

BEFORE THE PALMERSTON NORTH CITY COUNCIL

UNDER THE RESOURCE MANAGEMENT ACT 1991

IN THE MATTER AN APPLICATION BY THE ANGLICAN DIOCESE OF WELLINGTON FOR THE REFURBISHMENT, STRENGTHENING AND EXTENSION TO THE HERITAGE-LISTED BUILDING KNOWN AS ALL SAINTS CHURCH, 338 CHURCH STREET, PALMERSTON NORTH

STATEMENT OF EVIDENCE OF JOHN EDWARD BROWN ON BEHALF OF THE ANGLICAN DIOCESE OF WELLINGTON

(HISTORIC HERITAGE)

DATED 10 DECEMBER 2020

INTRODUCTION

Experience

1. My full name is John Edward Brown. I am a Director of Plan.Heritage Ltd., an independent historic heritage and planning consultancy based in Auckland.
2. My qualifications include a Bachelor of Arts (BA) in archaeology from the University of Newcastle-upon-Tyne (UK 1996) and a Masters of Archaeology (and Cultural Heritage) from the University of London (UK 2004). In addition to academic papers in classical art and architecture, history and photography, I have also undertaken training in the practical conservation of historic buildings.
3. I am a member of the International Commission on Monuments and Sites New Zealand Branch (ICOMOS NZ), and the Zealand Archaeological Association (NZAA). I am an associate of the Chartered Institute for Archaeologists. I am also an affiliate member of the Institute for Historic Building Conservation (UK) and a former affiliate member of Engineering New Zealand.
4. I am a director of Plan.Heritage and have held that position since September 2015. I have over 27 years' experience working within the historic heritage sector for public and private organisations. This includes as an archaeologist specialising in the analysis of historic buildings and building materials, and as a built heritage expert specialising in the assessment and conservation of standing buildings. My work has a particular focus on the evaluation of heritage values and assessment of effects on historic heritage, including resource consents, character evaluations and heritage impact assessments through the Resource Management Act 1991, and archaeological assessments through the Heritage New Zealand Pouhere Taonga Act 2014. This includes consideration of the broader historic environment such as context and setting, and historic landscape values.
5. Prior to establishing Plan.Heritage in 2015, I was the Team Leader for the Built Heritage Implementation Team in the Auckland Council's Heritage Unit. I led that team for four years, delivering specialist built heritage and conservation advice throughout Auckland. Before I moved to New Zealand, I worked in a variety of

heritage roles within the public and private sectors in the UK, including Pre-Construct Archaeology Ltd, the Museum of London, Arup, Gifford and English Heritage.

6. While at Auckland Council I sat on the Council's internal Major Projects Design Review Panel, and the Council's seismic committee responding to the 2016 Building Act Amendment (Earthquake Prone Buildings), providing heritage input.

Code of Conduct for Expert Witnesses

7. I am familiar with the guidelines for an expert witness contained in the Environment Court's Practice Note 2014. The evidence I am about to give is within my area of expertise and represents my best knowledge about this matter.
8. While I have visited the site and visually examined the condition of the All Saints Church, I am relying on several expert engineering, architectural and structural condition reports provided by the Applicant for matters relating to the structural integrity of the building.
9. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope of this evidence

10. I have been asked to provide evidence in relation to historic heritage values that may be affected by the proposal to seismically upgrade, and undertake alterations and additions to, the scheduled 'All Saints Church', located at 330-338 Church Street, Palmerston North (**the Church**).
11. I prepared a Heritage Impact Assessment (**HIA**) dated September 2018, which was lodged with the application as part of the Assessment of Environment Effects. I have also been involved in pre-application consultation discussions with Heritage New Zealand Pouhere Taonga (**Heritage NZ**), and with public presentations on the proposals for the site in 2018. I reviewed the section 92 requests by Palmerston North City Council and the planning responses prepared by Lakemba Properties NZ Ltd (dated January and April 2020) on behalf of the applicant.

12. In this statement of evidence I do not repeat the Project description in full and refer to the summary of the Application in the evidence of Mr Forrest on behalf of the Applicant (**the Project**).
13. In forming my assessment of potential effects arising from the Project, in relation to seismic strengthening, I rely on the engineering opinions provided by Mr Hopkins and Mr Clark.
14. I have read the submissions received on the Application.
15. My evidence will cover the following matters:
 - (a) Summary of evidence;
 - (b) Identified historic heritage values of the Church;
 - (c) Potential effects on the historic heritage values of the Church as a result of the Project;
 - (d) Review of PNDP heritage provisions;
 - (e) Recommended consent conditions;
 - (f) Comments on submissions on the application that relate to historic heritage; and,
 - (g) Conclusions.
16. I have, with Ms Chessa Stevens and with Dr Jamie Jacobs, prepared a joint witness statement¹. I have also received the Officers Section 42a Report and evidence for Council. These documents outline matters of agreement and disagreement which will be addressed separately in my rebuttal statement.

¹ Joint Witness Statement – Heritage Assessment dated 04 December 2020

SUMMARY OF EVIDENCE

17. My HIA identifies that the Project proposed by the Anglican Diocese of Wellington will have a direct impact on the scheduled All Saints Church as a result of seismic strengthening, as well as alterations and additions, for the provision of a new entrance foyer and shelter canopy.
18. The Church has been deemed earthquake prone at 3% NBS, and has been closed since 2013 due to seismic risk. The parish community consider that to support the cost of seismic upgrade and future use of the Church, it needs to be altered and adapted for the contemporary needs of the congregation, as well as attracting new visitors.
19. The Church is scheduled in the Palmerston North City Council's Operative District Plan (**PNDP**) as a Category 1 building of cultural heritage value (PNDP Appendix 17a Schedule ref 1). It is also included on the New Zealand Heritage List/Rārangi Kōrero (**The List**), maintained by Heritage NZ, as a Category 1 historic place of special or outstanding significance (The List ref 191).
20. The existing church was constructed c.1913-1914. The site was formerly occupied by two 19th century churches and a school hall, now demolished (NZAA T24/37). As there was pre-1900 activity on the property, the site meets the definition for an archaeological site under the Heritage New Zealand Pouhere Taonga Act 2014 (**HNZPTA**), however the building itself does not (being post-1900 in date).
21. There will be a temporary change to the setting of the Church as a result of the enabling and construction works. Built heritage places intervisible with the project area will experience some change to their setting and views (to and from these places). This will result in temporary cumulative and minor adverse effects on any context values associated with these scheduled places, as is typical for construction projects.
22. On completion of the Project, there will be potential permanent positive effects on the historic heritage values of the Church by:
 - returning the building back into use as a place of worship for parish members who have a strong spiritual association with the place. Also the

local community will benefit from its use as a community hub and the sense of place and identity engendered by this use.

- through the continued presence of the Anglican Church on this site, who have used the location as a place of worship for over 145 years;
- seismic upgrade and improved long-term resilience of the structure;
- the re-opening of the church, and creation a new design element with greater flexibility in use
- protection/seismic strengthening of the Church as an example of the group of significant churches designed by Clere, and a local landmark in the city centre, which has been present for over 100 years.

23. On completion of the Project, there will be permanent adverse effects on the historic heritage values of the Church in relation to:

- design and context historic heritage values of the Church through partial loss of the baptistery and smaller amounts of original fabric to accommodate structural upgrades;
- Removal of a small part of the 'South' Wall to provide additional circulation; and,
- Some minor obscuring of street context from less significant viewing locations as a result of the new additions.

The other historic heritage values identified for the Church are not adversely affected by the proposal.

24. Potential adverse effects have been mitigated through sensitive massing of the revised design and public realm improvements, as well as reuse of material from the baptistery.

25. Overall, the assessment of effects in my HIA concluded that, while there was potential for significant adverse effects on one value category (design values), there are mitigation measures proposed by the applicant that reduce adverse effects on these values, and additionally provide significant benefit for the same

category. Seismic strengthening of the building will maintain the design values of the building, with increased resilience in the event of an earthquake.

26. My HIA considers the proposal against the relevant objectives, policies and assessment criteria for activities affecting buildings of cultural heritage value which are scheduled in the PNDP. The key findings were that:
- The RMA and the PNDP recognise several categories of heritage value, each of which have equal weight and consideration for the purposes of assessment;
 - That the PNDP anticipates and provides for the partial demolition of an architectural feature relating to a Category 1 Scheduled building of cultural heritage value;
 - That this outcome may be granted consent provided that, overall, the status of the historic heritage place is not diminished;
 - That, on the basis of expert reports regarding the condition and safety of the structure, the potential risk to public from earthquake, and the legal requirements to address the Building Act, this proposal is an appropriate outcome overall for the site;
 - Seismic upgrade and reopening of the building would not occur without the additional development – the application should be considered as a complete package;
 - That the works would enable economic use, and a continuation of the historical and spiritual community activity on the site, for the long-term and on this basis consent may be appropriately granted, subject to any relevant conditions imposed by PNCC;
27. Overall, the review of the proposal against the relevant objectives, policies and assessment criteria in the PNDP concludes that the proposed works meet the objectives and policies of the PNCC from a historic heritage perspective.
28. In my opinion, the management approach and recommended conditions adopted by the Applicant are appropriate. I consider that the conditions proposed

by the Applicant in Mr Forrest's evidence, are appropriately constructed to give sufficient comfort a robust managed process for historic heritage will be established.

29. In my evidence I identify matters in support of the proposal and in opposition raised by submitters, including matters raised by Heritage New Zealand in their submission, which is supportive of the proposal, other than the partial demolition of the baptistery.
30. Having considered the matters raised in the S42A report and by submitters, I remain of the view that mitigation proposed by the Applicant is appropriate and proportional to the effects on the values for which the place is scheduled.

HISTORIC HERITAGE VALUES

Methodology

31. The methodology I adopted in addressing the historic heritage values of the Church, follows the values based methodology for assessing historic heritage significance as set out in the Resource Management Act (RMA); District Plan and the New Zealand Heritage List.
32. The Church has already been assessed under the relevant District Plan criteria and the New Zealand Heritage List criteria. There is also a Draft Conservation Plan for the Church.²

Resource Management Act (RMA)

33. Historic heritage is defined in the RMA (Part 1;S2.1) as:

'those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities: (i) archaeological; (ii) architectural; (iii) cultural; (iv) historic; (v) scientific; (vi) technological'.
Historic heritage includes: '(i) historic sites, structures, places, and

² Bowman 2018 All Saints Palmerston North Draft Conservation Plan

areas; (ii) archaeological sites; (iii) sites of significance to Maori, including wāhi tapu; (iv) surroundings associated with the natural and physical resources’.

34. The PNDP provides a specific definition of Cultural Heritage Value that differs from the RMA definition, but which is similar in content:

‘means possessing historical, archaeological, architectural, technological, aesthetic, scientific, spiritual, social, traditional or other special cultural significance, associated with human activity’.³

35. The RMA does not, when using the phrase ‘any of’, place primacy on one quality over another. Nor does the PNDP in its definition of cultural heritage. In my opinion, it was therefore important that my heritage impact assessment recognised all the qualities which contribute to heritage values of the Church and any potential adverse or beneficial changes, which may impact on any one of these values.

Palmerston North District Plan (PNDP)

36. The Church is scheduled in the PNDP as a Category 1 building of cultural heritage value (PNDP Appendix 17a Schedule ref 1).
37. The PNDP recognises the following historic heritage values for the Church, which are described in Appendix 17a of the District Plan:

(a) Cultural Values

- Emotional (associations by way of function, location, history, setting or commemoration)
- Historical (imbued by virtue of age, or which provide the context for significant events or the activities of significant people or groups).
- Design (excellence, artistic merit or uniqueness of design, composition, craftsmanship or details.)

³ PNDP Section 4: Definitions

- Technological (contribution of a place to the creation, innovation or invention of a specific technology of its application)

(b) Use values (value attributed to a building or object as a consequence of its existing usage or as the result of its being conserved for reuse).

(c) Contextual Values (unique/ rare/ representative building type, construction or style, or work of a particular builder, designer, period or region). The level of Authenticity is also considered i.e. the extent to which a place reflects its “original state.

The New Zealand Heritage List / Rārangī Kōrero (The List)

38. The Church is also included on The List, maintained by Heritage NZ, as a Category 1 historic place of special or outstanding significance (The List ref 191)
39. The List summary recognises the following historic heritage values for the Church:
- Spiritual significance (a long-standing place of worship for the Anglican Christian faith)
 - Historical Significance (associated with the Anglican Church’s historical and continuing ecclesiastical presence in Palmerston North)
 - Architectural quality (as an example of Victorian Gothic Revival in brick masonry, reflecting honesty in construction – and of the work of the eminent New Zealand architect, Frederick de Jersey Clere)
 - Townscape/landmark value (has a pivotal importance in the Square townscape)

Archaeology

40. Heritage NZ has provided guidelines (Heritage NZ 2019a: 9-10) setting out criteria that are specific to archaeological sites, which are condition; rarity/uniqueness; contextual value; information potential; amenity value and, cultural associations.
41. The site was formerly occupied by two 19th century churches and a school hall, now demolished (NZAA T24/37). As there was pre-1900 activity on the property, the site meets the definition for an archaeological site under the HNZPTA.

42. The existing church was constructed c.1913-1914. The Church building itself is therefore post-1900 in date, so is not an archaeological site under the HNZPTA.

Conservation Plan

43. The Church has been most recently assessed by Ian Bowman in a draft Conservation Plan, dated 2018, using The List criteria. The summary statement is provided in the HIA and the Conservation Plan is included in full with the application.

Rationalisation of historic heritage values

44. The values assessments included in the List and Conservation Plan are not directly equivalent to the statutory assessment values adopted by the PNDP, which creates issues of consistency.
45. For the purposes of the HIA I therefore mapped the compatibility of the different criteria for historic heritage values assessment. This shows there is a general alignment, as set out and summarised in Table 1 (**Appendix 1**).
46. The historic heritage values criteria identified in the PNDP for the Church is used in the remainder of my evidence, as this is the statutory framework in which the resource consent application is being considered.

POTENTIAL EFFECTS ON HISTORIC HERITAGE VALUES

Methodology

47. The HIA contains an assessment of direct, indirect and cumulative effects on identified historic heritage values, as a result of the proposal. This is not repeated in detail, but the key effects are summarised below and in

48. TABLE 2 (**Appendix 1**).
49. Briefly, the methodology I adopted in addressing the potential positive and adverse effects of the Project on historic heritage was as follows:
- (a) Review of historical documents, including original plans;
 - (b) Review of relevant assessment documents and reports;
 - (c) site visits and physical inspection of the place;
 - (d) public consultation with community members;
 - (e) comparison with other examples of Clere's work; and,
 - (f) comparison with other churches in the city centre

Temporary construction effects

50. There will be a temporary change to the setting of the Church as a result of the enabling and construction works:
- Built heritage places intervisible with the project area will experience temporary minor adverse effects on any context values; and,
 - There is also a risk of accidental damage to the building occurring during construction works.
51. These risks however can be actively managed through a heritage construction management plan (**HCMP**), which I have set out as a recommended condition of consent in my HIA, and which is also expressed in Mr Forrest's statement of Evidence⁴

Potential permanent positive effects

52. On completion of the Project, there will be potential permanent positive effects on the historic heritage values of the Church in relation to the following:

⁴ David Forrest Statement of Evidence Appendix C.

- Enhancement of Emotional heritage values, by returning the building back into use as a place of worship for parish members who have a strong spiritual association with the place. Also the local community will benefit from its use as a community hub and the sense of place and identity engendered by this use.
- Maintaining of Historical values through the continued presence of the Anglican Church on this site over 145 years;
- Retention of Design values of the church as a result of seismic upgrade and improved long-term resilience of the structure;
- Enhancement of use values, through the both the re-opening of the church, and creation a new design element with greater flexibility in use than is currently present. The Church has been closed for seven years and would otherwise remain indefinitely closed if not for the proposal; and,
- Enhancement of contextual values of the place, through the protection/seismic strengthening of the Church as an example of the group of significant churches designed by Clere, and a local landmark in the city centre, which has been present for over 100 years.

Potential permanent adverse effects

53. On completion of the Project, potential permanent adverse effects which primarily relate to the design and context historic heritage values of the Church have been identified:
- Partial loss of an original design element to the building – the baptistery; replacement of the tower spires and parapets with more lightweight materials, and removal of smaller amounts of original fabric to accommodate structural upgrades;
 - Removal of a small part of the ‘South’ Wall to provide additional circulation; and,
 - Some minor obscuring of street context from less significant viewing locations as a result of the new additions.

54. The other historic heritage values identified for the Church are not adversely affected by the proposal.

Proposed avoidance, remedy and mitigation of adverse effects

55. The potential adverse effects on the setting of the Church are avoided or mitigated through sensitive massing of the revised design and public realm improvements:
- Elements projecting onto the street have been scaled back and kept free of the main tower and 'West' window, so that significant views from The Square are not interrupted;
 - Individual 'tree' structures are substituted instead of the proposal for an over-sized canopy noted in earlier iterations of the design.
56. Potential adverse effects on design values have been avoided or mitigated through design changes, such as:
- The redesign of the new additions to better respond to the design composition of the 'West' elevation;
 - The memory of the baptistery space through the use of the oculus, and;
 - The physical relocation of the baptismal font and stained glass to nearby locations.

Overall assessment of effects

57. Overall, the assessment of effects in my HIA concluded that the adverse effects to the historic heritage values of All Saints Church are considered to be moderate, given the mitigation which is proposed for the removal of parts of the baptistery and the critically significant beneficial effects arising from seismic upgrading.
58. In the context of the proposal, many of the works are necessary to seismically upgrade the structure, and other elements are very important to maintain intangible values of the All Saints Church and for the ongoing viability of the site as a place of worship. The beneficial effects of the proposal are significant. The

seismic upgrade of the All Saints Church is essential if it is to remain viable for future use.

59. In my opinion, the proposed alterations respond appropriately to the legislative requirements of the Building Act and the PNCC policies for earthquake-prone buildings. The continued community use and retention of the All Saints Church as a place of worship are key factors in making this assessment, as they will maintain and enhance the community use and emotional values of the place for the long-term.

REVIEW OF PNDP HERITAGE PROVISIONS

60. The PNDP defines conservation as:

‘the protection or preservation of a heritage resource (building, site, vegetation or habitat) in order to maintain the natural or cultural heritage values associated with the resource, and to safeguard its potential for future generations’.⁵

61. In my opinion, the proposal maintains the identified heritage values, and the potential for future generations (the opportunity use), as set out in the conservation philosophy adopted by the PNDP. This is because with regard to the baseline environment, the building remains unused and it will slowly degrade, presenting a significant seismic risk.
62. The PNDP objectives and policies associated with historic heritage are primarily located in Section 17 of the PNDP, though there are some strategic objectives provided elsewhere, which I comment on in my HIA (e.g. Section 2.5 of the PNDP – City View Objectives).
63. The objectives and policies in Section 17: Cultural and Natural Heritage, relate to individual places of heritage value identified in Schedule 17a. I have reviewed these in detail in my HIA, but it is useful to refer here to some key objectives and policies which are particularly relevant to this application.

⁵ PNDP Section 4: Definitions

64. Objective 1 of the PNDP is 'To ensure that buildings and objects of cultural heritage value to Palmerston North are appropriately protected and conserved'.

65. In my opinion the Project is consistent with Objective 1 of the PNDP. The proposal meets this objective through the seismic upgrading and retention of the existing scheduled building so that it can once again be used. The proposal does require some adverse alterations to occur to the physical fabric, but this is compatible with the emotional and contextual values of the place – maintaining its historical function for the community which values it spiritually.

66. Policy 1.4 of the PNDP is :

To recognise that relocation or partial demolition may be 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.

67. I note also that Policy 1.4 is reinforced through the following explanation:

Explanation "the rule does not impose any requirement to demonstrate a need to provide the altered or additional space nor, in relation to any building that is a Church, will it impose any control on the manner of religious or liturgical practice, use or observance."

68. In relation to the first test in Policy 1.4, in my opinion it has been demonstrated by the applicant the partial demolition proposed in this instance is appropriate because the overall retention of significant heritage values is achieved.

69. In relation to the second test in Policy 1.4, in my opinion a 'thorough analysis' of the alternative options available has been undertaken. I note in particular that the application has involved input and advice from expert Structural Engineers, Architects, Heritage professionals and Heritage New Zealand. As stated in the

evidence of Mr Gerald Cogan, Mr David Chapple and Mr Nigel Dixon, several design options and structural responses have been considered over several years of planning. The 'preferred concept' has also been significantly revised, following preparation of a conservation plan by a recognised conservation expert, through discussions with Heritage New Zealand, and myself. The implications of the proposal are, in my opinion, well understood by the applicant.

70. Another key policy is 1.6:

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

71. I note that this policy does not place a hierarchy on the response – avoidance, mitigation or remedying of an effect are all valid responses, which have been considered as part of the proposal.

72. A related and key assessment criterion to this policy (1.6) is set out in R17.7.2 (external alterations and additions to category 1 and 2 scheduled buildings and objects not located in the residential zone):

'a. The reasons for the proposal including (without limitation) the extent to which any alteration or addition would enable a better or economic use of the building and/or land, and the extent to which the retention and/or renewal of the building would be more likely if the application was approved'.

73. In my opinion the continued use and occupation of the building is likely if the application is approved. Otherwise it will remain closed for the foreseeable future. The proposal therefore meets this criterion.

74. Overall, in my assessment, the proposal meets the relevant objectives, policies and assessment criteria in the PNDP from a historic heritage perspective.

RECOMMENDED CONDITIONS

75. In my opinion, the management approach and offered conditions adopted by the Applicant are largely appropriate. I consider that the conditions proposed by the Applicant in Mr Forrest's evidence, are reasonably constructed to give sufficient

comfort a robust managed construction process for works to a sensitive historic heritage building will be established.

76. Notwithstanding this, as set out in my HIA, the adverse effects of partial removal of the Baptistery could be further mitigated by the following conditions:
- a) A detailed drawn record, in plan and in section, is prepared of the Baptistery wall, floor and roof plan (this should be to a high level such that it could be reconstructed at a later date if required)
 - b) A heritage construction management plan is provided to PNCC for certification prior to commencement of construction, to ensure potential for adverse construction effects is minimised; and,
 - c) An archaeological assessment is provided, which advises on any requirements under the HNZPTA, and for any authority application that may be required for earthworks.

MATTERS RAISED BY SUBMITTERS

77. A total of 101 submissions were received, with 98 in support, and three in opposition.

Submissions in Support

78. Those submissions in support of the proposal included a number from the parishioners of the church, who have an active interest in its continuing use and contribution as both a community hub and place of worship.
79. A review of the submissions identified some clear themes as to why submitters supported the proposal. In my opinion, these include:
- (a) A desire to retain a religious and spiritual community presence at the heart of the city, established over more than one hundred years in this location;
 - (b) A need to implement the church's stated aims of inclusivity and welcoming to all in need;

- (c) A strong respect for, and desire to retain, the church building as part of this purpose;
 - (d) Repeatedly an opinion was expressed that the external form of the church was a barrier to this, being unwelcoming, dark, and closed off from the public;
 - (e) A desire to communicate to authorities that the church is not 'the building', and for this opinion to be recognised and respected in decision-making;
 - (f) That the proposed design retained the physical heritage qualities of the place, while maintaining and enhancing cultural heritage values (community, spirituality) for the opportunity of future generations to benefit.
80. In my view, the submission of both the Church owners and the parish community strongly suggest that there will be an enhancement of cultural heritage values, as an outcome of the proposal. In particular the submissions highlight benefits for the community and spiritual values of All Saints Church.
81. In terms of future use, it is apparent in the submissions that the parish community does not give primacy to the historical architectural attributes of the building, rather there is a central goal to ensure the Church is fit for purpose for current and future requirements, as a place of worship and a community hub.
82. I observe that this sentiment fits with the history of the site, which has been a place of worship for over a 130 years, but with a built form that has changed markedly over time. The current Church is the third to occupy this site. The first church was replaced in 1881, while the second church was enlarged twice (1891 and again in 1901), and then replaced and relegated for use as a hall following construction of the existing building. It has subsequently been replaced by the current hall.

Submissions against

83. One submission did not support the modern addition to the church, but did support its retention and continued use. The second submission against was made by Ms Dangerfield, on behalf of Heritage New Zealand. A third submission,

by Historic Places Manawatu-Horowhenua, also did not support the application on the grounds that the proposal was not in keeping with conservation 'best practice' and that the new addition was too dominant⁶. Historic Places Manawatu-Horowhenua did support the use of the church in the 21st- century, and considered that the structural strengthening appears to have been carried out in accordance with ICOMOS NZ Charter.

84. Ms Dangerfield apparently agrees with my own assessment in regard to the new addition, in that it is appropriately designed, so as not to dominate the existing church:

'The Church will remain almost completely visible from the street and The Square – even though this is a large addition on the front of a category 1 heritage building. While the additions do impact on the front view, they are unlikely to change the viewer's appreciation of the Church

The additions are not overlay damaging, obscuring or out of proportion to the building. The form and design of the additions is certainly dissimilar, but the scale and materials are respectful to the building.

Although the view of the church from the street will be altered, overall the heritage significance of the church as seen from The Square will remain.

While the additions extend the footprint of the Church, the canopy is ultimately reversible.

In our view, on balance, the Impact of the additions on heritage values is not major, and Heritage New Zealand supports the canopy addition'⁷

85. Ms Dangerfield also acknowledges that the seismic upgrading is 'essential for the future of the building'⁸, which we both agree on.

⁶ Submission no. 98. Historic Places Manawatu-Horowhenua

⁷ Submission no. 13. Heritage New Zealand Pouhere Taonga

⁸ *ibid*

86. Notwithstanding this, Ms Dangerfield considers that overall, the proposal does not meet the objectives of the PNDP, and should be declined.⁹ Primarily, this is because of the removal of the baptistery, which Ms Dangerfield considers is a significant adverse effect.¹⁰
87. In my view, her key reason for coming to this conclusion is in her interpretation of Policy 1.4. This is evident where Ms Dangerfield states:
- The applicant asserts that the proposed demolition of the baptistery will help in the retention of the building. However we are not satisfied that the demolition is the best result in terms of allowing development while at the same time protecting heritage values.¹¹
88. As outlined above in my evidence (para 68), the applicant has undertaken a thorough analysis of the Proposal in relation to the historic heritage values of the Church and alternative options available. Policy 1.4 requires consideration of the social, cultural, economic and environmental costs and benefits. Ms Dangerfield is apparently advocating for primacy of heritage values, above all other costs and benefits, which are of consideration under Policy 1.4.
89. Furthermore, Ms Dangerfield appears to be applying a very narrow lens in her consideration of 'historic heritage values'. As outlined above in my evidence (para 37), architectural considerations are just one subset, of a diverse range of heritage values that are recognised under the PNDP criteria and RMA definition.
90. In my opinion, the assessment of the impact of the proposal on historic heritage values differs between Ms Dangerfield and myself for the following key reasons:
- (a) Ms Dangerfield has not given sufficient weight to the positive effects of the proposal, namely the substantial economic investment by the applicant in the seismic upgrade of the Church, and the resulting benefits to the fabric of the building, enabling reoccupation/ use of the building and the improved safety of people, should a seismic event occur.

⁹ ibid

¹⁰ ibid

¹¹ ibid

- (b) Ms Dangerfield has not given sufficient weight to the positive effects on the full range of historic heritage values recognised for the Church, instead focusing on a narrow subset of architectural considerations (Design criterion). For example the heritage values under the emotional criterion (spiritual and community); the historical associations (the continued historical use as a place of worship) and contextual values (seismic upgrading of an important example from a group of ecclesiastical buildings by Clere) should be given equal validity.
- (c) Ms Dangerfield's consideration of the adverse effects on the architectural value of the building has not given sufficient weight to the positive effects or avoidance and mitigation of such effects. For example, we agree that the new addition is appropriately designed and that the seismic upgrading is essential for the future of the building. In my opinion, this should mitigate the removal of parts of the baptistery, so that the effect overall is acceptable.
- (d) In relation to the baptistery, there are a number of careful design decisions that do not appear to have been given sufficient weight by Ms Dangerfield:
 - (i) the external wall and roof is proposed to be removed, not the liturgical space itself. The location of the Baptistery is recognised in the new design.
 - (ii) the proposed demolition represents a loss of approximately 3% of the original fabric of the building, with the vast majority (97%) being retained and strengthened.
 - (iii) parts of the baptistery are being retained in situ (internal arches and floor space) or relocated (font and stain glass windows)
- (e) Ms Dangerfield considers that the intervention to the Baptistery is irreversible. I consider that this is incorrect. It is reversible, using a combination of restoration (reassembly and reinstatement of retained features) and reconstructed elements (from original drawings, records, and physical parallels surviving elsewhere on the building). In this scenario reconstructed elements would not constitute the majority of the

place, and is in accordance with the ICOMOS New Zealand Charter (2010)

- (f) Ms Dangerfield has not sufficiently acknowledged the effort by the applicant in consideration of the historic heritage values of the Church in developing options for its future.

91. The fundamental issue is that the building is earthquake prone, and remedial work will ultimately have to occur under the provisions of the Building Act if the building is to be maintained at all.
92. It is well publicised that the owners of heritage properties are facing significant challenges related to the costs and feasibility of earthquake strengthening. It is estimated that currently 297 unreinforced masonry churches are present throughout New Zealand, excluding 12 churches demolished in Christchurch because of heavy damage sustained during the Canterbury earthquake sequence in 2010.¹² Reportedly the church buildings are constructed mainly between 1870 and 1940 and now approximately half of the entire inventory is registered with Heritage NZ.¹³ The final conclusions of a study into unreinforced masonry churches in New Zealand concluded:

The 2010-2011 Canterbury earthquakes have again demonstrated the unsatisfactory earthquake performance of un-strengthened URM churches, with approximately 15% of the affected buildings demolished due to the heavy damage suffered. Due to the high seismicity of New Zealand, the large concentration of people that may occur in religious buildings, and the societal relevance of these structures for historical and symbolical reasons, assessment and mitigation of the earthquake vulnerability of URM churches is of paramount importance.¹⁴

93. Comparative analysis with other churches of similar scale designed by Clere (**Appendix 2**) reflect the differing approaches to seismic strengthening around the country and over time. The most obvious is St Matthews Church in Hastings

¹² Alessandra Marotta, Tatiana Goded, Sonia Giovanazzi, Sergio Lagomarsino, Domenico Liberatore, Luigi Sorrentino and Jason M. Ingham. An Inventory of Unreinforced Masonry Churches In New Zealand. Bulletin of the New Zealand Society for Earthquake Engineering, Vol. 48, No. 3, September 2015

¹³ Ibid.

¹⁴ Ibid

(Category 1), where the tower has been significantly reduced in height compared to the original designs. In particular, the reduction of St Matthews Tower was in response to the Napier Earthquakes of 1931, which has had a significant effect on the overall architectural composition. The most extreme example was the total demolition of St Brigids Church, Feilding, reportedly in part because of the additional cost of structural seismic upgrading required under new building regulations¹⁵.

94. In my opinion, the removal of the Baptistery in part is no more a significant intervention than the St Matthews example, and far greater damage is likely to occur to an unreinforced masonry church, such as All Saints Church with a 3% NBS rating, should a seismic event occur.
95. For high-risk areas such as Palmerston North this is 15 years from the issue of the notice (7.5 years for a 'Priority' Building'), plus 10 years extension due to Category 1 status of the building. This work may include partial demolition, or even full demolition. I do not know if the church is determined to be a priority building, but this is potentially the case, as its collapse could significantly endanger public safety and impede rescue services, for example if the tower collapsed across the street. A 'do-nothing' scenario will not provide a positive conservation outcome.
96. The removal of the Baptistery may allow seismic strengthening of the Tower to occur more efficiently, but this is not the sole purpose for its removal. The dual purpose of the proposal is also to re-orientate and re-focus the entrance of the Church, so that it is more welcoming to the street, encouraging and welcoming to parishioners and new visitors. The removal of parts of the Baptistery best facilitates this desire, while maintaining the majority of the Building's design form and structure.
97. In relation to the original architectural composition, I note that when comparing the elevation of the church both with and without the external baptistery wall, there is still a similar expression of horizontal and vertical elements. This is because the three arches which form the interior wall of the baptistery occupy a similar space in the elevational organisation of the west wall (**Appendix 3**). This,

¹⁵ <https://www.stuff.co.nz/manawatu-standard/your-manawatu/feilding-herald/419932/End-nigh-for-St-Brigids>

combined with the primary record (original drawings), and retained elements, mean that the original composition is not entirely lost, and could be accurately reconstructed.

98. I believe it is evident that there is no one size that fits all when adapting historic buildings. The optimal design for fabric retention is not in this case the optimal design for intended use. Overall, I consider the 'best result' is to put the Church back into use, serving the community it was built for/ its intended purpose and seismically strengthened for future generations to enjoy. This is achieved by the proposal.
99. I disagree with the reason Ms Dangerfield has given to decline the application, for the above reasons and as set out in my HIA, which acknowledges the partial loss of the baptistry, but considers that overall this is outweighed by the heritage benefits.

CONCLUSION

100. In summary, my key conclusions in relation to the Project are that:
- (a) The adverse effects of the proposal on historic heritage values are primarily related to architectural values, and that this is mitigated through reversible design, reuse of existing building elements, and seismic upgrading which would not otherwise occur.
 - (b) The Project does not diminish the overall historic heritage values of the place, and the Church will still maintain its heritage status as a Category 1 building of cultural heritage value in the PNDP.
 - (c) The provision of new additions provides for the long-term continuation and enhancement of historical, community and spiritual qualities which are strongly associated with the cultural heritage values of the place.
 - (d) The proposed conditions presented by Mr Forrest are appropriate and will further ensure the adverse effects of the proposal are avoided remedied or mitigated, while maintaining the heritage values of the place.

101. I have considered the matters of disagreement, and I remain unchanged in my opinion on these matters. In my view, the adverse effects are clearly recognised and understood by the applicant, but they are also clearly offset in the proposal by the improved resilience of the Church, both physically and spiritually.
102. As quoted from the Institute of Historic Building Conservation Professional Practice Principles:

To make good-quality judgments about potential changes to heritage, it is essential to consider the impacts of those changes against a wide social, economic and environmental context. Focusing only on cultural values can lead to poor-quality and unsustainable decisions because it considers only a small part of a complex process. In some instances this can result in heritage assets and resources becoming non-viable, threatening their survival. Fundamental to this is the recognition that change created our historic environments and that change is an essential part of managing and developing those environments.¹⁶

Dated 10 December 2020

A handwritten signature in blue ink, appearing to read 'John Brown', with a long horizontal flourish extending to the right.

John Brown

¹⁶ IHBC 2017. Section 3.1 Reconciling Values. Pg 12

APPENDIX 1: TABLES

TABLE 1: SUMMARY OF CULTURAL HERITAGE VALUES FOR THE CHURCH

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			

Value	Comment	Conservation Plan / HNZ value equivalent	Assessed Significance
Representative/ Townscape	<p>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</p> <p>One of a number of churches within the CBD surrounding the square.</p> <p>Tower at corner of square is a key local landmark</p> <p>Low to moderate archaeological potential</p>	<p>Physical Values –</p> <p>Archaeological information</p> <p>Representativeness</p> <p>Context or group</p> <p>Historical –</p> <p>Patterns</p> <p>Authenticity –</p> <p>Location and setting</p>	High
Authenticity	<p>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.</p>	<p>Authenticity –</p> <p>Form and design</p> <p>Use and functions</p> <p>Materials and substance</p> <p>Tradition, techniques and workmanship</p> <p>Location and setting</p> <p>Spirit and feeling</p>	High

TABLE 2. SUMMARY OF ANTICIPATED EFFECTS ON HISTORIC HERITAGE VALUES - CATEGORIES

Value	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

APPENDIX 2: COMPARATIVE CHURCH DESIGNS BY CLERE

Clere completed over 100 designs for churches¹⁷. A total of 20 of his churches are recognised on the New Zealand Heritage List. His body of work can be broadly divided into timber designs and masonry (brick and concrete) designs.

The presence of a separate Baptistry on the west elevation does not appear to be typical of Clere's body of work, especially his designs for masonry churches. He did add a baptistry of similar form to Old St Paul's, Wellington (mainly designed by Frederick Thatcher), but usually, the west window and tower were the main architectural features, sometimes with a central entrance under the west window. This is demonstrated in the following images.

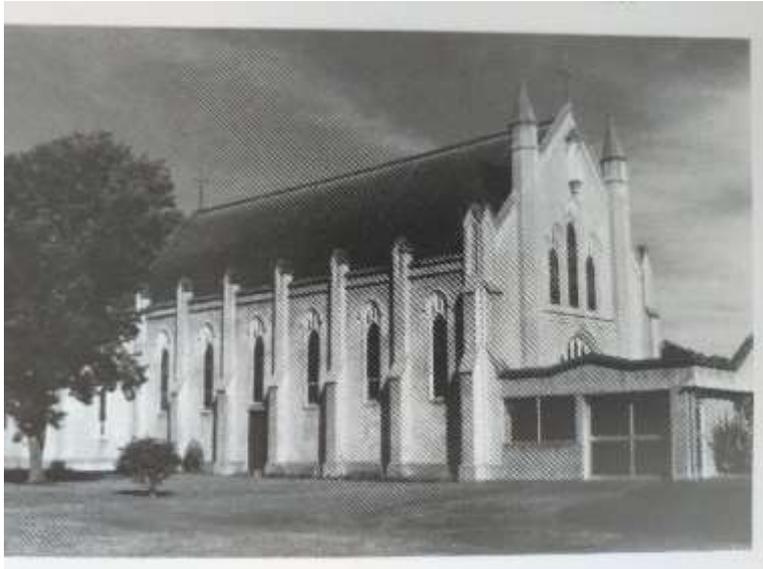
The clearest comparison of the examples below in terms of scale and materiality is with the western elevation of All Saints Anglican Parish Church – Hāitaitai, but Clere's other churches in Palmerston North (for different denominations) show similar application of the west window as a principle feature.

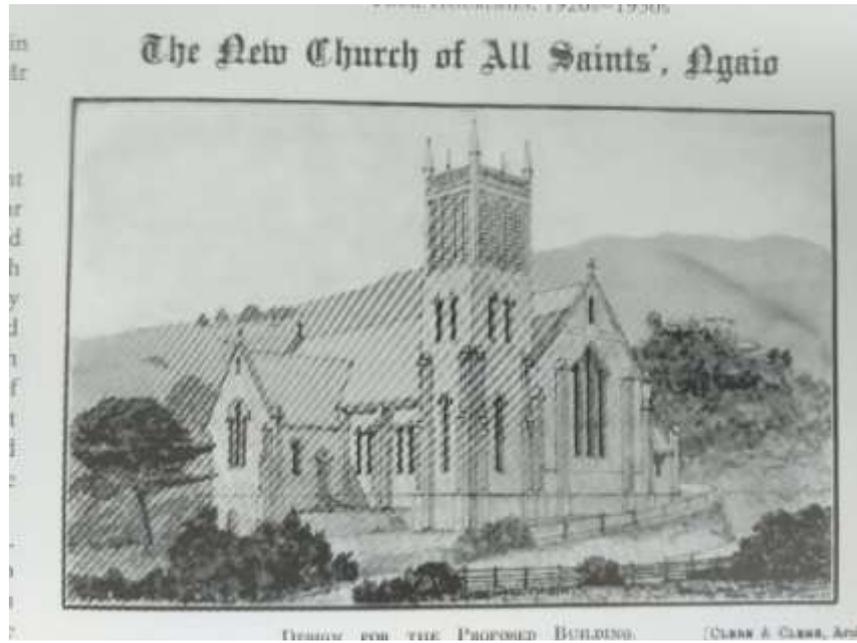
Images from Maclean S 2003: *Architect of the Angels – The Churches of Frederick de Jersey Clere* (unless otherwise stated)

¹⁷ Maclean S 2003: *Architect of the Angels – The Churches of Frederick de Jersey Clere*

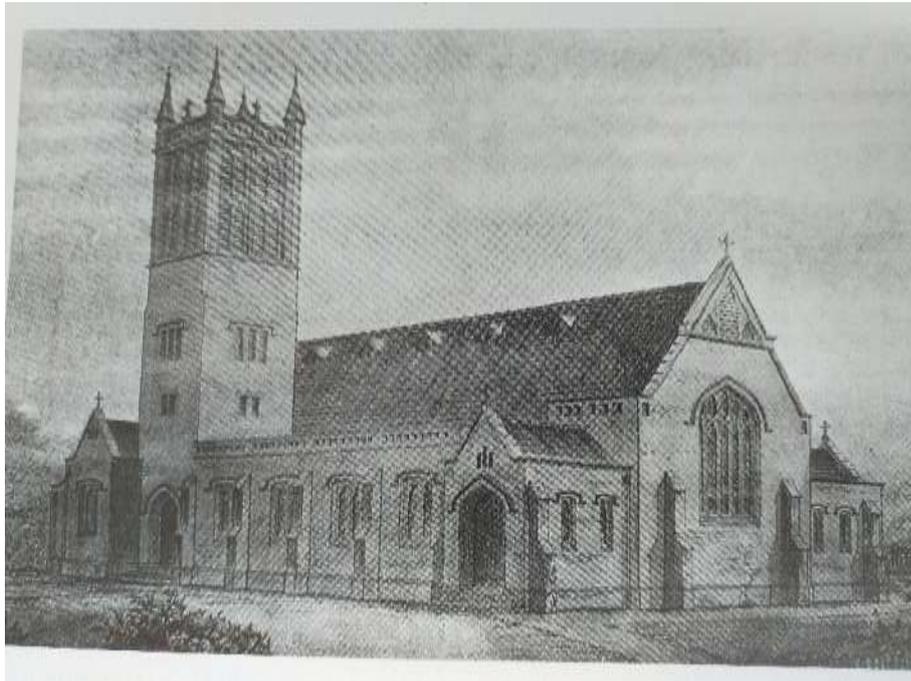


Top – Baptistery addition to Cathedral church of Old St Paul's Wellington (HNZ, Sheehan 2001); Bottom – St Brigid's, Fielding, deemed unsuitable to renovate and demolished in 2009)





All Saints Ngaio.- closed for worship since 2011 due to earthquake risk. Top, as designed by Clere. Bottom – 2015 with a reduced tower height (Image Wellington City Council, WCC schedule 21/ 378)



St Hilda's Island Bay (top – original design; bottom – as constructed, Facebook – St Hilda's 2020)





St Matthews Hastings (top – as originally constructed; bottom – HNZ listing ref 179, Category 1, Helen McCracken 2002; tower reduced in height after Napier Earthquake 1931)





All Saints Anglican Parish Church - Haitaitai (Heritage New Zealand Category 2 ref 1331)



St Oswald's Whanganui HNZ Category 2 ref 956 (St Oswald's Website 2020)



Former Baptist Union Church, Palmerston North (Author 2017)

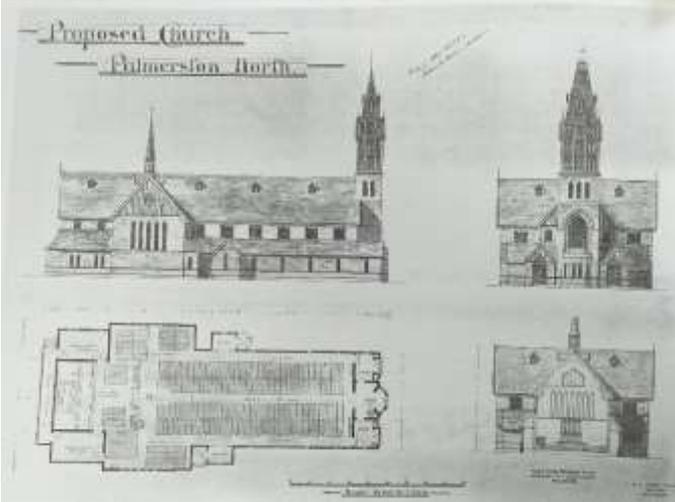


Cathedral of the Holy Spirit, Broadway Ave HNZ Category 1 No. 195 (Streetview 2019)

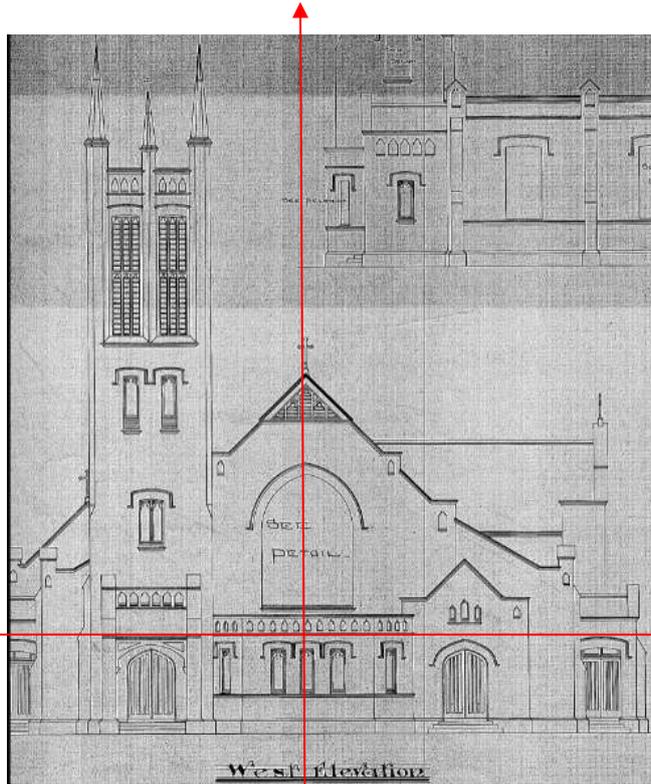
APPENDIX 3: ANALYSIS OF EFFECTS ON ARCHITECTURAL COMPOSITION



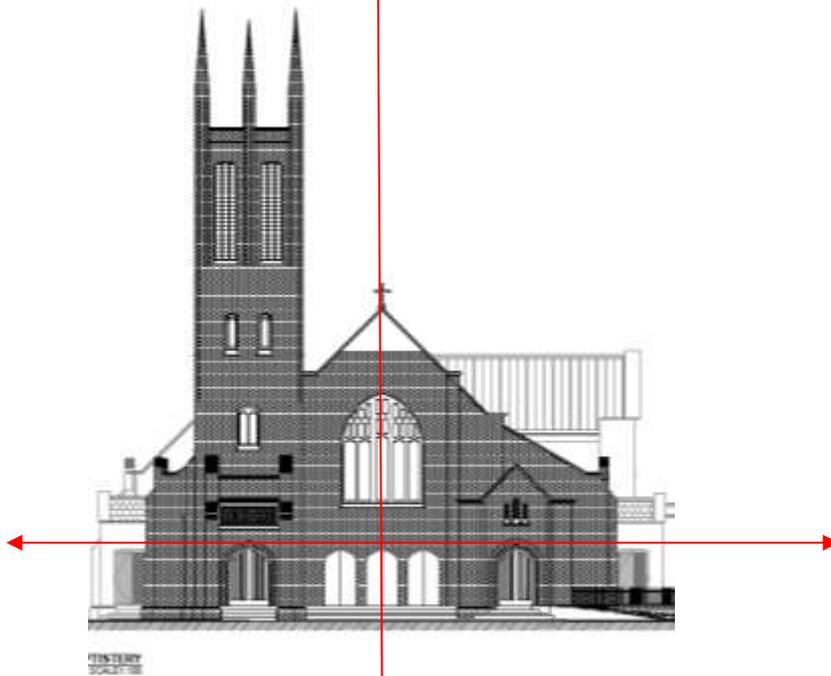
Existing (Author 2017)



All Saints Palmerston North. Original design for All Saints Palmerston North – the original design (rejected) has a reduced baptistery with central tower and flanking doors). This arrangement is not dissimilar to the Cathedral of the Holy Spirit. The accepted 1913-1914 design uses a tower entrance and separate porch entrance.

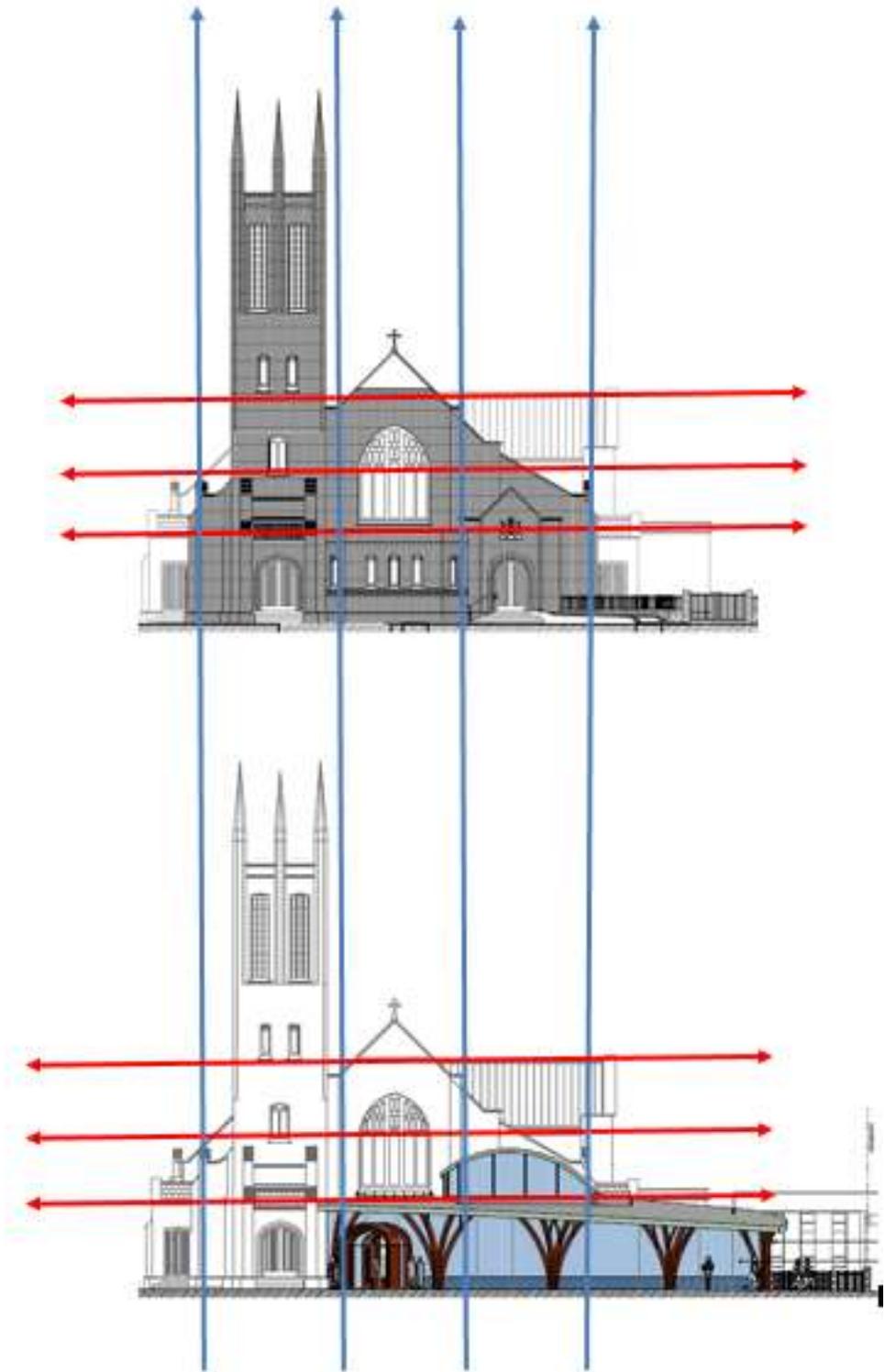


Existing (Clere original drawing)



Removal of Baptistery Wall

The arrangement of the three internal baptistery arches will now be externally expressed, maintaining something of the original horizontal and vertical composition.



The Tower and the 'West' window are the key architectural elements of the street elevation. The architectural organisation of the 'West' elevation, based on these two key features, is essentially maintained through the new design with addition, as shown on this diagram. The full elevations of the 'West' window and Tower are visible.