

28 February 2019

Auckland Council request for further information 18 February 2019:

Special Character response

This memo responds to the queries raised by the Council's heritage specialist re the proposed private plan change for Brightside Hospital. Text in blue is the Council's RFI, and my responses directly follow.

Removal of houses at 149, 151 and 153 Gillies Avenue

The Special Character Assessment by Lifescapes focuses on the ways the landscape features can be retained through the proposed development of the hospital. Council's heritage specialist is of the view that while this analysis is helpful, it is incomplete. A further analysis is required on the values of the houses. How these values, which have been identified by Lifescapes as being of architectural merit and consistent with the values of the area, can be maintained and enhanced?

The analysis should explore options including (but not limited to); retention, reuse or relocation. If the assessment concludes that the houses should be removed (even though it agrees that the houses are consistent with the values of the area), alternative options for maintaining their values should be explained.

RESPONSE:

The architectural values of the three houses at 149 – 153 Gillies Ave are examined against the *Key Attributes* of the area's special character (AUP Schedule 15.1.7.3.) in Section 4.3. of the Lifescapes report, and are assessed in Section 5.1. It is found that the houses at 151 and 153 Gillies Ave have architectural merit that illustrate the identified character values of the SCA.

It is important to observe that the special character values of the SCA call for examination of these values for properties *in the round*, in terms of "physical and visual qualities" (built form, architectural values, urban structure) that form part of the relevant broader area. This is deliberately different from a historic heritage assessment against the criteria of AUP Part B5.2.2(1) – (5), which is beyond the remit for a special character assessment under Part B5.3.2(2).

Noting the above, the houses' architectural values are examined below against the historic heritage criterion "physical attributes" of Part B5.2.2(f), in response to this RFI.

(f)(i) a type, design or style: As described in Lifescapes report Section 4.3, the houses' designs combine influences from Californian bungalow and English cottage styles. In the case of 149 Gillies

Ave the original architectural form has been highly modified. The houses at 151 and 153 Gillies Ave remain largely intact (various alterations and interior remodelling are noted), and both houses are examples of the architectural design of upper-middle class residential development in the 1920s. They do not, however, represent a remnant of these stylistic characteristics, as evidenced by the extent of the SCA overlay across the Auckland region, and neither are considered notable in terms of architectural singularity in style or detailing.

(f)(ii) a method of construction, craftsmanship or use of materials: As described in Lifescapes report Section 4.3, the houses' construction in timber and brick is typical of the SCA period. While they are in good condition and have been well maintained they are not notable in terms of their craftsmanship, and while they are good examples (and therefore representative in the broadest sense) this method of construction and use of materials remains common through the region.

(f)(iii) the work of a notable architect, designer, engineer or builder: As discussed in Lifescapes report Section 3, the house at 151 Gillies Ave was designed by the well-known architectural practice of Arnold & Abbott, and it is plausible that 153 Gillies Ave was also designed by them. While a notable firm, these houses are considered fairly undistinctive when viewed as part of their overall portfolio of work, which remains well-represented in the city.

The above examination does not purport to be a comprehensive assessment of these properties against AUP Part B5.2.2(1) – (5) criteria for scheduling. However, it does align with the Lifescapes report's finding that, while good examples of their type, the houses are not architectural exemplars or have a rarity that would warrant retention under a scheduling-type arrangement as a historic heritage place.

The historical analysis in Lifescapes report Section 3 supports this finding in that there is no indication based on known information to date that the houses themselves have historical, social, mana whenua, knowledge or technology values as required for scheduling. It is considered that they appropriately sit in a "special character" statutory framework rather than one of "historic heritage." This being said, it is affirmed in the Lifescapes report that the houses do have architectural values consistent with the character values of the SCA.

How to maintain and enhance the character values of the houses? It is at this juncture that wider benefits and costs must be appropriately balanced as required under RMA Section 32 and as assessed in the AEE prepared by SFH Consultants. It is important to note as discussed in the Lifescapes report that while the houses align with the special character values of the SCA, this is largely concealed from the street.¹ It is other historical characteristics of the properties – historical walls, trees, gardens – that actively contribute to the special character of the SCA. In my view, the comparative weight given to maintaining and enhancing values that have limited appreciation from the public realm should be

¹ And has been since their earliest development, per the principles of the Garden Suburb movement that instigated the early establishment of heavily-treed sites and boundaries.

relatively modest in the context of a Special Character assessment, which specifically emphasises individual properties' contribution to collective character rather than singular significance.

That said, options for retaining the houses, either through (1) physical retention and reuse on site, (2) relocation and reuse elsewhere, and (3) photographic archival and presentation, are explored below.

(1) Physical retention and reuse on site

As discussed in the AEE report, growing demands on the Brightside hospital require the facility to significantly expand. The needs of surgical facilities etc. require a comprehensive and purpose-built architectural development which precludes the incorporation and use of the existing houses due to their domestic scale, layout and detailing.

While retention on site may be considered the most beneficial outcome from a special character perspective, this outcome would be significantly undermined by wholesale alteration to the buildings and to their surrounds in efforts to achieve their retention. Their historical use as private residences would also be lost. Any attempts to "work around" the houses would likely require much more significant loss of trees, gardens etc. than that of the proposed design that is to seek resource consent – site elements that have been identified as contributing to the area's special character value.

In summary, it is considered that this option would not only nullify the purpose of this plan change proposal but would undermine the very values that are seeking to be maintained and enhanced.

(2) Relocation and reuse elsewhere

It is potentially possible for the houses to be removed from their foundations and be transported to a new location elsewhere. This option may be considered to have merit in terms of the retention of houses that have identified architectural values, and their potential continued use as private dwellings. However, relocation would necessarily remove the houses from their historical position in the SCA, leaving them with little meaning from a special character perspective in a new location.

From a practical perspective it is likely that the process of removal would necessitate the dismantling of portions of stone boundary walls proposed for retention under the development scheme. It is also likely that damage to trees would be unavoidable even with good management protocols in place. These would both be detrimental outcomes in terms of special character.

In summary, it is my view that consideration of house relocation does not sit within the Council's relevant considerations under the provisions of special character. This is due to the fact that relocation would dislocate the houses from the central basis of their special character, as they are removed from that historical context. At a practical level, this option may cause damage or loss to other site elements that contribute more effectively to special character in the public realm.

(3) Photographic archive and interpretation

Another option for the houses is for archival-quality photographic records to be made of them prior to any works commencing. This photography, combined with historical information, could form the basis for a historical interpretation scheme that would be incorporated into the new building's final design. This is a recommended consent condition in the resource consent application (Special Character Assessment) soon to be lodged with Council.

It is considered that this approach would provide a useful record of the properties, fully capturing their individual architectural qualities and site contexts. With the retained trees and boundary walls, the photographic collection would add an additional layer of future legibility to the sites through interpretative display.

In conclusion, I concur with the assessment by SFH Consultants that it is appropriate for the houses at 149 – 153 Gillies Ave to be removed to enable hospital development, in accordance with the evaluation required under Section 32 of the RMA. While it is acknowledged that the houses have architectural value, this value is (1) hidden from public view and therefore makes little contribution to the SCA, and (2) not of sufficient quality or distinctiveness to be considered for individual scheduling. Retention of the houses defeats the purpose of the plan change and may undermine, rather than maintain and enhance, the properties' broader identified character values. House relocation is considered plausible but beyond the scope of relevant considerations under special character. It is therefore recommended that an option of photographic record and interpretation be pursued to acknowledge and maintain identified values.

Removal of Special Character Overlay

The assessment by Lifescapes includes a discussion on how the identified character values of the landscape features can be maintained and enhanced through re-development. However, if the proposed plan change for rezoning is approved, the special character overlay will be removed and any requirements to consider character values will be gone.

How could the applicant ensure that protection of these values will be in place? Council's heritage specialist's view is that relying on provisions under Chapter H25, rather than character-specific provision, is an inadequate approach to protect the character values.

RESPONSE:

The statement above is correct and acknowledged in the Lifescapes report. I concur with the view that the HFHZ provisions provide limited scope for the protection of character values (though I also note that the SCA seeks to "maintain and enhance" special character qualities, not "protect" them).

It is for this reason that alternative approaches to that of simply removing the overlay along with the zone change are considered in the Lifescapes report.

Alternative approaches

Council's heritage specialist notes that alternative options for managing character places and features could be explored. These include, for example, covenanting significant features such as walls, gates and other natural landscape features through the private plan change request or concurring resource consent application.

Can you confirm if this alternative approach (covenanting significant features) has been considered as part of either the private plan change or resource consent applications.

RESPONSE:

Yes. An encumbrance or covenant on the title is an option that may be explored by SCHL in conjunction with the Council. Under this approach the zoning would be changed and the SCA overlay removed from the subject sites, and an appropriate type of encumbrance would be placed on the combined property title. The encumbrance would seek to ensure the long term retention and maintenance of key features identified as contributing to the area's special character. This could include notable trees and the basalt walls that contribute to the streetscape.

Such an approach may provide an appropriately integrated balance between the relevant objectives of the RPS, being the need to provide social facilities for community's health and safety and the need to maintain and enhance character and amenity values of identified special character areas.

An issue with this approach, like the development plan approach above, is the potential for "locking down" intrinsically fluid landscape features. This would need to be carefully considered and any encumbrance structured accordingly. However, it may be a more appropriate approach than the insertion of a development plan into the HFHZ, in that the encumbrance is appropriately placed on the property in question rather than being embedded in the Unitary Plan.

It is recommended that this approach be explored by Council and SCHL.

Regards,

Carolyn Hill

Lifescapes