

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

AND

IN THE MATTER OF: A hearing by Palmerston North City
Council

JOINT WITNESS STATEMENT OF EXPERTS – URBAN DESIGN

3 December 2020



227-231 Broadway Avenue
PO Box 1945
Palmerston North
DX PP80001



Nicholas Jessen

06 353 5210

06 356 4345

njessen@crlaw.co.nz

INTRODUCTION

1. This joint witness statement relates to an application for land use consent, pursuant to section 9(3) RMA for Partial Demolition and Additions and Alterations to All Saints Church and is on the topic of Urban Design.
2. It follows on from expert conferencing on 1 December 2020 where the experts met to discuss issues falling within their expertise in terms of urban design for the application.
3. The expert conferencing was held on 1 December 2020 by way of audio-visual conferencing and completed by way of email exchange.
4. Attendees at the conference were:
 - a. Gerald Cogan (urban design/architecture);
 - b. Morten Gjerde (urban design/architecture);

CODE OF CONDUCT

5. We confirm that we have read the Environment Court Practice Note 2014, and in particular the Code of Conduct for Expert Witnesses, and we complied with it.

PURPOSE AND SCOPE OF CONFERENCING

6. The scope of the issues covered at this conference included those questions identified at Annexure A.

KEY FACTS AND ASSUMPTIONS

7. Both experts agree that making changes that will enable All Saints Church to be used regularly is good for the Church, the community and the urban setting.

METHODOLOGIES AND STANDARDS

8. In our respective assessments of the proposed additions and alterations we have each referred to our training, education and experience.

AGREED ISSUES

9. The issues that are agreed between the experts are set out at Annexure A.

DISAGREEMENT AND REASONS

10. The issues upon which the experts cannot agree and the reasons for their disagreement are set out at Annexure A.

PRIMARY DATA

11. Application for Resource Consent and the drawings attached to it.

OTHER MATERIAL

12. No additional material was referred to by the experts during the conferencing.

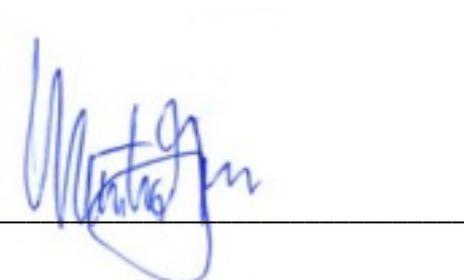
RESERVATIONS

13. Neither of the experts expressed reservations.

Date: 3 December 2020



Gerald Cogan



Morten Gjerde

ANNEXURE A

In the matter of All Saints Church Expert conferencing – Urban Design

Issue	Agreed Position	Disagreements, with reasons
<p>Do the experts agree that the proposed redevelopment will maintain or enhance a safe, convenient and pleasant pedestrian environment? If not, why?</p>	<p>Generally agreed that the proposed changes would maintain or enhance pedestrian safety and, in many circumstances, also convenience. The pleasantness of the environment would also be enhanced, other than where it is noted we disagree.</p> <p><i>GC: Discussion around baseline critical to this as the existing building provides minimal enhancement to pedestrian experience – in this context the proposed redevelopment will enhance the pedestrian environment.</i></p> <p>Agreed that there is scope to improve a ‘pinch-point’ between the addition (encroachment on footpath) and one of the proposed canopies – indicated as only 2,500. This identified as a potential safety concern between pedestrians and building users.</p>	<p>Disagreement around the extent to which the aesthetic qualities of the proposed redevelopment will lead to a pleasant pedestrian environment. The key reason for this is the visual relationship between the host building and the proposed addition. For MG the contrast in form, coupled with the extent to which the addition wraps around the front of the host building creates a poor visual relationship.</p>
<p>Do the experts agree that the proposed frontage provides strong visual connections with the street? If not, why?</p>	<p>Both experts agree that the proposed frontage provides strong visual connections with the street</p>	
<p>Do the experts agree whether the proposed design will amount to a “high quality” building design that acknowledges</p>	<p>Both experts agree that the addition does many things well, all of which are</p>	<p>The experts could not agree that the form of the proposed addition acknowledges and responds to</p>

Issue	Agreed Position	Disagreements, with reasons
<p>and responds to the context of the site and surrounding environment? If not, why?</p>	<p>characteristics of a “high quality” building design for an urban setting. These include transparency at the street edge, which will activate the street environment when the building is being used or not; universal accessibility and a visually interesting form.</p> <p><i>GC: in understanding of context of brief programme (spatial and functional relationships etc) that the design does acknowledge and respond to both site and surrounding environment, especially with acknowledged constraints.</i></p>	<p>the context of the site in a manner that leads to a “high quality” building. While it is visually interesting in and of itself, and responds to the setting well in some respects, the experts could not agree that visual relationship between the host building and the proposed addition is of a high quality.</p>
<p>Do the experts agree that the proposed addition provides active street frontage and enhances the visual quality and design of the Church at street level? If not, why?</p>	<p>The experts agree that the proposed addition creates an active street frontage. The transparency of the frontage will help ensure the internal spaces and the activities taking place will be visible from the public street.</p> <p>The primary view of the church diagonally from the Square towards the bell tower is maintained in its original form.</p> <p><i>GC: addition has been configured to maintain, as far as reasonably practicable, the visual amenity of the existing church from street level, and in a wider urban context. Acknowledged that in order to meet the brief programme it was necessary to wrap extension around corner of the church, but the addition flows down to minimise obstruction of that corner.</i></p>	<p>The experts did not agree that the proposed addition enhances the visual quality and design of the Church at street level. That the proposed addition would wrap around the front of the existing Church, in combination with the architectural design of the addition, are the key reasons for the disagreement.</p>

Issue	Agreed Position	Disagreements, with reasons
<p>Do the experts agree whether the proposed additions and alterations respect the scale of the existing building and avoid visual dominance? If not, why?</p>	<p>The experts agreed that the proposed addition respects the scale of the existing church building.</p> <p>Discussion around obstruction vs dominance: the addition doesn't dominate the existing, again largely in part due to its transparency allowing the existing building to be read through the addition and, therefore, in its entirety.</p>	
<p>Do the experts agree whether the proposed additions and alterations reflect the architectural style and character of the building? If not, why?</p>	<p>The experts agreed that the proposed additions do not reflect the architectural style and character of the building.</p> <p>There is also agreement that a contrasting design approach can be appropriate, particularly where a building such as the All Saints Church is a complete and coherent architectural form.</p>	
<p>Do the experts agree on the full nature and scale of the proposal's effect on public safety, visual amenity, pedestrian amenity, and efficient, convenient & safe access? If not, what are the different views and reasons for them?</p>	<p>The experts agreed that the characteristics of the proposed addition and work to the northern elevation of the Church (including removal of the Baptistry) would lead to an active and accessible street frontage.</p> <p>There was also agreement that the proposed alignment of the addition, in conjunction with the proposed abstract trees in the public street, would lead to pinch points that could disrupt pedestrian flow along the footpath at</p>	<p>The key area of disagreement was the effect the proposed addition would have on visual amenity for two reasons; the fact the addition would wrap around the corner and onto the street facing elevation of the Church as well as the high contrast in architectural style.</p>

Issue	Agreed Position	Disagreements, with reasons
	<p>times. That said, there is also agreement that the abstract trees/canopies can enhance the streetscape. Key attributes of the abstract trees are that they speak 'harmoniously' with the form of the addition and that they will lead to public engagement. There is also a clear connection beyond the immediate site, as the design attributes connect closely with the area of the Butterfly Pond in the southwestern area of the Square.</p> <p>There was also agreement that the proposed addition would not visually dominate the host building, largely because of an appropriate building height and scale.</p>	