

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT WELLINGTON**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHEKE
O TE WHANGANUI-A-TARA**

IN THE MATTER of the Resource Management Act 1991
AND

IN THE MATTER of the hearing of submissions on the Proposed
Wellington City District Plan

HEARING TOPIC: Hearing Stream 3 - Heritage

**STATEMENT OF PRIMARY EVIDENCE OF VERONICA CASSIN
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

(BUILT HERITAGE)

24 APRIL 2023

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1. EXECUTIVE SUMMARY

- 1.1 I consider that historic heritage values are strongly indicated within the proposed Mount Victoria North Townscape Precinct (**Townscape Precinct**). These values are related to historic patterns of development, construction technology, climate responses and socio-economic functions and should be considered with the significant Townscape values of one of Wellington's most iconic urban landscapes. I do not consider these values have been appropriately assessed in a historic heritage context.
- 1.2 It is particularly relevant that historic heritage areas are not simply assessed on the quality of the streetscape or experience of a place from only the public realm. A robust understanding of the generating circumstances and historical events of an area is fundamental to assessment of historic heritage values which, put simply, are a legible result of human interaction with the natural environment.
- 1.3 The Mount Victoria Heritage Study 2017 appears to have tried to draw out historic heritage from assessment tools better suited to a townscape or streetscape study. Historic heritage requires complex study, and I do not consider the assessment conducted to be a sufficiently detailed tool with which to assess historic heritage values.
- 1.4 My opinion is that historic heritage values cannot be adequately assessed when evaluating townscape character and other amenity values from an urban design perspective. It is not sufficient to include a flag for additional research. The preferred approach is to use tools specifically designed for assessing historic heritage.
- 1.5 The provisions of the proposed Mount Victoria North Townscape Precinct and the relevant viewshaft would be insufficient to protect any latent historic heritage and therefore should not be relied upon as an interim measure.

- 1.6 In my opinion a thorough and robust heritage assessment should be undertaken to locate the latent historic heritage values more clearly in this highly prominent area of Wellington City.

2. INTRODUCTION

- 2.1 My name is Veronica Cassin. I am employed by Archifact Architecture and Conservation Limited as a heritage consultant.
- 2.2 I have a Bachelor of Architecture from Unitec Institute of Technology in Auckland and a Master of Architecture, Cultural Identity and Globalisation from Westminster University in London. I have specialised in heritage policy and building conservation for 18 years. My experience includes architectural practice in New Zealand and the United Kingdom, local government heritage policy development in New Zealand and heritage consultancy in both countries.
- 2.3 In considering Wellington City Council's Proposed District Plan (**PDP**), I have been asked by Kainga Ora to consider whether there are historic heritage values present within the proposed Townscape Precinct incorporating St Gerard's Church and Monastery and its setting, and what the appropriate recognition and management of a heritage area would be.
- 2.4 I have reviewed the publicly available documents including:
- (a) Mount Victoria North Townscape Precinct Urban Design Review, Urban Perspectives, April 2022;
 - (b) Historic Heritage Issues and Options Report, WCC 2020;
 - (c) Methodology and guidance for evaluating Wellington's historic heritage, Final v1 February 2021;
 - (d) Mount Victoria Heritage Study 2016-2017;
 - (e) Thematic Study of Wellington, Boffa Miskell for WCC, 2013; and

- (f) Historic Area Evaluations for proposed Heritage Areas:
 - (i) Doctors Common Heritage Area 2021;
 - (ii) Armour Ave Heritage Area 2022;
 - (iii) Elizabeth Street Heritage Area 2021;
 - (iv) Moir Street Heritage Area 2022;
 - (v) Porritt Ave Heritage Area 2021;
 - (vi) Ascot Street Heritage Area 2021.

2.5 A number of documents that would be of interest in this matter are not available on the PDP portal, specifically:

- (a) The 'background report' referenced in the Heritage Issues and Options paper;¹
- (b) The 'Lower Hawker Street Historic Heritage Assessment', referenced in the acknowledgments of the Mount Victoria Heritage Study; and
- (c) Any specific historic heritage area assessment for the Mount Victoria North Townscape Precinct.

Code of Conduct

2.6 Although this is a Council hearing, I have read the Environment Court's Code of Conduct 2023 and agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise.

Scope of Evidence

2.7 My evidence will address the following matters:

- (a) The distinction between townscape quality as an amenity consideration and townscape as a historic heritage value;

¹ Historic Heritage Issues and Options Report, WCC 2020, pg 5

- (b) The potential for historic heritage within the proposed Townscape Precinct at Mount Victoria North;
- (c) The methodology by which proposed Mount Victoria Heritage Areas were assessed and distinguished from the Character Precinct and the Townscape Precinct; and
- (d) Recommendations for the recognition and protection of historic heritage as it pertains to St Gerard's Monastery and Church as the focal point of a distinct heritage area, including a potential boundary line for a new Heritage Area.

3. KĀINGA ORA SUBMISSIONS AND FURTHER SUBMISSIONS

- 3.1 The Kāinga Ora primary submission sought that the Council review the methods adopted to manage the identified townscape values and noted that the creation and identification of a viewshaft would be an option for managing those significant views to the monastery and maunga.
- 3.2 Since filing its initial submission to the PDP on this matter, Kāinga Ora has refined its approach to acknowledge that historic heritage values within the proposed Townscape Precinct may be present, and that further assessment is required to determine if there is historic heritage that the Council has a duty to protect. Additional viewshafts are not being considered in regard of historic heritage management.

4. TOWNSCAPE AMENITY OR HISTORIC HERITAGE TOWNSCAPE VALUES

- 4.1 The RMA defines historic heritage as: *'those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:*
 - (i) *Archaeological:*
 - (ii) *Architectural:*

- (iii) *Cultural:*
- (iv) *Historic:*
- (v) *Scientific:*
- (vi) *Technological; and*

(b) *Includes-*

- (i) *Historic sites, structures, places and areas; and*
- (ii) *Archaeological sites; and*
- (iii) *Sites of significance to Māori, including waahi tapu;*
- (iv) *Surrounding associated with the natural and physical resources.*

4.2 The PDP² describes Townscape as *‘the visual appearance of a neighbourhood when viewed from surrounding public spaces. It includes the collective image of, and relationship between, the following elements: setting and landscape – built form and landscape setting (landform and associated vegetation pattern); the lay-out of streets, lanes and footpaths (urban structure); subdivision patterns; buildings and structures; and gardens and open spaces.’*

4.3 The PDP offers a further description of how Townscape can be understood in Policy MRZ_PREC02: *‘Townscape focuses on long-range views from public spaces, which differs from streetscape values which are enjoyed in the immediate streetscape’.*

4.4 The identification of historic heritage is invariably specific and multi-faceted; therefore, it does not always respond well to visually based criteria such as townscape amenity. Historic heritage incorporates the connective tissue of an area and works at a range of levels to draw out a sense of place beyond appearance and amenity within public spaces, and, sometimes, it goes beyond spatial or physical elements to recognise values such as events, personnel, or associations.

² Full Wellington City Proposed District Plan, 6 March 2023, Part 1 Introduction and General Provisions, Definitions.

- 4.5 The methodology described in the Mount Victoria Heritage Study indicates that the assessment tools were developed, principally, to identify character rather than historic heritage values.
- 4.6 Recognition of the proposed Mount Victoria North Townscape Precinct as a Heritage Area would not preclude development but would be a more appropriate control to enhance and reveal latent historic heritage values.
- 4.7 It is important to note that historic heritage areas can include sites that make no contribution to historic heritage but that could be improved in the future. Similarly, sites of differing qualities can make equivalent contributions to the identity of a place and its heritage values.
- 4.8 It is particularly relevant that historic heritage areas are not simply assessed on the quality of the streetscape, townscape or the visual experience of a place from only the public realm - an exercise more aligned to assessments for visual amenity. A robust understanding of the generating circumstances and historical events of an area is fundamental to assessment of historic heritage values which, simply put, are a legible result of human interaction with the natural environment.
- 4.9 There is no suitable written account of the immediate Mount Victoria North area's history to underpin the council's current assessments³ nor is it evident from the publicly available documents that an appropriate historic heritage assessment tool has been applied to the proposed Townscape Precinct.

5. POTENTIAL FOR HISTORIC HERITAGE IN PROPOSED TOWNSCAPE PRECINCT

- 5.1 I have visited the area and undertaken a desktop review of the publicly available reports.
- 5.2 I consider that historic heritage values are strongly indicated within the proposed Townscape Precinct. These values are related to historic

³ Mount Victoria Heritage Study Report, June 2017, page 14.

patterns of development, construction technology, climate responses and socio-economic functions as well as townscape values in relation to historic heritage.

- 5.3 The PDP adopts the Operative District Plan Townscape Area with some minor changes which are discussed and reviewed in the 'Mt Victoria North Townscape Precinct Draft District Plan Provisions / Urban Design Review' prepared for Wellington District Council by Urban Perspectives in April 2022.
- 5.4 However, it is not apparent from my review of reports that the Mount Victoria Townscape Precinct has been appropriately assessed, within publicly available documents, for historic heritage values.
- 5.5 I consider that the proposed Townscape Precinct shows evidence of historic socio-economic patterns in dwelling types, innovation in wind and earthquake design, and technology related to the early cutting of terraces into the maunga as well as historic heritage values specifically related to townscape.
- 5.6 The specific areas of interest are:
- (a) St Gerard's Church and Monastery;
 - (b) Oriental Terrace;
 - (c) Roxburgh Street, partial;
 - (d) McFarlane Street, lower-side, and Prince Street; and
 - (e) McFarlane Street, upper-side.
- 5.7 These potential historic heritage area values are afforded a high degree of public recognition and prominence because of their location and presentation to the wider city. The opportunity to recognise and protect these values should not be lost.
- 5.8 The indications of historic heritage within the proposed Townscape Precinct are sufficient that I consider a thorough historic heritage

assessment should be undertaken by the Council to determine those values clearly.

6. METHODOLOGY, TOWNSCAPE PRECINCT URBAN DESIGN REVIEW 2022, AND THE MOUNT VICTORIA HERITAGE STUDY, WCC, 2016-2017

- 6.1 The Urban Design Review of the proposed Townscape Precinct states that it does not seek to protect historic or heritage values.⁴ It goes on to identify the largely visual qualities of place which are already protected under the Operative District Plan. It also recognises that the buildings outside the Character Precinct but within the proposed Townscape Precinct (particularly McFarlane Street upper side and Oriental Terrace) make a strong contribution to the Townscape Precinct and that they lack demolition controls which make these sites vulnerable to redevelopment.
- 6.2 The Townscape Precinct Urban Design Review suggests that the potential for a tall building to affect views towards St Gerard's could be controlled through a height restriction.⁵ However, it is my opinion that this would be insufficient to protect potential historic heritage values in the specified locations.
- 6.3 An earlier report, Mount Victoria Heritage Study Report June 2017, commissioned by WCC, states its first objective as being to gain an understanding of historic heritage across Mount Victoria. However, no conclusion about the historic heritage values of the Mount Victoria North Precinct is presented which is surprising given its prominence.
- 6.4 A closer review of the Mount Victoria Heritage Study Report and the methodology within reveals that, while there was a lot of work undertaken, the tools used might not have been suitably sequenced to identify historic heritage values.

⁴ Mt Victoria North Townscape Precinct Draft District Plan Provisions / Urban Design Review, Urban Perspectives, April 2022, page 2.

⁵ Ibid. page 5.

- 6.5 The methodology and digital assessment tools for the Mount Victoria Heritage Study were adapted from Auckland Council's 'special character' survey tools. The survey approach focusses on the contribution that individual sites make to 'streetscape' amenity, as evidenced by the "Streetscape Bonus" point awarded to certain sites⁶.
- 6.6 A binary field was provided for potential historic heritage to be flagged on a site-by-site basis. This resulted in the identification of a further 42 sites that had additional research undertaken, resulting in 39 sites that are described as having strong heritage values⁷ and that could meet the threshold for recognition as historic heritage. However there does not appear to be any facility in this process to identify historic heritage areas, nor is it made clear from publicly available reports where these buildings are located.
- 6.7 Assessment methodologies for local authorities are most efficient when they can be quantifiable and replicable. The evaluation guidance⁸ states that its purpose is to ensure '*consistency in the way places are evaluated and that evaluations contain a sufficient level of detail so that subjectivity is minimised, and evaluations are consistent, defensible and transparent.*'
- 6.8 The Mount Victoria Heritage Study Report from June 2017 appears to have tried to draw out historic heritage from a visual amenity study, and the Urban Design Review from April 2022 does not assess historic heritage values or townscape quality as it relates to historic heritage value.
- 6.9 The final Mount Victoria Heritage Study (June 2017) itemises its limitations following the data collection phase and attributes them to funding constraints. It categorically states that no specialist architectural advice was able to be utilised.⁹ Therefore, the accuracy of the data and the tools with which it has been collected should be carefully considered.

⁶ Mount Victoria Heritage Study Report June 2017, Appendices 2 and 3, pages 25 and 28.

⁷ Ibid, page 13.

⁸ Methodology and guidance for evaluating Wellington's historic heritage, Final v1 February 2021.

⁹ Mount Victoria Heritage Study Report, June 2017, page 11, bullet point 3.

- 6.10 The study to identify historic heritage in the Mount Victoria Heritage Study Report 2016-2017 does not appear to have progressed past Stage 2 of four proposed stages. This potentially demonstrates two things:
- (a) The methodology was flawed and could not have been expected to reliably identify historic heritage areas; and
 - (b) There is no publicly available heritage area assessment for Mt Victoria North because the assessment phases could not be completed.
- 6.11 My review of the Mount Victoria North Townscape Precinct Urban Design Review, the Mount Victoria Heritage Study, and the Doctors Common Heritage Assessment indicates that historic heritage could have been lost from the preliminary data set simply because some sites within the study area are not visible from the street or the wider townscape or, they have had a high degree of modification.
- 6.12 I agree that the proposed Doctors Common Heritage Area is deserving of historic heritage area status and that it has distinctive values located within a discrete area. However, I consider that very similar values are evident within the broader proposed Mt Victoria North Townscape Precinct and that those values may not have been appropriately assessed due to the limitations of the methodology used.
- 6.13 The swathe of modifications on the upper side of McFarlane Street are located in Wind Zone 4 and have a high degree of exposure than other parts of the area. This has likely necessitated changes as a response to climatic conditions and is a distinctive consequence of Wellington's geographic position and, therefore, warrants further, specific, investigation.
- 6.14 'The Response to Wind' is identified as a sub-theme in the Wellington Thematic Heritage Study, commissioned by the WCC Heritage team in 2013, and discusses, among other things, tree-planting in response

to wind. Tree planting and landscaping has not been conclusively assessed or addressed in the heritage evaluations.

- 6.15 The 'Integrity' assessment criterion in the heritage audit could eliminate the upper side sites on McFarlane Street prematurely and consequently affect the cohesion and understanding of a potential historic heritage area.
- 6.16 WCC's historic heritage evaluation guidance advises that how a place '*was constructed, used and altered can all be part of its physical values.*'
- 6.17 The Mount Victoria Heritage Study Report methodology describes how assessments were made from the street¹⁰, which cannot adequately assess or recognise the contribution of individual sites or an area to the more prominent views from outside of the precinct. Nor can it adequately identify historic heritage values.
- 6.18 Similarly, the resultant mapping exercises demonstrate that the digital assessment tools prioritising building style, age and integrity neglect to discuss design quality, response to context, or innovation. Each of these qualities could be considered historic heritage values related to physical, social, townscape and technology values, and socio-economic themes.
- 6.19 The assessment criteria, as described in the Mount Victoria Heritage Study, do not have facility to identify cultural activity related to planting and landscaping or sites of significance to Māori; either of which could provide elements of historic heritage value worthy of recognition as a matter of national importance.
- 6.20 I consider that the proposed Mount Victoria North Townscape Precinct has potential for historic heritage values to be present in addition to what is recognised by the proposed Doctors Common Heritage Area. It is possible to have a large, multi-faceted but cohesive Heritage Area with sub-areas that demonstrate disparate discrete values.

¹⁰ Mount Victoria Heritage Study Report June 2017, page 9.

7. RECOMMENDATIONS FOR RECOGNISING AND MANAGING A NEW HISTORIC HERITAGE AREA FOR ST GERARD'S CHURCH AND MONASTERY

- 7.1 The Mount Victoria North Townscape Precinct, as proposed, does not seek to protect historic heritage values.
- 7.2 While there may be some common elements within the historic heritage values and the Townscape Precinct qualities, the status of the existing viewshaft and the Townscape Precinct provisions within the district plan could be amended without due consideration of historic heritage values.
- 7.3 I consider that historic heritage values are strongly indicated within the proposed Townscape Precinct. These values are related to historic patterns of development, construction technology, climate responses and socio-economic functions as well as townscape values in relation to historic heritage.
- 7.4 The provisions of the proposed Townscape Precinct and the relevant viewshaft would be insufficient to protect any latent historic heritage, such as described above, and therefore should not be relied upon as an interim measure.
- 7.5 I consider that a thorough and robust heritage assessment should be undertaken to more clearly locate the latent historic heritage values in this highly prominent area of Wellington City.

Veronica Cassin

24 April 2023

APPENDIX 1 – CURRENTLY PROPOSED WCC PDP VIEWSHAFT & TOWNSCAPE PRECINCT



