



## **ALL SAINTS', PALMERSTON NORTH, CONSENT APPLICATION**

### **SUMMARY OF EVIDENCE**

1. I would like to present a brief summary of my evidence and to make some comments on presentations by the applicant.

#### **Conflict of interest**

2. Firstly I would like to address the issue of a conflict of interest that the applicant considers I have in giving evidence on behalf of the PNCC. These are described in a minute prior to the hearing and in Mr Maassen's submission on page 52, paragraph 251.
3. I must confess I am a little perplexed and not a little concerned for my professional integrity as to why I have been accused of having a conflict – I am commissioned by clients to perform a duty relating to built heritage (e.g., write a conservation plan), I complete that duty, submit an invoice and, following payment, my duty to the client is concluded. This is the case with my commission from All Saints'.
4. On page 53 of Mr Maassen's submission at paragraph 251 states that it" is not appropriate for an ICOMOS professional to assist with the preparation of a Conservation Plan and its implementation through a resource consent and then give evidence against the connected group". I have not assisted with the implementation of the plan through a consent application.
5. Before agreeing to giving evidence, I conferred with Colin Orchiston, an NZIA expert in the area of ethics and architectural practice. He agreed with my conclusion that I do not have a conflict of interest, nor do I have an ongoing duty to All Saints' following completion of the conservation plan in 2018.

## Issues relating to the conservation plan

6. Following best practice for writing conservation plans, the 2018 plan includes:
  - a) physical and social history;
  - b) assessment of heritage values and heritage elements;
  - c) conservation issues including owners' objectives and threats to those values and elements; and
  - d) conservation policies and actions to retain or enhance heritage values and, relating to this hearing, **how the building can be changed and adapted while keeping identified heritage values.**
7. In his submission on pages 41 and 53, Mr Maassen suggested I wrote Section 5.1 "Owner's objectives". As has been confirmed in the hearing the Church Building Advisory Board (CBAB) supplied the text, which was copied and pasted into the document verbatim. The sentence introducing the section explains this. This includes the section of the conservation plan at the top of page 29 describing the desire of the church to redesign the entry through the baptistery.
8. In his page 53 paragraph 252 Mr Maassen suggests that the plan "expressly contemplates the removal of the baptistery wall". As I have just stated, the suggestion to remove the baptistery wall was written by CBAB and not by me.
9. Section 5.2 of the conservation plan describes potential threats to the building including inappropriate and insensitive modifications to the church and setting, as described in paragraph 16 of my evidence in chief.
10. With respect to the threats and policies of the 2018 plan on pages 34-37, I consider that the proposed partial demolition and additions will realise the threats identified by:
  - removing the baptistery, which is an important, original, design element of the church at the centre of the street elevation while also contributing appreciably to its interior design;

- reducing levels of authenticity of fabric, design and setting by removing the baptistery and constructing a highly discordant addition obscuring most of the lower half of the north elevation and the west elevation visible from the street; and
- a consequent loss of heritage values and significance.

11. Policies in the plan are provided to guide resolution of these threats and to provide long-term care for the building as per paragraph 19 of my evidence in chief. The proposed partial demolition and additions are in direct opposition to policies in the plan as the combined proposal:

- does not follow the ICOMOS Charter;
- would adversely impact heritage values, heritage fabric, authenticity and views to and from the building;
- has not been prepared or reviewed by an experienced conservation architect;
- is contrary to standard guidelines such as those prepared by HNZ or Historic England (action 6.1.2.11);
- the design is discordant, unsympathetically contrasting with the heritage building while also obscuring significant views and fabric of the church.

12. It should be noted that conservation plans are policy documents and are not written to answer specific building issues, such as a particular design of an addition. A plan provides general guidelines on how to approach the design of appropriate additions and alterations.

13. The plan was thoroughly reviewed by the CBAB with a number of well-considered comments and suggestions. All their comments and suggestions were included in the final draft of the plan in March 2018. An email to me from Mr Neall on March 28 2018 stated that apart from 2 minor corrections, “no other significant points have been brought to my attention”. I took that to mean that the church accepted the plan.

14. With respect to adopting the plan, this is deemed as “desirable”, and is not a requirement.

#### Plan.Heritage HIA

15. I reviewed the Plan.Heritage impact assessment report and disagree with the assessment and conclusions. I prepared my own heritage impact assessment using an international best practice assessment methodology the (ICOMOS guide, also used by NZTA for assessing impact on all roads that may affect built heritage). I concluded that the impacts on the heritage values of the building would be significantly adverse, permanent and irreversible.

16. Mr Brown in his rebuttal evidence, paragraphs 18 and 69 states that he cannot follow the assessment conclusions. The matrix on page 29 of my evidence provides the answer. The value of the building is assessed as high and the magnitude of impact is moderate (definitions are included in page 28 of my evidence). Following the matrix, the significance of impact is deemed as moderate/large. This is in general accord with Ms Stevens’ assessment, but using different terminology.

17. The Plan.Heritage assessment endorses the removal of the baptistry considering that it is an insignificant percentage of the overall fabric of the church. This view belies the highly significant architectural, rarity, people, events, pattern and education values that it has. Removal of, say, a similar percentage of plain brickwork at the rear of the building would clearly not have the same heritage impact.

18. The assessment considers that mitigation of the destruction of the baptistry can be effected by the relocation of stained glass windows and the font and retaining brickwork for a possible reinstatement of the baptistry if the addition is ever removed. This gesture in no way makes acceptable the very considerable heritage loss.

19. In particular the suggestion that retention of bricks for a possible reconstruction in the future is, in my experience, unlikely. I was involved with the conservation of the old BNZ buildings in Wellington. As a condition of a resource consent,

heritage fabric was removed and stored with the intention of reinstatement at some time in the future. I was commissioned to annually review the stored heritage items. After 10 years it was agreed that the fabric was unlikely to ever be reinstalled and that it could be disposed of. This is consistent with Dr Jacobs evidence.

20. I would like to address the concept of the potential reversibility of the addition which is seen as a mitigation. There will be irreversible damage to the brickwork where the addition is attached to the building. This will include flashings along the roof where brickwork will have horizontal cuts made and support to the underside of the flashings with, say 4 x 2 timber and fixings. It will include vertical cuts made for attaching the walls in at least three places. It will include cuts made into the wall for flooring to be attached. It will include fixings made into the brickwork for handrails and any other fittings fixed to the walls and floor. Two doorways are to be cut into the building causing further damage and there are likely to be services required in the new space which will require additional cutting out of brickwork.

21. I have been involved with the installation of a replacement glass canopy between the Hunter Building and the Robert Stout building at Victoria University. The canopy being replaced was supposed to have been “lightly” fixed. When replacing it for a new canopy there was considerable, permanent damage done. Extensive repairs were required to brickwork and obtaining bricks of the same colour was impossible, leaving the repairs obvious. **Photos**

22. The usual period of time a new building is constructed for is 50 years. I would imagine the addition would be designed and built for this period, given the costs quoted for its construction. I would not consider a 50 year life span to be “temporary” but permanent and therefore the addition should be considered as irreversible. The unlikely retention of brickwork for the baptistery for a period of 50 years, suggests the rebuilding of the baptistery is even less likely.

**Chessa Steven’s Section 42 A report**

23. I have reviewed Chessa Stevens' HIA, which is thorough and considers all matters in a succinct, professional and knowledgeable manner. I agree with her conclusions and that the application should be declined.

### **Strengthening**

24. I endorse the strengthening element of the proposal however as this will greatly improve the resistance of the building to earthquakes. There will be small loss of significant fabric with the most vulnerable external elements being replaced in light-weight materials in a matching design. This follows common conservation practice when strengthening heritage buildings.

Ian Bowman 22/1/21

**Timetable for preparation of the conservation plan**

Date	Person	Contents
16 August 2016	David Chapple	Letter indicating that the 2009 CP was referred to extensively but that change shad been made to the church. Structural engineers had been employed for strengthening. Requesting a proposal for updating the CP.
24August 2016	Ian Bowman	Letter providing an offer of service
December 2016	Ian Bowman	Draft CP
16 December 2017	David Chapple	Email, indicates that CBAB requires the CP to be updated for an application to Lotteries for “a new frontage”
13 January 2018	David Chapple	Requests costs for previous CP as part of application to Lotteries
February 2017	Ian Bowman	Updated draft CP
February 2018	Ian Bowman	Updated draft CP
26 February 2018	Vince Neall	Comments for inclusion in the plan

28 February 2018	Vince Neall	2 minor comments for inclusion in the plan
23 April 2018	Vince Neall	One minor comments for inclusion in the plan
April 2018	Ian Bowman	Final CP