

**Verbal submission on an application for resource consent publicly notified
HWCP Management Ltd
Inner City Redevelopment**

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I would like the hearings panel to know that I have knowledge and experience in heritage management.

- I have a BA (honours) in history from the University of Otago, and a Master of Arts in Public History from Monash University in Melbourne, a qualification which included heritage management.
- I have worked since 1995 as a technical advisor on historic and cultural heritage, most of that time (until mid 2017) for Department of Conservation at a local and national level.
- My work has included preparation of conservation plans and heritage assessments (for conservation and loss), providing technical advice on conservation treatments for various heritage fabrics, working with technical specialists in a range of heritage conservation areas.
- In addition I led a national project to prioritise heritage for conservation across all public conservation land using a software called Zonation. This software produces a hierarchical prioritisation at the landscape level. It has been used by the Department primarily for the prioritisation of biodiversity ecosystems and species, but has also been applied to calculation of biodiversity offsets. My team worked on the design of criteria for evaluating heritage using the software, and applied the software to this application in a pilot study.
- I have attended multiple training courses provided by the International Centre for the Study of the Preservation and Restoration of Cultural Property (ICCROM) - one of the three advisory bodies for World Heritage. I have subsequently worked for them as a lecturer in Rome and Japan, providing training on the preparation of statements of significance - the main component of heritage assessments.
- Overall I have a very robust understanding of and experience in the assessment of heritage values, comparing values across multiple places, and prioritising within large groups of heritage places.
- I have also been involved in the presentation of many heritage sites for visitors, developing visitor experiences to engage people with history, culture and identity.
- In addition I am the chair of Heritage South Trust which organises an annual heritage month for Southland and I sit on the Southland Heritage and Buildings Preservation Trust. Through these involvements I have many connections in the Southland heritage community, and have an understanding of our communities value for our heritage.

I made a written submission on the application in opposition on the basis of specific points relating to heritage value, and some concerns about financial viability and compliance with the District Plan.

Barriers to participating in the resource consent process

- I am making a verbal presentation in spite of an overwhelming feeling that this is project in its current form is a foregone conclusion. This is a feeling that I know is shared by many in our community, and may be a factor contributing to many people not submitting, or speaking to a submission. But there are other barriers:

- Like others I am eager to see our inner city revitalised, looking cared for, and attractive. So far this project has been the only option presented for achieving such a change and it may seem like it is this project or nothing.
- Another barrier is the overwhelming scale and nature of the application documentation. Even as a heritage professional it is not easy to review all of the reports in a personal unpaid capacity. Because of the changing nature of the project proposal through the process, with more documents having been made accessible each few days, there is also the challenge of integrating the information from multiple reports presented over time, into a cohesive whole.
- From the perspective of someone with heritage management experience, beyond reading and assimilating all the paperwork it would be necessary to do further research in order to develop an assessment of the proposal that could stand up to the material presented by the applicant.

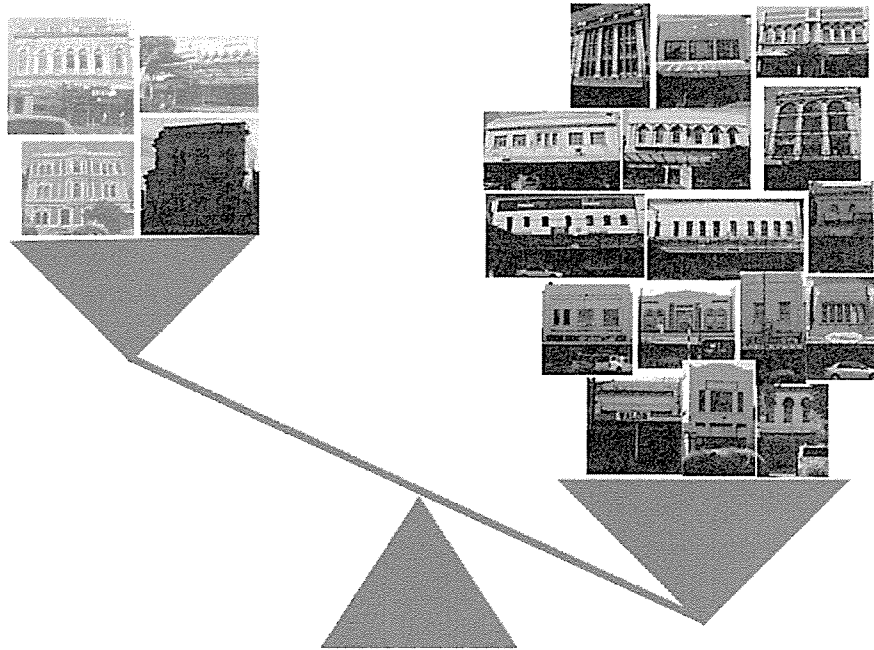
It is for these reasons, combined with the 49% council share in the project, that I believe a more robust, facilitative approach to community engagement should have taken place. Especially when it puts two key priorities of the council - the revitalisation of the inner city, and implement heritage protection - in opposition to each other. Or perhaps this is something the council should have done before becoming involved.

The retention of heritage values / mitigation of loss is too low

My written submission outlined my concern that the mitigation proposed for the loss of heritage buildings is disproportionately low in relation to the amount of heritage and heritage value that will be lost. Having seen the proposed mitigation measures and conditions for the project in the Section 42a, I still believe this is the case.

- I support the condition for recording heritage buildings prior to and through demolition.
- I also support sharing of this along with broader information on the lost heritage values through public interpretation. Appropriate display and interpretation of material that might be excavated during ground works is also a good thing.
- The reuse of building materials from demolished buildings in the new complex is also mentioned. I think these items should be clearly interpreted for the public, including an explanation for why the materials have been used in this way so that they don't just appear as convenient decorative elements.
- I am happy to see that the application has been changed to include retention of an additional facade in Esk street. I think this is a better outcome than isolated facades on multiple streets.
- However, the application includes the complete demolition of sixteen out of twenty buildings with heritage value within a city block, and the almost complete demolition of a further three, save for their facades.
- The twentieth building (former Bank of New South Wales) is not owned by the applicant so far as I know. I agree with the applicant's witness that incorporating it into the planning as a place for future civic activities to ensure that it has an ongoing use is great. I still disagree that this is mitigation on the part of the applicant as decision-making about its fate is in the hands of the owners.
- Facades alone do not constitute heritage. But they are better than nothing. I think the proposed development could easily incorporate two or three additional historic facades in Esk Street, and perhaps more of the buildings (the front quarter for example, considering possibly to retain NZIC, Temple Chambers). This is arguably the best place to create a heritage focus because it is a narrow and more intimate street, and it has a greater overall heritage character/ambiance as a result of many heritage buildings on both sides of the street

- Mitigation could also be in the form of funds set aside now, (resulting from profits) to be allocated for heritage conservation projects on other heritage buildings within the CBD.
- It would be a dangerous precedent to justify this level of heritage loss on the basis of the argument that there are a further 149 heritage buildings throughout the city - if the same rate of 'mitigation' (by retention or partial retention of heritage) were applied to future proposals the cumulative effects upon heritage would be devastating and the proportion of heritage that would survive would be far too low, especially given the importance the District Plan places upon heritage values.



I would like to draw a comparison between the mitigation offered for this project and that agreed for ILT hotel development from the Commissioners decision for that resource consent:

- ILT to put in place procedures for retaining three existing heritage buildings in portfolio namely: Waxy O'Sheas building at 90 Dee Street, Lone Star building at 197A Dee Street, Speights Ale House at 38 Dee Street". My understanding is this includes earthquake strengthening and upgrade.
- Financial contribution of \$50,000 to a Council managed Heritage Fund to assist with mitigating the loss of one district plan listed heritage building.
- Hotel name to be direct historical reference using "Langland's":
- Public interpretation of the heritage, by way of either signage/panels, images, videos or hotel information booklets.
- Recording of the Building to Level 2 during demolition.
- Re-use of transferable materials in either, new structure, street furniture, fixture or fittings, way-finding etc

This scale of mitigation, especially with regard to the first two substantial points, seems a more balanced approach. I submit that the required mitigation for this project should be reconsidered in light of the scale of heritage loss, and comparison to this other recent example.

The heritage character of the Southland Times building will be undermined by painting over the exposed brick

My written submission outlined my objection to the painting of the exposed brickwork of the Southland Times Building.

The applicant's witnesses respond to this stating the painting is 'reversible', and necessary to 'remedy issues with the existing brickwork'. However, I still believe this will diminish the heritage character of the facade and that it undermines the mitigative effect of retaining the facade. I am now also concerned about the impact of the painting upon the bricks, especially in case the 'issues with the existing brickwork' relate to the current state of preservation of the bricks.

Impacts of paint on brick: Brick is a very porous material - moisture moves in and out naturally from unpainted bricks. Most paints will seal the surface. This will create a problem if there is any moisture inside the brick when it is painted, or if moisture makes its way inside by wicking up from the ground, from inside the wall, or through cracks in the paint (which seem inevitable).

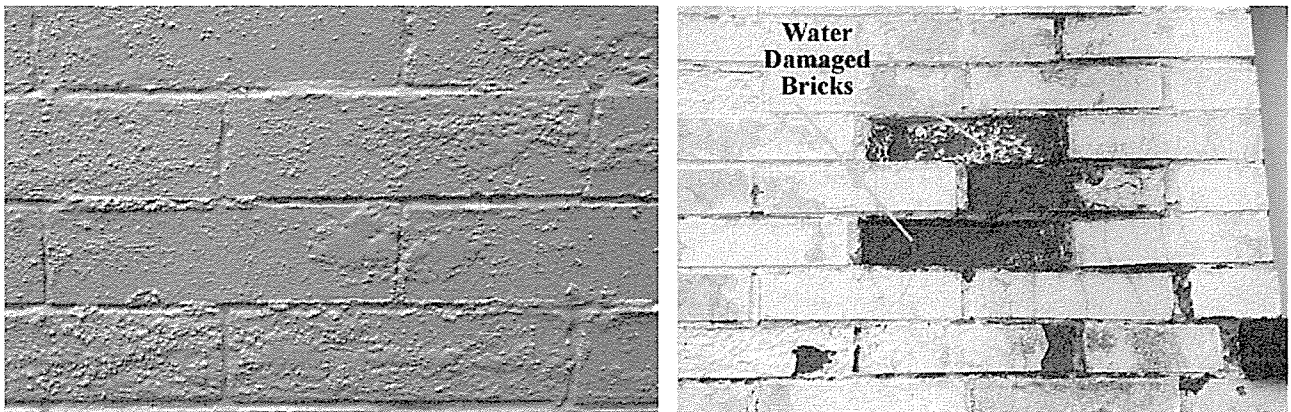
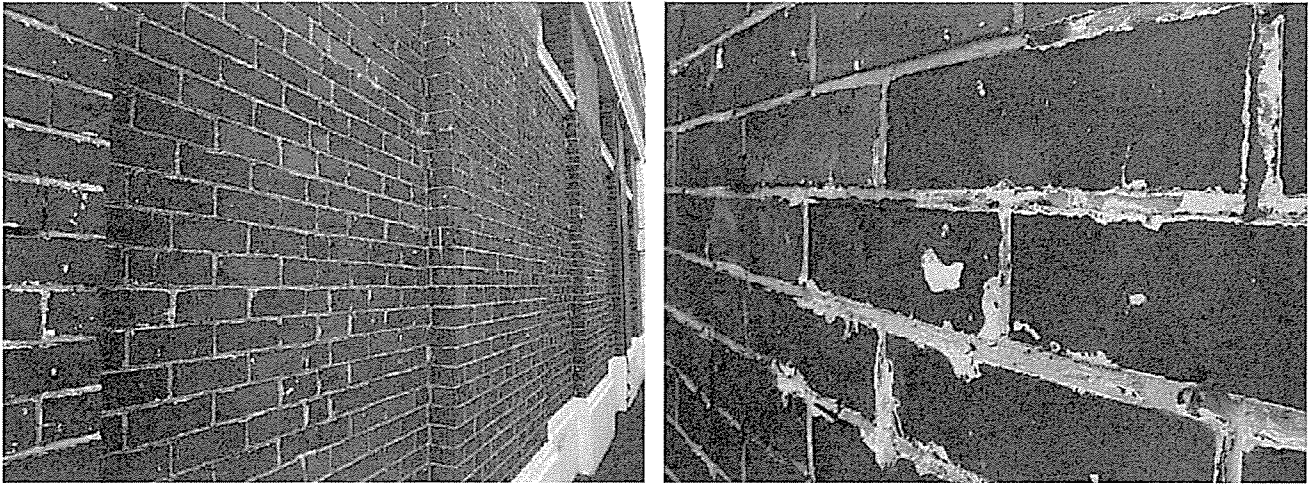


Photo: Painted surface on bricks showing (left) bubbling and (right) spalling because of moisture trapped in bricks

This can cause structural damage to the bricks as well as a moisture problem inside the wall. The effect is exacerbated if there are any salts present - in mortars or cements, or in the bricks as a result of salts in ambient moisture in coastal areas. The situation will be worse if the 'issues with the existing brickwork' (referred to by the applicants witnesses) relate to the condition of the bricks, their surfaces, or the pointing.

Reversibility of painting bricks: Taking paint off sounds easy if you say it quickly. However, more risks arise. Some chemical cleaners can introduce salt into the masonry, causing subsequent problems (again because of the porosity of bricks). Removal can also damage the surface of the bricks, opening them up to further subsequent deterioration. In some cases paint can penetrate into the bricks, making it impossible to remove it without damaging them - this is especially the case if the brick surface was already compromised. Mechanical removal of paint can have even worse consequences. Cement based or textured coatings are very difficult to remove without damage to the bricks.¹

¹ Anne E. Grimmer, *Keeping It Clean: Removing Exterior Dirt, Paint, Stains and Graffiti from Historic Masonry Buildings*, 1992. pp.19-20.



These images of a building in Invercargill demonstrate the end result of poorly implemented painting and paint removal of a brick surface.

Overall there are more and better reasons not to paint previously unpainted bricks on heritage buildings than there are to paint them. Instead, I propose - as this facade is being retained for its heritage value - that:

- The advice of a conservation architect with experience in historic masonry structures should be followed for the preservation of the facade as a whole. The condition of the bricks may require some conservation treatment to ensure they are preserved well for the future, including repointing.
- Any painting of this or other retained facades/buildings (excluding currently exposed bricks) should follow nationally accepted colour schemes for heritage buildings and/or the Invercargill Renovation and Colour Guidelines published by the ICC, prepared by Oakley Gray architects. Anything else undermines the mitigative effects of retaining the facades.

The potential long term negative impacts upon the HNZPT Category I former Bank of New South Wales are not addressed

My written submission outlined my concerns about the long term conservation of the former Bank of New South Wales. This seems to have been misunderstood in the responses to submissions (those which I have managed to read) as concern for the building during the demolition and construction phase.

This building is in a vulnerable position on the south west corner of the block facing the weather. The full height part of the building forms an 'L' shape. Within the 'L' there is a smaller single storey 'L' shaped section of building. There is an alley along the eastern boundary, and a small open area in the north east corner.

- I am worried about how the building will be impacted by the loss of sun from the north/north east and by close placement of new and very tall buildings which will inhibit air movement around the building. Both sun and air are important for keeping the building dry and well preserved. Access to outside walls which are currently accessible is also important for ongoing maintenance of the building.
- Surrounding it with new buildings on these two faces could, if not done appropriately, prove fatal for it - refer to the poor condition of the vicarage of St Johns Anglican Church in Tay Street which is largely due to it being built around on the north and east faces, exacerbated by lack of maintenance, resulting in severe instability.



- The application does not make it clear (or have enough detail which I have been able to find to show) how the new buildings will be butted up against the historic building or what steps will be taken to ensure that the historic building is not put at risk.
- Having a tilt slab wall adjacent, with a small gap will allow for water to access the wall of the historic building, and for material to slowly build up at the base, and over time this could prove devastating for this historic building. This would be as good as demolition in terms of sealing its long term fate.
- I do not know if these are matters addressed by the covenant on the building. It is unlikely that the covenant deals with matters off the property boundary.
- If the project is to be positive for this building then its long term condition needs to be taken into account in the design and placement of adjacent buildings. Again the advice of a conservation architect experienced with this type of building should be followed.

How significance is assessed and evaluated

The application documentation shows insufficient investigation and assessment of cultural aspects of the heritage values.

- No results from social research or survey with regard to heritage value are apparent in the assessment.
- In describing Cultural Values the Heritage Impact and Archaeological Assessment report does not show any indication of investigation into if or how the people of Invercargill currently do or do not value the heritage buildings beyond referencing the District Plan. The cultural values, under the heading “Public Esteem” the report references listing on the District Plan and HNZPT List, but nothing more. In addition it is not clear what the basis is for the statements under the heading “Identity”.

- The Pop Up Shop did not ask any questions about heritage values within the proposed development area.
- This standard of assessment of cultural values is probably consistent with most other resource consent applications where heritage values are being assessed. However, this is something that should change, and in this regard New Zealand practice needs to follow international best practice, which has higher expectations. Furthermore, this application is extraordinary both in its scale and impact upon heritage, and because of local body involvement where the project proposed is at odds with the council's own heritage planning lists and rules.
- The City Council did run public consultation on heritage buildings across the whole CBD in March 2018 in a pop up museum in Esk Street and submissions via mail. Information from this could have been integrated into the report with regard to which buildings were highly valued by the community.

I note that the section S42a report states that replacement of the heritage buildings “with a modern, high quality building complex is ‘appropriate’”, with one of the reasons being given as “The buildings have heritage values, but these cannot be described as outstanding or nationally significant.”

- This statement diminishes the relevance of locally significant heritage and the importance of preserving it, and why it is included on district plans. Often it is the locally significant heritage which embodies local identity and character.
- If we only save nationally significant heritage we will see a progressive homogenisation of our retained heritage, with a loss of local flavour and distinctiveness in the streetscapes of our cities.

Heritage in crisis

- I am very conscious of the fact that our inner city, and in particular our inner city heritage is at a crisis point.
- Low rental returns, deteriorated condition, and earthquake proneness all make maintenance, repair, and strengthening of heritage buildings exponentially more expensive with every passing year.
- I do not propose that it is necessary or desirable to retain every heritage building in the CBD. However, along with many others, I think our heritage streetscapes are a major (if not the only) point of difference for the city.
- They are a tangible part of our identity and character, and could be used to create a unique experience for tourist visitors, building on the Transport World, the Motorcycle Museum and E Hayes as heritage attractions, for example.
- There are many ways of thinking about the dual challenges of revitalising our inner city and preserving our heritage, and of addressing them together. There are successful examples in NZ and overseas, including through the use of UNESCOs Historic Urban Landscape approach.
- Therefore it saddens me that this bold and brave attempt to save our inner city, has overlooked its greatest asset and potential.
- This project presented an enormous opportunity to set something in motion to not only revitalise our inner city, but to turn the corner on maximising the potential of our heritage and preserving it.
- But it seems clear that the properties within the block were purchased with the intention of demolishing all, in spite of the heritage listings and rules in the District Plan and by Heritage New Zealand Pouhere Taonga. And in spite of the council itself being a major partner in the project.

- In my years of experience, beginning from this basis never leads to a good heritage outcome because the heritage is only addressed in terms of ‘mitigation’ and it is an afterthought rather than an integrated part of the design and thinking.

Potential to undermine the District Plan

The outcome of this application will potentially have far reaching implications for the District Plan and its future implementation. A decision to approve the application without a much higher level of mitigation for heritage loss will substantially undermine the plan and its rules.

The plan includes listing of a number of heritage buildings. The lists were developed through a robust process of assessment (architectural assessment (Oakley Gray) followed by historical research (A. Morton)), rules were developed to reflect the assessed values, and the whole went through a robust public consultation process. The resulting plan represents a kind of contract between the people and the council about how heritage will be treated in the city. The current proposal sits well outside that contract on many levels. What will it mean for future applications to demolish heritage buildings if this scale of loss without commensurate mitigation is endorsed?

Some of the applicant’s expert witness statements suggest that the imperative to revitalise the inner city has precedence over the priority for heritage in the CBD in spite of the plan rules. I propose that these two things are not mutually exclusive. If the importance of retaining some heritage character had been part of the ‘brief’ for the project it could have been incorporated in a sympathetic and meaningful way into the architectural design. It might have made the project even more spectacular, adding a value for tourist visitors to experience, as well as local shoppers and users of other amenities.

In conclusion, it seems the city council is suffering from some kind of institutional cognitive dissonance - “a state involving conflicting attitudes, beliefs or behaviours, producing a feeling of mental discomfort, leading to an alteration in one of the attitudes, beliefs or behaviours to reduce the discomfort and restore balance”. The council has a District Plan which shows a great deal of respect for the value of heritage in the CBD. At the same time it has chosen to engage, albeit in a detached way, in a project that will lead to the loss of so much of that heritage and potentially undermine other parts of it. This to meet the priority objective of revitalising the inner city.

Approval of the proposal in its current form will confirm the cognitive dissonance and demonstrate that the belief that will be sacrificed is that of valuing heritage. Without more robust mitigation measures and meaningful tangible gains for heritage approval will seriously undermine the future for heritage in the city, the District Plan, the process which created it, and faith of the heritage sector of the community in the council when it comes to heritage values. In an ideal world this project would have started with valuing heritage as one of its core tenets so that both goals - inner city revitalisation and heritage preservation - could be achieved together.

My submission would be met by the Council making the following decision;

- The applicant should be required to retain a larger number of facades, and potentially the front quarter of some buildings. It would be preferable if these were in Esk street to create some continuity of heritage streetscape. At least three additional facades should be considered, including NZIC, Temple Chambers. This would be a step towards bringing the ratio of heritage lost to retained into balance (bearing in mind that a facade is not a building, and when only a facade is retained there is still considerable heritage loss).
- The applicant should be asked to establish a fund now or in the future, to be administered by the council or other suitable body, to be used for heritage conservation projects on other buildings within the CBD.
- The applicant should be required to ensure that the former Bank of New South Wales building walls (north and east) are not negatively impacted upon by the proposed new structures.
- Technical advice should be sought from qualified professionals to ensure that construction details are such that the building is secure and safe from an increase in moisture accumulation on the north and east walls.
- The applicant should be required to set aside funds in trust with the council or other body as security to be used in the event of archaeological discoveries that require conservation work and analysis.
- The processing of the consent should involve adherence to District Plan height limits to avoid creating too much surplus rentable space within the CBD. The HWR tower should not be as high as proposed, nor should the office block buildings at the eastern end of the development when there is so much unused office space in the city - this will serve to lower the value of spaces and decrease rentals for all owners. Other spaces are more likely to be improved and upgraded if there is demand, rather than fall into shabby disuse, and face eventual demolition.
- From a ratepayer perspective, as the City Council has a financial stake in this enterprise, approval should be contingent upon robust proof of financial viability. This project presents an amazing opportunity and enormous risk in one moment. It is important to get it right. A staged development might be a safer way to proceed.
- The colour scheme for the Southland Times Building should include leaving the exposed brick exposed, and use of approved heritage colours for the remainder of the building. Similarly all the retained facades should be painted in colours that match their period of construction and in a way that highlights their design and decorative elements, from national heritage colour charts/ recommendations by qualified professionals. The wider development should be sympathetic to that rather than creating a homogenous colour trend.
- The applicant should be expected to ensure that the historic kerbstones are protected and retained in situ. There should continue to be interpretation of these.
- Mitigation steps outlined in the application should also be included in the consent, if granted.

