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2 July 2020

Job No. 140450.64

Lana Gooderham
Planner
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Dear Lana,

The Church of Jesus Christ of Latter-day Saints (application 010.2019.00010774.001) – Response to Heritage NZ letter dated 27 May 2020

Further to the receipt of the Heritage NZ letter dated 27 May 2020.

On behalf of the Church, we have prepared a comprehensive response to the matters raised in the Heritage NZ (HNZ) letter. In addition, Adam Wild of Archifact has prepared a memorandum which is included as Attachment 1 to this letter which addresses a number of specific matters. We have adopted the topic headings used by Heritage NZ for ease of reference.

District Plan Objective & Policy Framework

HNZ consider that the Block Plant AEE would benefit from a more fulsome consideration of the policies contained in Chapter 19 – Historic Heritage of the Operative District Plan, specifically Policies 19.2.1a, 19.2.1c, 19.2.3a and 19.2.3b. For the sake of completeness, I have included all of the Historic Heritage Objectives and Policies as Attachment 2 to this letter.

Policy 19.2.1a seeks that “The City’s historic heritage shall be protected from the adverse effects of subdivision, use and development.” The proposal to remove the vacant Block Plant will be contrary to this policy in that the building would not be retained on site, however in my view the proposal would be generally consistent with Policy 19.2.1b¹ and 19.2.2b². While the physical fabric of the Block Plant building would be removed, the Matthew Cowley Pacific Church History Museum located just 100 metres from the Block Plant already has an extensive archival quality heritage museum. This museum contains photos, film clips and books which contain a record of the construction and operation of the Block Plant and more importantly of the operation of the block making machinery which is no longer in the building, having been removed over 50 years ago. This means that the available records of the activities and people associated with those activities that took place in the Block Plant are already preserved and available for any member of the public to access. In addition, it is proposed to memorialize the activity of block making which took place in the Block Plant building through the construction of a plinth made of the original blocks and located on the residential

¹ Policy 19.2.1b Ensuring that where features have been destroyed or damaged, the historical heritage values of these sites are recorded and recognised to ensure the historical legibility of Hamilton City.

² Policy 19.2.2b The loss of heritage values associated with scheduled items shall be avoided.



street in the location of the building. This will include a simple interpretive panel that will provide some information about the Block Plant (the machinery and the building), its role in the manufacture of blocks that form the basis of all the retained heritage buildings including the Temple and provide directions to the nearby Church History Museum where more extensive archival material is available to view.

In addition, Mr Wild states that the refurbishment of the other heritage buildings both on the Temple View Project site and the Temple site will continue to be a living testament to the values of the blocks produced in the Block Plant than the values of the building itself³. The Mendenhall building, the First House, the Kai Hall and the GRB building have all been comprehensively refurbished and are in regular use today. The majority of these buildings have also received awards at the Waikato Architecture Awards, Heritage Section in 2018.

In relation to Policy 19.2.1c, I note the comments from Mr Wild in his letter in Attachment 2 where he states that the ICOMOS charter provides helpful guidance in the preparation of conservation plans and protection of historic heritage, however it was not prepared for the purpose of administering the Resource Management Act. I concur with his view and consider that Policy 19.2.1c is not relevant to the consideration of this application.

While Policy 19.2.3a is clear that the demolition or relocation of buildings or structures ranked A is to be avoided, Policy 19.2.3b is less direct when it states that the demolition or relocation of buildings ranked B should be discouraged. This reflects the fact that in some situations, relocation or demolition may be the only option for a B ranked heritage building when all other feasible options have been explored. The Block Plant is a B ranked heritage building.

The Explanation connected to the ODP Objectives and Policies relating to Buildings and Structures is helpful in that it explains the differentiation between A ranked Heritage buildings and B ranked Heritage buildings. The explanation under 8-1.1 Ranking of Significance states that: "Plan Ranking A: Historic places of highly significant heritage value include those assessed as being of outstanding or high value in relation to one or more of the criteria and are considered to be of outstanding or high heritage value locally, regionally or nationally." However, the B Ranked building statements is as follows: "Plan Ranking B: Historic places of significant heritage value include those assessed as being of high or moderate value in relation to one or more of the heritage criteria and are considered to be of value locally or regionally."

Heritage Significance

The Block Plant is a B ranked heritage building listed as item H135 in the Operative District Plan. The Archifact Block Plant Heritage Assessment⁴ sets out a full assessment of the heritage values of the building as found and provides a more comprehensive review of these values than that found in the Operative District Plan (ODP). The Archifact report concludes the following in relation to the criteria for significance found in the ODP:

- Historic qualities – Moderate
- Physical/Aesthetic/Architectural qualities – Low
- Context or Group Qualities – Moderate
- Technological Qualities – Low
- Archaeological/Cultural Qualities – Low
- Scientific Qualities - Nil

³ Pg. 2, Archifact memorandum 15 June 2020

⁴ Appendix D – Assessment of Environmental Effects



The assessment of alternative uses⁵ concluded that of the potential uses; only commercial (offices) and residential (apartments) were appropriate to be considered further. Retail, community and industrial uses were not pursued for the reasons set out in the 18 May letter. In relation to the potential refurbishment to offices, the 18 May letter notes that the economic assessment of the office option concluded that it was not feasible⁶. Mr Wild noted in the same letter that “The extent of invasive strengthening and associated demolition of existing floor slabs and walls clearly shows that quantitatively a significant proportion of these elements would require demolition where required to meet the designed adaptation reconstruction. This action would directly affect the authenticity of the building fabric of the heritage building and the legibility of its heritage building typology, and correspondingly impact the historic heritage values for which the Block Plant was recognised in the ODP.”⁷”

In relation to the refurbishment to residential use, the 18 May letter notes that the economic assessment of this option is that it is also not feasible. In the same letter, Mr Wild concludes that: “The extent of invasive strengthening and associated demolition of existing floor slabs and walls clearly shows that quantitatively a significant percentage of these elements would require demolition where required to meet the designed adaptation reconstruction. This action would directly affect the authenticity of the building fabric of the heritage building and correspondingly impact on the historic heritage values for which the Block Plant was recognised in the ODP.”

The explanation connected to Objective 19.2.3 and the related Policies provides helpful background. It states that: “The strengthening of historic heritage buildings to meet earthquake strengthening requirements is important to ensure heritage buildings and structures are safe and useable. However, the strengthening of these buildings and structures still needs to ensure that the heritage values are retained.” The Archifact memo⁸ advises that both refurbishing options and the seismic strengthening associated with those options for the Block Plant would compromise the very fabric that contributes to the buildings historic heritage values in the first place. In reliance on the opinion of Mr Wild, I disagree that the demolition of the Block Plant would adversely affect the significant heritage values of the place and beyond.

Architectural Values

As stated in the memo attached to this letter, Mr Wild does not concur with the HNZ letter in relation to architectural values. The HNZ letter also considers that the block plant marks the geographic breadth of the former Church College and that its removal would focus attention only on the Temple and Tuhikaramea Road as opposed to the former school site as well. As part of its Temple View project, the Church has developed and refined a masterplan for the site ever since 2012. A guiding principle for the masterplan has been the protection and enhancement of the Temple. The purpose of the Temple View project has been to revitalise the Temple View community while injecting new economic life into the local community. Stage One has now largely been completed and partially fulfils that vision. The community and church areas of the project are centred on the former Mendenhall building, the GRB and the Kai Hall with the associative Legacy Park while remainder of the site has been designed for the development of up to 300 residential houses. As noted above, the photos, film and books located in the Church History Museum provide clear, visual reminders of the former Church College. There is no value in retaining the Block Plant to retain a geographical marker of the former school.

⁵ Letter to HCC dated 18 May 2020 plus Attachments

⁶ pg. 3, Letter to HCC dated 18 May

⁷ Pg. 3, Archifact memo dated 7 May 2020, Adaptive reuse options, Attachment 6, letter to HCC dated 18 May 2020

⁸ Archifact memo, Attachment 6 to the 18 May 2020 letter to Council



Effects of Demolition

The HNZ letter questions the Heritage Impact Assessment statement that there are no practical functions for the building and states that there are more meaningful public benefits in the retention of the Block Plant and Our letter dated 18 May 2020 provided a comprehensive assessment of both commercial office and residential apartment uses for the Block Plant. Architectural quality plans were prepared, costed by a Quantity Surveyor, assessed by a Structural Engineer, assessed by a Heritage Architect and economically assessed by a Valuer. The conclusion of all those technical reports was that neither the office or apartment options were economically feasible but just as significantly, the reports concluded that the seismic upgrading and alterations necessary to make each of the options work architecturally and meet the relevant building codes would significantly impact the external heritage fabric of the building. Potential community, industrial and retail options were also discussed in the 18 May letter and were either inappropriate for the residential area or have already been provided elsewhere within the Temple View project site. In my view, the only two potential reuse options for the Block Plant have been comprehensively assessed and neither is appropriate.

Economic Analysis of Adaptive Reuse

While the economic costs associated with the refurbishment of the Block Plant have been assessed and found to be significant, they only comprise part of the picture. The assessment by the Structural Engineer⁹ notes that the majority of the east facing and internal walls of the Block Plant are required to be demolished to facilitate both the office and apartment options. In relation to the office option, Mr Wild notes that the alterations would “directly affect the authenticity of the building fabric of the heritage building and the legibility of its heritage building typology and correspondingly impact the historic heritage values for which the Block Plant was recognised in the ODP”¹⁰. Mr Wild reaches a similar conclusion in relation to the apartment option.¹¹ In my view neither the office or apartment options are feasible and both would result in the demolition of significant elements of the building. I also consider that the Church has given sufficient consideration to those options that were the most appropriate for the site given the surrounding uses.

Cumulative Effects

Mr Wild has commented at length on the cumulative effects issue in his memo¹² and concludes that there will not be cumulative effects arising from the removal of the Block Plant on the wider heritage values associated with Temple View. He states that: “The conservation and adaptive reuse of 5 significant heritage buildings (including the Temple) along with the significant improvements to the urban and environmental context for those buildings means that there have already been substantial positive cumulative effects on heritage values within the Temple View project. Whilst demolition of the Block Plant will have a minor cumulative effect in terms of brownfield development and loss of redundant buildings, this is adequately compensated by the restoration and re-purposing of higher quality heritage buildings elsewhere within the Temple View area. In conclusion, there is no cumulative adverse effect on historic heritage values of the surviving four listed Category B scheduled items or the Category A Temple individually or collectively arising from the proposed demolition of the Block Plant building. Consequently,

⁹ Attachment 3 – 18 May 2020 letter to Council

¹⁰ Pg. 3, Attachment 6, Archifact memo dated 15 June 2020 in 18 May letter to Council

¹¹ Pg. 4, Attachment 6, Archifact memo dated 15 June 2020 in 18 May letter to Council

¹² Attachment 7, Archifact memo dated 1 April 2020 in 18 May letter to Council



there are insufficient grounds for refusal based solely upon cumulative impacts upon remnant heritage values.¹³"

Seismic Strengthening

The HNZ letter states that no design to strengthen the building has been presented however this is incorrect. Attachment 1 to the 18 May letter contains a seismic report by Beca on the Block Plant building. Attachment 3 to the same letter contains a set of marked up seismic strengthening plans prepared by Beca and based on the architectural plans prepared by Walker Architects¹⁴. The conclusion of the seismic strengthening technical work is that the alterations necessary to achieve both the office and apartment options would result in the removal of a significant portion of the heritage fabric of the building.

Conclusion

We have set out above our responses to the HNZ letter and reiterate the conclusions reached in both the AEE and the 18 May letter in relation to the removal of the Block Plant. The proposal to remove the Block Plant is consistent with most but not all of the relevant Heritage Objectives and Policies in the Operative District Plan. However, the proposal is aligned with the sustainability principles of the RMA insofar as reuse of the site for residential redevelopment will better provide for the social and economic needs of the community. The intangible social and cultural values of the place can be retained through the existing and proposed commemorative mitigation.

Please contact me if you have any questions.

Yours sincerely
Bloxam Burnett & Olliver



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cc – Adam Aalders, David Heperi, Derek Nolan, Aidan Cameron, Adam Wild

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¹³ Pg. 7, Attachment 7, Archifact memo dated 1 April 2020 in 18 May letter to Council

¹⁴ Attachment 2, Walker Architects Plans, in 18 May letter to Council



Attachment 1
Historic Heritage
Objectives and Policies



All Historic Heritage

- Objective 19.2.1 Significant buildings, structures, sites and items that define the City's historic heritage are identified and protected.
- Policy 19.2.1a The City's historic heritage shall be protected from the adverse effects of subdivision, use and development.
- Policy 19.2.1b Ensuring that where features have been destroyed or damaged, the historical heritage values of these sites are recorded and recognised to ensure the historical legibility of Hamilton City
- Policy 19.2.1c Subdivision and development shall adhere to the conservation principles of International Council on Monuments and Sites (ICOMOS) being the New Zealand Charter (2010) for the Conservation of Places of Cultural Heritage Value where applicable.
- Objective 19.2.2 The heritage values of a diverse and representative range of natural, physical and cultural resources are protected.
- Policy 19.2.2a Items of significant heritage value (buildings, objects, areas, trees and sites) shall be scheduled.
- Policy 19.2.2b The loss of heritage values associated with scheduled items shall be avoided.
- Policy 19.2.2c Outstanding examples of a particular type of site, or sites that are highly significant to the community shall be scheduled.

Buildings and Structures

- Objectives 19.2.3 The heritage values of significant buildings, structures and their immediate surroundings are protected.
- Policy 19.2.3a Demolition or relocation of buildings or structures ranked A in Schedule 8A shall be avoided.
- Policy 19.2.3b Demolition or relocation of buildings and structures ranked B in Schedule 8A should be discouraged.
- Policy 19.2.3c Subdivision and development shall retain, protect and enhance the heritage values of any building or structure listed within Schedule 8A.
- Policy 19.2.3d Subdivision and development shall avoid any potential cumulative adverse effects on any building or structure listed in Schedule 8A.
- Policy 19.2.3g The continued use or adaptive reuse of any building or structure of identified heritage value shall be encouraged.
- Policy 19.2.3h The site surrounding the heritage building or structure shall be protected to the extent that it contributes to the heritage values.
- Policy 19.2.3i Encourage the strengthening of buildings in Schedule 8A to increase their ability to withstand future earthquakes while minimising the significant loss of associated heritage values.



Attachment 2

Archifact Memorandum dated 15 June 2020



memorandum

archifact

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limited

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for: bloxam burnett & olliver

from: archifact – architecture & conservation ltd

date: 15 june 2020

re: block plant, temple view
response to the heritage new zealand pouhere taonga comments

background

The Block Plant is included in *Schedule 8A: Built Heritage (structures, building, and associated sites)* of the Hamilton City Council [HCC] Operative District Plan (18 October 2017) [ODP] as a Category B place, ID# H135. The Block Plant has been recognised in the ODP for the following qualities:

- a - historic qualities
- b – physical/aesthetic/architectural qualities;
- c – context of group qualities
- f – cultural qualities.

The Block Plant (1956) was associated with the mechanised manufacture of cement blocks used in the construction of a large number of buildings in the Temple View area (including itself) and beyond; and most notably the Temple at Temple View. The Block Plant replaced earlier hand and machine-pressed masonry blocks produced elsewhere on the former Church College of New Zealand (CCNZ) campus.

The Block Plant is a utilitarian building that has been modified over time; particularly since the original block making activity became redundant. Today, while the Block Plant is recognised in the ODP for its inclusion as a Category B heritage asset, it is arguably more recognisably associated with its function as an ancillary building during the operation of CCNZ where it was used for storage, for maintenance equipment and as a sports' changing room and training facility. The Block Plant was in use as an ancillary building for a much longer period than that of block manufacture¹. The CCNZ campus was closed at the end of the 2009 academic year.

Neither the Block Plant, nor any other building at Temple View, appears on the New Zealand Heritage List administered by Heritage New Zealand Pouhere Taonga (HNZPT), although it is acknowledged that a covenant has been entered into between HNZPT and the Church of Christ of Latter-Day Saints (**the Church**) with respect to the George R Biesinger building (**GRB**) and the Kai Hall, and it is acknowledged that the

¹ The Block Plant was utilised for block making for 15 years between 1955 and c1970 and for the following 50 years served as an ancillary building for the CCNZ (until the end of 2009) and for storage since then.



Church has entered into a memorandum of Understanding with HNZPT. This has resulted in a well-established, active, and on-going process of consultation with HNZPT, including discussions concerning the Block Plant and the wider Temple View project.

HNZPT response

HNZPT considers that there might be a more “*fulsome*” assessment of effects on historic heritage, however (while leaving a more complete planning response to Mr Dawson) it seems to me that the policies referred to by HNZPT do not lead to better informing any decision maker to the effects arising from the proposed removal of the Block Plant as being “inappropriate”. In reference to Policy 19.2.1c I am mindful of the clarification provided by the Independent Hearing Panel’s *Report to Auckland Council* Hearing Topic 031 – Historic Heritage (Proposed Auckland Unitary Plan, July 2016) concerning the role of the ICOMOS Charter and the purpose of conservation planning which may be of assistance:

*“The ICOMOS NZ Charter provides helpful **guidance** [emphasis added] in the preparation of conservation plans and protection of historic heritage it was not prepared for the purpose of administering the Resource Management Act. The Panel considers that the ICOMOS NZ Charter is best utilised to support professional judgement and conservation practice.”²*

I also note that while Policy 19.2.3b “*discourages*” demolition of buildings ranked B in Schedule 8A, it does not prohibit such activity.

The assessment relied on in the AEE uses criteria from the ODP that give effect to the objectives and policies of the Operative District Plan and all of these have been considered with respect to effects on the appropriateness of subdivision, use, and development of the Schedule Category B Block Plant building.

In responding to the bullet point entitled *heritage significance* the HNZPT reference to the Block Plant appears to not acknowledge that a number of the earliest buildings (including the First House) constructed at Temple View were made from blocks in fact fabricated from hand cast block made elsewhere on the former campus. The variance in values of the block making that occurred at Temple View originally from the machined form produced in the Block Plant itself (which has no equipment left within it and was never used for all the block making) represents a shift to a historically, technically, and socially lesser value block. Later buildings including those others in other parts of New Zealand, and those found in the South Pacific Islands all stand as a more potent testament to the values of the block plant’s production rather than of the vales of the Block Plant per se. Accordingly, I disagree with the HNZPT statement that “...*demolition* [of the Block Plant] *would adversely affect the **significant*** [emphasis added] *heritage values of the place and beyond*”. Reference to my Memo discussing the collective effects of the greater Envisaging Project provides context to my position. As such I also refute HNZPT’s opinion concerning the physical, tangible, and symbolic links apparently evident in the Block Plant, as a significant consequence of the Envisaging Project appropriately places greater focus on those other heritage buildings, not least the Temple and this is acknowledged by NZHPT in the paragraph on ‘*architectural values*’. I do not consider that the Heritage Impact Assessment “*diminishes*” the architectural importance of the Block Plant, but rather recognises the building’s typology and its relative architectural

² IHP Report to AC Topic 031 Historic heritage 2016-07-22 9, p9

values in that context as has been examined in my Memo considering collective effects.

I find it difficult to follow NZHPT's rejection of the broader public benefits arising from the wider proposed development in their consideration of effects of demolition when consent development has already dramatically shifted the topographic context with which the Block Plant now stands.

I also do not agree with HNZPT's position concerning "*cumulative effects*" with respect to a "*loss of a great number of structures that comprised and completed the former CCNZ*". Most of these structures were not recognised for historic heritage values or afforded "protection" under the ODP while I understand the collective values of Temple View are not aligned with the former CCNZ campus, but with the Temple (reinforcing the fact that the area is called Temple View).

I believe the NZHPT opinion concerning seismic strengthening is more than adequately addressed in my Memo and in other reports (such as those produced by Beca which also describe what strengthening intervention would be required in practice) discussing adaptive reuse which clearly illustrates the degree of intervention and loss of original fabric required to enable the options tested.

conclusion

While the theoretical potential for adaptive reuse of the listed Block Plant building has been recognised, as the costs show it is not a real potential. An exercise in considering appropriate adaptation has resulted in detailed exploration of the two most relevant adaptive reuse options within the evolving surrounding context and considering the impacts on the recognised historic heritage values associated with the Block Plant. The analysis of those options through architectural, structural, planning, valuation, and heritage lenses has recognised that the degree of intervention required to ensure the structural resilience of the building, the architectural compliance with provisions of the Building Act, the consented surrounding context, and the relevance of the adaptation in the current market results in degrees of physical intervention to the heritage fabric that adversely affects the historic heritage values for which the Block Plant was included in the ODP.

The Telfer Young *Market Valuation* report analysis concludes that neither the Office nor Residential repurposing options are economically feasible and that the highest and best use of the site is to remove the building to enable residential development to proceed. While the economic assessment was carried out during the Covid-19 restrictions, the Telfer Young report makes it clear that their recommendations would have remained valid if they had been carried out prior to the Covid-19 pandemic taking place³.

From an historic heritage value and effects perspective the consented surrounding enabling and development works associated with the Comprehensive Development Plan for the area has already shifted the values and significance of the Block Plant. This is addressed in our memo considering the cumulative effects of removing the Block Plant on the Temple View area. The adaptive reuse options require significant intervention and alteration (resulting in loss) of original Block Plant building fabric and a loss of legibility of the original Block Plant typology and consequential values as recognised in the ODP.

³ Telfer Young report, section 19.4, pg 58

In conclusion, and from an historic heritage effects position, I do not consider that the NZHPT response disproves or affects consideration of the appropriateness of demolition of the Block Plant in this instance.