

Before Wellington City Council

Under the Resource Management Act 1991

In the matter of Plan Change 81:
Rezoning 320 The Terrace and
de-listing the Gordon Wilson Flats

**STATEMENT OF EVIDENCE OF ADAM WILD
(HISTORIC HERITAGE)**

1 DECEMBER 2015

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INTRODUCTION

1. My full name is Adam Wild.

Qualifications and Experience

2. I am a director of **Archifact – architecture & conservation ltd**, an Auckland-based architectural practice accredited in accordance with the rules of the New Zealand Institute of Architects (**NZIA**) and the Registered Architects Board with particular skills in architecture, building conservation, and the management of buildings, objects, places and areas of historic heritage value.
3. I hold a Master of Arts degree in Conservation Studies (Historic Buildings) from the Institute of Advanced Architectural Studies at the University of York and a Bachelor of Architecture from the University of Auckland. I am a registered architect and Fellow of the NZIA.
4. I was the founding Chairman of the NZIA Heritage Task Group and in 2005 drafted the Institute's first Heritage Policy. I am a member of the NZIA Resilience Working Group and made written and oral submissions to the Parliamentary Select Committee for the Building (Earthquake-prone buildings) Amendment Bill. I am the NZIA's Auckland Branch Committee spokesperson for Heritage.
5. I am a full member of the International Council on Monuments and Sites (ICOMOS) New Zealand, a member of ICOMOS Pasifika, and an expert member of the International Polar Heritage Committee (a scientific committee of ICOMOS). I am a full member of do.co.mo.mo (the International Committee for documentation and conservation of buildings, sites and neighbourhoods of the modern movement). I am a full member of the New Zealand Conservators of Cultural Materials association, a member of, and peer reviewer for, the International Association for Preservation Technology International, and a member of the International Cities, Town Centres and Communities Society.
6. I am currently, or have been, conservation architect for a number of nationally and internationally significant building conservation projects. Included amongst these projects is the Treaty House at

Waitangi (1834); Hulme Court, Auckland (1843), the Old Government House Precinct, Auckland (1840 and 1856); the Heroic Era huts of Scott and Shackleton in the Antarctic; the former Court House in Apia, Samoa; and, the Civic Administration Building (1966) in Auckland.

7. In the professional roles I have had and perform today as outlined above, I have acquired a sound working knowledge in the specialist discipline of building conservation, issues relating to the recognition and assessment of cultural heritage values, and methodologies for conserving these in accordance with national legislation and national and international conservation Charters.

Code of Conduct

8. I confirm that I have read and am familiar with the Environment Court Practice Note of December 2014 with respect to the Code of Conduct for Expert Witnesses. Accordingly I confirm that this evidence is within my area of expertise and that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed herein.

Scope of Evidence

9. I was originally invited by Victoria University of Wellington (**VUW**) to undertake a heritage assessment of the Gordon F. Wilson Flats as found in November 2104.
10. In accordance with that invitation I undertook myself, or directed members of my staff to undertake, a number site visits including investigation of the site, the building upon it, and an extensive investigation of the interiors of the building as found. This process included undertaking a comprehensive photographic survey.
11. My site investigation and recording was supplemented by a review of a range of archival sources describing the architectural, structural and constructional details of the building; its architects, engineers and builders; and other information that assisted me undertake a heritage assessment of the Gordon F. Wilson Flats as found.
12. In May 2015 I completed a heritage assessment of the Gordon F. Wilson Flats based on my investigations and measured against a

range of generally accepted assessment criteria. This report: *Gordon Wilson Flats, 314 The Terrace¹, Wellington, Heritage Assessment, May 2015* acknowledged historic heritage values evident in the Gordon F. Wilson Flats, but concluded that these values were overall of moderate significance. I discuss the conclusion of my report in greater detail below.

13. I have read the Council officers' report dated 24 November 2015, which recommends a decision confirming the proposed Plan Change, and I support that recommendation. I have been asked by VUW to provide this statement of evidence covering:
 - (a) A summary of my report: *Gordon Wilson Flats, 314 The Terrace, Wellington, Heritage Assessment, May 2015*;
 - (b) Responses to issues raised by submitters relevant to my area of expertise;
 - (c) Responses to the Officers' Report.

EXECUTIVE SUMMARY OF GORDON WILSON FLATS, 314 THE TERRACE, WELLINGTON, HERITAGE ASSESSMENT, MAY 2015

14. This report is an objective and independent assessment of heritage values of the Gordon Wilson Flats development and has proved to be a finely balanced exercise in determining the level of significance for the place. The Gordon Wilson Flats are considered overall to be of **moderate** significance.
15. The place has architectural value for its Modernist influences as a building type that is relatively rare in the Wellington region and in the wider national context. It has **considerable** historical value for a design that is a surviving example of the work of Gordon Wilson and his team within the Ministry of Works Architectural Section, recognised as one of the most important design offices of cost effective, high

¹ Our early drafts had identified the address as being 320 The Terrace. This was based on the Wellington City Council GIS map (<http://mapping.gw.govt.nz/gwrc/>), the Wellington City Council rates valuation reference, the Wellington City Council Chapter 21 Appendix containing the Heritage List: Buildings (page 23), but we were later advised that 314 The Terrace was more accurate. We note that proposed District Plan Change 81 refers to the site as 320 The Terrace.

density social housing during the mid-twentieth century. The Gordon Wilson Flats hold **considerable** historic and social significance in signifying the forward thinking aspirations of the State during the 1950s, and the building continued to function as a key centre of local social housing through to its closure in 2012. **Moderate** significance is recognised for its aesthetic, architectural and townscape values, with **no** functional significance and only **minor** significance attributable to scientific and technological values (archaeological significance was not assessed as part of this assessment).

16. The development was originally envisaged to provide economic State rental accommodation, however, the architects were challenged to provide a building at basic cost, on what was determined a difficult site. Building design was undertaken by the head office of the Ministry of Works under the leadership of Gordon F Wilson, and was of a similar design to the earlier development of the Grey's Avenue Flats, Auckland. The foundation stone for the Gordon Wilson building was laid on the 6 August 1957 with completion in 1959. Few alterations have been carried out to the building ensuring the scale, mass and layout of the original Modernist building form and integrity has not been compromised over the design conceived in the post-war years. However, engineering assessments undertaken in 2011 identified an urgent need for remedial works to the façade to such a degree that a decision was made to evacuate the residents in May 2012.
17. The building is formed as an 11-storeyed residential block with an externally expressed superstructure of wall and floor slabs creating a rhythm of cellular units. The Ground Floor is generally laid out with 12 single bed-sitting room flats and ancillary spaces and on the floors above are a total of 75 maisonette-style flats; 70 of which are composed around a floor area of 64m² with two double bedrooms, whilst the remainder have one double bedroom and a single room. The foundation system devised for the project had not previously been used on any structures in New Zealand at that time and consequently the building was the subject of a structural monitoring programme by the Department of Scientific and Industrial Research to measure earthquake movement. From the recent exploratory excavation by Beca it has been determined that the piles are **not** a driven octagonal pile as per the plans. The system therefore may be

either the dry-grout methodology that was mentioned in the architectural journal, or a more conventional poured pile.

18. Following the success of earlier high density developments including the Dixon Street Flats (Wellington) and Auckland's Symonds Street and Lower Greys Avenue flats (first stage), post war accommodation pressures challenged designers to develop cost effective social housing. Based on a potential template design model during the period when Modernist influences were integral to social housing design and development, the first of type was envisaged with the construction of the Upper Greys Avenue Flats (second stage) in Auckland and the subject place followed quickly thereafter. However, ongoing political and public pressures ensured that the second building to be constructed, in the form of the Gordon Wilson Flats, was also the last; so forming a premature end to the brief foray by government in the provision of high density social housing in the post-war years.

MATTERS RAISED IN SUBMISSIONS

19. Of the submissions received by the Wellington City Council a number address matters within my area of expertise. I note that submissions concerned with the heritage values of the Gordon F. Wilson Flats include those who are either for or against the matter of removal from the Wellington City Council heritage List and its demolition.
20. In the main I address those submissions concerned with respect to the perceived negative effects of the proposed delisting of the Gordon F. Wilson Flats from the schedule of Wellington City Council heritage List and its demolition where submissions provide a level of commentary that I can respond to. These submissions include the following and those which do not provide evidence of a sufficient level of detail to which I can respond are tagged with an asterisk (*):
 - (a) Submission 3 by the Architecture Centre Inc.;
 - (b) Submission 4 by Avril Jill Miles (*);
 - (c) Submission 5 by Cara Franceso (*);
 - (d) Submission 6 by Craig Relph;

- (e) Submission 8 by Dan Stenton (*);
- (f) Submission 19 by Julia Gately;
- (g) Submission 21 by Kenneth John Davis;
- (h) Submission 26 by Dr Ben Schrader, Michael Kelly, and Chris Cochran;
- (i) Submission 28 by Patricia Gruschow (*);
- (j) Submission 30 by Roland Sapsford;
- (k) Submission 31 by Sarah Wilcox (*); and,
- (l) Submission 32 William Stuart Aitken (*).

21. I note that not all submissions are opposed to the delisting of the Gordon F. Wilson Flats and its demolition and I have therefore also considered the following:

- (a) Submission 12 by Heritage New Zealand; and,
- (b) Submission 16 by John Gary Blincoe and Wendy Ann Walker.

SUBMISSIONS AGAINST DELISTING AND DEMOLITION

Submission 3 by the Architecture Centre Inc

22. The submission of the Architecture Centre Inc. and in particular section 2 of that submissions includes consideration of a range of perceived issues each of which I address here separately by reference to each paragraph.

Paragraph a

23. As a conservation architect, member of do-co-mo-mo New Zealand, and of a range of other national and international architectural conservation organisations I take the recognition and advocacy of New Zealand's modernist architectural legacy with particular interest and passion and I have advocated for better recognition of these buildings and that movement through my role within the NZIA and in evidence submitted to the Independent Hearings Panel hearing submissions on Auckland Proposed Unitary Plan.

24. I believe the core issue raised in this paragraph is the consideration of the significance of the Gordon F. Wilson Flats in the history of the development of modern architecture in New Zealand, and social housing in particular.
25. In my *Heritage Assessment*² I made some effort to explore this context and my research showed that, while within the body of buildings surviving from the modernist period of the typology, the Gordon F. Wilson Flats was a late contributor to that movement and suffered greatly from a shift in Government policy (and with that budget) that shifted much of the original design emphasis. As such this, and other attributes, have led me to consider this building in a lower regard to that of the precedent-setting Dixon Street Flats, the lower-Greys Avenue or Symonds Street Flats in Auckland, or even the Gordon F. Wilson Flats' sister block in mid-Greys Avenue in Auckland. Importantly, with the exception of the Symonds Street flats (for which a proposal for its redevelopment is currently being considered), all these buildings remain in active use.
26. It is of some interest that reference to the Gordon F. Wilson Flats is missing in the most recognised books on the history of New Zealand architecture, with the exception of a one line reference in Julia Gately's book *Vertical Living*³ at page 49 where it is paired to the upper-Greys Avenue Flats in Auckland, putting into question just how significant the historic context and perspective of the Gordon F. Wilson Flats is.

Paragraph b

27. I agree with the Architecture Centre that the inclusion of the Gordon F. Wilson Flats in the Wellington City Council District Plan's heritage list was, at the time, for very good reasons, but I believe that a number of factors have affected the recognisable values of the place as found today and these have been carefully described in my *Heritage Assessment*. My assessment has, in accordance with best practice, assessed the place as found, and it is of note that a range of factors

² Archifact – architecture and conservation ltd. *Gordon Wilson Flats Heritage Assessment, section 4*, May 2015. Notably Section 4.3 of that assessment deals specifically with the history of multi-unit State Housing in New Zealand

³ Gately, J. and Walker P. *Vertical Living*, Auckland University Press, 2014

including (but not limited to) seismic resilience undiscovered at the time of the Council updated assessment of the place in 2012 has seen the evacuation of the building occupants.

Paragraph c

28. The Architecture Centre here suggests that removal of the Gordon F. Wilson Flats from the Council list is in some way a reward for a programme of demolition of neglect. It is disingenuous to suggest that either Housing New Zealand or VUW, through its own pre-purchase due diligence process and subsequent ownership, were guilty of such a predetermination. The ultimate evacuation of the Gordon F. Wilson Flats' Housing New Zealand tenants came in response to what had not been evident before that moment, and in a post-Christchurch earthquakes' New Zealand all heritage is under a new risk, with which public opinion and government policy are now concerned. Public safety is the primary concern above the public good that historic heritage represents. The issues affecting the Gordon F. Wilson Flats today are directly linked to inherent design and material defects.

Paragraph d

29. I do not believe economic arguments are determinants of historic heritage value. The recent Harcourts case in the Environment and High Courts and the Euphrasie House appeal in Hamilton before the Environment Court demonstrate variations to the relevance of economic considerations of retention, repair and reuse.

Paragraph e

30. I consider the matter raised here concerned with the non-compliance of the proposed activity due to the expiration of the previous existing use right is a planning matter and not within my expertise.

Paragraph f

31. I consider the matter raised here concerned with the University's strategic plan is a planning matter and not within my expertise.

Paragraph g

32. I do not agree with the submitter's contention that recladding the Gordon F. Wilson Flats with a curtain wall would not materially affect the heritage significance of the building. I am aware of options being explored by Beca on behalf of VUW which considers two primary options for recladding the building. We have discussed effects arising on heritage values from either of these options and my concerns recognise that a fundamental architectural element contributing to the building's heritage values is represented by the relief in the elevational rhythms established by the expressed horizontal and vertical structural elements typical of the most essential modernist idiom in combination with the relief afforded those elevations by the balconies to the east and west elevations. A curtain wall would effectively reduce the elevations to a two-dimensional and enclosed flat skin. My concerns with such an intervention is that this is the language of a very different type of building.

Paragraph h

33. In this paragraph the Architecture Centre submit that the Gordon F. Wilson Flats is a "rare typology". This is a matter I have addressed at paragraph 24 (above). I do not believe it is rare, but it is part of the relatively small body of extant work within this typology found today.

Paragraph i

34. Similarly, in this paragraph, the submitter argues that the internal planning is rare, but I am mindful that the precedent-setting mid-Greys Avenue Flats of the same design and internal planning completed before the Gordon F Wilson Flats as well as the lower-Greys Avenue Flats (whose interior planning has been specifically identified in the Auckland Council listing of the building in the Operative District Plan) means that this planning is no more than a "good representative example" as is recorded in the Wellington City Council 2012 assessment. I believe the value suggested by the submitter has been inflated and without independent assessment I maintain my own recent assessment of the place as found.

Paragraph j

35. The submitter recognises the social values of the place and these align with the assessment I have undertaken, however as I have noted in paragraph 24(above) these social values are not unique to the subject building and most relevantly the evacuation of the building leaves its social housing purpose redundant while other existing examples in Wellington and elsewhere in New Zealand retain their designed social housing purpose. My Section 4.3 in my *Heritage Assessment* provides commentary on this context.

Paragraph k

36. I agree with the submitter that the building, designed in the office managed by Gordon F. Wilson and to which his name was ascribed following his death before the completion of the building, replacing the McLean State Flats to which this building was designed as Stage 2 is of some note, but that in itself does not lend the place greater historic heritage value. Neither do I see delisting of the building through Plan Change 81 as lessening the regard or legacy of Gordon F. Wilson and his body of work through the best of his surviving projects.

Paragraph l

37. I do not agree with the submitter that the Gordon F. Wilson Flats have an important spatial relationship with the McLean Flats. My assessment recognises that while the two buildings were originally designed to have a particular relationship as stages of the same complex, the earlier and original iterations of the Gordon F. Wilson Flats designed by Plischke in 1942 were amended. Part of the change in scheme from what was originally designed to what was ultimately constructed saw a shift in the relationship between the two buildings. As built the Gordon F. Wilson Flats suffered a realignment away from the McClean Flats and onto a more independent north-south longitudinal axis.

Paragraph m

38. The submitter suggests that the functional and social values of Gordon F. Wilson Flats have higher heritage values than the retention of the physical fabric of the façade. I do not agree with this point. Such an argument appears to align with the proposed plan change as a new building may equally provide social or student housing and the continuation of those values as much as retention of the existing might. The submitter appears to concede that the retention of the physical fabric of the façade is less important.

Paragraph n

39. In my assessment cultural values are examined through a lens of architectural, aesthetic, historical, social and townscape values; collectively an understanding of these values informs a sense of cultural meaning. Rather than lessening by "averaging" or "diluting" the heritage assessment as the submitter suggests this collective view aligns directly with heritage criteria which recognises that cultural heritage values are determined by a consideration of aesthetic, historic, scientific, and social values. It is of note that at paragraph 103 of the Section 42A Report the methodology that I used and that conclusions that I reached are accepted. At 5.1 of Ms Rickard's appraisal she considers the assessment criteria I have used to be "*similar to the criteria used by WCC to assess the heritage values of places on the Heritage buildings Schedule*".

Paragraph o

40. In my heritage assessment I have considered the rarity values of the Gordon F. Wilson Flats as found under both townscape and historical values and weighting of the historic heritage significance has been informed by that understanding.

Paragraph p

41. In accordance with conservation best practice a building or place is assessed as found. Such a process avoids predeterminations as to value and recognises that values are dynamic and can go up and down over time. I have been obliged to recognise that the functional

values of the building are nil because the building is unoccupied, and that is informed by my understanding of the consequence of design and material defects evident after nearly 60 years which have seen the building's use closed.

Paragraph q

42. My heritage assessment includes specific consideration of the history and role of multi-unit state housing accommodation in New Zealand at Section 4.3. In providing that context it has then been possible to consider the Gordon F. Wilson Flats.

Paragraph r

43. I acknowledge the submitter's agreement with my assessment of the historical significance of the Gordon F. Wilson Flats.

Paragraph s

44. Heritage assessment best practice considers a place as found. While we recognised through our research that the Gordon F. Wilson Flats had employed innovative technological systems for its time (particularly in the foundation system) and that there is a suggestion that the performance of that system had been monitored and measured, we were unable to find any evidence of that record having survived or indeed that the designed foundation piling system had in fact been implemented. From the recent exploratory excavation by Beca it has been determined that the piles are **not** a driven octagonal pile as per the plans. Specialist engineering advice we sought during our assessment could not attest to the significance of that technology and its value today as a system was doubted. Due to the system's below ground nature it does not readily demonstrate particular characteristics of building technology that can be recognised, understood, or interpreted.

Paragraph t and u

45. I do not believe there is anything to respond to here.

Submission 6 by Craig Relph

46. Mr Relph recognises the “*beauty*” and “*cultural heritage and architectural significance*” of the Gordon F Wilson Flats and believes that its removal off the District Plan’s heritage list should not be consented. I agree with Mr Relph’s assessment of the values he has recognised, but not to the extent that retention on the heritage list is warranted any longer. I believe my heritage assessment has used appropriate criteria to assess the building as found and its historic heritage values.

Submission 19 by Julia Gately

47. I agree with the sentiment of Dr Gately, but believe that the concern is not based on the actual values evident in the building as found today in balance. I believe my May 2105 *Heritage Assessment* has considered the building as found and objectively assessed its heritage values. While much of the first paragraph of the submission is primarily concerned with planning matters, I believe that reference to obligations in the RMA misses the point that primary protection afforded historic heritage in the RMA is linked to the “appropriateness” of any action.
48. I do not believe that the delisting of the Gordon F Wilson Flats risks setting a precedent (paragraph 2) as each application will be assessed on a case-by-case basis and the merits of the case.
49. I disagree with Dr Gately’s paragraph 3 that not having used the Wellington City Council criteria and methodology for assessing heritage significance in any way lessens my ability to assess those values as I have done in my May 2015 *Heritage Assessment*. The criteria I have used include all the relevant criteria commonly used for assessing historic heritage value and the variations in nomenclature is nothing more than semantics. My conclusions are in line with best practice and are used in the Proposed Auckland Unitary Plan and provide a helpful and relevant comparative assessment to those found in the Wellington District Plan.
50. I believe my response to the Architecture Centre’s submission which is similar in intent to that at paragraph 4 of Dr Gately’s submission

addresses her concerns. I also believe that section 4 of my *Heritage Assessment* provides important context within which the Gordon F Wilson as found today should be seen.

Submission 21 by Kenneth John Davis

51. I agree with Mr Davis that the Gordon F. Wilson Flats have historic heritage value and I agree with Mr Davis' sense of regard for our mid-twentieth century modernist architecture. In having looked carefully at the Gordon F. Wilson Flats and assessed it against criteria commonly used in the assessment of historic heritage value, while I can recognise historic heritage value in the building and its associative connections I cannot reach a conclusion aligned as fixedly as his. The building included a number of technical innovations which in themselves may have lent the building greater value, but it is these design and material decisions which have led to the evacuation of the building's occupants and the abandonment of the building's functional purpose. That the building was named after Gordon F. Wilson was in homage to his death and not in itself because this was Wilson's best building; in my opinion it wasn't.
52. While the perspective of history is critical in making informed decisions about the future of places of historic heritage significance, it should be used equally to guide appropriate futures (subdivision, use and development in RMA language).
53. I was very interested to see Mr Davis' suggested concept plans for amalgamating the existing 2 bed maisonette flats into larger 5 bed flats. I cannot comment further on the scheme however as I am not sure of the structural implications or of the viability of such a configuration for student accommodation and I will leave this to others to discuss.

Submission 26 by Dr Ben Schrader, Michael Kelly, and Chris Cochran

54. I believe the associative values of Plischke with the Gordon F. Wilson Flats is somewhat inflated. As my heritage assessment noted Plischke is attributed to the original design scheme for the McLean Flats complex of which the first stage was realised. By the time the second phase was built the design scheme had, in my opinion, moved significantly

away from the original concept and the Gordon F. Wilson Flats were significantly realigned to read as a more independent and standalone building.

55. Another important shift in the scheme constructed was a design shift away from the Plischke model, and comparative links to the Dixon Street Flats, to a scheme that treated the principal east and west elevations in a significantly more compositionally expressed structural grid. Of note in that compositional shift the stair cores do not breakup the elevations as Plischke had intended. Plischke, of course, had left Wilson's Department of Housing Construction by 1943 and the Gordon F. Wilson Flats were not constructed until 1957-59.
56. The submitters suggest the Gordon F. Wilson Flats "*introduced maisonette-style flats to New Zealand*", but the upper Greys Avenue Flats were constructed and opened two years earlier in 1957 so the Auckland building can in fact claim the precedent.
57. The submitters recognise technological value in the Gordon F. Wilson Flats through the system of piling and that that system included equipment to measure seismic movements. In the course of our research we could find no record of the results of the structural monitoring programme undertaken by the DSIR so the value of the monitoring system is nil unless the data can be traced.

Submission 30 by Roland Sapsford

58. This submitter considers delisting implies "*lack of heritage merit*", but does not expand as to how this is so. I am mindful that a place doesn't need to be on a list to be of heritage value so delisting doesn't change its significance, rather it changes the control Council have over it. I do not think anyone who has an informed opinion of the Gordon F. Wilson Flats would deny it has a degree of historic heritage value, but as found today many of the qualitative values for which it was recognised in the District Plan in 1995 have lessened.

SUBMISSIONS FOR OR NEUTRAL OF THE PROPOSED DELISTING AND DEMOLITION

Submission 12 by Heritage New Zealand

59. As the lead national heritage agency Heritage New Zealand's omission to recognise the Gordon F. Wilson Flats on the New Zealand Heritage List they administer also reflects a perception that the significance of the building is of regional or local value.

Submission 16 by John Gary Blincoe and Wendy Ann Walker

60. I note that these submitters consider the demolition (and I assume delisting) of the Gordon F. Wilson Flats is "*not a particular issue*".

OFFICERS' REPORT

61. In considering the Council's Section 42A Report I note first the recommendation that proposed Plan Change 81 be "Approved".
62. I acknowledge the breadth of reporting disciplines relied on by the reporting planning and consider the perspectives these disciplines bring to the consideration of the Plan Change and of the Gordon Wilson Flats in particular is appropriate, well researched and defensible when considering the heritage values of the Gordon Wilson Flats and the question Ms Rickard (Council's principal heritage advisor) concludes with in her technical report where she asks:
- "The question now is whether the heritage values of the building and the non-heritage considerations have been sufficiently well researched in order for a defensible outcome to be reached"*⁴
63. I agree with the Section 42A Report's consideration of the impact of demolition and heritage significance of the Gordon Wilson Flats as described between paragraphs 100 and 114.
64. At paragraph 101 a key heritage issue is addressed being the heritage assessment of the building against which effects can be accurately measured. I note and agree with the Report's observations that both the Council's 2012 determination of heritage values and my own

⁴ Rickard, V. *Heritage Appraisal*, p8

findings are aligned and at paragraph 105 the Report accepts the conclusion that the building is of "moderate" significance.

65. It is of note that at paragraph 103 of the Section 42A Report the methodology that I used and the conclusions that I reached are accepted. At 5.1 of Ms Rickard's appraisal she describes my comparative analysis of the characteristics of the Gordon Wilson Flats as a "*detailed assessment*" and she considers the assessment criteria I have used to be "*similar to the criteria used by WCC to assess the heritage values of places on the Heritage buildings Schedule*". At her section 5.2 Ms Rickard notes that the conclusions of the WCC 2012 research report and the evaluation conclusions contained my in analysis are "*comparable*", "*both reach similar conclusions*", and (at Section 7 of Ms Rickard's appraisal) are "*closely aligned*".
66. I agree with the list of reasons accepting the appropriateness of the plan change application on heritage grounds provided at paragraph 114 of the Section 42A Report.

ADAM WILD
1 December 2015