

BEFORE THE HAMILTON CITY COUNCIL

IN THE MATTER of an application pursuant to the Resource Management Act 1991

BY the Church of Jesus Christ of the Latter-Day Saints Trust Board

FOR of an application for resource consent, for proposed demolition of the former Temple View Block Plant

**STATEMENT OF EVIDENCE OF WENDY TURVEY (HISTORIC HERITAGE)
ON BEHALF OF HAMILTON CITY COUNCIL**

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QUALIFICATIONS AND EXPERIENCE

1. My name is Wendy Turvey.
2. I am the National Manager of WSP Research (previously Opus Research).
3. I have the following qualifications and experience relevant to the evidence I shall give:
 - I hold a Bachelor of Science degree in Town and Regional Planning from the University of the Witwatersrand, Johannesburg, South Africa.
 - I have 30 years' planning experience in the areas of historic heritage management, heritage planning, and project management.
 - I specialise in preparing and reviewing heritage assessments for the development or redevelopment of historic heritage assets, preparation of heritage inventories, District and Regional Plan policy, and management of historic projects.
 - I am an ex-member of the Hamilton City Council Independent Heritage Advisory Panel.
4. I confirm that I have read the 'Code of Conduct' for expert witnesses contained in the Environment Court Practice Note 2014. My evidence has been prepared in compliance with that Code. I agree to comply with it in presenting evidence at this hearing. Unless I state otherwise, this evidence is within my sphere of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

BACKGROUND AND ROLE

5. My evidence is given on behalf of the Hamilton City Council (HCC), having been commissioned by HCC to undertake an independent peer review of the Land Use consent to demolish the former Block Plant in Temple View. I have provided advice to Hamilton City Council to help inform their Further Information Request.
6. I am familiar with the Block Plant building and the Former Church College of New Zealand site.
7. I visited the Block Plant on 5 February 2020. I was accompanied by the applicant's consultants including their heritage consultant, and an official from HCC. On the same day I also visited a number of other heritage sites within the Former Church College of New Zealand site. This included the Temple (currently under restoration), Wendell B Mendenhall Library, GR Biesinger Building, and Kai Hall.
8. I have visited the Former Church College of New Zealand site, on at least four previous occasions over a period of approximately five years while undertaking peer reviews on behalf of HCC for the Temple, GR Biesinger Building, Wendell B Mendenhall Library, David O'McKay building and Kai Hall.

SCOPE OF EVIDENCE

9. The primary purpose of my evidence is to discuss the heritage effects of the demolition of the Block Plant on both the Building and the broader heritage landscape.
10. My evidence addresses:
 - a. The legislative; national and international frameworks that guide heritage management practice
 - b. An assessment of the building and the site's historic heritage values
 - c. An assessment of the application from a heritage perspective of the Objectives, Policies and Assessment criteria contained in the Hamilton City Operative District Plan with particular reference to the effects of demolition, cultural landscape implications and potential for adaptive re-use of the Block Plant
 - d. Response to submissions
 - e. Recommended mitigation and conditions
 - f. Conclusion.

HERITAGE FRAMEWORK

11. The Block Plant Building is listed as Category B Building (item H135) in Schedule 8A of the Operative Hamilton City District Plan (ODP). The building is listed for its a) historic qualities, b) physical, aesthetic/architectural qualities, c) context or group qualities, and f) cultural qualities. The building is not listed by Heritage New Zealand Pouhere Toanga (HNZPT) under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA). Demolition of a B ranked structure or building under the ODP, is a Discretionary Activity.
12. Under section 6 (f) of the RMA the protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance.
13. Demolition is generally not an acceptable option within the framework of international and national best practice guidelines and RMA statutory requirements unless the item is beyond repair.
14. The ICOMOS New Zealand Charter (revised 2010) is a widely accepted set of conservation principles. While the ICOMOS New Zealand Charter was not prepared for the purpose of administering the RMA, it is an indicator of best practice. This is clearly set out in Policy 19.2.1c of the ODP "*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*". Demolition is not defined in the

Charter as it is not a recognised conservation principle. However, it is evident that demolition is contrary to best practice principles.

15. The ICOMOS New Zealand Charter in 8. Also states that the “*conservation of a place of cultural heritage value is usually facilitated by the place serving a useful purpose. Where the use of a place is integral to its cultural heritage value, that use should be retained. Where a change of use is proposed, the new use should be compatible with the cultural heritage value, of the place, and should have little or no adverse effect on the cultural heritage value*”.
16. The Block Plant is not listed by HNZPT. The Environment Court found in Hamilton East Community Trust vs Hamilton City Council (NZEnvC220 ENV-2013-ALK000065-17 October 2014) that “*listing acknowledges, rather than creates, heritage value*”. Therefore, it cannot be assumed that if a building is not listed that it has lesser heritage value.
17. HNZPT in their best practice series “*Sustainable Management of Historic Heritage Guidance Information Sheet 15 Demolition of Historic Buildings*” August 2007 states that “NZHP is opposed to the demolition or removal of historic buildings, except where the place is beyond repair”. This is re-emphasised by the Heritage New Zealand email to the applicant dated 27 May 2020.

DISTRICT PLAN IMPLICATIONS – HISTORIC HERITAGE VALUES

18. The history of the Block Plant is well documented in the Hamilton City Council Built Heritage Inventory Record Form prepared by Matthews and Matthews Architects Ltd in 2012, in the Archifact Heritage Assessment dated November 2019, summarised Archifact Assessment of Effects – Heritage November 2019 and in the Bloxam Burnett Olliver Assessment of Effects dated November 2019 as well as the information and material held by the Pacific Church History Museum in the Mendenhall Library Building.
19. As stated above, the building is listed for a number of factors including “**historic**” qualities. I agree with the Archifact Heritage Assessment that the building has moderate to high significance. This assessment concurs with, and possibly rates higher than the HCC Built Heritage Inventory Record Form Assessment. Although this is not the original location for block making there is a strong, documented history. In addition to the blocks being used for a multitude of buildings on the Church College site, this legacy also includes other buildings in Temple View, New Zealand and Pacific. In my opinion the historic qualities of the Block Plant cannot be disputed given symbolic and physical links to the site and beyond.
20. However, there is divergent opinion on the b) physical, aesthetic/architectural qualities, c) context or group qualities, and f) cultural qualities, between the HCC Built Heritage Inventory Record Form Assessment for and Archifact Assessments.
21. With respect to the physical, aesthetic and architectural qualities I concur with the HCC Built Heritage Inventory Record Form that these values are moderate rather

than low as suggested by Archifact. Heritage Assessment. HNZPT is of a similar mind in their letter of 27 May 2020. While the building is utilitarian and functional this does not diminish its significance. Its appearance, nature and construction materials simply reflect its use and is not out of kilter with the site. The depth and diversity of heritage value is strengthened by having a range of building type. Generally industrial type buildings are not well preserved or are underrepresented in HNZPT and Council listings. There are approximately 10 “industrial” type buildings contained in Schedule 8A of the ODP. The other scheduled items represent dairy, motor vehicles, railway, power and beer. The Block Plant is the only link to construction and the evolution of building materials from WWII. This Block Plant therefore has much broader heritage significance beyond the Former College site.

22. With respect to ‘context or group qualities’ my evaluation is that it is moderate/high – thereby sitting between the Archifact Heritage Assessment (rated as moderate) and the HCC Built Heritage Inventory Record Form (rated as high) values assessment. While the context or group values have been diminished by the substantial clearing of the immediate area around the Block Plant, this does not preclude the Block Plant from having values, within the broader heritage landscape. The Block Plant marks the outer extent of heritage buildings within the former Church College site. The building has gained importance since the demolition of its closest heritage neighbour the David O’McKay building. It is also worth noting that this remains the only “industrial” type building on the former Church College site. The only other comparable building to commemorate the construction history of the former Church College site and the national and Pacific buildings was the timber workshop and treatment plant. The timber workshop and treatment plant has been demolished.
23. Although the New Zealand Labour Missionary Charitable Trust, in their letter attached to the applicant’s consent application, support the demolition of the building I again fall between the Archifact (low value rating) and the HCC Built Heritage Inventory Record Form (moderate rating) cultural values assessment. In my view the cultural values rate as moderate/low.
24. I agree with that the overall rating for the Block Plant is moderate as per the conclusion of Archifact and Hamilton City Council Built Heritage Inventory. Even though the building is rated moderate it is still has heritage significance and is listed in the District Plan in Schedule 8A.

DISTRICT PLAN IMPLICATIONS – POLICIES AND OBJECTIVES

25. With respect to the objectives and policies in Section 6.2 of the ODP I consider that the following objectives and policies are relevant:
 - Objective 19.2.3 The heritage values of significant buildings, structures and their immediate surroundings are protected

- Policy 19.2.3(c) Subdivision and development shall retain, protect and enhance the heritage values of any building or structure listed within Schedule 8A
 - Policy 19.2.3(d) Subdivision and development shall avoid any potential cumulative adverse effects on any building or structure listed in Schedule 8A
 - Policy 19.2.3(g) The continued use or adaptive reuse of any building or structure of identified heritage value shall be encouraged
 - Policy 19.2.3(h) The site surrounding the heritage building or structure shall be protected to the extent that it contributes to heritage values
 - Policy 19.2.3(i) 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.
26. Demolition results in the total loss of the Block Plant. Clearly demolition does not protect the structure or retain, protect or enhance the values of the Block Plant (Objective 19.2.2 and Policy 19.2.3(c) ODP Assessment criterion E1a), E1e), E1g) and E2).
27. It is only in recent times the heritage significance of the Former College site has been formally recognised. Prior to notification of Variation 7 to the ODP in 2007 no heritage items were included in the 2001 Proposed District Plan. Seven heritage items were included in the 2007 variation namely H106 David O'McKay building, H107 GR Biesinger Building, H108 LDS Temple, H109 Mendenhall Library, H133 First House, H134 Kai Hall and H135 Block Plant. A number of resource consents have been granted for the refurbishment of the Temple, GR Biesinger Building, Mendenhall Library, First House and Kai Hall, and the demolition of the David O'McKay Building. It is acknowledged that the refurbishment of the various buildings from a heritage perspective have followed best practice and in particular the work currently underway on the Temple. Equally it should be acknowledged that has been a loss of heritage fabric on the Former College site with the demolition of the David O'McKay building. The current application alongside the David O'McKay building could potentially lead to a 28% loss of listed items (Policy 19.2.3(d)). This is besides, the large-scale demolition of other buildings on the site such as accommodation, classrooms, workshops and other ancillary structures.
28. With respect to Policy 19.2.3(g) continued use or adaptive reuse encourages the retention of heritage buildings, places and structures, this is reinforced by two ICOMOS New Zealand Charter (revised 2010) Charter principles:
- 8. Use – The conservation of a place of cultural heritage value is usually facilitated by the place serving a useful purpose and;
 - Where the use of a place is integral to its cultural heritage value, that use should be retained.

29. In HNZPT's 2011 publication of Heritage Redesigning Adapting Historic Places for Contemporary New Zealand, Jeremy Salmond states that "*buildings are erected to be used, not revered. Apart from those few genuinely important historic buildings for which assiduous preservation is the only acceptable option, the bulk of our heritage has to go on being useful, either as a living space or for work and play*".
30. The applicant has explored adaptive re-use primarily for residential and commercial purposes through both an architectural and commercial lens. I concur with Archifact in their memorandum dated 7 May 2020 Block Plant Temple View Adaptive reuse, and the Alternative Use Assessment by Walker Architects that the level of modification that would be required to adapt the building for those uses would have an adverse effect on heritage values. Daylighting is an issue in parts of the building and modifications would be required with addition of external windows and doors affecting the external heritage fabric.
31. I also accept the conclusions contained in the Telfer Young Economic Analysis and the alternative use costings by CJM Quantity Surveyors around commercial and residential use options. I also accept the applicant's assessment in the Bloxham Burnett Olliver comment on Assessment criteria E1h) and i) in so far as it refers to residential and office use.
32. I also accept from a planning perspective that there may be issues around the use of the property for commercial purposes taking into account the surrounding zoning and planned land use.
33. However, I believe there are much lower level use options that have not been explored by the applicant that would partly address some of the cost element, effects on the heritage fabric and zoning implications. The applicant has not fully explored community uses as they state there are well established, high quality facilities already on the site and available for community use. These include the Mendenhall Library, Kai Hall and GR Biesinger Building. The building however lends itself to uses such as a "Men's Shed", artists' studios or craft workshop space for pottery, sculpture and alike, storage facilities for local community use, storage of maintenance equipment for the site, and a gym for residents (akin to a gym in townhouse complex). None of these activities would be appropriate or could be accommodated within the existing high-quality community facilities. I therefore disagree with the Bloxham Burnett Olliver comment on Assessment criteria E1h) and E13 with respect to community facilities. I also disagree with respect to the applicant's assessment of sustainable function in the Bloxham Burnett Olliver Assessment comment on assessment criterion E13 as I believe that there are low level uses for the building that would ensure consistent and sustainable use.
34. With respect to Policy 19.2.3 (i) and Assessment criteria E1h) and E13, even for low level uses some degree of strengthening would be required, as per the Beca 2009 (updated in March 2020)strengthening report to reach 67% NBS. For the lower levels uses, such as those stated above, there would be minimal need for new door and window openings which addresses some of the structural challenges given the

existing mainframe. There would also be the added heritage advantages that the disruption to the current heritage fabric would be minimal compared to commercial and industrial use.

35. Uses such as “Men’s Shed” or craft workshops would retain some connection to the original use of the building, retaining its heritage value. It may also provide the opportunity to retain the old generator within the building as a commemorative feature of the original block house activity.
36. The Block Plan building forms part of the existing environment and should be acknowledged as such. Residential development is effectively a new use. The heritage environment should not necessarily be modified to fit new uses. New uses should be sympathetic to the heritage environment. That said, the area will be developed for residential use and that can be done in a way that respects the Block Plant. This is not particularly difficult to achieve in that the Block Plant is not of such a scale or materials that the residential environment could not accommodate it. The photographs in Annexure “A” demonstrate that the Block Plant is of a scale of a large residential building and with design the residential environment could cope with the Block Plant without creating visual or amenity impacts for either uses.
37. In the Mitigations and Conditions section below, I set out my reasons as to why I consider the commemorative plinth as inadequate mitigation for demolition of a high value heritage building and the extent of building recording that may be required. I therefore disagree with the applicant’s assessment of assessment criteria E1m).
38. With regard to Policy 19.2.3(h) regarding contextual values, this has been traversed under heritage values above, as there still remain site and broader Hamilton contextual values. While I agree with the applicant in respect of assessment criteria E1i), the context has changed but does not nullify the broader heritage landscape values. If the Block Plant was to be retained it would positively contribute to the character of the area and maintain the relation of the building to its immediate and broader setting. I therefore hold a different view on the applicant’s assessment of assessment criteria E3.
39. I also disagree with Bloxam Burnett Olliver assessment of assessment criteria E13 in respect of its remote location from other heritage buildings. I hold the view that the Block Plant forms the outermost border contributing to a distribution of heritage across the Former College site and reflects activities as they occurred in various locations.
40. I agree with the Bloxham Burnett Olliver comment on assessment criteria E1b), E1L), e3c), E3d), E4, E5, E6, E7, E8, E16 as the assessment criteria are not considered relevant.
41. With respect to Bloxam Burnett and Olliver’s assessment criteria E1k), HNZPT is clearly not neutral and I support the content of HNZHT’s letter dated 27 May 2020. Notwithstanding this, I acknowledge that HNZHT has not made a submission on the application.

RESPONSE TO SUBMISSIONS HERITAGE FRAMEWORK

42. The submission of Meshweyla MacDonald opposes the demolition application due to cumulative effects on the Temple environment and effects on the special character of the Temple View community. As stated above, there has been localised landscape changes around the building which have immediate impact on context and values but this does not impact on the broader values of the Block Plant. The location of the Block Plant marks the outer heritage extent of the Former College site, symbolises the history of the site, is the only “industrial” type building with heritage values remaining on the Former College site and contributes to small number of listed “industrial” type buildings within Hamilton City.
43. While context is important for heritage structures, it is only to be expected that over time the landscape will change but this in itself does not provide grounds for demolition.
44. The New Zealand Labour Missionary Charitable Trust support demolition. Many of the members were involved in the building of the buildings on the campus so have first-hand knowledge of the buildings’ use and function. The submission also highlights the fact that the Block Plant operated for 15 years but has subsequently had multiple other uses. Although the Block Plant has had multiple uses the original use remains the most significant from a heritage perspective.
45. All other submitters support the demolition of the Block Plant. A number of submitters do not provide reasons for supporting the proposed demolition. Those that do provide reasons support demolition on the grounds that the building does not have a suitable use, visual effects, cost of seismic strengthening, changing residential nature of the area and the fact that there are records of the building in the Mendenhall Library. All of these points have been traversed in the body of my evidence.

MITIGATION AND CONDITIONS

46. Demolition is a permanent adverse effect for which there is no mitigation. If demolition is the outcome, the heritage values are irretrievably lost. For a heritage perspective I cannot support the demolition of a Category B building that has high historical value. Damage to the building has been done with some undermining of the building having occurred during clearance of the surrounding land. At a minimum this damage needs to be repaired to at least to maintain the current condition of the building.
47. The applicant has suggested the construction of a memorial plinth made from bricks to commemorate the site is suitable mitigation. They also propose to include memorial elements associated with the Block Plant as part of the proposed rose garden memorial to be developed north of the Mendenhall Library. I do not however consider this is an appropriate form of mitigation considering the historic significance of the building.

48. However, in the event of the application for demolition being granted, conditions should be imposed and suitable mitigation implement reflective of the significance of the building.
49. Considering the Block Plant forms the outermost heritage site, and is quite isolated from other heritage buildings on-site, mitigation is required in the immediate vicinity. In addition to the memorial plinth, there should be additional site interpretation material provided at a location able to be viewed by the public from the street. A plan should be provided to Hamilton City Council for approval and maintenance conditions imposed to ensure that the plinth and other commemorative material is retained.
50. While there is a plan to commemorate the building in the proposed rose garden, there is no guarantee that the rose garden will be developed or the extent to which the building will be commemorated. For this to be considered mitigation certainty is required around the construction of the rose garden and a detailed plan provided as to how the building will be commemorated. A condition should be applied that requires development of the rose garden within five years and the commemorative features to be approved by Hamilton City Council.
51. Some of the Block Plant history is showed cased in the Pacific Church History Museum in the Mendenhall Library. The current material should be further developed and become a permanent feature.
52. The history of the Former College site has been prepared by Archifact as well as a photographic record. However, a detailed recording of the building is required. Normally recording of the setting would also be required of the immediate surrounds however these have been completely cleared which is unfortunate. A detailed record of the building should be prepared and submitted to Council. The record should include:
 - a. A description of the exterior (materials, methods of construction, dimensions, overall shape and form);
 - b. Relationship between the building and its past and present setting (may need to be done with the use of aerial photographs considering the extent of earthworks undertaken around the site);
 - c. Description of each interior space;
 - d. Description of fittings, fixtures and machinery (generator). Information should include the description of materials, constructions methods, visual appearance and dimensions, as appropriate;
 - e. Photography should be carried out to archival standards using a 35mm camera and quality lenses, as a minimum.
53. Exterior photographs should include:

- a. Principal elevation (frontage)
 - b. Other elevations
 - c. Typical details (doors, windows).
54. Interior photographs should include:
- a. Wide view of rooms
 - b. Internal elevation
 - c. Typical details (ceilings, doors, windows)
 - d. Recording of generator details.
55. The two posters in the upper room “The Bench Press” and “Back Workout” as shown in Appendix BE of the Assessment of Environmental Effects should be removed intact and retained as a reminder of when the building was used as a gym and changing sheds. These posters should be put on display at the Mendenhall Museum or placed in the museum archive.

CONCLUSION

56. The Block Plant, and the site (Former College) have indisputable heritage significance. This extends from local industrial significance manufacturing blocks used for construction on a multitude of buildings on the College site, through to the blocks being used on numerous LDS sites nationally and in the Pacific. The retention of the Block Plant maintains a linkage from manufacturing of the building material through the construction of a number of important LDS buildings. The significance is further enforced as they are no other listed construction related heritage buildings in Annexure 8A of the ODP.
57. The heritage values are recognised by the scheduling of the Block Plant as a Category 8A heritage building in the ODP. The building is not listed by HNZPT but this does not detract from the Block Plant’s significance as the HNZPT list is not a comprehensive list of all New Zealand Buildings.
58. Demolition of heritage buildings is generally contrary to international and national best practice guidelines and RMA statutory requirements particularly as the building is not considered to be beyond repair.
59. The residential and commercial uses explored by the applicant will, have an adverse effect on the interior and exterior of the building as substantial modification would be required to retrofit the building. It has been demonstrated in the Walker and Walker Architects, CJM Quantity Surveyors and Telfer Young reports that it would be neither practical nor cost effective to retrofit for these uses.
60. However, there are much lower level uses that have not been explored by the applicant that would enable the building to be retained with some structural

strengthening to 67%, as outlined in the Beca 2009 (and updated March 2020) report.

61. The scale and form of the Block Plant are such that they are not out of kilter with residential scale buildings.
62. The mitigation offered by the applicant is inadequate to address the effects of demolition of a high value heritage building.
63. The Block Plant should be retained and the application for demolition consent denied.

Wendy Turvey

21 August 2020

ANNEXURE A PHOTOGRAPHS

Block Plan Scale and Size

