

Before Wellington City Council
Under the Resource Management Act 1991

In the matter of Plan Change 81 to:

- Rezone 320 The Terrace, and
- Remove the Gordon Wilson Flats from the schedule

STATEMENT OF EVIDENCE of JEREMY SALMOND, ARCHITECT

Qualifications and Experience

1. My name is Laurence Jeremy Elder Salmond. I am a registered architect and I am a director of Salmond Reed Architects Limited. I have been in professional practice as an architect since 1972. I hold the degree of Master of Architecture (Auckland) and I am a Fellow of the New Zealand Institute of Architects.
2. I am a member of the Association for Preservation Technology International, and a past Chairman of the New Zealand Committee of the International Council on Monuments and Sites (ICOMOS); I contributed to the development of the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value. I am a member of the Auckland City Urban Design Panel and I was a founding Trustee of the North Shore Heritage Trust. I have received the Queen's Service Order for Public Service for my work in heritage conservation and advocacy.
3. I have 43 years' experience as an architect, and working experience in the United Kingdom and New Zealand, particularly in the field of conservation architecture research and practice. I have undertaken specialist training in conservation method and practice in Australia, the UK the US and Canada. I am experienced in building restoration and the preparation of conservation plans and heritage studies. I have experience in the analysis, design and documentation of conservation works for a wide range of heritage buildings, as well as the design and construction of contemporary new structures.
4. I am the author of the book *Old New Zealand Houses 1800-1940* (and I observe that the subject house at 48 Seaview Road was constructed in this era). I have contributed essays to a number of other published works, including *Common Ground; Villa: from Heritage to Contemporary; Te Kerikeri 1770-1850: The Meeting Pool; and The French Place in the Bay of Islands*. I have delivered papers and lectures at conferences and seminars related to conservation practice.

5. I have assisted several local authorities with the identification of areas of special character and with the preparation of guidelines for the maintenance of existing character. I have advised a number of territorial Local Authorities on issues related to the preservation of historic areas and I have developed guidelines published by these Councils for this purpose. I assisted Auckland City Council in the resolution of issues raised by Plan Change 163 (PC 163) appeals from the decision of the Auckland Council on submissions to that plan change.
6. I have prepared, or contributed to studies on heritage and character values which can be identified in urban and other settings, where these studies are intended to assist with the formation of planning policy and rules. These have included studies of historic landscapes associated with significant cultural heritage buildings, conservation plans for historic landscapes and built precincts, and contributions towards the development of master plans and area plans for defined landscapes.
7. My Company specialises in the conservation of heritage buildings, sites and areas, and a major part of the work of the practice is concerned with the maintenance, restoration and adaptation of old buildings. We have prepared in excess of 160 conservation plans for important heritage buildings throughout New Zealand.
8. The Company has worked (alone, or in association with other design professionals) on many significant projects to rehabilitate and adapt important heritage buildings, including (in Auckland) the Civic Theatre, the former Chief Post Office, the War Memorial Museum, Auckland University Clock Tower, the Art Gallery and The Symonds Street Flats, and (in Wellington) Sacred Heart Cathedral. I have been involved since 2005 with projects for the University of Auckland involving seismic upgrading and adaptation of its heritage buildings. Since 1990, I have been advising on conservation and planning matters related to the Britomart Precinct.
9. I have been requested to undertake an assessment of the heritage significance of the Gordon Wilson Flats at 320 The Terrace, Wellington. In agreeing to do so, I wish to record that in forming my opinion, I have relied on my familiarity with the building from the street only, and otherwise on my general professional knowledge of New Zealand architectural history, as well as on historical detail included in the report by Mr Adam Wild, of Archifact, together with the informed assessment provided by Dr Linda Tyler. My conclusions are, however, my own.
10. The historical background to the design and construction of the flats is well described in Mr Wild's evidence. This, together with Dr Tyler's evidence shows that the building was one of a small number that represented a radical shift in the design and procurement of intensive housing in New Zealand. Six examples were constructed, in Auckland and Wellington, and each, although distinctive in design, represent a social and architectural phenomenon unprecedented in this country. They have, as a group, particular significance as exemplars in New Zealand of the application of contemporaneous international influences, both social and architectural. They are representative of some of

the most accomplished and progressive design thinking of the period following the Second World War.

11. I understand that the property was acquired from Housing New Zealand, which is reported as having found the cost of refurbishment as “prohibitive” – a figure of “more than \$1m has been quoted in the press. I have to say that this seems to me to be a remarkably low figure, but even at substantially greater cost, this would in my opinion be a worthwhile investment in the provision of a particular kind of accommodation that is in high demand major in major cities in New Zealand.
12. My company has been directly involved in design development for the Symonds Street Flats in Auckland for Housing New Zealand which showed these to be capable of seismic strengthening and upgrading in a manner compatible with contemporary expectations at a cost that is reckoned to be commercially sound. While I recognise the greater seismicity of the Wellington region, I do not consider a similar outcome to be unachievable for the Gordon Wilson Flats – *provided* that the owner for the time being is willing to contemplate that option.
13. The application before the Council shows that the University is not willing, but this does not, to my mind, justify the removal of the building from the schedule. It must be presumed that the University carried out due diligence prior to acquisition of the property, and must consequently have been aware:
 - A. that the building was scheduled, and
 - B. that the building required remedial work to satisfy seismic code requirements.
14. I have made an assessment of the heritage value of the Gordon Wilson Flats, to establish its significance in Wellington and in the national context. Value is by definition a subjective view, but it is susceptible to reasonably dispassionate analysis. In common with other experts, I have adopted the criteria published by Heritage New Zealand Pouhere Taonga as an accepted basis for making an assessment of heritage values associated with the place.

15. **Aesthetic Significance**

Considering the formal qualities of the fabric and setting: the form, scale, materials, space etc. Assessment of the space or its parts demonstrating aesthetic significance or contribution to the overall integrity of the design of the place.

The Gordon Wilson Flats represent the European architectural modernist tradition transposed into a New Zealand setting. The building, along with a small but distinctive group of similar structures demonstrates an architectural literacy and competence that transcended national boundaries, reflecting the best contemporaneous design thinking.

This building, together with the others in the group, contributes to a design ensemble of national and international significance.

In my opinion, the building has **considerable** aesthetic significance.

16. Archaeological Significance

The degree to which the space can be said to have an archaeological potential.

While the site may be presumed to have potential archaeological value, due to both traditional and post-contact settlement, I have no specific knowledge of an particular significance associated with the site.

I have, therefore, made **no assessment** of Archaeological Significance.

17. Architectural Significance

Addressing the design and architectural aspects of the place. Assessment of the space demonstrating those particular characteristics of a school of design.

The Gordon Wilson Flats are significant in New Zealand as one of a small group of buildings in the international Modernist architectural tradition. They were well ahead of their time in this country, and represented a step change in the sophistication of State-sponsored housing, which had wide influence in architectural design in this country.

I note that the slightly earlier Symonds Street Flats designed by Frederick Newman are scheduled in Category A in the Auckland Council operative district Plan and proposed Unitary Plan.

As the last example of this group to be constructed, the Gordon Wilson Flats represents the most developed form of its type, and is thus an important architectural milestone in New Zealand.

In my opinion, the Gordon Wilson Flats have **exceptional** architectural significance.

18. Functional Significance

The contribution of the function of the place that can be assessed as having cultural heritage significance.

The function of a place is only sometimes a relevant criterion for heritage value. This usually relates to the original or intended use, and as a general proposition, where that use is sustained, this can be a component of heritage value.

The Gordon Wilson Flats remain, as constructed, an accommodation building. This use is temporarily suspended because of the need to upgrade the structural capacity of the building. This does not mean the use has changed, and does not materially alter the functional significance of the building.

Having regard to the social significance of the Gordon Wilson Flats and its original purpose, I regard the functional significance of the building as **considerable**.

19. Historical Significance

The ability to demonstrate an association with persons, ideas or events. Included in this section are the histories of all the other criteria considered.

The construction of modern mass housing by the State after World War II was a major political and ideological act that marked New Zealand as a country with highly progressive social policies.

For these reasons the building has, in my opinion, **exceptional** Historical Significance.

20. Scientific Significance

Concerned with the importance of the place as evidence and with the physical survival of that evidence in the building fabric. Scientific value is the potential to provide information about past human activity. This may encompass technology, archaeology, philosophy, custom, taste and usage as well as technique or material.

While the building may be regarded as innovative in some aspects of its technical design, I am not aware of a particular contribution to scientific knowledge associated with its construction.

On that basis, I assess the building as having **minor/no significance** under this criterion.

21. Social Significance

The notion of a spiritual, traditional, political, national, or any other cultural sentiment expressed by a group.

The Gordon Wilson Flats have exceptional social significance in New Zealand as the outcome of a new political social environment which sought to eradicate poverty and slum dwelling, and to set exemplary standards of accommodation the were well-designed and well-constructed.

For this reason, the building has in my opinion **exceptional** Social Significance.

22. Technological Significance

Assessment of the demonstration of particular characteristics of a building technique or craft.

The design of the building incorporated new and innovative foundation and construction methodologies intended to address seismic performance of this building. In this respect it was regarded at the time as highly progressive technically.

In my opinion, the building has **moderate** significance under this criterion.

23. Townscape Significance

An assessment of the 'Townscape Value' or the contribution of the space to its greater context.

As a response to the steep terrain of Wellington's hill suburbs, the Gordon Wilson Flats make a significant contribution to the city's urban form.

The scale of the building sits well in an urban setting historically dominated by often multistory single family dwellings. It's place in this part of the city is even more assured today in the context of more recent large scale buildings – notably those of the University, and it's alignment with the natural contour accentuates these connections.

For these reasons the building has, in my opinion, **considerable** Townscape Significance

24. District Plan Considerations

A plan change is, in my view, an inefficient and improper way of dealing with the issues related to a recognised (listed/scheduled) heritage building. The *Resource Management Act* is not the appropriate statute for dealing with matters related to compliance with the building code. I note that the strategy adopted by the Applicant is to challenge the significance of the building – rather than examine the effects of change required to meet code compliance.

- 25.** The District Plan does however provide mechanisms though for balancing heritage values against pragmatic issues such as compliance with seismic standards, and these can satisfactorily be dealt with through the resource consent process. If the applicant wishes to demolish, it can therefore apply for resource consent under those provisions of the Act and the District Plan, and show:
- a. that the building is incapable of being strengthened, or
 - b. that the only available method for so doing is incompatible with the heritage values intrinsic to the building,
 - c. that there is no other possible use for the building than that for which it was constructed.

- 26.** I note that the High Court's decision on the appeal against refusal to consent to demolish Harcourts building shows that economic effects are not a justification for giving consent, and cannot therefore be a justification for a plan change.

- 27.** The application does not demonstrate that compliance with the NBS is not possible, and as far as I am aware, does not show any resolved strengthening proposal to support that proposition.

- 28.** The Archifact report does not, in my opinion, provide any new grounds for removal of the building from the schedule, and thus does not provide a substantive argument for a plan change. The Archifact report wrongly asserts that "due to the redundancy of the place as an operational social housing facility, ... The Gordon Wilson Flats ... hold no functional significance." This is palpably incorrect – the fact that "at this point in time" the building is considered

to be a health and safety risk does not invalidate its value and historical significance as a social housing facility. It is not competent therefore to ascribe “*no significance 0*” under this criterion when the facility is clearly capable of continuing to be used once health and safety issues have been resolved (and there is no evidence that this is not feasible).

29. The sole basis of justification to remove the building from the schedule under a private plan change will be that it was incorrectly scheduled in the first instance, and the heritage evidence does not support this.

The conclusion reached that the building has only “**moderate** significance overall” is questionable when the assessment shows that it has at least **considerable** significance under the key criterion related to historical and social value (an assessment with which I disagree).

30. In conclusion, it is my firm professional opinion that the Gordon Wilson Flats is a building of **exceptional** heritage significance to Wellington and New Zealand, principally on account of its Social and Architectural significance, but also as measured against other relevant criteria, as I have outlined above.

Jeremy Salmond

QSO, M.Arch, FNZIA

Director

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