

# Richard Knott Limited

Urban Design | Masterplanning | Built Heritage | Town Planning

**To:** Ian Johnson, Senior Consultant, Mitchelldaysh

**CC**

**From:** Richard Knott

**Date:** 3<sup>rd</sup> July 2019

**Re:** Peer Review - Heritage

Application for consent to demolish a Category B Heritage Building (Municipal Pools) and undertake associated earthworks and site remediation

30 Victoria Street, Hamilton Central, Hamilton

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## 1. Preparation of this Memo

This memo provides a review of the discretionary activity application to demolish the Category B Heritage Building the Municipal Pools, 30 Victoria Street, and to undertake associated earthworks and site remediation.

The application is supported by a large number of technical reports. For the purpose of my peer review of the application I have considered:

- × Resource Consent Application and Assessment of Environmental Effects: Demolition of the Hamilton Municipal Baths – Category B Built Heritage (H88), Bloxam Burnett & Olliver, November 2018 (**AEE**)
- × Hamilton Municipal Pools, Assessment of Heritage Values, Archifact Architecture and Conservation Limited, October 2018 (**Assessment of Heritage Values**)
- × Municipal Pool – Victoria Street, Options Report, WSP Opus, August 2018 (**Options Report**)

I visited the site on the 29<sup>th</sup> August 2018 and am familiar with the local area.

I have worked in the areas of heritage, urban design and planning for 30 years and prior to establishing Richard Knott Limited in March 2014 held several senior heritage, urban design and planning roles.

### *Richard Knott Qualifications:*

- Post Graduate Diploma Building Conservation (2002), Bournemouth University, UK
- Master of Arts Urban Design (1995), University of the West of England, UK
- Bachelor of Planning (post graduate) (1989), University of Manchester, UK
- Bachelor of Arts (Hons.) Town and Country Planning (1988), University of Manchester, UK
- Making Good Decisions Certificate Holder (since 2010)

### *Richard Knott Professional Memberships:*

- Member Institute of Historic Building Conservation
- Chartered Member Royal Town Planning Institute
- Member Institute of Highway Engineers

### *Richard Knott Recent Training:*

- University of Southern California; Fundamentals of Heritage Conservation (July/August 2016)

## 2. Background

The Municipal Pools are included on Schedule 8A Built Heritage of the Hamilton Operative District Plan as a Category B item; item no.88. Plan Ranking B places are:

*'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.'*

## 3. Assessment of Heritage Values

The Assessment of Heritage Values provides an overview of the history of the heritage place, including the various alterations which have been made since their original construction, the heritage status of the pools in the original Hamilton District Plan and the District Plan Review, a description of the physical condition of the pools complex and an assessment of the buildings against the criteria used to identify the heritage value of historic places from 8-1.2 of the operative District Plan (ODP).

In carrying out the assessment of the pools complex against the 8-1.2 criteria the report has adopted an amended the scoring system, rather utilise the approved scoring identified in the ODP. The ODP includes the scoring values 'outstanding', 'high' and 'moderate'. The Assessment of Heritage Values adds the additional values of 'little' and 'none' (although I note that 'none' has been used in other HCC Heritage Inventory assessments, including that carried out for the municipal pools). Each of the criteria at 8-1.2 is therefore assessed as to whether it exhibits outstanding, high, moderate, little or none heritage significance.

The conclusion the Assessment of Heritage Values states that:

*'...Achieving a moderate score in a single criterion is a relatively straightforward matter and could allow almost any place to be included within Appendix 8A. Rather we consider that, on balance, if the significance of a place is such that it has overall historic heritage significance, then this would enable a more robust method of establishing whether or not a particular place is of historic heritage value....*

*...The low significance evaluation in 13 of 15 heritage assessment criteria (and its moderate ranking in only two criteria acknowledges that the historic heritage values for which the Municipal Pools were included in Schedule 8A Built Heritage of the District Plan have been eroded to a point that its inclusion in Schedule 8A is now questionable. The parlous condition of the entire pool complex (while not a criterion for the assessment of heritage value) means that the conservation of its historic heritage values would require the complete reconstruction of the facility with the resultant loss of almost all the surviving original fabric.*

*The removal of the pool facility is an appropriate use and development of a heritage resource in this instance. Mitigation of the loss of the Hamilton Municipal Pools by way of integration of the site into the adjacent public reserve which boasts the Ferrybank Band Rotunda as shown in the Opus report dated 25 October 2018 is considered appropriate and should be supported.'*

### **Richard Knott Limited Comments on Assessment of Heritage Values:**

The Assessment of Heritage Values does not provide any comment on the proposal to demolish the Pools against relevant Objectives or Policies of the ODP or of other policy documents, but instead concentrates on considering the heritage significance of the complex. As noted above, the methodology of this assessment has moved away from the that established in the ODP by introducing the additional value level of 'little' and by challenging the ability of a place assessed as being of moderate value in relation to only one of the heritage to criteria to be recognised as a plan ranking B place.

Adopting this adapted methodology for the Assessment of Heritage Values has reduced the usefulness of the report for this resource consent process as it is not aligned with the requirements of the ODP and has taken away the ability to make a direct comparison to the Council's previous assessment of the complex (carried out

in 2012 by Matthews and Matthews Architects). Whilst the Assessment of Heritage Values does compare its scores to the Council's 2012 scores, the altered methodology means that this is not a like for like comparison. It is therefore not possible to draw conclusions from this comparison as to whether or not the significance of the building has altered since 2012 (even though the Assessment of Heritage Values attempts to do this).

In addition, I consider that the Assessment of Heritage Values has assessed some of the values of the site unduly harshly. For example, I find it hard to accept that the building has 'little' historic value, given its associations to significant local swimmers, divers and coaches (and as set out in many of the submissions).

Overall, I believe that the Assessment of Heritage Values would have been more helpful to the consideration of the application had it followed the ODP scoring and assessment process, rather than challenge the ODP. The ODP has been through a process of submissions and hearings, which validate and legitimise its contents and requirements. To challenge this through this resource consent in effect also questions the validity of the assessment carried out for every other building on the heritage schedule and in effect seeks to change the baseline against which this application should be assessed.

However, notwithstanding the conclusions of the Assessment of Heritage Values, it is clear that the pool complex remains worthy of its Plan Ranking B status as the assessment confirms that the pool complex scores 'moderate' against two criteria and so meets the ODP requirement of being assessed as being of moderate value in relation to one or more of the heritage criteria.

### **Options Report**

The Options report considers the condition of the existing pool complex, its earthquake risk and provides three options; (i) build new on site, (ii) strengthen pool walls and upgrade services and buildings and (iii) demolish entire site and develop into green space.

#### ***Richard Knott Limited Comments on Options Report:***

Whilst I accept the conclusions of the report, it would have been useful if it had considered other options, for instance whether there is the opportunity to bring forward a hybrid scheme which retained and upgraded some parts of the existing building, such as the grandstand so that some heritage features would remain on the site, alongside other completely new elements. The consideration of such a limited number of options limits the usefulness of the report from a heritage perspective.

### **4. Assessment of Environmental Effects**

The AEE takes the conclusions of the Assessment of Heritage Values and other reports, including the Options Report, and places these in the context of the Objectives and Policies of the ODP. The AEE concludes (in relation to effects) that:

*'There are no practicable options appropriate for the refurbishment of the site that would not destroy the remaining heritage features of the facility. Even the replacement of the facility in this location would require the initial demolition of the existing facility. While it is recognised that the proposed demolition of the scheduled building is "discouraged", the policy framework does not require that the demolition activity is avoided as it is for a Category A ranked building.'*

#### ***Richard Knott Limited Comments on AEE:***

I do not have any significant concerns with the assessment of the proposed demolition against the ODP objectives and policies contained in the AEE, other than where there is a reliance on the conclusions of the Assessment of Heritage Value, where I have already set out my concerns above. In relation to this, the crux of the application, from a heritage perspective, appears to be Objective 19.2.3 and its associated policies. In particular:

- *Objective 19.2.3, The heritage values of significant buildings, structures and their immediate surroundings are protected.*

- 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 19.2.3g - The continued use or adaptive reuse of any building or structure of identified heritage value shall be encouraged.
- 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.  
(Emphasis added)

These should be read in the context of my conclusion above that notwithstanding the conclusions of the Assessment of Heritage Values, the pool complex remains worthy of its Category B status.

I agree with the AEE that Policy 19.2.3b is not directive and only discourages the demolition of category B buildings. However, Policy 19.2.3c is directive and states that heritage values of any building or structure listed shall be retained. These policies need to be balanced to provide direction on this matter.

I believe that Policy 19.2.3c should be considered in light of the fact that the complex is in poor condition, does not meet accepted standards for earthquake risk, access for people with disabilities and is not currently fit for purpose. Given this, I agree with the conclusions of the AEE that it is unrealistic to seek to retain the municipal pools in their current condition. However, as noted above, the options report is limited in its scope and I do not therefore accept that refurbishment would inevitably destroy all of the remaining heritage fabric as there are potential options which have not been considered which could potentially retain some of the heritage values of the building.

## 5. Conclusion

Taking the ODP and the Assessment of Heritage Values together, it is clear that the building is worthy of its current Plan Ranking B. There is therefore an expectation that any development shall retain, protect and enhance the heritage values of the site and that demolition of the building should be discouraged.

However, before coming to a final recommendation on the application, I believe that further thought should be given as to the whether specific elements of the existing buildings can be retained, such as a the grandstand, in addition to providing interpretive signage site which tells the history of the building and its users as offered by the applicant.



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