

BEFORE THE PROPOSED NATURAL RESOURCES PLAN HEARINGS PANEL

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Significant historic heritage provisions

AND

IN THE MATTER of the submissions and further submissions set out in the S42A Officer's Report

**RIGHT OF REPLY EVIDENCE OF MICHAEL KELLY AND
CHRIS COCHRAN ON BEHALF OF THE GREATER
WELLINGTON REGIONAL COUNCIL**

TECHNICAL – Significant historic heritage inventories

18 July 2018

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Table 1: Abbreviations

Abbreviations	
Coastal Marine Area	CMA
Proposed Natural Resources Plan	Proposed plan
Regional Policy Statement for the Wellington Region	RPS
Resource Management Act	RMA

1. INTRODUCTION

- 1.1 Our names are Michael Kelly and Chris Cochran. Together with other authors we prepared the technical reports identifying historic heritage values for the proposed Natural Resources Plan for the Greater Wellington Regional Council.
- 1.2 This supplementary evidence is in the form of a right of reply to matters raised by submitters on historic heritage matters.
- 1.3 Our qualifications and experience were outlined in statement of evidence presented to the Panel on 29 May 2018.

2. CODE OF CONDUCT

- 2.1 We confirm that we have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note and that we agree to comply with it.
- 2.2 We confirm that we have considered all the material facts that we are aware of that might alter or detract from the opinions that we express, and that this evidence is within our areas of expertise, except where we state that we are relying on the evidence of another person.
- 2.3 We are authorised to give this evidence on the behalf of the Greater Wellington Regional Council.

3. EVIDENCE

- 3.1 The following evidence is organised into seven matters. They are:
 - Proposed heritage area, Lambton Harbour
 - Proposed listings raised in submissions (confirmations)
 - Removal of proposed listings (demolition)
 - Proposed individual listings
 - Existing listings raised in submissions but declined
 - Proposed amendments raised in submissions
 - Confirmation of extent of listed item – Aberdeen Wharf

Proposed heritage area, Lambton Harbour

- 3.2 The Civic Trust seeks the retention of the Wharves and Wharf Edges and the former Overseas Passenger Terminal (OPT) wharf (Clyde

Quay Apartments), along with the addition of the former Link Span Building, as listed items in the regional plan. In addition to this, other submitters, including Heritage New Zealand Pouhere Taonga (HNZPT), seek the listing of specific items within Lambton Harbour that were not included in the final version of the heritage inventory prepared by the consultants (see 3.4).

- 3.3 As noted in 3.5, we continue to hold the position that the Wharf Edges and former OPT should not be listed as individual items.
- 3.4 We feel that a better approach to managing the broad swathe of heritage in the Coastal Marine Area (CMA) would be via a heritage area listing that extends from Clyde Quay Boat Harbour to Kings Wharf.
- 3.5 The reasons for this are as follows:
- It would acknowledge the heritage value of the human development of the whole of the CMA of Lambton Harbour.
 - It would include all the significant heritage items proposed for individual listing.
 - A wide range of heritage items would be included within the heritage area e.g. buildings, infrastructure, sculptures and objects.
 - It would offer a level of legal protection for places of lesser heritage value that have nevertheless played a part in the history of the area e.g. the edge of reclamation (rip-rap) or wharfage from the second half of the 20th century.
- 3.6 The proposed heritage area incorporates the oldest part of the city's working port, a place central to the region's prosperity from the second half of the 19th century onwards. It is an area rich in maritime heritage; the structures within the CMA, principally wharves, are the physical reminders of the development of the port during its heyday. These structures also tell the story of the expansion of the waterfront through reclamation and wharf extensions. There is a variety of form evident throughout the area – wharves (especially the finger form), sheds, utilitarian structures, sculptures, as well as the well-defined edge of reclamation.

- 3.7 The boundaries of the area are outlined in the map attached to the Right of Reply: Significant Historic Heritage prepared by Ms Legarth as attached Appendix M. They show that the area would incorporate significant heritage items within the CMA that are proposed for individual listing (Clyde Quay Boat Harbour (part); Taranaki Street Wharf; Queens Wharf and associated buildings; Harbour Ferry Wharf, Waterloo Quay Wharf, Railway Wharf and Glasgow Wharf), as well as some that are not proposed for individual listing (Tug Wharf and Kings Wharf). Of these, the easternmost four (Waterloo Quay Wharf, Railway Wharf, Glasgow and Kings) are under the jurisdiction of CentrePort.
- 3.8 It would also include structures such as the Linkspan Building (described as the Customs Post Building by the Civic Trust in its submission) on Taranaki Street Wharf; the Clyde Quay Wharf (formerly occupied by the Overseas Passenger Terminal); the Taranaki Street Breastwork; rip-rap harbour edge (various locations), and sculptures (including Len Lye's Wind Wand).

Proposed listings raised in submissions

- 3.9 Aberdeen Quay, Evans Bay and Oriental Bay Sea Walls

The Wellington City Council has sought the removal of these items from the schedule. We have reviewed the inventory listings for each of these items and can confirm that the structures meet the criteria for listing in Schedule E.

- 3.10 Miramar, Railway and Waterloo Quay Wharves

In its submission (2015) on the Proposed Natural Resources Plan, CentrePort Ltd sought the removal of the proposed listing of the above wharves, on the basis that each should be subject only to the rules applying to non-heritage structures and be 'available for Port or other related uses'. In its submission (2015), CentrePort Properties Ltd sought the removal of Waterloo Quay and Railway Wharves from Schedule E on the basis that development of these structures is appropriate. We have reviewed the inventory listings for each of these items and can confirm that the structures meet the criteria for listing in Schedule E.

- 3.11 Parawhaiti Stream Bridge, Tauweru Bridge, The Swingbridge, Ruakokoputuna Bridge, The Waihenga Bridge

The Masterton District Council and South Wairarapa District Council consider that the above bridges, which sit within their jurisdiction, do not represent the best of the district's bridges and that other examples exist. Notwithstanding that the consultants only inspected the bridges on the indicative list, those chosen for inclusion in the inventory meet the criteria for listing. The councils have not submitted the names of any bridges they feel might fit the criteria better.

Removal of proposed listing

- 3.12 Ngatiawa Bridge, Reikorangi, near Waikanae, a timber truss bridge, was proposed for listing and included in Schedule E. In 2017 it collapsed into the river bed because of a lack of maintenance; the debris was later removed. This bridge should be removed from Schedule E.

Proposed listings raised in submissions but not included in Schedule E

- 3.13 Kings Wharf

An inventory entry was completed for Kings Wharf, but it was not included in the inventory or in Schedule E. We do not recommend that Kings Wharf be included because it has had major modifications to the deck and sub-structure, with loss of authenticity, and it has lost its finger form in being subsumed for the full length of its eastern side by modern reclamation.

It nevertheless has some historic value, sufficient for it to be included in a heritage area, and it would make a suitable termination to the eastern extremity of such an area.

Glasgow Wharf

An entry was prepared for this structure and it was included in the consultant's inventory. It was not included in Schedule E. We can confirm our original assessment, that Glasgow Wharf meets the criteria to sufficient extent for it to be included in Schedule E. It also

fits logically within a heritage area. (See: Lambton Harbour Heritage Area Ms Legarth's Right of Reply Appendix M).

3.14 Linkspan Building

This is assumed to be the building described as the Customs Post Building by the Civic Trust (see above). This building is described in the heritage inventory entry for the Taranaki Street Wharf, although it does not appear to be on the wharf itself. The consultants feel that this building has heritage value but is unlikely to meet the criteria for listing so would be better managed as part of a heritage area.

Existing listings raised in submissions but declined

3.15 Clyde Quay Apartments, Clyde Quay Wharf

The Civic Trust sought the inclusion of the former 'OPT wharf' on the basis that the construction of the Clyde Quay Apartments is 'an innovative development which is likely to have technological heritage recognition in time'. We acknowledge that the building of the carpark under the deck of the wharf (and below high tide level) and the strengthening of the wharf itself have significant technological value; this may be acknowledged as a heritage attribute at some time in the future.

Clyde Quay Apartments is a modern building, finished in 2014. A small number of the original reinforced concrete piles remain, while some of the timber piles and other fabric from the extension to the wharf undertaken in the early 1960s also remain. Mosaics installed when the building opened in 1964 are on display on the ground floor. The building takes some design inspiration from the original OPT building (in particular its long low form, reminiscent of an ocean liner, and the tapered 'spire' part way along the ridge). These interesting features of the existing modern structure are insufficient to render this a heritage building in terms of the criteria.

We would recommend that the Clyde Quay Apartments and Clyde Quay Wharf be included in the proposed heritage area for their vestigial heritage value.

3.16 Reclamation edge

The hard edge of the reclamation, where it is visible, is a distinctive feature of the waterfront but, in our view, it fails to meet the criteria for listing. The rip-rap may have been listed in the prior plan, as the Civic Trust states, 'to identify and protect the historic land/sea interface or "edge" at the time of the handover from Port use to public use', but this does not make the edge itself a place of significant heritage value. We would suggest that any heritage value that the edge of reclamation has would be better acknowledged as part of a heritage area.

3.17 Finger wharfs

Apart from the former OPT wharf, only one other finger wharf raised in submissions (by the Civic Trust) is not recommended for listing, and that is the Tug Wharf, or former Ferry Wharf (1897). This wharf, partly land-locked, is much altered and is now incorporated into a walkway. Again, its relatively modest heritage values would be better acknowledged as part of a heritage area.

Proposed amendments raised in submissions

3.18 Railway and Waterloo Quay Wharves

If listing of the above is confirmed, Centreport Properties Ltd seeks amendments to the descriptions of those wharves because they overstate the historical significance of the wharves. It specifically seeks changes to the wording in the summary at the top of the Evaluation of Significance section. For Railway Wharf, it wants the word 'significance' replaced with 'value'. As these words are generally interchangeable, such a change would serve no particular purpose. For Waterloo Quay Wharf it would like the term 'historic significance' replaced with 'heritage value'. The term 'historic significance' is used for a reason so a change would not be supported.

3.19 Ladle Bend Bridge, Pakuratahi Bridge, Water drop shaft tower

The Rail Heritage Trust of New Zealand seeks amendments to the tabular descriptions of the above three structures. Specifically, it would like to see 'Western approach to the...' added to the location

description for Ladle Bend Bridge and Pakuratahi Bridge. It would also like to see the Water Drop Tower renamed the Water Drop Shaft. We agree with these suggested amendments.

Confirmation of extent of listed item – Aberdeen Wharf

3.20 Note that the extent of the structure known as Aberdeen Wharf and listed in Schedule E, is incorrectly shown on the Greater Wellington Regional Council's GIS map. The correct extent is that shown in Appendix E of Ms Legarth's Right of Reply.

Map - Lambton Harbour Heritage Area (all coloured areas below MHWS)

