

**Hearing Stream 3 – Heritage
Wellington City Council**

In the matter of

Proposed District Plan review incorporating the
Intensification Streamlined Planning Process
(ISPP), and the first schedule of the Resource
Management Act.

Hearing 3 – Heritage

Expert Evidence of Cameron de Leijer on behalf of CAMJEC Limited

Date: 18/04/2023

Next Event Date:

9th May 2023

Hearing Chair:

Trevor Robinson

Hearing Pannel:

Heike Lutz, Liz Burge, Rawiri Faulkner, David McMahan.

Introduction

- 1 My full name is Cameron Peter de Leijer. I am a Senior Surveyor and Planner at Spencer Holmes Ltd. I specialise in Cadastral Surveying, Resource Management, and Land development.
- 2 I am planning evidence on behalf of CAMJEC Limited.
- 3 I am authorised to provide this evidence on their behalf.

QUALIFICATIONS

- 4 My qualifications and experience are as follows:
 - 4.1 I have a Bachelor of Surveying from the University of Otago and Bachelor of Science from the University of Canterbury.
 - 4.2 I have 5 years post graduate experience as a surveyor in private practice at Spencer Holmes Limited. During that time, I have worked on a variety of survey projects. I now work closely in the land planning field which includes the preparation of resource consent applications, as well as developing land use strategies for clients.
 - 4.3 In October 2021 I achieved the requirements to be a Licensed Cadastral Surveyor under the Cadastral Survey Act 2002, which is a rigorous set of exams that require knowledge in the law surrounding Cadastral Surveying. Upon obtaining my license to undertake cadastral surveys, I became full member of the surveying professional body, Survey and Spatial New Zealand.
 - 4.4 I previously sat on the Board for the Survey and Spatial Wellington Branch executive team. I currently have a position on the Board of the Positioning and Measurement Stream for Survey and Spatial New Zealand, which is the one of the governing streams of the survey profession.

5 My involvement in these proceedings (via CAMJEC Ltd) has been to prepare the original submission and to provide this evidence for the heritage hearing.

CODE OF CONDUCT

6 I have read the Code of Conduct for Expert Witnesses set out in the Environment Court's Practice Note 2023. Whilst this is a Council hearing, I have complied with the Code of Conduct in preparing my evidence and will continue to comply with it while giving oral evidence before the commissioners. My qualifications as an expert are set out above. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

ORIGINAL SUBMISSION

7 The original submissions seeks to remove 233 Willis Street (Item 525/528) from Heritage Buildings (Schedule 1) list.

BACKGROUND

8 WCC sought to list 233 Willis Street as a heritage item within Plan Change 58.

9 At the District Plan Hearing the commissioners heard evidence provided by Spencer Holmes (Ian Leary) and the owner of the time (Mr Bennett) with respect to why the building should not be listed as a heritage item. These are summarised (from PC58) below:

9.1 Significant alterations from 1990 undermining the original architectural integrity of the building

9.2 Only 2 original features remain on site, the projecting hood and vertical triangular oriel windows

- 9.3 Maintenances costs being incredibly burdensome.
- 9.4 Limitations on how the site could be redeveloped.
- 9.5 Substantial modifications will be required to for the building to meet the building code in an economically viable way.
- 9.6 Costs to raise the building in its current form to the earthquake standards will be in excess of the capital value.
- 9.7 The sides and rear of the property do not add significant heritage value to the townscape of Wellington.
- 9.8 The section 32A report did not address the economic impacts of the listing (and earthquake strengthening) adequately.
- 10 The Committee discussed the listing of the property and agreed that that the carpark, and the rear and side elevations were of lesser value. However, the Committee determined that the front of the building had sufficient value to warrant listing.
- 11 The Committee recommended that only the front façade accompanied by a set back of 8 meters of 233 Willis Street is listed in the District Plan.
- 12 An appeal from PC58 was made to the Environment Court, and the end result was the building was not listed as part of PC58.

SECTION 42A REPORT AND EXPERT EVIDENCE

- 13 A Historic Heritage Evaluation was completed by Wellington City Council in July 2021 for the property at 233 Willis Street.
- 14 The July 2021 HHE report for 233 Willis Street is based on a 2007 HHE report provided by NZ Heritage Properties, but with added information with respect to the architect who designed the building (Edmund Anscombe) and a new assessment against a new policy provided by the GWRC.

- 15 “Methodology and guidance for evaluating Wellington Historic Heritage” released by WCC outlines how these evaluations are undertaken.
- 16 The section “Evaluation Process” outlines the 8 steps of evaluating the historic heritage significance and states certain steps are required.
- 16.1 Step one is to undertake historical research of the place and comparable places, the historical and physical context and the physical form and style. This step has been completed well for the contemporary history for the site and its context, however it does not take in the most recent history, in particular Plan Change 58 and the issues/alterations that have been highlighted in this process.
- 16.2 Step two is a site visit to assist with understanding the place. The Historic Heritage Evaluation for 233 Willis St stated that no site visit has been completed for the evaluation.
- 16.3 As such, the report produced by Wellington City Council is incomplete in parts.
- 17 It is noted that the heritage expert for Council (Moirá Smith) has based her recommendation on this incomplete HHE report, as well as a site visit and the decision for PC58.
- 18 Ms Smiths recommendations is that due to the recent research with respect to the history of the building and the association of the architect, and the design of the building, the whole building should be listed.
- 19 Ms Smith also noted in her assessment that the integrity of the façade has been further diminished as the single storey bay has been removed.
- 20 Whilst this new information outlines the history of the building and the relationship with the designer, it does not alter the fundamental fact that the building itself has changed significantly from the original design. The site itself may have a rich heritage historical significance, however

the only aspect of that this should relate too is the vertical triangle windows. It might be appropriate to recognise this historical heritage in a different manner than registering a building on the Historical Heritage Building Schedule that is set for demolition.

21 The comments made Mr Leary with respect to PC58 are still relevant for 233 Willis Street where the ‘the building is not one which makes people stop and appreciate architecture’ and ‘the side and rear facades of the building do not make any significant or valuable contribution to townscape and street scape’. This can be clearly seen in the attached images at the end of this evidence.

22 The building is currently subject to a resource consent (SR496847) that includes the demolition of the building at 233 Willis Street and a construction of a new development on-site.

23 We have been advised that the costs of strengthening the building are uneconomic. Furthermore, listing a building adds significant costs to the strengthening process. WCC and other support facilities provide no meaningful relief to the costs.

24 The owners of the building are committed to implementing this resource consent as stated in the submission supplied by CAMJEC Limited.

25 This was identified in both the evidence supplied by Ms Smith and the section 42A report published by Adam McCutcheon.

26 Both Ms Smith and Mr McCutcheon indicate that once the building is demolished, it does not make sense to have this property listed as a heritage item.

27 Mr McCutcheon goes further in his recommendation stating that if the building is listed, then it would be inefficient to require another plan change when the building is demolished. We agree with this recommendation and the proposed outcomes if the building is listed.

28 We would furthermore highlight the increased cost to the applicant and the required time for Council to process this plan change. These considerations have not been taken into account when the S32A report was published with respect to a cost/benefit analysis.

CONCLUSION

29 The registration of 233 Willis Street as a Historical Heritage Building as part of SCHD1 is not supported by the owners, nor recommended by Mr McCutcheon, as the building is set for demolition. Ms Smith also concludes that the heritage listing should be removed once the building is demolished.

30 The building integrity and original architecture has only been reduced since the last time this building was proposed to be listed as a Historic Heritage Building under PC58.

31 For the above reasons, the only logical conclusion is that this building is not listed as part of SCHD 1.

Date: 24/04/2023

A handwritten signature in blue ink, appearing to be 'I. Leary', is written over a faint circular stamp.

Review and Agreed by: Ian Leary.



Image 1: (circa 1960) 233 Willis Street- Original Design (Source Archives online WCC)



Image 2: (2023) 233 Willis Street



Image 3: (1957) Streetscape 233 Willis Street (Source Archives New Zealand). The building is an example of the open factory design model incorporating bands of windows to let light and fresh air into the building for the workers.

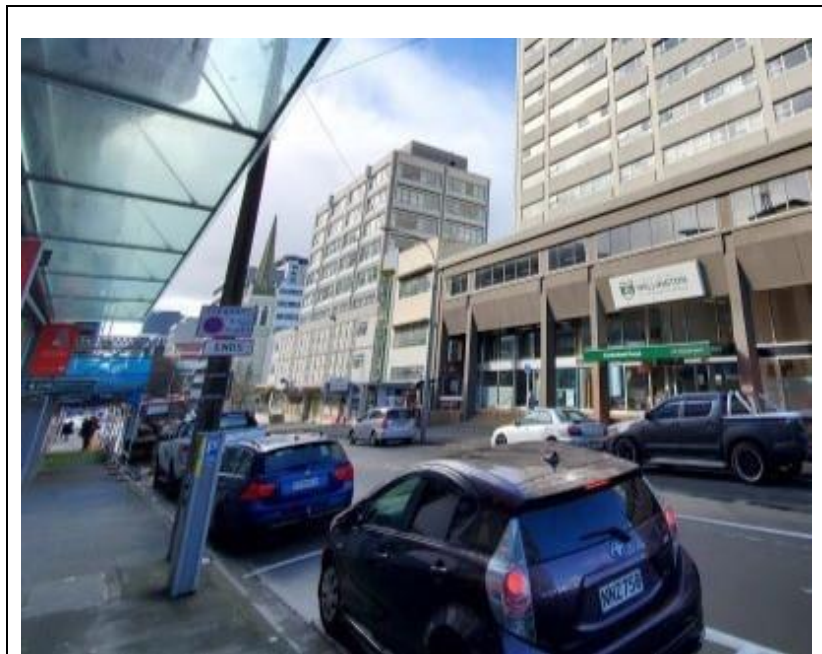


Image 4:- (2023) Streetscape 233 Willis Street south boundary wall (with windows)butts directly to Cumberland House and on the north boundary to Richard Pearce House.. The ground floor of 233 Willis Street with a floor area of approx 405m² has four windows that let light into the ground floor, two on Willis Street as seen in **image 2** above and two on the north boundary (obscured from sight by the Antipodes Building at 103 Ghuznee Street



Image A

refer to images 3&4 above
Willis Street Mezzanine Floor (south boundary) wall butts to Cumberland House



Image B

refers to images 2&3 above
Willis Street First Floor. (south boundary) wall butts to Cumberland House
There are two boundary windows letting light into the studio space of this tenancy on the north boundary wall



Image C

refers to images 3& 4 above
Willis Street Ground Floor with a floor area of approximately 405 square metres butts to Richard Pearce House and 103 Ghuznee Street. Four windows let light into the ground floor.. Two are shopfront windows to Willis Street and two are as seen here here the north boundary wall butting to 103 Ghuznee Street.



Image D

Willis Street Mezzanine Floor south boundary butts to Cumberland House and north boundary butts to Richard Pearce House
refer to image 2 above. Light enters this space via the lower window band on the Willis Street boundary and the lower panes of the oriel window.