

Before the Independent Hearings Panel at Wellington City Council

Under Schedule 1 of the Resource Management Act 1991

In the matter of Hearing submissions and further submissions on the
Proposed Wellington City District Plan

Hearing Topic Hearing Stream 3 - Heritage

**Statement of supplementary heritage evidence of Moira Smith on behalf of
Wellington City Council.**

Date: 1 May 2023

INTRODUCTION:

- 1 My full name is Moira Catherine Smith, and I am a self-employed conservation architect and heritage advisor.
- 2 I have prepared this statement of evidence on behalf of the Wellington City Council (Council) in respect of technical heritage matters arising from the submissions and further submissions on the Wellington City Proposed District Plan (PDP).
- 3 Specifically, this statement of evidence relates to matters in Part 4 of the PDP including the:
 - Heritage Schedules
 - Heritage Design Guide
- 4 I have read the respective evidence of:

CAMJEC Limited ID 268

- a) Cameron Peter de Leijer

Claire Bibby ID 329

- b) Barry O'Donnell

Dr M Keir & Ms S Cutten ID 415 & FS 091

- c) Dr M Keir & Ms S Cutten
- d) Nina Smith

Go Media Limited ID 236

- e) Francis John Costello

Heritage New Zealand Pouhere Taonga ID 70 & FS 9

- f) Dr James Andrew Jacobs
- g) Dean Raymond

Historic Places Wellington ID 182 and FS111 and Wellington's Character Charitable Trust ID 233 and FS82

- h) Bill McKay
- i) Michael Kelly

Jane and Turi Park ID 73

- j) Samuel Arthur Kebbell
- k) Joe Jeffries

Kāinga Ora 391 & FS89

- l) Veronica Cassin
- m) Victoria Woodbridge

Parliamentary Service ID 375 and FS48

- n) Peter Coop

Quayside Property Trust ID 104

- o) Ian Bowman
- p) Ian Thomas Leary

Wellington Heritage Professionals ID 233 & FS82

- q) Eva Forster Garbutt
- r) Amanda Mulligan and Michael Kelly

Wharenui Apartments ID 358

- s) Ian Thomas Leary

- 5 I have prepared this statement of evidence in response to expert evidence submitted by the people listed above to support the submissions and further submissions on the Proposed Wellington City District Plan (the Plan / PDP).

QUALIFICATIONS, EXPERIENCE AND CODE OF CONDUCT

- 6 [My statement of evidence](#) sets out my qualifications and experience as an expert in heritage and conservation architecture.
- 7 I confirm that I am continuing to abide by the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023, as applicable to this Independent Panel hearing.

SCOPE OF EVIDENCE

- 8 My statement of evidence addresses the expert evidence of those listed above.
- 9 It specifically relates to the matters of Hearing Stream 3 – Heritage. Particularly SCHED1, SCHED2, SCHED3, SCHED4 and the Heritage Design Guides included in Part 4 of the PDP.
- 10 This statement does not relate to:
- Notable trees
 - Sites and Areas of Significance to Māori

RESPONSES TO EXPERT EVIDENCE

CAMJEC Limited ID 268

(Cameron Peter de Leijer for CAMJEC Limited)

- 11 This evidence relates to 233 Willis Street which is included in SCHED1 as item 525.
- 12 Paragraph 16 reviews the evaluation process for assessing historic heritage significance and considers that the Historic Heritage Evaluation (HHE) report for 134 Willis Street is incomplete as the authors did not carry out a site visit as part of their desktop evaluation. Paragraph 17 considers that I have based my recommendation on the “incomplete” HHE report, as well as a site visit, and the decision for PC 58.
- 13 In response to paragraph 16 & 17, I note that the site visits carried out for the purpose of heritage evaluation are generally carried out from areas that are publicly accessible (i.e. from the street), unless there is a specific invitation from the building owner to visit the site.
- 14 For clarity, I note that I am familiar with the building and have viewed the building from Willis Street (and Victoria Street). As such, I consider that I have based my assessment on a good understanding of the building.
- 15 I also note that my view continues to be that the building has significant heritage values and is eligible for inclusion in SCHED1 of the PDP based on the requirements of GWRC RPS Policy 21.
- 16 I also continue to acknowledge that the current resource consent for the redevelopment of the site may be a relevant factor in the planners’ decision to include or exclude the building from SCHED1 of the PDP.

Claire Bibby ID 329

(Barry O’Donnell for Claire Bibby)

- 17 This evidence relates to a proposal by Claire Bibby to include the Tawa No.2 Tunnel Survey Marker as a heritage structure in SCHED2 of the PDP.
- 18 I acknowledge the additional information provided by the Rail Heritage Trust of New Zealand on the tunnel survey marker, which includes useful historic research.
- 19 My view is that this evidence is also relevant to the submission by the Tawa Historic Society (ID 386) on the archaeological values of the Main Trunk Line, particularly the section of railway in Tawa that was made redundant by the construction of the tunnels.
- 20 As such I have a minor amendment to paragraphs 697 and 1076 of my

original evidence. The amendment is that I have an additional recommendation that the Council should consider a heritage study based on the historic themes of transport / railways for the Tawa/Glenside area.

Dr M Keir & Ms S Cutten ID 415 & FS 091
(Nina Smith for Dr M Keir & Ms S Cutten)

- 21 The evidence prepared by Ms N Smith relates to the sales valuation of item 514, Toomath House (former), 28 Robieson Street.
- 22 Ms N Smith's report sets out the expertise, methodology, and comparative analysis used to prepare the valuation report. I confirm that this answers the questions that I raised in my original evidence in paragraphs 63-67, and 362-365 on methodology and comparative analysis.

(Dr M Keir & Ms S Cutten)

- 23 Dr Keir and Ms Cutten have commented on the methodology used by the Council for the preparation of historic heritage evaluation (HHE) reports.
- 24 In response to paragraph 2, a clarification is that the intention of the HHE report for the former Toomath House at 28 Robieson Street is to meet the requirements of Policy 21 of the Greater Wellington Regional Council (GWRC) Regional Policy Statement (RPS) to identify and assess the heritage significance, and significant heritage values of the place.
- 25 I disagree with the comment in paragraph 2 and paragraph 4 of Dr Keir and Ms Cutten's submission, that the HHE report does not address the heritage values of the place. This is specifically addressed in the assessment criteria.
- 26 I agree with the comments in paragraph 5 that the HHE report identifies whether a place is eligible for inclusion in the district plan, and that this forms part of the decision-making process for the Council that is required under the RMA.
- 27 I agree with the statement in paragraph 5e that the experts who wrote the HEE report did not undertake a site visit, but confirm that I have viewed the property from the street. I also note that supplementary information on this property is available in publications such as *Long Live the Modern*, and *4-architects* and in the video *Antonello and the Architect*, and that I own a copy of each.
- 28 I confirm that I have also read the commentary provided by Dr M Keir and Ms S Cutten that accompanies the research paper on the *Protection of Private Property Rights and Just Compensation*.
- 29 I confirm that the *Environment Court Decision No. [2023] NZEnvC 056*

(March 2023) provided by Dr Keir and Ms Cutten is outside my field of expertise.

- 30 An overall comment, in response to the evidence provided by Ms N Smith, and Dr Keir and Ms Cutten is that I have not changed my mind with respect to substantive issues raised in my original evidence.

Go Media Limited ID 236
(Francis John Costello for Go Media)

- 31 This evidence relates to the provisions for signs in the heritage design guide.
- 32 Mr Costello seeks clarification on the traditional locations for the placement of signs, and my view is that the locations noted in guideline G19, G20, G21, and G22 generally refer to all signs, and do not exclude third-party signage.
- 33 Paragraph 12 of Mr Costello’s evidence refers to the Kauri Timber building at 104 Fanshaw Street in Auckland as a good example of a sign located on a heritage building – see figure 1. My view is that the sign in this Auckland example is located in one of the “traditional” locations indicated by the signs design guide in the Wellington PDP.



Figure 1: Kauri Timber Company, 104 Fanshaw Street, Auckland

- 34 A further local example of third-party signage on the blank side wall of a heritage building (and in a heritage area) is shown in figure 2 below.



Figure 2: 151 Cuba Street has a sign located on the blank side wall of the heritage building.

- 35 In response to paragraph 13 – guideline G23 is intended to enable building owners to manage the signage on their buildings, and to simplify compliance with resource consents.
- 36 In my experience, it is useful to include a condition in a resource consent for tenant signage in resource consents that are granted months (or years) before the building works are complete. A consent condition for a signage policy is intended to benefit owners by:
- a) reducing the need to apply for resource consent for future tenant signs for the completed development;
 - b) reducing the risk that future tenant signs will not comply with the original resource consent;
 - c) reducing subsequent compliance costs; and
 - d) providing control to building owners on the overall appearance of their buildings and sites.
- 37 If there are concerns that the G23 gives specific direction on third party signage, then the guideline could be removed, and the Council could continue to use a resource consent condition to achieve the same outcome.
- 38 In response to paragraph 14, I do not agree with the proposed changes to guideline G19 and G21. This is because the blank sides of buildings are traditional locations for signage (including third party signs) as shown in figures 1 & 2.
- 39 I also do not agree with the addition of guideline GXX – as my view is that the intention of the design guides is to illustrate “what good looks like” rather than introducing new polices. This means that the guidelines must be directed by the objectives and policies in the district plan – particularly the SIGN and HH – historic heritage chapters. I agree that the wording for the diagram under guideline G19 could be amended to clarify this point.

- 40 Although I disagree that a new guideline GXX is necessary, I am aware of situations where the revenue from third party advertising is used to support the care and restoration of heritage buildings. From my experience (of involvement in the resource consents for these projects), the assessment of negative effects and positive benefits has been a key factor in the consenting process. But in my view each situation has been unique, and it is difficult to give generic advice in the heritage design guide on this issue.
- 41 In response to the comments on digital signage in paragraphs 15 – 19, I have been involved in the assessment of digital signs intended to be placed on heritage buildings. I note that - while some of these consent applications have been fully supported by the Council - that the signage location, placement, size, levels of illumination, quality of the screen, and rate of change of images have been “carefully considered” by all involved.
- 42 A general point is that, given that most of our heritage buildings and areas are unique, and because digital signs are a relatively new technology, it is difficult to give generic design guide advice. This is partly because digital signs are not a traditional element for heritage buildings. In my experience there is little research available on the effects of digital signs on the historic environment.
- 43 The best background information that I have found is a joint publication from English Heritage and CABI on Large Digital Screens in Public Places – [Large Digital Screens in Public Places | Historic England](#) which is available by email from Historic England, and of which I have a copy. The guidance describes the care which consenting authorities need to take when assessing the benefits and negative impacts of digital screens in historic environments. I note that this guidance is directed at digital screens for the purpose of live broadcasts of the London Olympics, rather than for third party advertising, but still consider that it is useful to see the direction given to UK local authorities on consenting these screens. Given that the document is not readily accessible online, I include part of the content as follows:

Local authorities are responsible for deciding whether or not digital screens should be permitted, and, if so, where. In every case they will need to weigh carefully the potentially conflicting benefits and disbenefits arising from a specific proposal. Where they are sited appropriately, and curated and managed, large digital screens have the potential to contribute positively to town and city centre spaces and to support local policy objectives such as regeneration, economic development and community engagement. However, equally, in inappropriate locations they can cause significant harm to the character, appearance and amenity of such spaces and impede other objectives. Wherever they are proposed, before a decision is made to permit a screen, the local authority will need to establish that there are substantial benefits to the function, amenity and quality of the space, as part of an integrated approach to placemaking and sustainable regeneration, and that any harm to other attributes is minimised.

In every case applicants should carry out pre-application consultations with the local authority.

- 44 In my view this supports my overall point which is - that is difficult to provide useful but generic advice in the heritage design guide on the circumstances where a digital sign may be appropriate.
- 45 In response to paragraph 18 is that I do not agree with the alternative wording proposed for guideline G22 as in my view this does not address the careful design and analysis that is required for the successful introduction of a digital sign into a heritage area or on a heritage building.

Heritage New Zealand Pouhere Taonga ID 70 & FS 9

(Dr James Jacobs for Heritage New Zealand Pouhere Taonga (HNZPT))

- 46 I agree with much of Mr Jacobs' evidence. As such I have focused my substantive comments on matters where my opinion differs, or where I consider that clarification is required. These are the:
- a) Extent of the proposed Truby King Heritage Area
 - b) McLean Flats and Hurston

Truby King Heritage Area

- 47 In response to Dr Jacobs's comments on the Truby King Heritage Area I have re-read the relevant parts of:
- a) The Historic Heritage Area Evaluation (HHAЕ) report for the Truby King Heritage Area prepared for the Council by NZ Heritage Properties in September 2021.
 - b) My peer review notes for the HHAЕ report prepared in June 2022.
 - c) Landscape Features Inventory for Truby King Park prepared in May 2022 by my practice.
- 48 I agree that the proposal by HNZPT to exclude the former hospital and nurses' home site from the heritage area has merit. Particularly as:
- a) The Council's intention for the heritage area is to have regard to the relevant listing in the New Zealand Heritage List Rārangī Kōrero.
 - b) The 1920s Karitane hospital building has been demolished.
 - c) HNZPT do not consider that the remaining buildings on the former Karitane hospital site have significant heritage values (and will presumably update their associated listings report for the historic area to reflect this).
 - d) The former Karitane hospital site and former nurses' home are difficult to see from the public areas of the historic reserve / publicly accessible parts of the heritage area.
- 49 I am concerned that, without an accurate survey of the properties, it is difficult to establish whether the landscape items along the lower and middle drive are located within the property boundaries of the historic reserve (or whether they are on the adjacent site of the former hospital that is now in private ownership).
- 50 As such I suggest a minor amendment to the proposal suggested by

HNZPT which would include any landscape features along the east of the existing driveway.

- 51 Figure 3 below shows the proposed extent of the Truby King Heritage Area. The red outline is the extent of the HNZPT Historic Area and the original proposed WCC heritage area. This generally correlates to land that was once owned by the King family. The green shading omits the former Karitane Hospital and Nurses' Home but includes a 20m buffer to the east of the driveway to ensure that any landscape features are included in the heritage area.



Figure 3: Possible amendment to the extent of the Truby King Heritage Area.

McLean Flats and Hurston

- 52 Dr Jacobs considers that the McLean Flats at 320A The Terrace and Hurston at 1 Mersey Street are eligible for inclusion in SCHED1 of the Wellington District Plan.
- 53 I agree with Dr Jacobs comments in paragraphs 20 and 27 that there is sufficient information available in the HNZPT registration reports to carry out an assessment against the WCC heritage criteria/RPS Policy 21 criteria for heritage identification.
- 54 I also continue to consider that both places are likely to meet the WCC thresholds for listing in the PDP.

55 In my view the key issue is a matter of timing. That is - whether the places should be included in the proposed district plan in the current process or whether they should be added to the plan via a future plan change or variation.

56 I note that although the Council is required to review District Plan provisions every 10 years, HNZPT have a continuous listing programme. In effect this means that items listed by HNZPT often have to wait for a plan change before they can be added to a district plan.

(Dean Raymond for Heritage New Zealand Pouhere Taonga)

57 I agree with much of Mr Raymond's evidence. I have focused my comments on a matter where I consider that clarification is required. This is the extent of the Council's consultation with the occupants of Hurston.

58 I understand that the Council's Cultural Heritage Manager, Mark Lindsay, visited the religious order at Hurston before the PDP was notified. He was unable to speak to the manager as she was overseas and uncontactable at that time.

Historic Places Wellington ID 182 and FS111 and Wellington's Character Charitable Trust ID 233 and FS82

(Bill McKay for Historic Places Wellington and Wellington's Character Charitable Trust).

59 Mr McKay's evidence relates to the Gordon Wilson Flats at 320 The Terrace, which are included in SCHED1 as item 299.

60 I generally agree with Mr Kay's evidence.

61 In response to Mr McKay's point raised in paragraph 22 on the successful adaptive reuse of similar buildings. I would add the overseas example of Park Hill Estate, in Sheffield, England, which has been adapted (in part) for use as student housing.¹

¹ Oliver Wainwright, "It always felt good here: how Sheffield's brutalist Park Hill estate survived the haters and their bulldozers", *The Guardian* newspaper, 07 April 2022
<https://www.theguardian.com/artanddesign/2022/apr/07/park-hill-from-brutalist-glory-to-sink-estate-to-contentious-regeneration>



📷 Student housing at Park Hill, part of phase 3 of the redevelopment. Photograph: Christopher Thomond/The Guardian

Figure 4: Park Hill Estate

(Michael Kelly for Historic Places Wellington and Wellington's Character Charitable Trust).

62 Mr Kelly's evidence confirms his work in providing the background research for nominations proposed for SCHED1 by Historic Places Wellington. The evidence also confirms his involvement in the preparation of the proposal for the addition of a Hay Street Heritage Area to SCHED3 for Wellington's Character Charitable Trust.

63 I generally agree with Mr Kelly's comments and evidence.

Jane and Turi Park ID 73

64 This evidence relates to 134 Brougham Street which is included in SCHED 3 item 44 Moir Street Heritage Area as a contributing building.

(Dr Samuel Arthur Kebbell for Jane and Turi Park)

65 In response to paragraphs 12 – 14 on historic values, I continue to consider that 134 Brougham Street contributes to the historic values of the heritage area. This is partly because the house was constructed for the Moir family who established the subdivision on Town Acre 294, and for the Rev Moir whom the Moir Street Heritage Area is named (assessment criterion A(iii) people). It is also for the age of the house, and the social history that it shares with other houses within the heritage area (assessment criterion A(iv) social).

66 In response to paragraphs 15 – 16, I acknowledge Dr Kebbell's point about the orientation of some other buildings in the heritage area, particularly the groups of houses constructed by the developer/builder

George Baker on Town Acres 295 and 296. I also agree that the Brougham Street houses are generally larger and slightly younger than 134 Brougham Street and the Moir Street properties.

- 67 I disagree with the conclusion that 134 Brougham Street lacks a relationship with the patterns of development for Moir Street. This is because the Moir family established the subdivision on Town Acre 294 and selected the best site for their own house – i.e., on a corner site and facing Brougham Street. In my view this adds to the significance of the historic patterns of development of the heritage area under criterion A(i) themes or patterns of development.
- 68 I agree with Dr Kebbell’s comments on the integrity and architectural values of 134 Brougham Street in paragraph 18. But disagree with the proposition that the building is dissimilar from others in the Moir Street Heritage Area in terms of later additions that altered the appearance of the building from a cottage (or small villa) to a bungalow.
- 69 I note Dr Kebbell’s comments on the social separation of the house from the Moir Street Heritage Area in paragraphs 22 – 24, but disagree with the conclusions. My view is that the separation between the house that fronts Brougham Street and those in Moir Street illustrates the social position of the (middle-class, but presumably not particularly prosperous) Moir family, and their relationships to their middle-class neighbours on Brougham Street and their working-class neighbours on Moir Street. This adds to the rich historic values of the heritage area.
- 70 As noted above, I do not agree with Dr Kebbell’s comments on rarity and representativeness in paragraphs 25-26, as I consider that 134 Brougham Street must be considered in terms of its ownership by the Moir family that established the Moir Street subdivision on Town Acre 294.
- 71 In response to comments on future value and the character precinct in paragraphs 27- 29 and 32 - 33 my view is that any future development on this site should have regard to the heritage values of the Moir Street Heritage Area. This is because the site is, in my view, an integral part of the original subdivision and the early patterns of development. This means that I consider that the house should be part of the heritage area and subject to the heritage area provisions of the district plan.
- 72 In response to the issues of building performance raised in paragraph 32 – 33 I consider that the heritage area provisions enable suitable adaptations for the comfort of the building’s occupants, and the “liveability” of the property.
- 73 An overall comment is that I have not changed my mind with respect to substantive issues raised in my original evidence.

(Joe Jeffries for Jane and Turi Park)

- 74 I have read Mr Jeffries planning evidence for 134 Brougham Street and confirm that I have not changed my mind with respect to substantive issues raised in my original evidence. In summary this is that the Moir

Street Heritage Area meets the requirements for inclusion in the PDP, and that 134 Brougham Street contributes to the heritage values and significance of the heritage area.

Kāinga Ora Homes and Communities 391 & FS89
(Veronica Cassin for Kāinga Ora Homes and Communities)

- 75 This evidence relates to the Mount Victoria North Townscape Precinct. It raises the question of whether there are historic heritage values present within this precinct, and considers whether the precinct should be recognised and managed as a heritage area.
- 76 This question is raised with relation to SCHED5 – viewshafts and urban design provisions for managing significant views towards Matairangi Mount Victoria, and St Gerard’s Monastery.
- 77 Although I can provide clarification of the 2016 – 2017 Mount Victoria Heritage Study (MVHS), I note that the Council’s substantive advice on urban design advice for SCHED5 - viewshafts is provided by others.
- 78 Ms Cassin raises the following concerns about the MVHS:
- a) The methodology of the study initially identified townscape character (i.e. amenity values) rather than heritage values.
 - b) The MVHS does not acknowledge all of the heritage values present in the Mount Victoria North Townscape Precinct.
- 79 The MVHS was prepared in 2016 – 2017 by a heritage consultant in conjunction with the Council’s senior heritage advisors, Museum and Heritage Studies masters students, and with some input from historian Dr Ben Schrader. The report is available from [Heritage - Mount Victoria Heritage Study report - Wellington City Council](#).
- 80 The study included the full extent of the area covered by the pre-1930s demolition rule in the operative district plan. This included the Mount Victoria North Townscape Precinct (then known as the Mount Victoria North Character Area in the operative district plan (ODP)) – see figures 5 and 6 below.



Figure 5: Extent of the MVHS included all of the areas covered by the pre-1930s demolition rule in Mount Victoria.

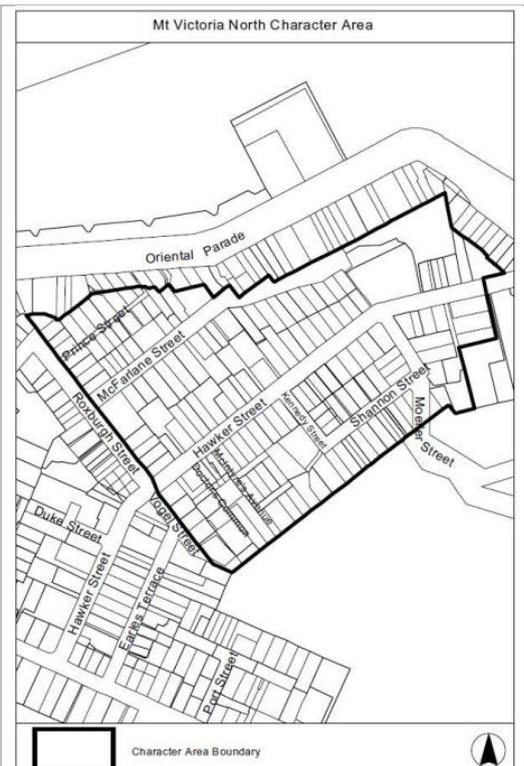


Figure 6: The extent included the Mount Victoria North Character Area (now the Mount Victoria North Townscape Precinct).

- 81 The MVHS proposed the creation of seven heritage areas including the Doctors Common Heritage Area. The Doctors Common Heritage Area is located within the Mount Victoria North Character Area/Townscape Precinct and is included in SCHED3 as item 42.
- 82 A key issue raised by Ms Cassin is that the methodology of the MVHS began with an assessment of streetscape values, and integrity. Paragraph 6.8 of Ms Cassin’s evidence considers that the MVHS is a visual amenity study rather than a heritage study or survey.
- 83 I note that the objectives of the MVHS were to:
- a) Gain an understanding of the historic heritage values of Mt Victoria and whether those values are aligned with identified heritage character.
 - b) Gain an understanding of what represents or typifies the historic character Mt Victoria that is not better represented in other suburbs.
 - c) Identify buildings and discrete areas / streetscapes within the suburb that have high heritage value.
 - d) Appraise the effectiveness of district plan rules and whether they are protecting historic heritage.
 - e) Identify mechanisms that might better protect historic heritage.
- 84 I agree with Ms Cassin that the initial stages of the project include some work that is common to both heritage studies/surveys and visual amenity

studies. For the MVHS these were:

- a) Fieldwork to assess the building style, boundary treatment, garaging, integrity, and contribution of each property in Mount Victoria to the predominant character of the street. This included approximately 1000+ properties.
- b) Digital mapping to identify patterns of buildings, integrity, and streetscape character.

- 85 I disagree with the assertion that the MVHS is solely a visual amenity study as the work also included:
- a) Leadership by experienced heritage professionals, who were familiar with the Thematic Study of Wellington, and with the research and assessment required for historic heritage. My understanding is that the lead consultant was a key contributor to the Thematic Study of Wellington 2013, and had researched and assessed many of the heritage areas already included in the district plan.
 - b) Consultation with the local community through the Mount Victoria Historical Society.
 - c) Research and assessment of seven areas and 42 individual houses identified in the fieldwork and mapping.
- 86 In response to Ms Cassin's paragraph 6.8, I disagree that the MVHS report does not assess historic heritage values or townscape values. These assessments are included in the report appendix for each of the 42 houses and seven areas identified in the fieldwork and mapping.
- 87 My view is that the MVHS produced robust and defensible evidence that has formed the basis of the additions of heritage buildings to SCHED1 and of heritage areas to SCHED3 in the proposed district plan.
- 88 I agree with Ms Cassin, along with other submitters such as Tim Bright (75), Joanna Newman (85), Alan Olliver and Julie Middleton (111), Vivienne Morrell (155), Mount Victoria Historical Society (214) and Wellington's Character Charitable Trust (FS82) that some parts of Mount Victoria could be revisited, and further research and assessment could be carried out. But consider that consideration should be given to views of the local community – particularly for the heritage values and additional research they have carried out for Tutchin Avenue, Claremont Grove, and Ellice Street.
- 89 I agree with Ms Cassin that the MVHS only included the first two stages of a four-stage programme and note that the future work included:
- a) District Plan effectiveness monitoring.
 - b) Recommendation of ways to achieve greater heritage protection – for example rules, and statutory and non-statutory design guides.
 - c) Identification of areas with lesser heritage or character values.
 - d) A history of Mount Victoria of 5,000 – 10,000 words.
- 90 I also note that some of this work has been completed as part of the preparation for the PDP, most notably the work by Boffa Miskell on the character analysis of the suburb.

91 In response to the issues raised by Ms Cassin in paragraphs 6.13 and 6.14 on relevant themes in the Thematic Heritage Study of Wellington. I note that the main author of the MVHS was also involved in the preparation of the thematic heritage study, and was aware of these themes when undertaking the fieldwork and subsequent research and assessment.

92 In response to recommendation 7.3, I agree that the historic themes identified by Ms Cassin may be present. But disagree that the themes of historic patterns of development, construction technology, climate responses, and socio-economic functions are “strongly indicated” to a greater extent than many other parts of Wellington’s historic suburbs.

93 In response to recommendation 7.4 I note that the streetscape and townscape of the Mount Victoria North Townscape Precinct is predominantly modified, with the notable exception of the Doctors Common Heritage Area. This is shown in the maps in the MVHS report – for example see figure 7 below.



Figure 7: Example of mapping from the MVHS to show streetscape values and integrity

94 I also agree that the place has significant townscape values, particularly when viewed from a distance, and for its landscape, as the setting for St Gerard’s Monastery, for the Doctors Common Heritage Area, and for the new buildings, and for its modified Edwardian and Victorian villas. In my view the values of the precinct are multilayered, and the townscape requires a multi-disciplinary approach to its management – particularly in terms of urban design and heritage provisions in the PDP.

95 In response to recommendation 7.5, I consider that the MVHS followed a robust process, and that the analysis of the seven areas and 42 buildings was thorough and completed to a very high standard.

96 I agree that submissions have identified some places in Mount Victoria that could be researched and assessed. But am not convinced by the evidence provided by Ms Catten that priority should be given to the Mount Victoria North Townscape Precinct over other places that have been identified by local communities.

(Victoria Woodbridge for Kāinga Ora Homes and Communities)

- 97 Ms Woodbridge's evidence addresses the Mount Victoria North Townscape Precinct, the role of design guides, and historic heritage chapter provisions.
- 98 I have read the evidence of Ms Woodbridge, and have responded to issues raised on the Mount Victoria North Townscape Precinct by way of my response to Ms Cassin in the paragraphs above.
- 99 I have read Ms Woodbridge's comments on the historic heritage chapter provisions and note that Mr McCutcheon will respond to the issues raised.
- 100 I have read Ms Woodbridge's comments on the heritage design guide and note that these generally relate to the use of the guides in relation to the historic heritage policies, and note that Mr McCutcheon will respond to the issues raised.

Parliamentary Service ID 375 and FS48
(Peter Coop for Parliamentary Service)

- 101 The evidence prepared by Peter Coop for Parliamentary Service relates to the Parliamentary Precinct which is a heritage area and includes a site of significance to Māori, a listed tree, heritage buildings, and heritage structures as follows:
- SCHED 7 – Waipiro Stream
 - SCHED 1 – item 36 Executive Wing (Beehive)
 - SCHED 1 – item 214 Parliament House
 - SCHED 1 – item 215 Parliamentary Library
 - SCHED 2 – item 36 Seddon Statue
 - SCHED 2 – item 37 Ballance Statue
 - SCHED 6 – item 187 English oak
- 102 The heritage area also includes the following items that I understand are not managed by Parliamentary Service:
- Government Buildings Historic Reserve and mana whenua statutory acknowledgement area.
 - SCHED 1 – item 179 Government Buildings
 - SCHED 2 – item 14 Wellington Cenotaph
 - SCHED 2 – item 32 Peter Fraser Statue
- 103 I have read Mr Coop's evidence, which generally refers to policy HH-P7, and understand that Parliamentary Service is seeking a change to this policy in respect to the Parliamentary Precinct.
- 104 I have not commented on the proposed changes, but have a suggestion that may help to address the issue. This is for Parliamentary Service to consider the use of a conservation management plan (CMP) that identifies significance, assesses condition, and establishes policies for the long-term management of the parliament precinct. A CMP could to help manage the

relationship between Parliamentary Service and the Council for adaptations that are required to support the function and evolving needs of parliament (as noted in Mr Coop's evidence paragraph 7.4).

105 I have noted in paragraph 161 of my original evidence that this is the approach of the Heritage Council of Victoria (Australia) where "A CMP may also be endorsed by the approval body, meaning that all actions in accordance with the CMP are automatically approved or are permit exempt." *Heritage Council of Victoria, Conservation Management Plans: Managing Heritage Places* page 5
https://www.heritage.vic.gov.au/_data/assets/pdf_file/0022/514273/Conservation-Management-Plans-Managing-Heritage-Places.pdf

106 The relevant policy in the PDP is HH-P5.

Quayside Property Trust ID 104
(Ian Bowman for Quayside Property Trust)

107 The evidence prepared by Ian Bowman and Ian Leary for Quayside Property Trust relates to 115 Brougham Street, which is a contributing building included in item 45, the Porritt Avenue Heritage Area.

108 In response to Mr Bowman's assessment of significance in paragraph 27 of his evidence, I agree that 115 Brougham Street has relatively low physical values.

109 I disagree with the assessment of historic heritage values in paragraph 27 in which the historic values are ranked as "Low".

110 My view continues to be that the building has significant historic values. This is based on the assessment of the place as an individual building for "Rowena's Lodge, 115 Brougham Street" in the Mt Victoria Study [Appendix 5 - Individual House Reports \(wellington.govt.nz\)](https://www.wellington.govt.nz/appendix-5-individual-house-reports).

111 In response to the assessment in paragraph 30 of Mr Bowman's evidence, I disagree with the assessment of the contribution that 115 Brougham Street makes to the Porritt Avenue Heritage Area. Mr Bowman considers that the place makes no contribution.

112 Instead, my view is the building, with its history as a girl's private school, boarding facilities for Wellington College, YWCA, and as a hostel, adds to the rich history of the heritage area. This is because the heritage area is made up of residential properties constructed from 1885 – 1910, three of which were used as girls' schools, and all of which are the original buildings on the sites.

(Ian Leary for Quayside Property Trust)

- 113 I have read and note the views of Mr Leary and have not changed my mind on the key issues for 115 Brougham Street which are outlined in my original evidence.
- 114 In summary, this is that the building at 115 Brougham Street has significant historic values, and has low physical values. The building is difficult to see from the Armour Avenue Heritage Area, and is less visible from the Porritt Avenue Heritage Area. But my view continues to be that the best way to manage the values of the place are to include the building in the Porritt Avenue Heritage Area. Alternatively, the place could be included in the Armour Avenue Heritage Area.

Wellington Heritage Professionals ID 233 & FS82

(Eva Forster Garbutt for Wellington Heritage Professionals)

- 115 I have read the evidence of Ms Forster Garbutt who is a heritage consultant with expertise in archaeology. I note that archaeology is beyond the scope of my expertise, except to the extent where I can add general heritage advice.
- 116 Ms Forster Garbutt's evidence relates to the archaeological provisions of the PDP.
- 117 In response to the issues raised by Ms Forster Garbutt on the values of post-1900 archaeological sites, I generally agree with Mr McCutcheon's point made in the s42A report that these have previously been managed by other existing heritage provisions.
- 118 In my experience, archaeological values have sometimes been addressed in resource consent applications and consent conditions. Examples include consents for works to the five tunnels included in SCHED2, and to the Kaiwharawhara Bridle Track, Mount Street Cemetery, and Old Coach Road included in SCHED3.

(Amanda Mulligan and Michael Kelly for Wellington Heritage Professionals)

- 119 Ms Mulligan and Mr Kelly have commented on the heritage provisions in Part 2 of the PDP, along with the design guides and schedules in Part 4. I have read the evidence, but my comments will focus on the matters related to Part 4 of the PDP.
- 120 I agree with the comment in paragraph 96 that the design guide is focused on urban form, and lacks guidance on residential heritage areas and individual houses. Some relevant background information is that the heritage design guide was substantially based on the central area urban design guide (CAUDG), which was also focused on urban form. I also agree that comprehensive guidance would be useful for the new and existing residential heritage areas.

- 121 I generally agree with the comments in paragraph 97 on rooftop additions. As such I suggest that a guideline is added to the design guide (which will need to be written so that it aligns with the objectives and policies in Part 2 of the PDP).
- 122 I generally agree with the comments in paragraph 98 on rear elevations, particularly where these form a distinctive element in the streetscape/ townscape. As such I suggest that a guideline is added to the design guide (again, this would need to be written so as to align with the objectives and policies in Part 2 of the PDP).
- 123 I generally agree with the comment on windows in paragraph 99, and suggest that this is added to the heritage design guide.
- 124 I generally agree with the comments on facadism raised in paragraphs 63 and 100.
- 125 My view is that facadism (or the partial demolition of all parts of a building except for the main façade) is one of options of last resort for a heritage building. By that I mean that all other reasonable alternatives should be explored before facadism is contemplated. I also note that HNZPT published good advice on the partial demolition of heritage buildings (that has recently been removed from their website). This advice included that there are some aesthetic and historical reasons for preserving building façades. For example, as a response to the loss of substantial parts of a building following a fire or natural disaster.
- 126 I disagree with paragraph 100 to the extent that in my view the heritage provisions in Part 2 of the PDP, along with heritage design guide guideline G37, and the additional considerations in the orange text and illustrations, provide well considered advice on this issue.
- 127 I also understand that the word “avoid” has specific meaning to resource consent planners, and is better used in a policy in Part 2 of the PDP. I note that it is used sparingly in the heritage design guide.
- 128 I disagree with the point raised in paragraph 101 to the extent that the policy on relocation is included in Part 2 of the PDP, and includes the circumstances when relocation can be allowed. Guideline G29 notes the preference for retention of buildings in their existing or original locations while guideline G30 is intended to illustrate “what good looks like” in the circumstances where relocation is the reasonable option (particularly as an alternative to total demolition).
- 129 I agree with the comment in paragraph on solar panels in paragraph 102, and suggest that the wording for guideline G34 is updated to include advice that these elements should be located away from the main or the most publicly visible elevation(s) and roofs.
- 130 I agree with the comment on area specific guidelines in paragraphs 103-105, and suggest that the Council should consider preparing additional guidance. This is addressed in section 21.11 of my original evidence, and

my position is unchanged.

- 131 I continue to agree with the point raised in paragraph 106 on the importance of public engagement, this is addressed in paragraphs 42 and 43 of my original evidence.
- 132 I agree with paragraph 110 that the schedules should not be ranked.
- 133 In response to the points raised on partial listings / facades in paragraphs 111 to 114. I note that I carried out initial work to identify partial listings as part of my work as a senior heritage advisor at the Council, but cannot recall the outcome of that work. Instead, I suggest that Mr McCutcheon's comments in the s42A report paragraphs 870 to 873 are a more reliable record.
- 134 I have read paragraphs 115 to 117 on the Wellington Central Library Te Matapihi, and confirm my view is unchanged. In summary, in my view the building should be reassessed once works are completed, as outlined in section 8.1 of my original evidence. I therefore disagree with Ms Mulligan on this point.
- 135 I have read paragraphs 124 to 131 on Te Ngākau Civic Square, and note that my view is unchanged. In summary, the Michael Fowler Centre, Municipal Office Building, and structures including the City to Sea bridge would require additional research and assessment to support any proposal for inclusion in SCHED1 or SCHED2.
- 136 In response to paragraph 129, I have re-read the Civic Centre Heritage Area report initially prepared in 2006 and agree that the existing report includes well researched background information on the buildings and structures.
- 137 I disagree that the preparation of the historic heritage evaluations suitable for a heritage building or heritage structure would take a few hours, and suggest from my experience that it would take one to two weeks to prepare the three HHE reports, along with time allowed for a peer review of each document.
- 138 This excludes the time required for the council's planners to carry out their work required under the RMA – for example the content required for the s32 and s42A reports. It also excludes the time required for internal discussion within the Council as the asset owner.
- 139 I have read paragraphs 132 to 135, along with the HHE report prepared for 355 The Parade, Island Bay. I agree that the Council's Pūoro Āmua | Planning and Environment Committee decided that the place should not be included in the PDP as notified.
- 140 I note that the HHE report found that the place had significant historic, physical (architectural, townscape, group, integrity), and social values, and is rare and representative. The HHE report makes a recommendation that the place is listed in the PDP as it meets the WCC heritage criteria/GWRC RPS policy 21 criteria.

- 141 For clarity, my view is that the place is eligible for inclusion in SCHED1 of the PDP.
- 142 In response to the points raised about the Mount Victoria Tunnel in paragraphs 136 to 141, I note that my recommendations are unchanged from section 13.4 of my original evidence. In summary, my view is that the Council should consider further research and assessment for the tunnel.
- 143 I have read paragraphs 142 to 149 and consider that the key point raised relates to public consultation and engagement, and to the Council's internal processes. As such, I have no additional comments.
- 144 In response to paragraphs 150 to 153, a point of clarification is that my view is that some minor work is required to reformat the 2017 report on the Ellice Street Heritage Area as an HHE report, but that the place is likely to be eligible for inclusion in SCHED3 of the PDP. My view is unchanged from my original evidence – see section 18.5.

Wharenui Apartments ID 358

(Ian Thomas Leary for Wharenui Apartments)

- 145 The evidence prepared by Mr Leary refers to SCHED1 item 509 Wharenui Apartments 274 Oriental Parade. I note that the submitters accept that their building has heritage values and have focused my responses to the issues raised by Mr Leary that require clarification. These include:
- a) Social (or historic) values.
 - b) Repair and maintenance.
 - c) Carport.

Social (or historic) values

- 146 Paragraph 15 of Mr Leary's evidence notes that the submitter (Wharenui Apartments ID 358) does not accept the statement in the HHE report that the building has significant social values. I note from the original submission that the question may relate to historic values.
- 147 I agree with submission 358 on this point – see paragraph 279 of my original evidence. My view is unchanged, and a summary of my original evidence is that the building has significant physical values (architectural, townscape, group, and integrity), and that the place is rare and representative – see section 5.5 of my original evidence.
- 148 To address this issue, I suggest an updated entry to SCHED1 noted below.

Repairs and maintenance

- 149 Mr Leary has raised some issues with the definition of repairs and maintenance in the PDP.

- 150 The key issue for the building owners appears to be that their maintenance regime includes like-for-like replacement of damaged windows with new or refurbished items – raised by Mr Leary in paragraphs 19-23 and 29-32.
- 151 The building owners appear to carry out a well-considered maintenance regime - given the age, style, and height of the building; the relatively large number of windows; and the location in a coastal marine environment.
- 152 My suggestion is that the Council’s planners consider if there are statutory and non-statutory methods that could enable the ongoing works to the windows that are reasonably required by the building owners.
- 153 Alternatively, the owners could consider commissioning a conservation management plan (CMP) that complies with HH-P5 and identifies significance, assesses condition, and establishes policies for the long-term management of the building. If this document was peer reviewed by HNZPT (as the HPA) and the Council, then early agreement could be reached for actions that are in accordance with the CMP.²
- 154 Mr Leary also raises concerns about painting the building in paragraph 26, which are similar to those raised by submission ID9 for SCHED1 item 415 Emeny House at 1 Ranfurly Terrace. For clarification, my view is that the following meet the definition of repair and maintenance:
- Repainting a previously painted item.
 - Changing paint colour.
 - Changing the brand of paint.
 - Changing a painted rimu weatherboard because it is damaged or decayed, with the nearest equivalent product such as treated pine.
- 155 A further issue for repairs and maintenance that may need clarification is fixings for scaffolding – this is identified by Mr Leary in paragraph 27 and relates to item f of the definition of repairs and maintenance which states that *f. The affixing of scaffolding to unless the work is reasonably required for health and safety;*
- 156 My understanding of the intent of item f is to enable “standard” scaffolding that uses minimal fixings to buildings (which are reasonably required for health and safety). I have included an example of standard scaffolding in figure 9 below.
- 157 Item f is also intended to manage the use of other (unusual) systems that use the face of the building as part of the scaffolding system. An example is the use of “putlog scaffolding” which often involves cutting out the mortar between bricks and fixing the scaffolding into a brick facade. This is shown in figure 8 below.

² This is the approach of the Heritage Council of Victoria (Australia) where “A CMP may also be endorsed by the approval body, meaning that all actions in accordance with the CMP are automatically approved or are permit exempt.” Heritage Council of Victoria, *Conservation Management Plans: Managing Heritage Places* page 5. https://www.heritage.vic.gov.au/_data/assets/pdf_file/0022/514273/Conservation-Management-Plans-Managing-Heritage-Places.pdf

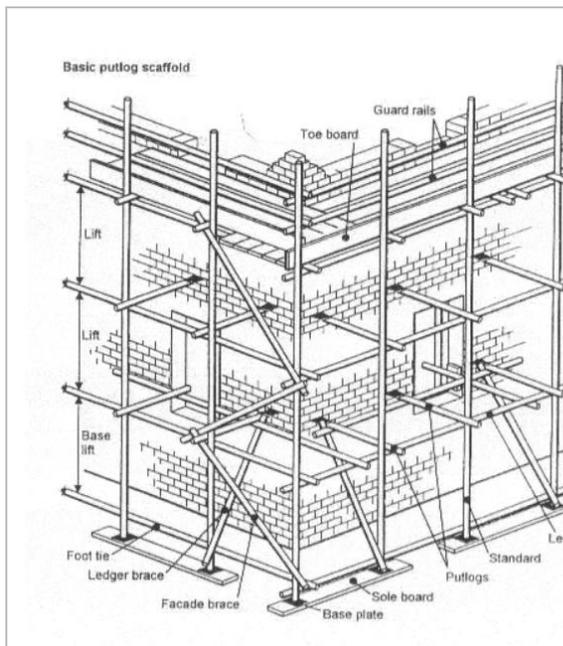


Figure 8: Putlog scaffolding



Figure 9: Standard scaffolding

- 158 The key issue for systems like putlog scaffolding is that although the costs of erecting the scaffolding are relatively low, the damage to the building (and costs of remediation) following the removal of the scaffold can be relatively high.
- 159 The final issue for repairs and maintenance raised by Mr Leary in paragraph 28 is damage caused by abrasive or high-pressure cleaning methods. This refers to the definition of repairs and maintenance item *g*. *The damage of fabric from the use of abrasive or high-pressure cleaning methods, such as sand or water-blasting;*
- 160 My concern is that it is that it is easy to damage building materials with abrasive and high-pressure cleaning methods and have included some examples in figure 10 below.



Sandblasting has permanently damaged this brick wall. Photo: NPS files

Figure 16:
This Portland limestone plinth shows ghosting. The outline of graffiti remains legible several years after the original graffiti was removed, even where re-soiling and green organic growth have occurred on the surface.



Figure 17:
This example of ghosting on brickwork shows where the outline of graffiti remains after removal. This typically occurs when high-pressure mechanical (air abrasive) cleaning follows the outline of the graffiti and results in surface alteration.



Figure 10: examples of damage caused by abrasive and high pressure cleaning systems.

- 161 The examples used in figure 10 have been sourced from the [Preservation Brief 1: Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings \(nps.gov\)](#) and [Graffiti on Historic Buildings: Removal and Prevention \(historicengland.org.uk\)](#).
- 162 In my experience as a conservation architect, I tend to give advice on cleaning based on the substrate (for example brick, stone, concrete, glass, etc) and the contaminant to be removed (for example organic growth, spray paint graffiti, oil, etc).

- 163 For clarity, I consider high pressure to be something above 20 Bar/300 Psi steam. This is based on the advice in <https://historicengland.org.uk/images-books/publications/conserving-war-memorials-cleaning/heag147-conserving-war-memorials/>
- 164 Also for clarity on abrasive systems, my concern is with the use of mechanical dry air-abrasive and wet air-abrasive systems – see page 10 of the advice in <https://historicengland.org.uk/images-books/publications/conserving-war-memorials-cleaning/heag147-conserving-war-memorials/>. The guidance differentiates between hand-held systems (like hand-held sanders for removing paint), and more complex mechanical systems that use a compressor to force abrasive materials through a hose and nozzle. In my view the use of hand-held devices should be enabled, and the use of mechanical abrasion systems should be carefully managed to avoid damage.
- 165 A final comment on the use of abrasive or high-pressure cleaning methods is that it is good practice for building owners to ask for advice from HNZPT and the Council’s heritage advisors on the use of abrasive cleaning and high pressure water “blasting” methods.
- 166 The final issue raised by Mr Leary in paragraphs 38-44 is whether the carport structures at Wharenui form part of the heritage building, or are a non-heritage building or structure. In my view the carport should be identified as a non-heritage structure, this is consistent with the assessment in the HHE report on page 29.
- 167 To address this issue, (and the comments on historic and social values noted above) I suggest an updated entry for the building in SCHED1 as follows:

DP Ref #	Address	Name	Legal Description	Protection required	Values	Link	HNZPT #
509	274 Oriental Parade	Wharenui Apartments	LOT 1 DP 49887	Entire external building envelope. <u>Excludes carport structures.</u> <u>Building curtilage for application of the historic heritage rules is mapped.</u>	A, B, E, F		