

7 December 2022

Supplementary statement of evidence – 2 Jervois Quay, Wellington, SR 513399

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This supplementary evidence is offered in support of Mrs Stevens' Section 42A Report – Heritage Assessment (dated 15 November 2022).

While not reassessing the proposal, this supplementary evidence seeks to clarify the Council's Cultural Heritage Team position in respect to Mrs Stevens's assessment, and to add some important comments, notably in support of the following:

1. The proposal is not for the reinstatement of an historic condition.
2. The proposal will have negative impact on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area.
3. There is no sufficient justification or mitigation for the negative effects that the proposal will have on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area.

1- Mrs Stevens's assessment is supported

4. Mrs Stevens has assessed the subject application on behalf of Council.
5. Her original assessment report (date 22 June 2022) has been peer-reviewed by Mr Daubé, Council's Heritage Advisor RMA, and it has been supported.
6. I have reviewed her Section 42A Report. It is full, comprehensive, as recognised by applicant's experts, and I don't consider that she has taken an overly precautionary approach in considering the potential heritage effects of the proposal.
7. Her assessment and conclusion are based on the extant heritage values of the building and the square, and the impact that the proposal will have on these values when it is assessed using the criteria given in the District Plan and against recognised heritage best practice.
8. I appreciate that it is consistent with the objectives of the Wellington Heritage Policy (September 2010) and the Greater Wellington Regional Council Regional Policy Statement, which are the basis for the Council's approach to heritage management, and with the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value (Revised 2010), which also provides important references in identifying and protecting heritage, and in the resource consent process, as noted in the District Plan.
9. I also understand that, overall, her assessment and conclusion support the previous advice given to the applicant by Council's heritage advisors since 2017.
10. Mrs Stevens has confirmed to me that she has read the final evidence prepared by Mr Wilde and Mr Knock, and her position has not changed.
11. I have also read the evidence, and I still agree with Mrs Stevens' assessment and conclusion that the proposal cannot be supported on heritage grounds.

2- Heritage values/historic condition

12. The application material in support of the application largely relies on the heritage significance of the sign on top of the Huddart Parker Building, and on the fact that the proposed new digital billboard will reinstate an historic condition of the building.
13. Mrs Stevens has recognised the association of sign to the Sentiment Connection heritage value of the building, but I would clarify some relevant aspects in this regard.
14. First, I note that neither the clock and weather forecast, or any kind of advert on the rooftop of the Huddart Parker Building are scheduled in the District Plan. As such, they are not heritage assets, and they have no recognised heritage value themselves.
15. In my understanding, the clock and forecast display were already removed when Plan Change 43 became operative (11 July 2012), and as such, they are not heritage fabric per se, either.
16. I know that signage has been present on the rooftop of the building between 1963 and 2011, this being a clock and forecast display, and a logo or company name almost always composed with neon cut out letters. No commercial sign – by which I mean advertising for a product or including a message – or billboard, have ever been fixed on the existing structure that has been unused since 2011.
17. The Wellington Heritage Inventory summaries that the Cultural Value of the Huddart Parker building primarily relates to its Aesthetic and Historic heritage values. The “temperature display and clock” are associated to the Sentiment Connection heritage value of the building, but no sign related to advertising is associated with this heritage value.
The Townscape heritage value evaluation says, first: “The building is situated on a prominent corner site at a corner of Post Office Square and Jervois Quay and has a strong street presence particularly when viewed from the north”. It is not specified that any sign contributes to the strong street presence of the building.
18. Only after, the Inventory says: “Its rooftop has long been occupied by signage, historically by an illuminated clock and weather forecast, presently by an advertisement for a local radio station and a temperature display. This signage takes advantage of the prominence of the building, particularly for passing traffic along the key transport route of Customhouse and Jervois Quays”. The fact that the rooftop of the building has long been occupied by signage taking advantage of a prominent position does not give any heritage value to the signage itself. Here again, the clock and forecast display are identified as the “historic” – meaning old – items, not the logo.
19. Importantly, the inventory also says under the Level of Cultural Heritage Significance section: “The building exterior has had few intrusive modern alterations and additions and retains much of the authentic building fabric”. The structure on the rooftop of the building may be one of these few intrusive modern alterations and additions.
20. The Inventory Report of the Huddart Parker Building explains why “the (1963) combined clock and temperature display on top of the building became a familiar inner-city landmark”, and why it was a unique feature in New Zealand when it was installed on the rooftop of the building. No association is made to any other advertising sign.
21. The Wellington Heritage Inventory says first, under the Social Heritage value section of the Post Office Square Heritage Area: “The square has important ongoing social value as a public place – a meeting place and a space where people pass through on their way to and from the waterfront”. In a second time, it associates “the time and temperature [...] checked from the neon sign on the Huddart Parker Building” to its Social Heritage value. Here again, the clock and forecast display is not the most relevant items associated with this heritage value, and again, no advertising sign is associated with this heritage value.

22. Based on that, my understanding is that, while the presence of a logo or company name on the rooftop of the building for some time is acknowledged, only the clock and the forecast display can be associated with heritage values, but no other type of sign.
23. This historic condition is incomparable to the proposed more than 50m² new digital billboard, which is not a reinstatement.
24. I do not agree with Mr Wilde that the new digital billboard could be a “reinstatement” in the meaning of the New Zealand ICOMOS Charter definition either: “to put back material components of a place, including products of reassembly, back in position”. The fact that time and forecast may appear on a rotating digital advertising display is not a “material component” as per the definition.

3- Impact on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area

25. Mrs Stevens has recognised the association of the clock and forecast display to the Sentiment Connection heritage value of the building. She has also recognised any potential positive effect of the proposal.
26. However, she has assessed that the overall effect of the proposal will be negative, and I agree with her.
27. I do not agree with Mr Wilde that the new digital billboard will positively reference to the history of the sign in the way it is recognised in the Inventory Report.
28. When it was installed in 1963, the time and forecast display was a *première* in New Zealand. It was unique.
29. Digital billboards are widely distributed industrial products, and they are not specifically designed to complement or enhance heritage. They are designed to be put on any buildings, in any contexts. LED technology has also become common now, and it does not generate any sentiment of connection in this respect.
30. Instead, the new digital billboard will be one more of “the intrusive modern additions to the building” identified in the Inventory, and this will impact on the authenticity of the Huddart Parker Building associated to its Level of Cultural Heritage Significance.
31. Mrs Stevens says: “The size and position of the Proposed Sign will somehow “alter the perceived proportions of the Grey Street façade”. My view is that it will certainly do that.
32. “The Huddart Parker building is a good example of what has become known as the Chicago style. The design follows Louis Sullivan’s dictum that a building should have a base, trunk and be properly capped”, in this case by the seventh-floor “crown”. In clear, the “crown” is the top end of the building, with nothing above.
33. Mr Wilde’s evidence stipulates that the new digital billboard will be clearly separate from the building and visually unrelated to its Chicago-style architectural detailing, but the illustrations provided with the application show that the parapet and the new digital billboard will be visually connected.
34. As such, and due to the dimensions and position of the new digital billboard (approximately as wide as the façade and as tall as a floor), the legible proportions of the Grey Street façade of the Huddart Parker Building will be those of an eight-story building, being one additional floor above the “crown”. This will be the case when the building is viewed from within the Post Office Square Heritage Area, and beyond.
35. Overall, this is contrary to the dictum, to the design and to the architectural qualities of the building, and this will significantly impact on the Aesthetic heritage values of the Huddart Parker Building recognised in the Inventory.

36. Interestingly, Mr Kern also compares the new digital billboard with a floor in his evidence: “the night time appearance [of the new digital billboard] would be no brighter than the lighting operating in the Huddart Parker building office floors”, meaning the new digital billboard could be legible as one of them, or in this case, as an additional floor above the crown of the building.
37. One additional rooftop office floor is not proposed, but as said, the new digital billboard will visually have the dimensions of one new floor on top of the building. Imagining an office floor with colour lights changing seven time per minute confirms me that the distractive effect of the new digital billboard will be significant overall, and that it will impact on the heritage values of the Huddart Parker Building and the wider Post Office Square Heritage Area.
38. Moreover, the negative impact will be exacerbated at night time, and including from close distance, where it may not be visible as such – or only partially – because distraction will be caused by unidentifiable sources of lighting spreading from the rooftop of the building, and changing colours seven time per minute.
39. The fact that, by essence, rotating images on digital billboards need to contrast with each other, may also be a compounding factor.
40. It is also important to consider, that when coming from the train station, or from the waterfront, the new digital billboard will be seen directly above the Wellington Harbour Board Shed 7, which is scheduled in the District Plan, and a Historic Place Category 1 with Heritage New Zealand. The new digital billboard will impact on this building too. This is not assessed in the application.
41. Mr Wilde refers to studies about effects arising from digital billboards on historic heritage values. I don't understand how they are relevant to the proposal, because he has not provided them.
42. It is also unclear which characteristics he refers to when he says: “the billboard characteristics associated with many studies are often quite different from the much more tightly bound operational characteristics that apply in New Zealand”, but my experience overseas is that in many countries, digital billboards similar to the proposed one would be prohibited in the first instance, and not only in heritage or city centre contexts.
43. The fact that some regulatory provisions seem more enabling in New Zealand may explain why more controls need to apply, but it does not mean that adverse effects on heritage values are managed or acceptable. In my opinion, most recent examples, including those shown on Mr Costello's evidence, show that there is still great improvement to do.
44. Mr Wilde also says that the proposed operational characteristics (such as a minimum image display time of 8-seconds, and with 0.5-second dissolve transitions between images) “have become industry standards in New Zealand”. My experience in New Zealand is that in heritage context, and because digital billboards are intrusive by essence, an extended dwell time (20-30 seconds, or more) is often accepted as one measure to reduce adverse effects on heritage values to some extent, although additional measures are often required to achieve an acceptable heritage outcome.
45. While I consider that there are sufficient elements demonstrating that the proposal cannot be supported from a heritage perspective, I agree with Mrs Stevens that “the Application documents lack sufficient detail of the Proposed Sign to enable an appropriate assessment of effects”.
In particular (not exhaustive), I note that the following relevant aspects are still unclear:
 - The dimensions of the new digital billboard are not clear: the application is for a maximum 13.0m x 4.0m digital billboard, but the drawings shows that the existing frame/structure/scaffold is wider, which is not shown on the illustrations. It is not clear if there will be a frame around the new digital billboard, or if it will be wider than stipulated, or how the connection with the frame will work. If the existing frame were to be adapted in width, I do not see how it will be possible without replacing it, or without any work on the building itself.

- The position (in plan) of the new digital billboard is not clear: the setback of the existing structure from the parapet appears to be different on the drawings, and it could be very limited, as shown in the illustrations and supported by Mr Coolen's evidence. This cannot be extrapolated from aerial views.
- The position (in height) of the new digital billboard is not clear: it is strongly stated that the billboard will be clearly separate from the building above the parapet level. I understand that the new digital billboard may sit approximately 2.0m above the rooftop floor level. However, at this height, the provided views show that the digital billboard and the building will still be visually connected. It is not clear if the applicant's statement will not be achieved, or if the new digital billboard will need to be positioned at a higher level.
- No clear specification of the new digital billboard components has been provided, except that "the sign itself will be approximately 80-120mm deep as such will have a very slender profile", as stated in Mr Costello's evidence. This is not sufficient, because the billboard will not be fixed on the façade of the building, and all its front, sides, back, and structural frame will be visible. It is also not sufficient information to appreciate how the new digital billboard components will interact with the existing structure (if it is retained).
- The assessment of the existing structure prepared by Dunning Thornton Consultants does not provide certainty that the existing structure will be reused, or that no work to the heritage building will be necessary: according to the assessment, approximately 50% of the existing structure will need repair/replacement/additional strengthening structural elements, but it is not clear if the applicant would accept to keep the existing structure, or if they would reconstruct a new structure, if more repair work were needed, and my opinion is, that it is reasonably likely to happen, considering that the structure is 60 year old and has been unused for more than a decade. It is also not clear whether the additional horizontal 180PFC will require new fixing to the roof of the building, and my opinion is also that, it is also reasonably likely to happen, if these elements are necessary to stabilize the structure. This is important, because the application largely relies on the fact that the existing frame will remain. A new structure would be completely different than the existing one, and this would certainly raise other issues.
- There is no clear specification of the display of the time and weather forecast: while Mr Mackenzie says that the time and weather forecast will be permanently displayed, the illustrations provided with the application show the time and weather forecast only with public content, which will be 20% of the time (approximately height seconds per minute). In this case, it will not be a permanent display as was the original (time and weather forecast were continuously displayed).

46. All this information is necessary to enable an appropriate assessment of effects.

47. I am not aware of any digital billboards installed on top of heritage buildings in Wellington.

48. Based on my experience at Auckland City Council as a Heritage Advisor, I am not aware of any digital billboards installed on top of heritage buildings either. One was proposed in a pre-application meeting, but it was strongly discouraged by the Council's advisors, and a resource consent was never applied for. There is one digital billboard existing on Ponsonby Road, but it is Business Special Character Area, and the digital billboard has replaced a legally established a static one. Overall, this case is not relevant.

3. Justification/mitigations

49. The Wellington Heritage Policy and the ICOMOS New Zealand Charter, do not support that "the inherent value of historic heritage is found in its resilience to remain relevant and valuable in evolving environments despite development" – Mr Wilde's statement.

50. This is because heritage buildings cannot achieve that without recognition, without protection, and without consideration on how changes are managed over time. This is also why legislations are put in place to prevent historic heritage from inappropriate use and development.
51. The Huddart Parker Building is a remarkable heritage building, it has been strengthened, and it seems to be well-considered and maintained. I believe that using it as a pedestal for digital commercial advertising is contrary to its heritage values, that it is not necessary, and that it will compromise the celebration of the Huddart Parker Building and Post Office Square Heritage Area.
52. It does mean that any sign could not be installed on the rooftop of the building in this instance, as long as adverse effects are understood and well managed.
53. In her assessment, Mrs Stevens has recognised that the District Plan anticipates signage in heritage context, and that it does not prohibit it.
54. She has also acknowledged that the District Plan provides clear directions to “ensure that signs on listed heritage buildings or within Heritage Areas do not adversely affect heritage values and qualities and avoid unnecessary or inappropriate signage” – Operative District Plan, Policy 20.2.1.9 – and this is also directed in the Proposed District Plan.
55. My understanding is that these directions must be followed.
56. Based on her assessment, Mrs Stevens has concluded that the proposal will not follow the directions of the District Plan, and I agree with her.
57. Similarly, Mrs Stevens has recognised that the Sign Design Guide provisions anticipate the appropriateness of a considered design and location for signage.
58. In this instance, she has concluded that the proposal will not be appropriate, and I agree with her conclusion.
59. Mrs Stevens has also recognised the specificities of the Huddart Parker Building and of the context it sits in, and this is why she has suggested some changes to the proposal, so that it could possibly be supported from a heritage perspective. I can accept that.
60. Mrs Stevens has also considered the applicant’s intention to provide for some public benefit (such as 20% of the time display offered for public content).
61. However, her conclusion is that “there is no sufficient justification or mitigation for the negative effects that the proposed billboard will have on the building”. I agree with that.

4. Conclusion/proposed conditions

62. Overall, I reiterate that I adopt Mrs Stevens’ conclusion, and that the proposal cannot be supported on heritage grounds.
63. In regard to the proposed set of resource conditions in case the proposal were to be approved, I would appreciate that the conditions related to heritage are reviewed by Mrs Stevens or the Council’s Heritage Team first, so that adverse effects on the heritage values of the Huddart Parker Building and the Post Office Square Heritage Area heritage are minimised as much as possible.