

LU 5331
27th October 2020

Anglican Diocese of Wellington
c/- Matthew Soong
PO Box 55
Palmerston North

Attn: Matthew Soong

BY EMAIL: honeyshape@icloud.com

Dear Matthew,

**PALMERSTON NORTH CITY COUNCIL
LAND USE CONSENT – RC LU 5331: ALL SAINTS CHURCH,
338 CHURCH STREET, PALMERSTON NORTH**

Background

On 20th November 2019, the Council requested Further Information in relation to the above application pursuant to Section 92(1) of the Resource Management Act 1991 (RMA). This request included the following item (emphasis added):

- 5. Reference is made throughout the documents included in the application of previous design iterations, including an earlier design that was taken to consultation; and, options for a west porch entry, that were discarded. **Can you please outline what these alternative options were, including what options were consulted on with parties.***

Note: it would be useful to demonstrate through further evidence why a west entry was considered to be an unworkable solution; and, understand see how previous designs have been "improved" in light of heritage considerations or issues raised as stated within the application.

An initial response to this item was provided in the Section 92 response (dated 15 January 2020). Appendix 3 of the s92 response where conceptual entrance options were discussed.

On 24th January 2020, the applicant was advised that there were several items in the Section 92 request which were still required/outstanding and myself and Council's (Consultant) Heritage Advisor, Mrs Chessa Stevens made ourselves available to meet with the applicant's team at the church on 20th February 2020. Matt Soong, David Forrest, Vince Neal and David Chapple also attended. The purpose of that meeting was to discuss the nature of the 20th November 2019 further information request and the matters required in response.

In discussing alternative options (item 5 of the s92 request), the applicant's team discussed previous work commissioned on structural schemes by Consulting Engineers Dunning Thornton and a Structural scheme peer review undertaken by David Hopkins and Win Clark. The Council subsequently requested (in email 5 March 2020) that this information be provided to inform the assessment of the application.

The applicant's response to these matters are set out in a letter on 20 April 2020. The information requested was not provided. The reasons given by the applicant for this are quoted below:

1. *"We do not think that these schemes should be put into the public domain as they were intended as guidance only.*
2. *"These two experienced earthquake engineers have graciously donated their professional time to this project and once again, we do not think that these comments should be put into the public domain as they were intended as guidance only. The comments received were referred to in discussion with Chessa, as it showed that the Church had received some independent professional input into its iterative decision-making process".*

The applicant was advised (8th May 2020) that there were several matters still outstanding in the Section 92 request. Whilst providing this information was not refused by the applicant (Section 95C of the Act), both Mr Soong and Mr Forrest requested that the Council proceed to make a notification decision. Mr Forrest noted that there may be further information at a later stage (e.g. following the close of submissions or by the Hearings Panel). The Council agreed to proceed to a make a notification decision noting that this information was still outstanding.

On 11th September 2020, the applicant provided the Council with **draft** statements of evidence from the following parties which are stated to support the spiritual, liturgical and missional values of the Diocese that underpin the application:

- Vince Neal
- Nigel Dixon
- David Moxon
- Suzanne Fordyce
- Gerald Cogan

At paragraph 9 of the accompanying letter to Council, prepared by Diocesan Manager Mr Ben Pringle, it reads:

“The Anglican Diocese will call evidence that it has reached the view that if the missional, theological and liturgical values that have inspired the modifications cannot be achieved, then it is not prepared to support the high cost of strengthening because it is not in the business of funding museums”.

Further Information Request

This letter sets out additional information the Council requires to continue processing the application and is requested before the hearing. Such a request was anticipated by the applicant when they requested the council to proceed to a notification decision.

Pursuant to section 92(1) of the Resource Management Act 1991 (the ‘Act’), the following information is requested so that the Council can better understand the nature of the activity proposed, the effects of the activity on the environment, its fit with the relevant policy framework, and the way in which any adverse effects of the activity may be mitigated:

The Council requires further information in order to understand the proposal’s alignment with the direction under **Policy 1.4** in Chapter 17 of the District Plan. This policy states (my emphasis):

*“To recognize 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”.***

From the material provided is it presently unclear as to what extent realistic alternative options have been considered. I note from the above that:

- a) There are several occasions within the above reference material where the documents included reference to other options. For example, Paragraph 22 of Mr Gerald Cogan’s draft evidence also referred to consideration of a separate west porch entry; and, the further information response on 15 January (Appendix 3) included a range of entrance options.

- b) Mr Pringle has stated that the Diocese “*it is not prepared to support the high cost of strengthening*” without reference to what these costs will be. Policy 1.4 sets out a thorough cost benefit analysis of the alternative options available, including social, cultural, economic and environmental costs and benefits. An assessment of different options including the one supported by the applicant will be essential for an understanding why other (less invasive options) have been dismissed.
- c) This further assessment should have a clear relationship with economic implications and limitations as well. Such implications and limitations should be further detailed for any realistic alternatives, relative to the preferred option. It should include an option where strengthen is undertaken without the partial demolition of the baptistry and entrance frontage.

To assist with your consideration of, and response to, these matters, I draw your attention to a similar assessment carried out by Victoria University in 2015 ([link here](#)). That assessment was based on a different project (for demolition of a heritage building) in a different statutory context, so it will not necessarily be directly transferrable to this application. It is merely provided to indicate an example of a similar assessment on a proposal of alternative options (relative to that application), which includes feasibility and economic viability of multiple alternatives – and including multiple objectives and indicators to assess/score the options against. The provision of such information is necessary for me fully understand the proposal and to prepare my s 42A report.

Please direct any further information to the address for service identified below.

Please do not hesitate to contact me if you have any queries about this request.

Yours sincerely,



Ryan O'Leary
CONSULTANT PLANNER
Palmerston North City Council

Address for Service:
The Property Group
PO Box 12066,
Palmerston North 4444
Mobile: 027 469 8992
Email: roleary@propertygroup.co.nz