.	Refer to (i) to (k) above.
(n)	The south and west elevations are monolithic, featureless and blank which degrades the streetscape and visual amenity of neighbouring properties.	I agree that these elevations as proposed are monolithic, featureless and blank.
(o)	The tower is too tall and restricts light to nearby buildings on Drummond and Hanson Streets.	This is not a heritage issue; however, the shading on Drummond Street that will be created by the tower is evidenced by the

In Opposition to the Proposal		
	Submission Point	Reviewer's Comment
		shadow studies in the Design Statement.

216. For submissions in support of the proposal, I have extracted the key points made by the submitters that are relevant to historic heritage values, and provided a response.

In Support of the Proposal		
	Submission Point	Reviewer's Comment
(a)	It is a reasonable solution to retain and strengthen the façade and build a modern accommodation block behind, making the building safe.	In some circumstances, it is reasonable to retain only the façade(s) of a historic building and construct a new building behind. In this case, the Applicant has not demonstrated conclusively that this is the only reasonable outcome.
(b)	The condition of the existing building is poor and/or is a hazard.	I agree that the condition of the existing building is poor and it is a potential safety hazard. Something should be done to address this; however, there are multiple ways that this can be achieved.

In Support of the Proposal		
	Submission Point	Reviewer's Comment
		I note that the condition of the building as it stands is poor because it has not been appropriately protected by the owner since it was vacated. I note also that temporary protection could address the immediate health and safety hazard that the building poses to the public.
(c)	The site is not currently being used and/or is in poor condition <u>and</u> could provide housing	The proposal is not to provide housing, but a hotel.
(d)	The development will provide much needed housing in the area	
(e)	The site is not currently being used and/or is in poor condition <u>and</u> could provide a hospitality space	The proposal includes hospitality space on the ground floor. This could be achieved by strengthening and utilising the existing building.
(f)	Redevelopment of the site (as a hotel) will reinvigorate Adelaide Road	I agree that activating the site through reopening the building would help to

In Support of the Proposal		
	Submission Point	Reviewer's Comment
		reinvigorate Adelaide Road. This could be achieved by strengthening and utilising the existing building.

Conclusion

217. While I agree that the proposal necessarily offers a better option than complete demolition of the building, this is not the appropriate benchmark against which to assess the Application. Rather, the Application needs to be assessed against the requirements of the WCDP.
218. When assessed against the heritage rules in Chapter 21 it is evident that the proposal has more than minor effects on the heritage values of the building at 114 Adelaide Road.
219. This is corroborated by assessment against the HNZPT guidelines.
220. While I note the Applicant's position that it is not economically viable to proceed with a development on this site that does not provide approximately 2,300m² of floor area, the figures that are presented in the Application are not accompanied by sufficient explanation, and have not been peer reviewed.
221. I believe that options that do not involve such extensive partial demolition of the existing building, and/or options for a smaller addition to the building that would have a lesser negative impact remain open to the Applicant.
222. However, I acknowledge that the building needs to be strengthened, and that it is likely that an addition to the building will help to fund the strengthening. I believe that it is entirely possible that an addition to the building could be designed in such a way that it had an acceptable impact on the heritage values of the current building and the site.

223. The Application as it stands is not supported on heritage grounds as it will have a significant adverse effect on the heritage values of the building which are permanent and irreversible. While some mitigation has been offered within the proposal, this is not sufficient to reduce the effects to an acceptable level. However, a combination of additional assessment and adjustments to the proposed design (which I have suggested below), may reduce the negative impacts to an extent that they would be acceptable, provided that certain conditions were also met.

Additional Information

224. The following additional information is necessary to support an application for the proposed extent of demolition and new build:

(a) A conservation plan for the building that includes a thorough assessment of historic fabric significance, and provides clear policy direction on how the building should be managed with regards to partial demolition and additions.

(b) A detailed explanation of the figures provided in the Feasibility Study to demonstrate that way that the minimum additional area requirement was calculated, and to evaluate different costs and returns associated with different reasonable uses of the building (not just a hotel).

Suggested Changes

225. The following changes to the proposal are recommended to reduce the negative effects on heritage:

(a) Reconstruct the parapet in its entirety.

(b) Increase the 3m setback of the tower behind the façades to retain the building “in the round”; or, subject to a heritage significance assessment, retain historic fabric at ground and first floor levels to a minimum depth of one room of the original building.

- (c) Step the fifth and sixth floors back from the main tower in the same manner as the seventh floor to alleviate the bulk and mass of the tower if the overall height cannot be reduced.
- (d) Align vertical and horizontal divisions and the fenestration pattern of the proposed tower with the historic facades below, or consider a design that provides greater transparency in a manner that is similar to the southeast corner.

Recommendations for Conditions and Advice Notes

- 226. Should the panel approve the Application, the following conditions and advice notes are recommended for inclusion, subject to further discussion with Planning and Urban Design Officers.
- 227. **Condition 1:** Prior to any works commencing on the site, the consent holder must submit a documentary record of the building to WCC and receive approval for this record from the Compliance Monitoring Officer and Heritage Advisor. The record will include (as a minimum):
 - (a) the address or location of place;
 - (b) the name and contact details of who prepared the report;
 - (c) a written description of the place including an independently researched historic narrative;
 - (d) an assessment of heritage significance of the place and of the existing building fabric;
 - (e) a written description of the reasons for undertaking the recording;
 - (f) a description of the recording methodology;
 - (g) measured floor plans, ceiling plans, roof plans, and external elevations of the building in its current form;
 - (h) plans and sections (as necessary) to record the building structure and interaction of building elements and spaces;

- (i) comprehensive written description of the structural elements;
- (j) comprehensive written description of the exterior;
- (k) comprehensive written description of each space within the building;
- (l) comprehensive written description of the building's development over time;
- (m) comprehensive photography of the building before commencing work, and during the works as they are carried out, using a digital SLR with good lenses and a high megapixel count (10+ MP):
 - i. the camera should be set to record using a raw file format which should not be modified (though jpgs can be taken at the same time);
 - ii. all images should be labelled and referenced on a set of scale drawings accurately showing the location and direction of each shooting position;
 - iii. a contact sheet of images should be provided with the documentary record, and the raw files provided individually in digital format in conjunction with the record.

One copy of the completed photographic record will be placed on the property file and the second stored with the Council's Heritage Team.

228. **Condition 2:** Existing building materials are to be salvaged wherever possible so that they can be reused in the proposed redevelopment of the site. Prior to any alteration or demolition works commencing on the site, the consent holder must obtain an assessment of significance and condition of all existing building fabric, and submit to the Compliance Monitoring Officer and Heritage Advisor an inventory of materials to be salvaged from the building for recycling or reuse. The consent holder must receive approval for this list from the Compliance Monitoring Officer and Heritage Advisor. Salvage of these materials must be signed off by the Compliance Monitoring Officer and Heritage Advisor onsite.

229. **Condition 3:** Prior to any works commencing on the site, the consent holder must submit a Heritage Management Plan for the works to WCC and receive approval for this plan from the Compliance Monitoring Officer and Heritage Advisor. The plan will (as a minimum):
- (a) detail the methodology for construction;
 - (b) identify all historic building fabric that is to be retained;
 - (c) provide for 'tool box talks' and pre-construction meetings with contractors to familiarise them with the significant heritage features of the building and their statutory responsibilities and obligations in relation to the RMA and the HNZPTA;
 - (d) provide a temporary protection plan that details how the existing fabric to be retained will be protected from damage that may potentially occur during construction, including provisions for vibration monitoring;
 - (e) establish protocols for monitoring physical changes to the building that may arise because of the works;
 - (f) set out protocols for recording and removing historic fabric;
 - (g) set out protocols for storing historic materials to be reused or disposed of, and identify an appropriate storage area;
 - (h) set out protocols for communication paths and responsibilities of the consent holder to ensure that adverse effects, including accidental damage, are appropriately avoided or mitigated, and any issues that arise onsite are immediately notified to the correct party.
230. **Condition 4:** Prior to any alteration or demolition works commencing on the site, the consent holder must submit detailed drawings to a scale of 1:5, 1:10 and 1:20, along with descriptions to WCC confirming:
- (a) the parapet reconstruction;

- (b) replacement of the door with a window or new door(s) on the chamfered corner of the historic façade;
- (c) any and all changes to the windows in the historic facades;
- (d) methodology for conservation and repair of the historic facades, including all brickwork, plasterwork, window and door joinery;
- (e) the materials, placement of fenestration, and window treatment of the north and east facades of the tower;
- (f) the exterior treatment of the solid walls of the south façade of the tower.

The consent holder must receive approval for these detailed drawings from the Compliance Monitoring Officer and Heritage Advisor.

- 231. Condition 5: At completion, reconstruction of the parapet, replacement of the door on the chamfered corner, and all changes to the windows in the historic façades must be signed off by the Compliance Monitoring Officer and Heritage Advisor.

- 232. **Suggested Advice Note:** Work affecting archaeological sites is subject to a consent process under the Heritage New Zealand Pouhere Tāonga Act 2014. An archaeological authority (consent) from HNZPT) must be obtained for works to proceed if there is potential for an archaeological site to be modified or destroyed. It is illegal to modify or destroy an archaeological site without obtaining an archaeological authority. The Applicant is advised to contact HNZPT and/or commission an archaeological assessment prior to works commencing.



Chessa Stevens

WSP Principal Conservation Architect and National Built Heritage Lead

3 November 2021