

BEFORE THE INDEPENDENT HEARINGS PANEL

IN THE MATTER OF: An application for land use consent,
pursuant to section 9(3) RMA for
Partial Demolition and Additions and
Alterations to All Saints' Church

APPLICANT: Wellington Diocesan Board of
Trustees

CONSENT AUTHORITY: Palmerston North City Council

SECTION 42A REPORT OF CHESSA STEVENS – HERITAGE ASSESSMENT

Dated 4 December 2020

Executive Summary

1. My name is Chessa Stevens. I am Principal Conservation Architect and Heritage Consultant at WSP New Zealand Ltd.
2. I have prepared this evidence on behalf of the Palmerston North City Council to assess the heritage effects of a Resource Consent Application to strengthen and extend the All Saints' Anglican Church, 338 Church Street, Palmerston North.
3. All Saints' Church is listed as a Category 1 Historic Place with Heritage New Zealand Pouhere Taonga (HNZPT) (#191) and is scheduled as a Category 1 Building of Cultural Heritage Value in the Palmerston North City District Plan.
4. The heritage values of All Saints' Church are as follows: high emotional, historical, design, cultural, continuation, representative and townscape value, and moderate technological value.
5. All Saints' has a high level of authenticity in both its design and materials, being relatively intact and unchanged since construction; and a moderate level of authenticity in its setting due to the changes on the site and in the local streetscape that have occurred over time.
6. The design, technological, townscape and representative values of the building are tangible – meaning that they are physically observable and, therefore, inseparably connected to the physical building.
7. The emotional, historic, cultural and continuation values of the building are intangible – meaning that they are not physically observable, although they are inherently connected with the existence of the building in physical form.
8. I see the works that are proposed in the Resource Consent Application as having two distinct parts:
 - (a) the proposed seismic strengthening and upgrade works; and

- (b) the proposed partial demolition of the baptistery and new building addition to the north and west sides.
9. Seismic strengthening and upgrade of All Saints' Church will enable its ongoing use which, in turn, will facilitate its preservation and the protection of its heritage values. If the Application were for the strengthening works only, it would be supported on heritage grounds.
 10. The proposed partial demolition and addition will alter parts of All Saints' that have the highest level of heritage significance, being the north and west elevations, the baptistery, and the entrances either side; and will result in the permanent removal of highly significant historic fabric.
 11. The proposed addition is not compatible with All Saints' in terms of design, form, scale, mass or materials, especially when viewed from the exterior. It interrupts and obscures, rather than being sensitive to and compatible with, the architectural style and character of the existing building envelope.
 12. In these ways, the proposed partial demolition and addition negatively impact on the building's tangible values, as well as its level of representativeness and authenticity.
 13. All Saints' was in active use as a church and venue for other events up until it was found to be earthquake prone. Strengthening and upgrade (deferred maintenance) works to address weathertightness will enable it to be returned to use. Alterations beyond this are not necessary or essential to meet safety or accessibility requirements under the Building Code; nor are they necessary for the building to function as a church or a venue for other events.
 14. I acknowledge the Applicant's desire to create a more welcoming entrance to the building, and to create a visual link to the interior of the church. Similarly, I acknowledge the Applicant has been through a process of design development and consultation, and that it is not feasible to exhaust every possible design option. Notwithstanding these acknowledgements, I believe there are alternative ways to sufficiently address the inadequacies that the Applicant believes exist with the current building but that avoid or

reduce the negative impact on heritage values as compared to the proposed design.

15. As I understand it, the Applicant has not sought grants or funding support for the strengthening, which could be explored as an avenue to reduce the costs to the Diocese and congregation.
16. The mitigation being offered in the Application does not sufficiently reduce the negative impacts that will be caused by the proposed partial demolition and addition, and there are otherwise no available mitigations to sufficiently address the negative impacts.
17. The Resource Consent Application to strengthen and extend the All Saints' Anglican Church, 338 Church Street, Palmerston North is **not supported** on heritage grounds.

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Introduction

18. My full name is Francesca Louise Stevens. I practice under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and Heritage Consultant at WSP New Zealand Ltd.
19. I have the following qualifications and experience relevant to the evidence I shall give:
- (a) I hold a Master of Arts degree in Conservation Studies with Distinction from the University of York, United Kingdom.
 - (b) I hold a Bachelor of Architecture degree with Honours from Victoria University of Wellington, New Zealand.
 - (c) I hold a Bachelor of Arts degree from Victoria University of Wellington, New Zealand, majoring in Religious Studies.
 - (d) I am a Registered Architect with the New Zealand Registered Architects Board.
 - (e) I am a member of the Executive Board and Co-Secretary of ICOMOS New Zealand (the International Council of Monuments and Sites).
 - (f) I have approximately thirteen years' experience in architecture, specialising in heritage and historic buildings.
20. I have prepared this evidence on behalf of the Palmerston North City Council (PNCC) to assess the heritage effects of a Resource Consent Application to strengthen and extend the All Saints' Anglican Church, 338 Church Street, Palmerston North.

Expert Witnesses – Code of Conduct

21. I confirm that I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that except

where I state I am relying on information provided by another party, the content of this evidence is within my area of expertise.

Background

22. The Resource Consent Application to strengthen and extend All Saints' Church in Palmerston North was received by PNCC in November 2019.
23. I had been involved in preliminary informal discussions with Ryan O'Leary, acting on behalf of PNCC, regarding All Saints' since June 2018. However, I was not formally engaged by PNCC to provide heritage consultancy services relating to All Saints' until the Resource Consent Application was lodged in November 2019.
24. I see the proposal as having two distinct parts:
 - (a) The proposed seismic strengthening and upgrade works, which include:
 - i. Installing concrete shear walls to the interior of the tower;
 - ii. Strengthening concrete floors of the tower;
 - iii. Removing the existing brick finials from the tower and replacing with lightweight replicas;
 - iv. Excavating for and installing a new foundation to support the shear walls;
 - v. Installing post-tension rods into the walls;
 - vi. Removing the brick parapet and finials from the side elevations;
 - vii. Replacing the parapet with a reinforced concrete beam (required to provide anchor point for the rods);
 - viii. Reconstructing the brick finials over the concrete beam; and

- ix. Removing the existing roof and installing a plywood diaphragm and new roof.
- (b) The proposed partial demolition and new building addition, which includes:
- i. Removal of the exterior wall of the baptistery at the north (front) end of the church;
 - ii. Removal of a window and brickwork on the western side of the west porch and replacement with a door;
 - iii. Removal of a window and brickwork on the western elevation and replacement with double doors;
 - iv. Localised removal of brickwork and other fabric where junctions to the proposed addition are required; and
 - v. An addition comprising a new entrance and foyer, linking corridor, toilets, office and circulation on the north and west sides of the building.

Scope of Evidence

25. My assessment considers the following matters:
- (a) The heritage significance of All Saints' Church.
 - (b) How the proposed strengthening and extension conforms, or does not conform, to the assessment criteria given in the Palmerston North City District Plan (PNCDP).
 - (c) How the proposed strengthening and extension conforms, or does not conform, with heritage best practice.
 - (d) Whether there is sufficient justification for the negative effects that the proposed works may have on the building.

- (e) Whether there is sufficient mitigation for the negative effects that the proposed works may have on the building.

Heritage Status of the Building and Site

26. All Saints' Church is listed as a Category 1 Historic Place with Heritage New Zealand Pouhere Taonga (HNZPT) (#191).
27. All Saints' Church is scheduled as a Category 1 Building of Cultural Heritage Value in the PNCDP (ref. 1).
28. According to the New Zealand Archaeological Association database ArchSite, the site of the church is recorded as archaeological site T24/37. The site record refers to the Sunday school room at the rear of the church which appears on an 1896 general map of Palmerston North.

Heritage Significance of the Building

29. The PNCDP does not include an assessment of significance of All Saints' or an explanation as to why it has been included as a Category 1 Building in the Schedule of Buildings and Objects of Cultural Heritage Value.
30. A Heritage Inventory for the Palmerston North CBD was prepared in 1993 by Ian Bowman and Michael Kelly as part of a review of the PNCDP at that time, and provides an assessment of heritage values for All Saints' that remains relevant under the current PNCDP criteria (given in Appendix 17D). However, there have also been changes over the last 25 years that have impacted on aspects of this assessment. The assessment of significance provided by HNZPT in their List entry online is similarly out of date.
31. A more recent assessment of significance has been provided in the Conservation Plan for the building, prepared by Ian Bowman in 2018. However, the assessment criteria used in this document are slightly different to the criteria of the PNCDP.
32. Page 49 of the Applicant's Heritage Impact Assessment provides a useful summary table that aligns the Conservation Plan assessment of significance with the PNCDP criteria and rates the values in accordance with the

Conservation Plan four-tier grading system (high, moderate, low, negligible). It is reproduced in Table 1 below.

| Value | Comment | Conservation Plan / HNZ value equivalent | Assessed Significance |
|--------------------------------------|---|--|-----------------------|
| Cultural values | | | |
| Emotional | The building has obvious spiritual and religious values. It has been the centre of Anglican worship in Palmerston North for over 100 years. Well loved by parish community. Widely recognised as a local landmark by wider community and appears in contemporary art | Cultural – Commemorative Identity Public Esteem Authenticity – Use and functions Spirit and feeling | High |
| Historical | The site has over 130 years association with Anglican Church in Palmerston North Design by F de J Clere, the architect of All Saints A number of commemorative monuments within the church | Physical Values – Archaeological information Historic – People Events patterns | High |
| Design | Good example of combination of the English Arts and Crafts influenced Free Gothic and Perpendicular Gothic styles. Significant urban design values Tower is a significant local landmark at corner of the square | Physical Values – Architecture Authenticity – Materials and substance Tradition, techniques and workmanship | High |
| Technological | Standard construction techniques and materials for the period. Interior and exterior well executed. | Physical Values – Technology and engineering Scientific | Moderate |
| Use Values | | | |
| Economic | Limited economic value in current condition as the building is closed and has no function. | Authenticity – Use and functions | Low |
| Cultural/Community | Good social, functional and educational uses – well loved by parish community | Cultural Values – Public esteem Education Tangata Whenua | High |
| Continuation/ Appropriateness | Site remains in use as an Anglican Church complex – though the Church itself has been unused since 2013 | Authenticity – Use and functions | High |
| Contextual Values | | | |
| Representative/ Townscape | Good representative example of the architectural style with authentic interior and exterior by F de J Clere, one of over one hundred churches by Clere. One of 17 brick church designs by Clere One of a number of churches within the CBD surrounding the square. Tower at corner of square is a key local landmark Low to moderate archaeological potential | Physical Values – Archaeological information Representativeness Context or group Historical – Patterns Authenticity – Location and setting | High |
| Authenticity | The building is on its original site. Modifications to the exterior include re-roofing of structure in 1950s and minor alterations to vestry/choir to provide access to church hall at rear. Addition of accessible ramp to front porch. Much of the interior fabric and stained-glass windows do not date to the original construction date of the church, but they are original in their particular context and have been little altered since their addition to the church fabric. | Authenticity – Form and design Use and functions Materials and substance Tradition, techniques and workmanship Location and setting Spirit and feeling | High |

Table 1: Summary of Heritage Values of All Saints', taken from the Heritage Impact Assessment prepared by Plan.Heritage

33. I have reviewed the assessment given in Table 1, and am generally in agreement with it, with the following caveats:
- (a) The PNCDP criteria are based on documents that are now outdated.
 - (b) Use is not generally defined as a heritage value per se, although a place certainly has heritage values that are associated with its use, and the ongoing use of a heritage place is recognised as a way of ensuring that it is retained and maintained. I have interpreted cultural values as including emotional values, as well as education; and continuation value as falling into the category of historical. All of these values are intangible (refer paragraph 37 below), and I still agree that the rating of these values is high.
 - (c) Economic use is not a heritage value.
34. Using the PNCDP criteria and scale applied in the Applicant's Heritage Impact Assessment, I therefore confirm that I agree that the heritage values of All Saints' Church are as follows:
- (a) high emotional value associated with its spiritual and commemorative use for worship and events including weddings and funerals, and associated with the memorials within the building;
 - (b) high historical value for its 130-year long association with the Anglican Church and as a work of Frederick de Jersey Clere;
 - (c) high design value as an example of a well executed and largely original work in the Gothic style by de Jersey Clere, and for its strong street presence;
 - (d) moderate technological value associated with construction techniques and craftsmanship;
 - (e) high cultural value due to its being held in high esteem by the congregation and the wider community and a building that is recognised as contributing to the identity of Palmerston North;

- (f) high continuation value due to its continued use as an Anglican Church from the time of its construction until it was closed in 2013;
 - (g) high representative value as an example of the work of de Jersey Clere and as an example of its age and architectural style; and
 - (h) high townscape value for its presence as a landmark and an 'anchor' of The Square at the centre of Palmerston North.
35. All Saints' has a high level of authenticity in both its design and materials, being relatively intact and unchanged since construction; and a moderate level of authenticity in its setting due to the changes on the site and in the local streetscape that have occurred over time.
36. The design, technological, townscape and representative values of the building are tangible – meaning that they are physically observable and, therefore, inseparably connected to the physical building.
37. The emotional, historic, cultural and continuation values of the building are intangible – meaning that they are not physically observable, although they are inherently connected with the existence of the building in physical form.¹
38. Theological and liturgical principles and practices contribute to the emotional, historic, cultural and continuation values of the building, but are not heritage values in and of themselves.

Reports and Material Considered

39. As part of preparing this statement of evidence, I have read the following reports and documents:
- (a) Application Form, dated 30 September 2019;

¹ Based on the definitions of tangible and intangible given in the ICOMOS New Zealand Charter (2010).

- (b) Record of Title;
- (c) Assessment of Environmental Effects prepared by Lakemba Properties NZ Ltd, 30 September 2019;
- (d) Appendix A – Locality Plan (aerial photograph) dated April 2018;
- (e) Appendix B – Conservation Plan: All Saints’, Palmerston North, prepared by Ian Bowman, Revised February 2018;
- (f) Appendix C – Plans of Structural and Architectural Work Proposed, prepared by BSM Group Architects Ltd and Emajineer Structural Concepts, variously dated;
- (g) Appendix D – Plans of Streetscape Work Proposed, prepared by Urbanlogic Studio, April 2018;
- (h) Appendix E – District Plan Zoning Map, dated April 2018;
- (i) Appendix F – District Plan Relevant Rules Assessment, date and author not stated;
- (j) Appendix G – Heritage Impact Assessment: All Saints’ Church Palmerston North, prepared by Plan.Heritage Ltd, September 2018;
- (k) Appendix H – Record in Respect of Consultation, including:
 - i. Letter from Wiremu Kingi Te Awe Awa, Kaumatua o Rangitane, dated 5 April 2018;
 - ii. Letter from Alison Dangerfield, Area Manager Heritage New Zealand Pouhere Taonga, dated 26 July 2018;
 - iii. Affected Party Form from Tim Fitz-herbert, Property Manager Wallace Property Company Ltd, dated 10 July 2018;
- (l) Appendix I – Assessment of Relevant Objectives and Policies of the District Plan, date and author not stated;

- (m) RFI response letter from Lakemba Properties (Matt Soong) dated 15th January 2020, including:
 - i. Appendix 1: plan and elevation drawings prepared by BSM Group Architects Ltd, variously dated;
 - ii. Appendix 2: LocalMaps Print aerial photograph of the site dated 9 December 2019;
 - iii. Appendix 3: All Saints' Church Entrance Options Report, date and author not stated;
 - (n) RFI response letter from Lakemba Properties (Matt Soong) dated 17th April 2020, including additional rendered perspectives with photographic comparisons; and
 - (o) Submissions #1 to #101, and summary provided by The Property Group.
40. I note that, in their RFI responses, the Applicant did not provide some of the information that was requested.
41. I provided a memorandum with comments relating to the Resource Consent Application on 26 May 2020, prior to the Consent being notified. I have reiterated some of the comments made in that Memorandum in my assessment below.
42. In preparing this evidence, I have also used the following documents:
- (a) Palmerston North City District Plan (PNCDP);
 - (b) Heritage New Zealand Pouhere Taonga's (HNZPT's) *Sustainable Management of Historic Heritage Guidance Series*:
 - i. *Information Sheet 2: Assessment Criteria to Assist in the Identification of Historic Heritage*;
 - ii. *Information Sheet 12: Alterations and Additions to Historic Buildings*;

- iii. *Information Sheet 14: Partial Demolition of Historic Buildings;*
- (c) *ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value; and*
- (d) *Burra Charter: The Australia/ICOMOS Charter for Places of Cultural Significance.*

Site Visit

- 43. I visited the site on 20 March 2020 to make a visual assessment of the building to inform this assessment, at which time I met with representatives of All Saints' and their consultants for planning and design.

Legislative Requirements

- 44. The rules of Chapter 17 of the Operative PNCDP apply. External alterations and additions to a Category 1 Scheduled Building is a Restricted Discretionary Activity in respect of the impact of the design and appearance, and cultural and natural heritage values, with particular regard to the assessment criteria given in rule R17.7.2. The total or partial demolition of the exterior of any Scheduled Building is a Discretionary Activity under rule R17.8.1.
- 45. The Heritage New Zealand Pouhere Taonga Act 2014 also applies.

Summary of Applicant's Assessment of Environmental Effects as it Relates to Heritage

- 46. The AEE has been prepared by Lakemba Properties NZ Ltd on behalf of the Applicant, the Wellington Diocesan Board of Trustees. As referenced in paragraph 39, the Applicant has provided a Heritage Impact Assessment for the proposal, prepared by Plan.Heritage Ltd, along with a Conservation Plan for the building which was prepared by Ian Bowman in 2018.
- 47. In the introduction, the AEE states:

To strengthen the building to 100% of current building/earthquake standards and provide a new frontage will cost in the order of \$7 million. This is a significant amount of money for the parishioners and the community to raise, which can only be justified if the building is able to be widely used over the long term (i.e. for the next 100 years). To enable such use, the building's current inadequacies will need to be addressed whilst also preserving the heritage elements of the church that the community values. Whilst preserving the character of the building, particularly its interior, it is deemed necessary to meet the needs of today's worshipping community and changing patterns of worship.

48. This point is further emphasised in Appendix 3 of the Applicant's first RFI response dated 15th January 2020 – All Saints' Church Entrance Options. This report states:

...at a Special General Meeting in October 2015, the Parish discussed whether to strengthen or demolish the building. The strengthening option was approved with the caveat that the current church building be modified to meet current and future needs of the church and its community. If that could not be met, the demolition option would have to be revisited.

49. The Entrance Options report goes on to state:

In the past, the church was seen simply as a sacred space, and closed off from the secular, outside world. Today our emphasis is much more around interrelationship of the two worlds, with a gathering space being essential to provide a step from the outside world into the sacred space, and for both spaces to be welcoming and available for hospitality and community use. Consequently, the entrance is vitally important. It needs to be obvious, and needs to remove every obstacle that might deter someone from coming in. Any compromise to that goal is unacceptable.

The Applicant has not defined what they mean by "*welcoming*"; however, it is a term used throughout the various documents included in their Application and RFI responses, so I have assumed the Oxford English

Dictionary definition of a “welcoming place”, being “attractive and looking comfortable to be in”, applies.

50. The AEE relies on the Heritage Impact Assessment by Plan.Heritage to describe in detail the effects of the proposal on the heritage values of the building, summarising the findings of this Assessment in Section 4.2.2. The Heritage Impact Assessment provides a thorough evaluation of the effects of the proposal on the emotional, historical, design, technological, cultural, continuation, representative and townscape values of the building, as well as on its authenticity. The assessment of the proposal under the objectives, policies and rules of Chapter 17 that is given in the document, however, does not address some critical elements of the proposal, as I discuss further in my evidence below.
51. A supplementary assessment against objectives and policies is also provided in Appendix I of the Application which has some relevance to the Applicant’s overall assessment of the proposal with regards to heritage.
52. The AEE concludes:
 - a. The proposal will result in changes to the existing heritage building and affect the physical fabric of the building at specific locations. There will be some adverse effects arising from the alteration of the existing building through a loss of original fabric, and a partial obscuring of the original form of the building from the west and north elevations.
 - b. Adverse effects arising from the proposal can be mitigated through opportunities to re-use significant heritage features, such as the baptistery stained glass windows and baptismal font, elsewhere within the church or in the new additions.
 - c. There will also be significant beneficial effects arising from the seismic upgrade, repair and renovation of the existing building fabric, and through re-opening of the building so it can be used again for its original function as a place of worship.
 - d. As noted by the Applicant’s Heritage Expert, the assessment of the proposal has also given due consideration to non-statutory

guidance, including the policies set out in the Conservation Plan prepared for All Saints', and has sought to balance these guiding principles with the essential requirements of the Anglican Church as the owner and the most significant user of the place.

- e. This assessment objectively considers the adverse effects on heritage values against the beneficial effects of the proposal. In so doing, this assessment has demonstrated that there are greater positive outcomes than negative outcomes arising, both in terms of the number of beneficial effects, and in their magnitude.
- f. Overall, the proposal is considered to meet with the key objectives and policies set out in the District Plan and the purpose of the Act will be best served by granting consent to it.

53. My response to these points, along with others made in the Application, is provided in the assessment in paragraphs 54 to 158.

Assessment of Effects on Heritage Values

54. The assessment criteria at R17.7.2 of the PNCDP has assisted my consideration as to whether the effects of the proposed works on All Saints' Church are acceptable. I have also referred to the objectives and policies given in Chapter 17; Heritage New Zealand Pouhere Taonga's (HNZPT's) *Sustainable Management of Historic Heritage Guidance Series Information Sheet 12: Alterations and Additions to Historic Buildings* and *Information Sheet 14: Partial Demolition of Historic Buildings*; and the *ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value*. Where noted, I have used a definition given in the *Burra Charter*, the *Australia/ICOMOS Charter for Places of Cultural Significance*.

55. For convenience, I have grouped guidelines from the *HNZPT Sustainable Management of Historic Heritage Guidance Series* and articles of the *ICOMOS New Zealand Charter* with the assessment criteria in R17.7.2 where there is significant overlap or relationship; and I have assessed these together where I believe it is appropriate to do so. Where there may be

minor points of difference, I have given preference to the wording of the assessment criteria in R17.7.2 or addressed the wording of all applicable points. Where relevant, the assessment criteria of R17.7.2 are identified as the primary point of consideration (with a bold heading) while the HNZPT guidelines or *ICOMOS NZ Charter* articles are identified as ‘other provisions that are relevant’.

56. For the purposes of this Assessment, I have adopted the orientation points used in the AEE and Heritage Impact Assessment, as represented in Figure 1 below.

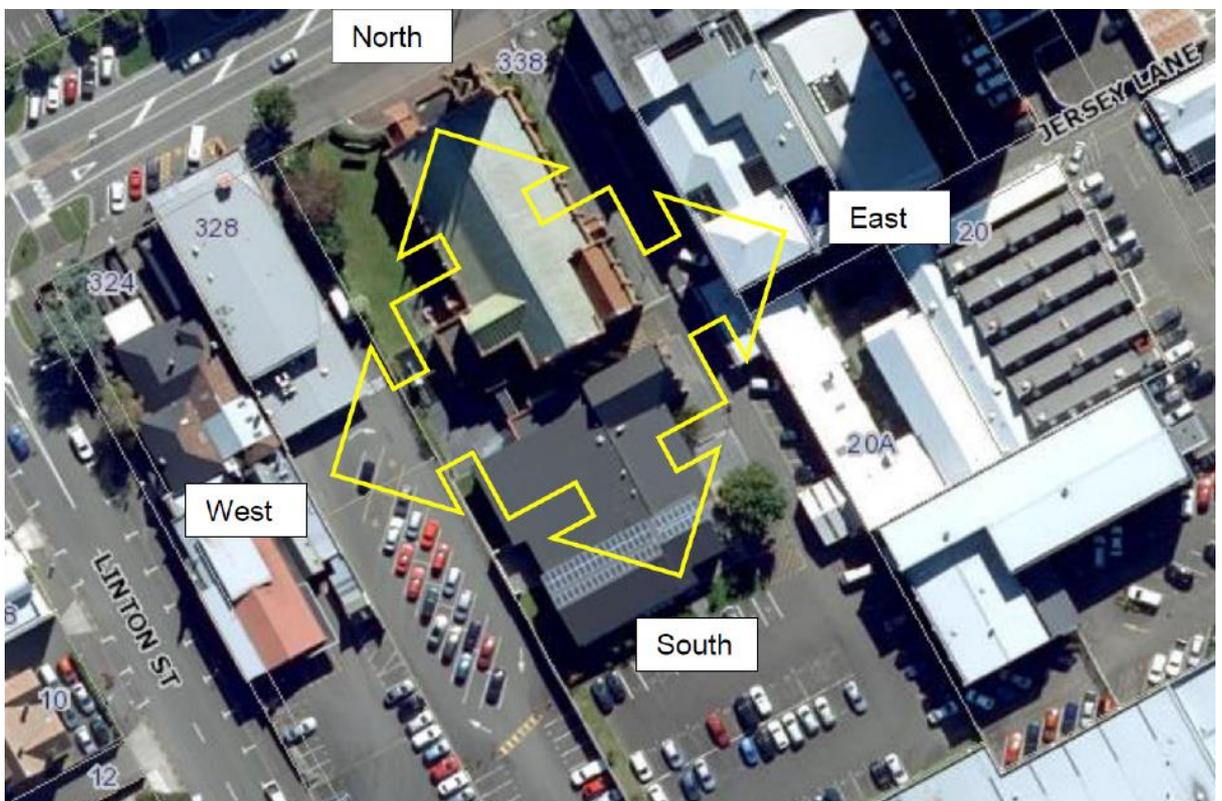


Figure 1: Orientation points used in the Heritage Impact Assessment prepared by Plan.Heritage

57. As noted in paragraph 24, I see the proposal as having two distinct parts: the first being the seismic strengthening and upgrade works, and the second being the partial demolition and addition. At several points my assessment considers these two parts separately, and this is noted where relevant.
58. Before assessing the proposal under the PNCDP and HNZPT criteria, I draw attention to Table 7 of the Applicant’s Heritage Impact Assessment which

summarises their assessment of the effects of the proposal on the identified heritage significances of All Saints'. It is reproduced in Table 2 below

| Value | Assessed Significance * | Adverse Effect /duration | Beneficial Effect / duration | Comment |
|--------------------------------------|-------------------------|--------------------------|------------------------------|---|
| Cultural values | | | | |
| Emotional | High | Minor Permanent | Critical Permanent | Stays in use with the community as a place of worship |
| Historical | High | Neutral Permanent | Critical Permanent | History of Association with Anglican Church is maintained |
| Design | High | Significant Permanent | Critical Permanent | Historic landmark is retained but with altered design. Mitigation is employed to ensure adverse effects are not significant and unacceptable |
| Technological | Moderate | Neutral Permanent | Moderate Permanent | Traditional construction techniques and materials will be retained and enhanced. Seismic technology will be of future interest and has educational value especially for conservation practitioners |
| Use Values | | | | |
| Economic | Low | Significant Temporary | Low Permanent | Cost of non-use and lack of heritage tourism etc. This will improve once building back in use |
| Cultural/ community | High | Significant Temporary | Critical Permanent | Building cannot be used currently, but on completion will be retained for long-term use |
| Continuation/ appropriateness | High | Neutral Permanent | Critical Permanent | Continued association of Church with site and use as place of worship |
| Contextual Values | | | | |
| Representative/ townscape | High | Moderate Permanent | Significant Permanent | There will be some loss of viewing experience, but key views are unaffected, and building will remain onsite as a landmark |
| Authenticity | High | Moderate Permanent | Critical Permanent | There will be a moderate degree of intervention with original fabric, but most of the building fabric will remain, the interior and the function will remain. Remaining fabric will have increased resilience |

Table 2: Summary of anticipated effects on historic heritage values of All Saints' taken from the Heritage Impact Assessment

59. I disagree with the assessment of adverse effects given in Table 2 as it relates to the proposed partial demolition and additions. Using the scale of effects given in the Heritage Impact Assessment at page 56, I consider that the adverse effect of the proposal on design values, representative/townscape values, and authenticity is 'critical' (rather than moderate or significant) and permanent.² Pursuant to the rating scale used in the Heritage Impact Assessment, 'critical' rating refers to "unacceptable adverse effects that cannot be avoided or mitigated. Most, or key, statutory

² I discuss what may be considered "temporary" as opposed to "permanent" in paragraphs 114 to 116.

63. I agree in principle with the statement made in the Applicant's AEE that raising and investing the amount of money required to carry out the strengthening is difficult to justify if the building is not able to be widely used in the long term. I also acknowledge that being able to provide for community events beyond the traditional use of the church as a place of worship will enable more efficient economic use of All Saints', as described in the Heritage Impact Assessment. However, All Saints' was being used for events other than worship prior to its closure in 2013, including music and cultural events; and I see no reason why this could not be resumed if the building is strengthened and made safe to use again.
64. Therefore, while I acknowledge that the partial demolition and addition as proposed may enable better economic use of the building or land and, based solely on the Applicant's comments in their AEE, that the building may be more likely to be retained, I consider it to be relevant that the building would retain a useful purpose and an economic use without those changes.
65. According to the Heritage Impact Assessment:
- ...the Diocese considers that it is vital for the building to respond to the current and future needs of the Anglican Church and its community. It is unlikely that the Anglican Church would retain ownership and use of the building in the long-term, if these requirements cannot be met.
66. Similar statements are made in the All Saints' Church Entrance Options report provided in their RFI response in January 2020, which states that *"any non-church use of the building would likely lead to more drastic change"* and *"for the building to survive it must not fall into disrepair"*.
67. The implication is that the partial demolition and addition proposed are *necessary* for the church to meet the needs of its community and that the strengthening works cannot be justified if these needs cannot be met. Beyond this, there is a further implication that the building will be left unused and/or will be sold and/or will need to be partially or completely

demolished to address the current safety concerns, if the additions are not approved.

68. I certainly do not consider that partial demolition and additions are necessary to facilitate the building serving a useful purpose, economic or otherwise, either by the congregation or the public. This is evidenced by the fact that the building served a useful purpose up until its closure in 2013.
69. Therefore, while I accept that retention and renewal of All Saints' will be more likely if the Application is approved in full for the purposes of assessment criterion a of R17.7.2, this factor should not, in my opinion, weigh heavily on the overall assessment because I consider it remains open to the Diocese to choose to put the building to a useful purpose, including an economic use, even without the partial demolition and proposed extension.
70. Further, I note that the cost of strengthening and extending the building would necessarily be much greater than the cost of strengthening alone. The AEE states that: *"To strengthen the building to 100% of current building/earthquake standards **and provide a new frontage** will cost in the order of \$7 million"* (my emphasis), but costing information has not been provided. A breakdown of the separate costs of strengthening and the extension, and a detailed cost-benefit analysis, is necessary to support the Applicant's position that the strengthening is only feasible if the extension is also approved.
71. I would encourage the Applicant to seek sources of funding support for the strengthening, which would further reduce the costs to the Diocese and congregation.

| | |
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| Assessment | Whether the external alterations and additions would be |
| Criterion R17.7.2 b. | compatible with the aspects of the original fabric of the building which contribute to its heritage significance, but visually distinct enough to be recognized as new work. |

| | |
|----------------------------------|---|
| Other relevant provision: | New additions should be distinguishable from the original. New work should be harmonious and sympathetic with the significant features of the place. |
| HNZPT Info Sheet 12 | The contrast should not be obvious or visually obtrusive. |

72. The Applicant's Heritage Impact Assessment states that the design of the addition employs:

...some of the elements of the Gothic architectural style found in the Church itself so that the overall effect is a harmonious one. There are clear references to some of the interior elements of the Church through the use of timber columns, but in a modern application.

73. The Heritage Impact Assessment also states:

The new addition is designed to respond to the architectural language of the existing building by incorporating Gothic architectural conventions for entrances and 'tree' forms to structural columns without attempting to emulate the characteristics of the Edwardian Gothic revival style. It is clearly differentiated as a new addition.

74. Certainly, the additions proposed in the Application are visually distinct, and would be easily recognised as new work. However, as criterion R17.7.2.b. and HNZPT guidelines both clearly articulate, in being distinct, additions to heritage buildings also need to be compatible with, and sympathetic to, the significant features and original fabric so as to avoid obvious or visually obtrusive contrast.

75. While the proposed seismic strengthening largely achieves this balance, the same cannot be said of the proposed addition. The tree-like forms of the proposed columns may arguably be seen as a modern interpretation of some Gothic forms used within the church; however, the new columns are not seen in the context of the church interior; but, rather, in the context of the church exterior. The arrangement of the columns, and the curved form of the walls and roofline of the proposed addition are juxtaposed

uncomfortably against the strong linearity of Clere's Gothic exterior in this case.

76. Similarly, the use of timber and glass for the addition, where the exterior of the church is predominantly brick, is incongruous. While it is true that glazed additions to historic buildings are often preferable to solid additions, this generally applies when the additions are discrete and/or when glazing is used to create a link or connection between the old and new, which is not the case with the additions being proposed for All Saints'.
77. I appreciate that the Applicant has tried to achieve a level of transparency with the addition, and to have some kind of connection with the building's architecture; however, I do not agree that the design of the proposed addition is compatible (as required by R17.7.2.b.) or "harmonious" (as recommended by the HNZPT guidelines) with the existing building materials or design.

Assessment **Whether the external alterations and additions reflect**
Criterion R17.7.2 c. **the architectural style and character of the building.**

Other relevant **New additions should be compatible to the original**
provisions: **design and detailing. Successful examples usually involve**
HNZPT Info Sheet **new structures being smaller in scale with larger setback,**
12 **built of similar materials but in a modern design.**

New additions should maintain the rhythm, orientation
and proportions of the original, especially where these
contribute to the significance of the place.

A large addition should be constructed in a way that
clearly separates it from the original building. The two
may be joined by means of a visually unobtrusive link.

ICOMOS NZ Charter **Adaptation should not dominate or substantially obscure**
Article 21 **the original form and fabric.**

New work should complement the original form and
fabric.

78. Clere's design of All Saints' draws generally on Perpendicular (or rectilinear) Gothic, with some Early English and Decorative Gothic elements. Strong vertical lines were a feature of this style, evidenced particularly on the north elevation of All Saints' where Clere created a vertical tripartite by placing the tower on the east, the stained-glass window and baptistry at the centre, and a porch at the west. The proposed addition disrupts this tripartite. The curved and organic forms of both the walls and roof, and the timber, glass and membrane roofing materials sit uncomfortably next to the linear forms and brickwork of the church facades; and the raised section of the addition that accommodates the gable of the west porch creates further incongruity and breaks up the rhythm and proportions of the street front elevation.
79. Wrapping around the church on two sides, rather than being separated and/or set back from it, the addition becomes the focal point, rather than the church itself. Instead of being smaller in scale and built of similar materials, the proposed addition is large and obtrusive, and features a substantial amount of modern glazing.
80. According to the Applicant's Heritage Impact Assessment, that the proposed addition will partially obscure the elevations of All Saints' will be mitigated by the use of full height clear glazed walls that will allow those parts of the original elevation behind the addition to be seen. However, the drawings provided with the Application do not accurately demonstrate the glazing as it will appear, and arguably create a false sense of the level of transparency that can be achieved.
81. In these ways, the proposed addition interrupts and obscures, rather than reflects, the architectural style and character of the existing building.

| | |
|-----------------------------------|---|
| Assessment | Whether the external alterations and additions respect |
| Criterion R17.7.2 d. | the scale of the building and avoid visual dominance. |
| Other relevant provisions: | New additions should be compatible (able to co-exist) in terms of materials, scale, size, proportions, mass, height, setback, texture, colour, plan configuration, surface |

HNZPT Info Sheet 12 **configuration and other details to adjoining and/or surrounding significant buildings.**

ICOMOS NZ Charter Article 21 **Any alterations or additions should be compatible with the original form and fabric of the place, and should avoid inappropriate or incompatible contrasts of form, scale, mass, colour, and material.**

82. Images provided in the Applicant's first RFI response demonstrate that the proposed addition becomes visually dominant when the building is viewed from the north and west.

83. The height of the gabled end of the nave and, more particularly, the tower, are not disrupted by the addition, which is generally single storey. However, this is breached by the curved roof form that encloses the gable of the west porch. This feature, in particular, is incompatible with the scale of the church, and increases the visual dominance of the addition.

84. As discussed under R17.7.2.b. and c. (paragraphs 72 to 78 above), the proposed addition is not compatible in terms of design, configuration, materials, colour or texture, especially when viewed from the exterior.

Assessment Criterion R17.7.2 e. **The extent to which alterations to street elevation is minimised and alteration to features of particular heritage significance is avoided.**

Other relevant provision: **New additions should be to the rear of the building or set back from significant elevations, including the roof elevation.**

HNZPT Info Sheet 12 **Any addition to significant façade(s) of the original building, including the roof, should be avoided.**

85. Criterion R17.7.2e requires assessment of two separate matters: the first being the extent to which alterations to the street elevation are minimised; and the second being the extent to which alteration to features of heritage significance is avoided. Only the first matter is directly addressed in the

Applicant's Heritage Impact Assessment. I address them separately in paragraphs 86 and 97 for clarity.

Minimise Alterations to the Street Elevation

86. As HNZPT *Information Sheet 12* states, additions to heritage buildings should generally be positioned at the rear or set back from significant elevations, with additions to significant façades being avoided. This is reflected in R17.7.2e. Contrary to this, the proposed alterations to All Saints' are entirely positioned on the two most prominent elevations: the street elevation (north), which is the most visible and highly articulated elevation of the building; and the west elevation, which is the second-most visible within the surrounding streetscape due to the large open space on the western side. In this way, the proposed additions partially obscure and conceal these elevations.
87. Furthermore, the proposed partial demolition is also concentrated on these two elevations, with the most major demolition – the removal of the baptistry wall – being on the street (north) elevation.
88. That the proposal would result in an obvious change to the street elevation of All Saints' is acknowledged in the Applicant's Heritage Impact Assessment. The position taken by the Heritage Impact Assessment is that this is necessary to serve the needs of the church and the parish; and that the street elevation can still be appreciated from close views or through kinetic experience. However, I consider that argument is somewhat beside the point for the purpose of this assessment, as the street elevation will no longer be intact, nor will it be visible in its entirety from any angle without the intervention of modern fabric (including from within the addition itself which requires the elevation to be looked up at through a glass roof).
89. Further, as already noted, while the proposed addition is glazed, the drawings provided with the Application do not accurately demonstrate the glazing as it will appear, and arguably create a false sense of the transparency that can be achieved.

90. The impact of the proposed addition on the street (north) elevation has been discussed further under 17.7.2.c. and d. (paragraphs 78 to 84 above).

Avoid Alterations to Features of Particular Heritage Significance

91. To evaluate whether or not the proposal avoids altering features of particular significance, it is first necessary to identify what these features are.
92. The Conservation Plan uses a five-tier scale to identify the level of significance of building elements: high, some, little, none, and intrusive, where “high” significance includes having a high level of integrity.³
93. The Conservation Plan assesses all of the exterior elevations of the building as being of high significance.⁴ Of particular relevance is the assessment of the north⁵ and west⁶ elevations:

(a) The north elevation:

...is the primary street elevation where Clere has successfully balanced tower, nave, aisles, baptistery and entries. It is a well recognised landmark in the CBD defined by its scale, form, and materials, which are also its character defining elements.

(b) The west elevation:

...demonstrates the planning of the church with the external expression of the organ loft, choir room and vestry as well as the southern aisle. Its scale, forms, materials, openings, buttresses and decorative detailing

³ As defined in the ICOMOS New Zealand Charter, “integrity” means the wholeness or intactness of a place, including its meaning and sense of place, and all the tangible and intangible attributes and elements necessary to express its cultural heritage value.

⁴ Conservation Plan, p24 and p26.

⁵ This is defined as the west elevation in the Conservation Plan.

⁶ This is identified as the south elevation in the Conservation Plan.

are character-defining elements in the design and are consistent with the Free Gothic style.

94. The Conservation Plan also assesses the baptistery and entry porches either side - being the main entry at the base of the tower, and the secondary entry (west porch) on the other side of the baptistery - as having high significance:

The baptistery is a primary space where a principal sacrament of the Christian church takes place, but which still retains a visible and open connection to the nave. The font is the focus of the space, which, with the stained glass windows, contribute to its quiet dignity. These elements have also been designed and crafted to the highest standards.

The entry at the base of the tower:

...is the main entry to the church and is a primary space. The details are simple but appropriate with substantial solid timber doors to the street and leaded glass doors to the church giving light and view into the interior.

95. Other interior spaces identified as having high heritage significance are the nave, chancel and aisles (forming the body of the church) and the chapel.
96. I agree with the assessment given in the All Saints' Conservation Plan that the north and west elevations, the baptistery, and the entrances into the church that are positioned either side of the baptistery, all have the highest level of heritage significance. I also agree with the Conservation Plan that, overall, these parts of the building have a high level of authenticity, being largely unchanged since the time of construction.⁷

⁷ As defined in the ICOMOS New Zealand Charter, "authenticity" means the credibility or truthfulness of the surviving evidence and knowledge of the cultural heritage value of a place. Relevant evidence includes form and design, substance and fabric, technology and craftsmanship, location and surroundings, context and setting, use and function, traditions, spiritual essence, and sense of place, and includes tangible and intangible values. Assessment of authenticity is based on identification and analysis of relevant evidence and knowledge, and respect for its cultural context.

97. I acknowledge that the proposed alteration has a lesser impact on the body of the church, and on the east and south elevations, which are also assessed in the Conservation Plan as having the highest level of significance. However, that does not negate the fact that the proposed partial demolition and additions directly alter, rather than avoid, features of particular heritage significance, being the north and west elevations, the baptistery, and the entrances either side. By altering these features, the proposed partial demolition and addition negatively impact on the building's design, contextual, and landmark values, as well as its level of representativeness and authenticity.

Assessment **Whether the external alterations and additions respect Criterion R17.7.2 f. the setting of the building.**

Other relevant provisions:

HNZPT Info Sheet 12 **New additions should preserve existing significant views to and from the heritage place and its setting.**

ICOMOS NZ Charter Article 9 **Where the setting of a place is integral to its cultural heritage value, that setting should be conserved with the place itself.**

98. All Saints' is recognised for the role that it plays in the townscape, both as a landmark and as a representative example of its type.
99. Images provided in the Applicant's first RFI response demonstrate that the proposed addition will affect the setting of the existing building, especially when viewed from the north and west. This is acknowledged in the Applicant's Heritage Impact Assessment. In addressing this, the Heritage Impact Assessment highlights that the north window and tower will remain fully visible from The Square looking southwest, and this is also demonstrated by the images in the first RFI.
100. Therefore, while the building's immediate setting, and thus its contextual and landmark values are impeded by the addition when the building is

viewed from the north and west, I agree with the Applicant's Heritage Impact Assessment that the building's landmark values in the wider setting of The Square largely remain intact, primarily because the tower remains intact.

Assessment **The benefit to the ongoing preservation of the building**
Criterion R17.7.2 g. **where external alterations are required as part of safety**
 improvements in relation to seismic performance, fire
 safety and physical access.

Other relevant **Places of cultural heritage value may be vulnerable to**
provision: **natural disasters ... or to humanly induced threats and**
ICOMOS NZ Charter **risks ... In order to safeguard cultural heritage value,**
Article 24 **planning for risk mitigation and emergency management**
 is necessary.

101. I have considered seismic performance, fire safety and physical access separately below.

Seismic Performance

102. The benefit that seismically strengthening the building will have for its ongoing preservation is not in dispute. Under the current Building Code, strengthening is necessary for the building to be used; and ongoing use supports ongoing preservation of the building.

103. The proposed strengthening scheme will require some permanent external alterations as follows:

- (a) Removing the existing brick finials from the tower and replacing with lightweight replicas
- (b) Removing the brick parapet and finials from the side elevations
- (c) Replacing the parapet with a reinforced concrete beam
- (d) Reconstructing the brick finials over the concrete beam

- (e) Removing the existing roof and installing a plywood diaphragm and new roof

104. The removal and replacement of the brick finials from the tower, and of the parapet and finials from the side elevations, will necessarily result in the loss of historic fabric, and will therefore impact on the building's authenticity. The concrete beam that will replace the parapet will also have an aesthetic impact that could be avoided by the use of brick slips cut from the original bricks. I do not agree with the Applicant's reasoning as to why they have not pursued this option.
105. However, while these alterations will arguably have a negative impact on the building's physical heritage values, this is not significant enough to outweigh the positive impact that strengthening the building will have through enabling ongoing safe use and reducing the likelihood that the building will be lost in a seismic event.

Fire Safety

106. As the Applicant has not provided a fire report or other fire safety compliance documentation as part of their Resource Consent Application, it is not clear whether or not the building currently meets fire safety requirements and/or would continue to do so if the strengthening works only were carried out.
107. Sections 2.3 and 5 of the AEE state that the additions to the building, particularly on the west side, will improve fire safety; but the letter dated 17 April 2020 acknowledges that there are numerous exits from all sides of the building. Given that all of the current exits would remain in place if the building were to be strengthened only, it is difficult to understand how the addition would improve upon the existing building with regards to fire safety.

Accessibility

108. In their responses to requests for further information (letters from Lakemba Properties dated 15 January and 17 April 2020) the Applicant confirmed

that All Saints' currently meets the requirements for accessibility under the Building Code, and will continue to do so if the strengthening works only are carried out. Therefore, while the proposed partial demolition and additions to the building would arguably improve physical access into the church, they are not required to make the building accessible, even once it has been strengthened.

109. It is also noted that, while the proposed addition will be accessible from the street, users that require a ramp will not be able to enter the church from the front, but will have to enter through the side (west) as the west porch will be blocked off from the nave.

Assessment **The extent to which any proposed work is in keeping with Criterion R17.7.2 h. any conservation plan for the building.**

Other relevant provisions: **The proposed partial demolition should be limited to parts of the building (including interior) that have been identified in a conservation plan or heritage assessment as having no significance, are not contributory to the significance of the heritage place, are intrusive, or where the partial demolition reveals fabric of higher degree of significance.**

HNZPT Info Sheet **14**

ICOMOS NZ Charter **All conservation work should be based on a conservation Article 4 plan which identifies the cultural heritage value and cultural heritage significance of the place, the conservation policies, and the extent of the recommended works.**

ICOMOS NZ Charter **Work undertaken at a place of cultural heritage value Article 6 should involve the least degree of intervention consistent with conservation and the principles of this charter.**

ICOMOS NZ Charter **Occasionally, existing fabric may need to be permanently Article 19 removed from a place. This may be ... because particular**

fabric has been identified in a conservation plan as detracting from the cultural heritage value of the place.

110. I do not agree with the Applicant's AEE or Heritage Impact Assessment that the Conservation Plan has been appropriately considered or reflected in the design. The proposed partial demolition directly contravenes the Conservation Plan, which clearly articulates that the external elevations and the baptistery have the highest level of significance, and intervention in these areas should be the minimum necessary for ongoing conservation and use of the building.
111. I note that the Applicant has commented that the Diocese did not officially adopt the Conservation Plan. However, it does exist, and it was commissioned by the Diocese, and included it in the Resource Consent Application (presumably on the basis of its relevance), so I have given it due consideration.

HNZPT Info Sheet 12 New additions should avoid permanent damage to significant fabric.

New additions should use existing openings to allow access between the old and the new. This will minimise adverse effects on significant fabric.

ICOMOS NZ Charter Article 21 Any change should be the minimum necessary, should be substantially reversible, and should have little or no adverse effect on the cultural heritage value of the place.

112. That the partial demolition of the baptistery as proposed in the Application will cause permanent damage to significant fabric cannot be debated. As discussed in paragraph 96, the fabric that is proposed for removal is of the highest level of significance; and, although the proposal includes relocation of the stained glass windows, these will be dislocated from their original context, and the remainder of the fabric will be lost.
113. The proposal will also cause permanent damage to significant fabric on the north and west elevations where it is proposed to connect the addition to

the existing building. The extent of this damage is not discussed in the Application, nor is the effect of this damage evaluated in the Applicant's Heritage Impact Assessment, presumably because the extent of this damage is not defined. However, it may be assumed that, even if the addition is structurally self-supporting, it is necessary for it to connect to the existing building to provide a weathertight transition. At a minimum, this will require the removal of existing bricks and the installation of new flashings.

114. The *ICOMOS NZ Charter* does not provide a definition of "substantially reversible". Therefore, I base my assessment of what is "reversible" on the definition provided in AustraliaCOMOS's equivalent of the *ICOMOS NZ Charter*, the *Burra Charter*: "*reversible changes should be considered temporary*". I do not believe that the Diocese intends for any of the changes within the proposal to be temporary or to be reversed in the future.
115. Alternatively, a dictionary definition of "reversible" may be applied. Lexico defines 'reversible' as meaning that the effects of a process or condition are "*capable of being reversed so that the previous state or situation can be restored*". I do not believe that the Diocese intends for the changes within the proposal to be capable of being reversed so that the building as it is now can be restored.
116. The greater the loss of original fabric, the less reversible a change becomes. Using new fabric to reinstate those parts of the building that would be demolished by the proposed works would be possible, but the authenticity and integrity of the building would still be diminished. Even if the fabric that is proposed for removal is carefully deconstructed and salvaged, reinstating it in its exact locations to the original design would only be possible if the materials are retained and stored, an exact record of the construction is made, and this record is cross referenced with those materials. The Application as it stands does not provide for this (although I note that it is recommended in the Heritage Impact Assessment). Further, even if such a record was to be made and the salvaged materials stored, there will inevitably be damage and loss of fabric resulting from the process

of deconstruction; and reconstruction will never be as authentic as the original construction.

117. With regard to openings specifically, the proposal goes against the HNZPT guidance, enlarging existing openings and creating new openings in the west façade and west porch which will result in further loss of fabric and changes to the church's architectural form. The Applicant's Heritage Impact Assessment does not directly address either of these issues.

HNZPT Info Sheet 14 **Partial demolition should not be allowed unless it does not adversely affect the significance and integrity of the place.**

The proposed partial demolition should be limited to parts of the building that are beyond physical repair due to fire or other damage.

ICOMOS NZ Charter Article 19 **Occasionally, existing fabric may need to be permanently removed from a place. This may be for reasons of advanced decay, or loss of structural integrity, or because particular fabric has been identified in a conservation plan as detracting from the cultural heritage value of the place.**

118. The proposed replacement of the roof, which also forms part of the seismic strengthening scheme, is necessary to make the building weathertight again. The current roof is a replacement of the original and is not considered to have high heritage significance; therefore, its removal for reasons of deterioration is acceptable as it does not substantially detract from the building's overall heritage values.

119. The partial demolition of the baptistery, in particular, will negatively impact on the building, as discussed in this report and as noted by both HNZPT (in the record of consultation provided in the Application) and in the Applicant's Heritage Impact Assessment. This part of the building is not damaged, and does not require any substantial physical repair, so cannot be justified on the grounds of damage or safety. It will result in the removal of original fabric, the loss of a key design feature and the obscuration of

other highly significant parts of the building, compromising the building's architectural significance and overall integrity.

120. It is notable that the Applicant's Heritage Impact Assessment does not provide a detailed evaluation of the impact that this partial demolition will have on the significance and integrity of All Saints'. Similarly, the Heritage Impact Assessment does not discuss in detail the impact of removing fabric and/or the damage that will be caused by adding larger openings into the building, or by connecting the proposed addition to the building. It makes reference to the possible cataloguing and storage of materials, but this would not substantially mitigate the adverse effect of their removal, and is not being offered as a mitigative condition by the Applicant.

17.3 A To ensure that buildings and objects of cultural heritage value to Objective 1 Palmerston North are appropriately protected and conserved.

121. The word 'appropriately' is at the centre of this objective, and may be debated. It is acknowledged that 'appropriate' does not necessarily mean 'optimal' or 'best'. I refer to the Supreme Court's decision in *Environmental Defence Society Inc vs The New Zealand King Salmon Co Ltd* in 2014 (NZSC 38) that 'inappropriateness' in Part 2, Section 6 of the Resource Management Act 1991 should be assessed by reference to what it is that is sought to be protected or preserved. In this case, it is the heritage value of All Saints' (being made up of the values identified in paragraphs 29 to 37 above) that is sought to be protected or preserved; specifically its tangible (physical) values.
122. While I consider the proposed seismic strengthening to represent appropriate protection of All Saints' (as a building of cultural heritage value), I do not consider the proposed partial demolition and additions to be appropriate as there will be considerable negative impacts on the physical or tangible values of the building while retaining its intangible values, where strengthening alone will ensure that all values are retained.

17.3 A To discourage the demolition or relocation of scheduled heritage Policy 1.3 buildings and objects.

123. Relocation or complete demolition are not being proposed in this case.

**17.3 A To recognise that relocation or partial demolition may be
Policy 1.4 appropriate to ensure long term sustainable use of the scheduled
building or object, in circumstances where:**

- **It can be demonstrated that relocation or partial demolition will result in the overall retention of significant heritage values; and**
- **Decisions on resource consent applications for the relocation or partial demolition of a scheduled building or object are informed by a thorough analysis of the alternative options available, including social, cultural, economic and environmental costs and benefits.**

124. In relation to the first requirement of Policy 1.4, please refer to the discussion in paragraphs 62 to 69 and 118 to 120. While the partial demolition that is proposed may, as part of the addition, improve the diversity of use options, it will result in an overall loss of significant heritage values, and therefore would not be consistent with this Policy. In these circumstances the Policy dictates that the partial demolition is not appropriate.

125. Even though I do not consider that the first requirement of Policy 1.4 is met, I also assess the application in relation to the second requirement for the sake of completeness. I acknowledge that the Applicant has been through a process of design development and consultation since the building was closed in 2013.

126. Through discussions with the Applicant, I understand that alternative methods of strengthening have been explored, although documentation has not been provided. I acknowledge and commend the Applicant for their willingness to strengthen the building, and for making a concerted effort to seek the best option for doing so.

127. Similarly, I acknowledge and commend the Applicant for withdrawing an earlier proposed design option in order to explore alternatives prior to lodging the current Application.
128. As part of their first RFI response dated 15 January 2020, the Applicant provided a brief report on five entrance options that they considered following the closure of the building in 2012 (Entrance Options report). The Applicant was asked for an assessment of these options in accordance with Policy 1.4 but this has not been provided. It is also noted that these options are specifically to address the entrance to the building and, although some of the options also include a discussion of additional facilities, this is not explored to any great extent in the Entrance Options report. I address the options individually in paragraphs 129 to 141 below.

Tower Entrance

129. No drawings are provided to support this option, but from the explanation provided it is assumed that this refers to the existing entrance at the base of the tower with no modifications except those that would be required for strengthening.
- (a) The Applicant states that:
- The form of this entrance, in its constriction and accessibility, now works against the community vision for the building i.e. to be welcoming... The Tower Entrance cannot physically fulfill the requirements of an entrance to a space that can accommodate events such as concerts for over 500 people.
- (b) However, the Applicant separately confirmed in the same RFI response that All Saints' currently meets the requirements for accessibility under the Building Code, and will continue to do so if the strengthening works only are carried out. It is a point of access not of congregation.

West Porch Entrance

130. A small sketch of this option is provided (Fig 2 in the report). It is not clear whether the figure is intended to show an enlargement of the existing porch; however, the explanation provided indicates that enlargement was discussed.

(a) The Applicant states *“The West Porch Entrance is narrower than the Tower Entrance. This neither provides direct visual access or a welcoming solution”*. I acknowledge that these statements are fair insofar as “welcoming” is defined in paragraph 49.

(b) The Applicant then goes on to state that:

Enlarging the West Porch Entrance would reduce the need to modify the baptistery so the extension to cover the baptistery would no longer be required. The west porch itself acts as a wind lobby so it negates the additional need for this also. Any gathering space should then start on the Linton Street side of the building. Modification to the original building fabric would be somewhat less than the modification to the baptistery.

I agree with the Applicant on this point, noting that the enlargement referred to is not explained or shown in sketches provided.

(c) To explain their objection to this option, the Applicant continues:

However ... to open at street level to the footpath is not possible due to height differences; the importance of visual access into the heart of the church is not possible; people are still first met with the solid brick, front and centre; the community gathering space would also be seen as secondary or additional rather than a holistic part of the church.

I address these points individually:

- i. There must always be a ramp from street level into the church, it's just a matter of where and how this is accommodated. It is not a barrier for the west porch option specifically.
 - ii. The importance that the Applicant is placing on a visual connection from the street into the building is acknowledged (as discussed earlier). However, images provided in the Applicant's first RFI response clearly demonstrate that the removal of the baptistery wall and the new addition do not result in a significant improvement in visibility of the church interior from the street either.
 - iii. It may be true that a community gathering space would be seen as secondary if it were positioned on the side of the building. However, All Saints' should always be the primary building on this site - both because of its heritage value, and because the fact that it is a church is the main purpose for which people have and will come to the site.
- (d) The Applicant also claims that the intervention into historic fabric required to alter the west porch would be in the order of 10%, as compared to 13% to create a new baptistery entrance; however, no drawings or calculations are provided to support these percentages.

West Side Entrance

131. I note that this is referred to as the South Side Entrance in the Applicant's RFI response, but for consistency I am following the orientation used in the Heritage Impact Assessment. I also note that the sketches in Fig 3 of the Entrance Options report indicate that this option was for a building extension on the west side, not just an entrance.

- (a) The Applicant states:

To the South [west], Linton Street side of the church is a lawn and garden. This location has large enough space to accommodate an entrance and gathering space. This side of the church receives a good amount of evening sun. The advantage of using this space as the main entrance would allow the original baptistery to remain. However, the main issue is that it doesn't provide direct visual access into the church.

I refer back to my comment in paragraph 130(c)ii above.

- (b) The Applicant continues that, with this option, *“people must follow a path that traverses the gathering and refreshment area in a ‘dog leg’ fashion”* to enter the church; and, that *“When considering formal processions (ie. weddings and funerals) this creates an awkward process”*. This depends somewhat on the design of a west side entrance option: it is not necessary to traverse *“the gathering and refreshment area”* if the gathering and refreshment area is located in a different position to that shown on the drawing (which is a very high level concept sketch). However, it is acknowledged that, by coming in from the side, it would be necessary to follow a ‘dog leg’ path to get to the central aisle, just as it is also necessary to follow a ‘dog leg’ from any of the current entrances. It is also noted that the tower or west porch entrances could continue to be used for ceremonial purposes, as is done with other churches that have both front and side entrances.

East Side (Square Edge Side) Entrance

132. I note that this is referred to as the North Side Entrance in the Applicant's RFI response, but for consistency I am following the orientation used in the Heritage Impact Assessment. No drawings of this option are provided, so the extent of what is being discussed as the Square Edge Side option is unclear.

- (a) The Applicant states: *“On the Square Edge side of the church runs a driveway connecting Church Street to the Community Centre and*

car park. This makes a gathering space with an entrance impractical at this location". However, there are alternative options to access the carpark that have not been explored: for example, along the west boundary (if there is sufficient width) or by an easement from Linton Street.

- (b) The Applicant then states: *"It may be possible to expand the porch between the sun-shaded alley"* but it is not clear what they mean by this. The Applicant continues: *"[expanding the porch] would have a detrimental effect on the visibility of the Community Centre, and also on the long-term development options for the car park behind the Centre"*. The Community Centre is not currently visible from Church Street, as can be easily demonstrated on Google Street View; therefore, it is difficult to understand how an entrance on this side of the church would detrimentally impact on visibility of the Community Centre. With regards to the car park, other access options are available as noted above.
- (c) I agree with the Applicant's statement that *"The historical construction of the church would still need to be changed to form a suitable entrance albeit out of view from the public street"*. I believe this option warrants further investigation.

Baptistery

133. This option, to remove the exterior wall of the baptistery and create a central entrance into the nave, appears to be an early version of the option that is being considered in this Application; however, it does not include discussion of an expansive addition to the front of the building.

- (a) The Applicant states that *"to open up the baptistery will allow a full line of visibility into the heart of the church"*. It is true that removal of the exterior wall of the baptistery would create an opportunity to see into the body of the church from the street, although this would be obscured by the arches that separate the baptistery and the nave which are not proposed for removal in the Entrance Options report or in the design that is the subject of this consent. I

refer back to my comment in paragraph 130(c)ii above regarding visibility.

- (b) The Applicant also states that *“A new view of the tower and large front window will be able to be seen directly from within the entry”*. However, the baptistery is only a few metres deep, and it is difficult to see how the view of the tower and the window would be substantively different if one were standing within what is now the baptistery compared to one standing outside the present baptistery wall.

134. In the All Saints’ Church Entrance Options report, the Applicant also provides a list of churches designed by Frederick de Jersey Clere where the entrances have been modified. These examples, with the exception of St Mary’s in Karori, are much smaller than All Saints’, and are in residential settings without the same landmark values. Typically, the modifications date to the period between the 1960s and the 1990s; and, while they have generally been carried out in the same or similar materials, and are not physically dominant features, they may not be permitted if they were subjected to the statutory requirements and assessment criteria as All Saints’ is now.

135. St Mary’s in Karori, being the most comparable of the examples cited by the Applicant due to its size, position, and unique composition, has been expanded at least three times, but this has been done in a way that is in keeping with the architectural style of the building and has ensured preservation of its heritage values. It demonstrates a successful alternative to the design approach that has been taken at All Saints’.

136. Concluding the Entrance Options report, the Applicant states:

Of the options considered, the two narrow existing entrances [the tower and west porch] are impracticable. It is possible to fashion an entrance on the east side, but this would compromise both the fabric of the building, and not meet use requirements for the next 50 years.

However, not enough evidence is presented in the report to substantiate these claims, particularly the claims about a new entrance and possible extension on the eastern side of the building.

137. The Applicant continues:

Some adaption of the building is necessary, with the best practical solution being an entrance from the baptistery. We conclude that this is realistically the only feasible solution, and the effects of the loss of the baptistery can be balanced by, for example, the opening of the interior of the church to people on the street and the relocation of the stained glass windows.

I disagree with these statements. It is not the only feasible solution, and visibility to the interior and relocation of the windows would not sufficiently mitigate the negative impact.

138. I acknowledge the Applicant's desire to create a more welcoming entrance to the building, and to create a visual link to the interior of the church. They have clearly articulated why this is important to their current approach and practice; and, as an architect as well as a member of the general public, I understand that active street edges, clear entrances and visual connections can often make buildings more attractive places to enter. However, I am concerned by their statement that any compromise to the "goal" is "unacceptable", where the goal is to create an obvious entry that "removes every obstacle that might deter someone from coming in". In this context, the "obstacle" is part of a building with significant heritage values. I am concerned that comments such as these indicate that the Diocese's examination of alternatives did not proceed with an open mind. For custodians of nationally significant heritage buildings, compromises are often required to enable ongoing use without the unnecessary loss of heritage values, and thorough open-minded assessments of alternatives are an essential part of any determination of what constitutes and appropriate development of a protected heritage site.

139. I acknowledge that it is not feasible to exhaust every possible design option to achieve the outcomes that the church desires, as these are almost

infinite. However, I also believe that, notwithstanding the design exercises that were undertaken with regards to the entrance, there are other alternative ways to address the inadequacies that the Applicant believes exist with the current building but that avoid or have a lesser negative impact on heritage values than the proposed design would have. For example, some simple interventions such as landscape improvements in front of the Church could make the existing entrances more enticing; and, while this may not provide the lines of sight into the building that the Applicant would like to achieve, the proposed design does not substantially improve this visual connection either.

140. There are multiple ways of achieving a more welcoming entrance with a more discrete, less dominating and less obtrusive addition in more compatible materials. More importantly, the need to modify the building entrance(s) does not justify an extension the size of which is being proposed. Reducing the size of any extension would help to reduce the dominance and obscuration.
141. Further, while the Application has emphasised the Applicant's position that the proposed partial demolition and addition are essential to enable their long term use of the building, and that strengthening alone is not viable without these, it has not in my opinion presented a thorough cost benefit analysis to support this position, economic or otherwise (refer to comments in paragraphs 69 and 70).

**17.3 A To encourage the continued use or adaptive reuse of scheduled
Policy 1.5 buildings.**

142. As already identified and discussed, use is essential to the ongoing protection and preservation of heritage buildings. While it is acknowledged that the proposed partial demolition and addition may support a more increased or diverse use of the building, continued use of the building can be achieved through seismic strengthening alone.

**17.3 A To avoid, remedy or mitigate the effects of activities or
Policy 1.6 development which could impair or destroy the cultural heritage
values associated with scheduled buildings and objects.**

143. All Saints' is scheduled, in part, in recognition of its design, which has remained largely unchanged since construction, and the role that it plays in the streetscape. The tangible values of the building, and its level of representativeness and authenticity, will all be impaired to varying degrees by the proposed addition.

144. The Applicant has proposed some mitigation measures in Section 12 of the AEE. I address each of these proposed measures individually below.

Additional mitigation for the removal of the baptistery wall and in particular the stained-glass windows is proposed, so that these significant heritage features are appropriately protected and re-used in the corridor to the new building to the west of the existing church.

145. I understand this statement to mean that the Applicant believes that the proposed relocation of the stained-glass windows from the baptistery to the proposed corridor will mitigate the removal of the baptistery wall (including the windows). Relocation of the font is also described as a mitigation measure in the Applicant's Heritage Effects Assessment, though is only peripherally mentioned in the AEE (Section 9). The Heritage Impact Assessment states that:

There will be some adverse effects arising from the alteration of the existing building through a loss of original fabric, and a partial obscuring of the original form of the building from the west and north elevations in terms of the existing viewing experience. Without mitigation, such as the reuse of the stained-glass windows and relocation of the font, these effects could be significant and unacceptable. However, the proposal has introduced several mitigation measures through its design, so that on balance these adverse effects are considered to be moderate and acceptable.

146. I do not agree. While I commend the Applicant for retaining the font and for integrating the stained-glass windows into their proposed design for the

extension, preventing them from being destroyed, this can only offer mitigation for loss of those individual elements. Displacement of the font and particularly the windows, and complete removal of the baptistery wall, will result in the permanent loss of historic fabric and directly impact on the design values of the church and this cannot be avoided or appropriately mitigated by relocating the font and windows.

Additional interventions have been limited to those that are necessary to improve the accessibility and safety, including fire safety, of the church. Any additional plant or machinery required will be fixed in a manner which avoids damage or obstruction of significant heritage fabric, particularly where this requires points of egress through the structure of the church.

147. I do not agree with the first part of this statement as outlined earlier in my evidence. I support the Applicant's stated commitment to avoiding any further damage or obstruction of historic fabric; however, the extent of damage and obstruction that is proposed by the partial demolition and extension is inconsistent with this commitment.

As the proposal will affect a recorded archaeological site, an archaeological authority will be applied for prior to any earthworks being undertaken.

148. This is a legal requirement and is not considered to be mitigation.

A detailed record of the church will be prepared prior to construction to document its existing form. This will assist in any future conservation of the church fabric and further mitigate adverse effects.

149. I support the need for a detailed record to be made should the Application be approved (as discussed further in my evidence below). However, recording is not a substitute for retention and conservation; and while it may provide some marginal mitigation, it is not appropriate mitigation in the context of what is being lost.

A Construction Management Plan will be prepared

150. I support the need for a construction management plan should the Application be approved (as discussed further in my evidence below).

However, this will only enable monitoring, mitigation and limitation of damage that could be caused to the building during construction beyond the damage that will be necessary to execute the proposed works as they are designed.

151. Considering paragraphs 145 to 150, I do not consider that the mitigation being offered by the Applicant is sufficient to counteract the negative impact that the partial demolition and addition will have on the heritage values of the building.
152. I disagree with the statement in the Applicant's Heritage Impact Assessment that *"Provided the proposed mitigation is undertaken, this proposal is therefore considered acceptable from a historic heritage perspective and can be supported"*.

17.3 A To encourage and support owners of heritage buildings to undertake alterations to improve structural performance, fire safety and physical access that will aid building conservation and use while minimizing the significant loss of associated heritage values.

153. Refer to the discussion in earlier in my evidence. The seismic strengthening aspect of the Application is consistent with this Policy. The proposed partial demolition and addition, while they may improve access from the street, will not substantially improve safety or accessibility of the church itself, and does not minimise the loss of heritage values that would be associated with these works.

17.3 A To promote public awareness and understanding of the value of heritage and heritage conservation.

154. The Applicant's AEE and Heritage Impact Assessment make reference to the use of public or meeting spaces proposed as part of the addition for exhibitions relating to culture and heritage, as well as to the increase in public interaction with the building that may result from construction of the addition. In this way, the proposal has the potential to promote public awareness and understanding.

155. However, the modern addition itself is not necessarily a good way of promoting public understanding of the value of heritage and conservation. This would be better achieved by retaining as much of the building's original fabric as possible, and keeping its original design intact.

RMA Part 2 In achieving the purpose of this Act, all persons exercising Section 6 functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

(f) the protection of historic heritage from inappropriate subdivision, use, and development

156. The purpose of the RMA, as defined in Part 2, Section 5, "*is to promote the sustainable management of natural and physical resources*". Part 2, Section 6 identifies seven matters of national importance that must be recognised and provided for by PNCC in achieving this purpose, one of which is "*the protection of historic heritage from inappropriate subdivision, use and development*" (Section 6(f)). With regards to what is considered "inappropriate" in the context of Section 6(f), I refer back to paragraph 121.
157. All Saints' is recognised as a Category 1 Historic Place with HNZPT and a Category 1 heritage building in the PNCDP. In both cases, Category 1 is defined as a building or place that has outstanding cultural heritage value. That the building therefore warrants protection from inappropriate subdivision, use and development under the RMA cannot be disputed.

- (a) **Subdivision:** this is not a relevant consideration for this proposal.
- (b) **Use:** the building was actively in use as a church until it was closed for safety reasons in 2013. It was also used for certain community events, although this was not (nor has it ever been) its primary purpose. Returning the building into use as a church that can also hold certain community events is therefore appropriate. This can be achieved by seismically strengthening the building. While it may be the case that extending the building would enable additional

uses, I do not consider this to be appropriate if it results in a loss of heritage value that cannot be appropriately mitigated.

- (c) **Development:** As discussed earlier in my evidence, I believe that the proposed seismic strengthening represents an appropriate development, but that the proposed partial demolition and addition do not.

158. In Chapter 2 of the PNCDP, PNCC sets out 27 City View Objectives that are intended to reflect the resource management issues that exist within Palmerston North City and represent the broad outcomes the PNCDP seeks to achieve in accordance with the requirements of the RMA. Specifically, in City View Objective number 16 - *“the historic heritage of the City is researched, identified and **preserved within the context of sustainable management**”* (my emphasis) - PNCC recognises the need to meet its obligations under Section 6(f), being to promote the sustainable management of natural and physical resources, having regard to the protection of historic heritage from inappropriate subdivision, use and development. This is similarly recognised in Objective 1 of 17.3 of the PNCDP and the policies that give effect to this objective. I have discussed these earlier in my evidence.

Matters Raised in Submissions and Response to Submission Points

159. I have reviewed the 101 submissions received. The majority of submissions supported the proposal, with five submissions against. In assessing the submissions, I have noted that:

- (a) Although many submitters chose to identify themselves as members of the congregation, they are not required to do so, nor to specify how this influences their position.
- (b) A number of submissions in support of the proposal comment only that the church is significant and they wish to see it preserved and/or being used again, but do not make any specific comment

about the proposed additions and/or how these additions will help to achieve this preservation and use. Therefore, while these submissions have been considered as being in support of the Application in full (rather than in part), it is noted that preservation and use can be achieved by strengthening alone.

160. For submissions in support of the proposal, I have broken down my comments by point (rather than by submitter) as several submitters make the same points in their submissions.

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| a. | The proposal will provide a more welcoming and inviting entrance and draw people into the church | Many submissions noted the "foreboding" street frontage of All Saints' and supported the more "open" entrance offered in the proposal, stating that it would make the church more welcoming and inviting. That the current frontage of the building is foreboding is a matter of opinion; but that it has heritage significance has been well established by multiple heritage experts. Prior to closure, members of the public beyond the congregation did come into the church (as evidenced by the guides that were previously made available) and there is no reason why this would not continue to happen after the church was strengthened and reopened, especially if some other more minor improvements were made, such as landscaping along Church Street. |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| b. | By encouraging people into the church, the church community will grow | While the church's mission of outreach is acknowledged, and growth of its congregation is seen as important, several submissions refer to the congregation having "outgrown" the church hall where services are being held, indicating that the church has continued to grow during the time that All Saints' has been closed. Therefore, a more welcoming entrance is not necessary to grow the church community per se. |
| c. | The proposal will provide weather protection from the elements | It is acknowledged that the current (original) design of All Saints' does not provide any shelter at the entrance points, and that, if doors are left open, there can be issues during windy or poor weather. This is problematic especially for weddings and funerals where large numbers of people will use the formal front entrances rather than the side entrances as the congregation may do. However, this is a functional issue rather than a heritage issue, and there are multiple ways in which weather protection could be improved with a different design, or by improving the side entrances. |
| d. | The proposal will improve connectivity | It is acknowledged that All Saints', as it was originally designed, does not have good |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | between the building and the street and provide a visible street front presence | <p>connectivity to the street, in the same way that it does not provide shelter at entry and exit points; and it is understandable that the church would like to improve the building in these respects.</p> <p>However, while the proposed addition is glazed, the drawings provided with the Application do not accurately demonstrate the glazing as it will appear, and arguably create a false sense of the transparency that can be achieved.</p> |
| e. | The current church building does not represent the congregation's values | <p>Whether or not the building should be required to "<i>represent the congregation's values</i>", and the way(s) in which it might do this, is open for debate. However, these are not strictly heritage-related issues. What is important from the heritage perspective is to consider the intangible values of the building equally with the tangible values, and acknowledge that the value that the building has for the church community, and the continuity of use of the building, must be considered equally alongside its architectural values and its setting. Strengthening alone will enable the building to be used as a church once again.</p> |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| f. | The church design is not fit for purpose and/or does not meet the needs of the church, and this will not be addressed by strengthening alone | <p>All Saints' was being used for worship until it was closed in 2013. While some issues or inadequacies with the layout had been identified before closure, the building was in regular use as a church, as well as a venue for musical and other events, demonstrating that these issues or inadequacies did not render the building unfit for purpose. I understand through informal conversation with the Applicant during my site visit that some discussion about altering the church to address changing use requirements had been had, but that no formal moves had been made to follow this through to a design process.</p> <p>Strengthening the building is essential to making the building fit for purpose again. However, other aspects of its fitness for purpose – such as a place for parents to take young children during services, a place to meet and greet or gather outside of the main body of the church, facilities that would enhance the multi-use capabilities of the building - could be addressed without an addition of the size, scale and design that has been proposed.</p> |
| g. | The proposal is in keeping with the | Some submitters take the position that strengthening the building will mean that |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | original architectural intent for processional entry | <p>the original main entrance at the base of the tower, already considered to be small and dark, will become unusable. Strictly speaking, this is not true. The entrance into the base of the tower will remain both usable and large enough to meet the NZBC accessibility requirements.</p> <p>The claim that the proposal is in keeping with the architectural intent of the original design is also made in the Applicant's Entrance Options report, which states: <i>"Frederic de Jersey Clere intentionally placed the main entrance facing the street front. To have the main entrance moved to a side seems to be not only contrary to Clere's desire for street connection but impractical for current use"</i>. It is true that the building was designed to be entered from the front elevation, with entrances from side elevations being secondary; and that entering from the sides results in a different processional experience. The importance of enabling and enhancing access from the front of the church is therefore acknowledged, but is not considered to outweigh the negative impact that the proposed addition will have on the building's heritage values. Furthermore, it is noted that the proposed design does not create a wheelchair</p> |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | | accessible entrance at the front of the building. These users will be required to use the side entrance through the western elevation, which is not dissimilar to the current access arrangements. |
| | h. The proposal will create a visual connection from the exterior to the interior of the church | Images provided in the Applicant's first RFI response clearly demonstrate that the removal of the baptistery wall and the new addition do not result in a significant improvement in visibility of the church interior from the street as claimed. |
| | i. It is not viable to strengthen the building without the proposed additions | It is acknowledged that there is a considerable cost associated with strengthening a building such as All Saints', and that it is sensible to take the opportunity to make improvements to functionality as part of strengthening where this is appropriate. However, the Application does not provide any cost estimates or other costing information, nor does it provide an explanation of why strengthening alone would not be viable. In Appendix 3 of their first RFI response dated 15 January 2020, the Applicant claims that preserving the building would come at a higher cost than building new; however, no costing information has been presented to support this claim. |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | | <p>Submitters have noted that strengthening alone would not address fitness for purpose (discussed above) and would provide little added value for the church community. However, this contradicts with comments made by the same and other submitters that use of the church is essential to the congregation and the community, and that not being able to use it has been difficult and disheartening. Enabling the building to be safely used again would clearly have value for the congregation.</p> <p>Prima facie, it may be assumed that this point is more about economics rather than addressing the congregations needs – in other words, that to make the strengthening economically viable, the building must expand to allow for more community functions from which the church can derive revenue. However, the church hosted public events prior to its closure, so these opportunities would continue to exist once the building is strengthened (although perhaps not to the same extent).</p> <p>Finally, while the financial burden of strengthening is considerable, there is funding available to the church to subsidise</p> |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | | the cost. The Applicant does not appear to have approached funding organisations or applied for funding, and is encouraged to do so. |
| j. | The proposal will allow for greater diversity of building use which is a form of future proofing | It is true that a greater diversity of use options will provide some degree of future-proofing for the building, and improving the building to allow for increased alternative uses is a sensible idea. However, the church was already being used for purposes outside of worship before its closure, and can continue to do so when it is safe for use again. The extent to which it can be used for other purposes will always be limited to some degree, as with all buildings. |
| k. | The proposal will retain 97% of the building exterior and 100% of the building interior | It is not clear where submitters have received these figures from, but the consistency with which they are referred to indicates that they may have come from the Applicant. Nowhere in the Application are there calculations regarding the volume of historic fabric that will be lost, nor is this discussed in the Applicant's Heritage Impact Assessment. Further, these figures conflict with the figures presented in the Applicant's Entrance Options report. |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | | <p>These figures – most particularly, “100% of the interior” – are demonstrably untrue. The partial demolition being proposed on the north and west sides will not just impact the exterior, but will result in removal of interior fabric as well. The proposal requires multiple physical interventions, not just where the baptistery and parts of the western wall are to be demolished, but also where the new structure will be fixed to the existing building – details of which are not provided in the Application.</p> <p>Regardless of the accuracy, it is not strictly the volume of fabric, but rather the significance of the fabric, and the design elements that the fabric forms, that are critical to assessing the impact of the proposal on the building's overall heritage significance. In this case, the significance of the fabric being removed is high, and therefore its removal will have a greater impact on the overall significance of the building than the removal of a greater volume of fabric of moderate or low significance may have.</p> |
| I. | The proposal will allow for protection of the building interior and | I agree that the interior of the building, and much of the furniture, fittings and fixtures, are of the highest level of significance. The |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| | objects therein, which are just as significant as the exterior | interior of the building, and these items, will be protected by the proposed strengthening. The proposed addition does nothing to add to this level of protection. |
| m. | The baptistery is not used and/or is not significant, and relocation of the windows will mitigate for loss of this part of the building | <p>The baptistery, on both the exterior and interior, has been assessed as having the highest level of significance. It is acknowledged that its position at the opposite end of the church to the alter is awkward, and that the space is now rarely used for its intended purpose. However, this could be addressed by some internal rearrangement, and does not require the partial demolition or additions that are being proposed.</p> <p>While relocation of the windows will provide some mitigation, it does not mitigate the negative impact of the partial demolition in its entirety.</p> |
| o. | The proposal will create a better link to the hall and other church facilities at the rear of the site | The proposed link that wraps around the west side of the building to the rear of the site would improve connectivity between the main body of the church and the other facilities; however, this connection already exists, and could be improved or enhanced in other ways. |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| p. | Additions or alterations should be "significantly different" from the original building | This is not a correct interpretation of the HNZPT criteria or other heritage best-practice guidelines, as addressed in paragraphs earlier in my evidence. |
| q. | Demolition of the tower, complete demolition of the building, or leaving the building unused and unmaintained will be the alternative outcomes if the proposal is not approved in full | <p>Alternative outcomes including demolition by neglect and/or demolition for safety reasons are often used as an argument in support of a proposal that involves a decision about modifying a heritage building. Demolition by neglect, and substantial or complete demolition of All Saints' for safety reasons would be hugely negative outcomes for heritage, and I do not believe that the Applicant, the church community, or the wider community, wants this outcome. Rather, all parties want to see the building retained and brought back into safe use.</p> <p>It is possible for the Applicant to address the current safety issues and return the building to use with seismic strengthening alone. I do not accept that the addition is required in order to avoid demolition of any kind. Grants to assist with seismic strengthening of heritage buildings are available to the Applicant, and I encourage them to explore this further.</p> |

| In Support of the Proposal | | |
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| | Submission Point | Reviewer's Comment |
| r. | The design of the addition relates to existing elements of All Saints' design | While there is some abstract connection between the form of the proposed addition and the Gothic origins of the original design, the proposed addition dominates and obscures the exterior of the building on its two most prominent elevations, as demonstrated by the images provided in the Application. The curved and organic forms of both the walls and roof, and the timber, glass and membrane roofing materials sit uncomfortably next to the linear forms and brickwork of the church facades; and the raised section of the addition that accommodates the gable of the west porch creates further incongruity. |
| s. | Retention of the building in its entirety doesn't allow for growth or development | There are multiple examples of situations in which buildings have been able to change to suit the needs of their users without negatively impacting on heritage significance and/or while retaining buildings in their entirety. |

161. For submissions in partial support or opposed to the proposal, I have broken down my comments by submitter.

| In Partial Support of the Proposal | | |
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| | Submitter | Reviewer's Comment |
| a. | Gerry Bennett | <p>This submitter states that he is in support of the proposal; however, his comments indicate that he supports the strengthening, but not the need for additions. In particular, he queries the need for an entrance "canopy" or additional entrance when there are already functional entrances to the side of the building, one of which has an accessible ramp.</p> |
| b. | Christine Bennett | <p>This submission supports the proposed strengthening but not the partial demolition and addition.</p> <p>As with the submission above, this submission notes that there are plenty of entry and exit points that serve the church, and there is no need for any more. It also notes that the passage from the church down to the hall, toilet and kitchen facilities was functional prior to the church being closed, and could be so again. These are points with which I agree.</p> <p>The submitter goes on to state their view that the "canopy" proposed for the front of the building is out of place and, while it would provide shelter, this is not necessary.</p> <p>It is the view of the submitter that making the church usable again by strengthening</p> |

| In Partial Support of the Proposal | | |
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| | Submitter | Reviewer's Comment |
| | | <p>and making it waterproof is sufficient for the needs of the church community, and there is no need for costly additions.</p> <p>I agree that all that is required to make the church usable is the strengthening, and that the additions as proposed are not necessary for this purpose.</p> |
| c. | Margaret Tennant | <p>This submission supports the proposed strengthening but not the partial demolition and addition.</p> <p>I agree with the submitter that All Saints' is one of Palmerston North's most substantial buildings of historical and architectural presence in the city; that it is a significant city marker; and that the street façade, in particular, is a major part of the landscape in the CBD. I also agree that the proposed partial demolition and addition go beyond good practice as outlined in documents such as the ICOMOS NZ Charter.</p> <p>The submitter also states that, while appreciating that the proposed changes are intended to bring the church into the 21st century, they are very much of the moment and out of keeping for a historic building. I agree insofar as I believe that the proposed extension is not compatible to the original design, detailing, materials, scale, or</p> |

| In Partial Support of the Proposal | | |
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| | Submitter | Reviewer's Comment |
| | | <p>proportions as addressed in paragraphs 72 to 81.</p> <p>The submitter acknowledges the tension between church users and “outsiders”, but hopes that the public attachment to the church in its current form might be seen as an advantage to be harnessed in fundraising efforts. I also acknowledge this tension. I also acknowledge the potential fundraising opportunities it may offer.</p> |

| In Opposition to the Proposal | | |
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| | Submitter | Reviewer's Comment |
| a. | HNZPT | <p>HNZPT acknowledge that the proposal will facilitate continued use of the church, but this could be achieved with lesser impact on heritage values. Demolition of the baptistery will cause significant adverse effects; and, while, reuse of windows goes some way towards mitigating these effects, they will continue to be unacceptable. Demolition of the baptistery is not the best result in terms of allowing development while at the same time protecting heritage values</p> |

| In Opposition to the Proposal | | |
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| | Submitter | Reviewer's Comment |
| | | <p>They also acknowledge that the proposed addition will enable the church to be more open and accessible to the community; however, it would be possible to have an alternative design which would have less adverse effects on heritage values than what is proposed.</p> <p>The submission also notes that the impact of attaching the additions to the historic heritage fabric needs to be addressed; and that the proposal conflicts with the conservation plan.</p> <p>I agree with all of these points.</p> |
| b. | Judith Bignell | <p>It is this submitter's view that a modern frontage on a historic building will be unpleasant, but does not provide detail as to why. I have no further comment to make in regards to this submission beyond what I have already stated above.</p> |
| c. | Historic Places Manawatu- Horowhenua | <p>This submission acknowledges that the proposed strengthening scheme minimises impact and is generally in accordance with the ICOMOS NZ Charter.</p> <p>In contrast, the submitter notes that the proposed addition does not comply with the ICOMOS NZ Charter, which states that alterations and additions may be acceptable</p> |

| In Opposition to the Proposal | | |
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| | Submitter | Reviewer's Comment |
| | | <p>where they are necessary for compatible use of a place, but that they should avoid inappropriate or incompatible contrasts of form, scale, mass, colour and material, and should not dominate or substantially obscure the original form and fabric.</p> <p>Like HNZPT's submission, this submission acknowledges that the church would like to operate as a 21st century organisation on the current site; however, they believe the current architectural solution offered does not meet heritage preservation best practice. Certainly, in the context of the ICOMOS New Zealand Charter, I agree with this submission.</p> |

Conclusion

162. Seismic strengthening of All Saints' Church will enable its ongoing use which, in turn, will facilitate its preservation; and it is therefore considered to have a positive effect on the heritage values of the building overall. If the Application were for the proposed strengthening works only, it would be supported on heritage grounds.
163. However, the Application as it stands also includes partial demolition and additions to the building. Based on the above assessment, it is evident that these interventions exceed what is necessary to return the building to use as a church and a venue for other events; and will negatively impact on the building's significant heritage values. The mitigation being offered cannot avoid or mitigate this impact. Therefore, the Resource Consent Application to strengthen and extend the All Saints' Anglican Church, 338 Church Street, Palmerston North is **not supported** on heritage grounds.

Recommendations for Conditions and Advice Notes

164. In the event that the Resource Consent Application to strengthen and extend the All Saints' Church is granted, I recommend that the following conditions be placed on the Consent.
165. **Condition 1:** Prior to any alteration or demolition works commencing on the site, the consent holder must submit a documentary record of the building to PNCC and receive approval for this record from the Compliance Monitoring Officer and council-appointed Heritage Advisor. The record will be sufficient to reconstruct exactly the elements that are removed, and will include (as a minimum):
- (a) the address or location of place;
 - (b) the name and contact details of who prepared the report;
 - (c) a short written description of the place (which can be taken from existing documents);
 - (d) a statement of significance of the place (which can be taken from existing documents);
 - (e) a written description of the reasons for undertaking the recording;
 - (f) a description of the recording methodology;
 - (g) measured floor plans, ceiling plans, roof plans, and external elevations of the building in its current form;
 - (h) plans and sections (as necessary) to record the building structure and interaction of building elements and spaces;
 - (i) comprehensive written description of the structural elements;
 - (j) comprehensive written description of the exterior;
 - (k) comprehensive written description of each space within the building;

- (l) comprehensive written description of the building's / structure's development over time;
- (m) comprehensive photography of the building before commencing work, and during the works as they are carried out, using a digital SLR with good lenses and a high megapixel count (10+ MP):
 - i. the camera should be set to record using a raw file format which should not be modified (though jpgs can be taken at the same time);
 - ii. all images should have accompanying metadata specifying: photo ID, capture device, converting software, colour space, bit depth, resolution, date of capture, photographer, caption, and any alterations made to the image;
 - iii. a set of scale drawings accurately showing the subject and the location of each image or position and direction of each shooting position to scales suitable to convey the necessary information should accompany the photographs;
 - iv. a contact sheet of images should be provided with the documentary record, and the raw files provided individually in digital format in conjunction with the record.

166. **Condition 2:** Prior to any alteration or demolition works commencing on the site, the consent holder must submit a construction management plan for the works to PNCC and receive approval for this plan from the Compliance Monitoring Officer and council-appointed Heritage Advisor. The plan will (as a minimum):

- (a) detail the methodology for construction;
- (b) identify areas of historic heritage value to be retained;
- (c) provide for 'tool box talks' and pre-construction meetings with contractors to familiarise them with the significant heritage

features of the Church and their statutory responsibilities and obligations in relation to the RMA and the HNZPTA;

- (d) provide a temporary protection plan that details how the existing fabric will be protected from damage that may potentially occur during construction, including provisions for vibration monitoring;
 - (e) establish protocols for monitoring physical changes to the building that may arise because of the works;
 - (f) set out protocols for recording, deconstructing and preparing removed fabric for storage, and identify the location of an appropriate long term storage area within the church grounds;
 - (g) set out protocols for communication paths and responsibilities of the consent holder to ensure that adverse effects, including accidental damage, are appropriately avoided or mitigated, and any issues that arise onsite are immediately notified to the correct party.
167. **Condition 3:** Prior to any alteration or demolition works commencing on the site, the consent holder must submit floor plan and elevation drawings to PNCC confirming the relocated positions of the stained glass windows and the font to be removed from the baptistery, and receive approval for this plan from the Compliance Monitoring Officer and Heritage Advisor. The relocation of these items into the agreed positions must then be signed off by the Compliance Monitoring Officer and council-appointed Heritage Advisor.
168. **Condition 4:** Prior to any alteration or demolition works commencing on the site, the consent holder must submit detail drawings to PNCC confirming the details for junctions between the existing building and the addition the treatment of all new or extended openings in the existing exterior envelope, and for those parts of the seismic strengthening that will be visible from the exterior including (but not limited to) the lightweight reconstruction of elements and the treatment of the concrete beams on the east and west elevations. The consent holder must receive approval for

these details from the Compliance Monitoring Officer and Heritage Advisor. Construction of these details must be signed off by the Compliance Monitoring Officer and council-appointed Heritage Advisor.

169. **Condition 5:** At completion of the works, the consent holder must provide a plan that details how the building owner will maintain appropriate storage conditions for materials removed from the building and ensure that the record required under Condition 1 will be archived to ensure that the connection between the stored materials and the record is not lost. This plan must be signed off by the Compliance Monitoring Officer and council-appointed Heritage Advisor before the consent is closed.
170. **Suggested Advice Note:** Work affecting archaeological sites is subject to a consent process under the Heritage New Zealand Pouhere Tāonga Act 2014. An archaeological authority (consent) from HNZPT) must be obtained for works to proceed if there is potential for an archaeological site to be modified or destroyed. It is illegal to modify or destroy an archaeological site without obtaining an archaeological authority. The Applicant is advised to contact HNZPT and/or commission an archaeological assessment prior to works commencing.
171. As an alternative to the Suggested Advice Note, a condition may be placed on the consent that the consent holder be required to provide confirmation that they have received an Archaeological Authority (or advice stating that they do not need an Archaeological Authority) from HNZPT prior to any works commencing on site.



Chessa Stevens
Principal Conservation Architect and Heritage Consultant

4 December 2020