

Before the Hearings Commissioners at Wellington City Council

under: the Resource Management Act 1991

in the matter of: an application by Ryman Healthcare Limited for resource consent to construct, operate and maintain a comprehensive care retirement village at 26 Donald Street and 37 Campbell Street, Karori, Wellington

between: **Ryman Healthcare Limited**
Applicant

and: **Wellington City Council**
Consent Authority

Statement of Evidence of **David Alan Pearson** on behalf of
Ryman Healthcare Limited

Dated: 29 August 2022

Reference: Luke Hinchey (luke.hinchey@chapmantripp.com)
Nicola de Wit (nicola.dewit@chapmantripp.com)

chapmantripp.com
T +64 9 357 9000
F +64 9 357 9099

PO Box 2206
Auckland 1140
New Zealand

Auckland
Wellington
Christchurch



STATEMENT OF EVIDENCE OF DAVID ALAN PEARSON ON BEHALF OF RYMAN HEALTHCARE LIMITED

INTRODUCTION

- 1 My full name is David Alan Pearson.
- 2 I hold the degree of Bachelor of Architecture from the University of Auckland.
- 3 I have been registered as an architect for over 45 years and am also an associate of the New Zealand Institute of Architects.
- 4 In 1996, I founded Dave Pearson Architects with the aim of providing specialist heritage architectural services to the owners of heritage buildings. I have held the position of Principal of the company, now known as DPA Architects, since that time.
- 5 I have over 30 years' professional experience in heritage architecture. This experience has included the design and oversight of many significant projects. I have worked extensively in Christchurch since the earthquakes and have acted as the heritage architect for the restoration of the Christchurch Arts Centre since 2013. I am therefore very aware of the need to seismically upgrade and strengthen heritage buildings and am familiar with the variety of techniques that can be used to achieve that.
- 6 I am familiar with Ryman Healthcare Limited's (*Ryman*) application to construct and operate a comprehensive care retirement village (*Proposed Village*) at 28 Donald Street and Campbell Street, Karori, Wellington (*Site*).
- 7 I provided heritage architecture advice during the design of the Proposed Village.
- 8 I prepared the Karori Village Technical Report – Heritage dated 14 July 2020 (*Heritage Report*). I also prepared an Appendix to the Technical Report dated 28 August 2020 provided as Appendix D to the Further Information Response dated 15 October 2020. I then prepared an Addendum to the Heritage Report dated 13 July 2021 following amendments to the design of the Proposed Village (*Addendum Report*).
- 9 I have been involved in a number of discussions with Ms Moira Smith who was then Wellington City Council's (*Council*) Senior Heritage Advisor, but now a consultant, in relation to the design of the Proposed Village and heritage-related conditions of consent.
- 10 I have visited the Site on various occasions including 28 February 2019, 13 August 2019 and 24 September 2019. Most recently, I

visited the Site on 3 June 2022, following the fire that occurred in the Allen Ward VC Hall building in March of this year.

CODE OF CONDUCT

- 11 Although this hearing is not before the Environment Court, I have read the Code of Conduct for Expert Witnesses and in the Environment Court Practice Note (2014) and agree to comply with these as if these proceedings were before the Court. My qualifications are as set out above. My evidence is within my area of expertise, except where I state I am relying on the specified evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 12 My evidence provides the following:
- 12.1 A summary of the assessment of the heritage effects of the Proposed Village, as set out in the Heritage Report, the Addendum Report and informed by subsequent amendments to the design;
 - 12.2 My response to the heritage matters raised in submissions;
 - 12.3 My response to the heritage matters addressed in the Council (*Officer's Report*) and particularly the Assessment by the Council's Heritage Advisor (dated 25 July 2022).
 - 12.4 My comments on the draft conditions; and
 - 12.5 My conclusions.

SUMMARY OF EVIDENCE

- 13 The Site of the Proposed Village was formerly occupied by the Wellington Teachers' Training College (*Teachers' College*). The Teachers' College buildings were constructed in two stages between 1966 and 1977 and an area known as the Lopdell Gardens was set aside as green space.
- 14 The buildings were designed by prominent Wellington architect, Bill Toomath, in a style known as "Brutalism" which was characterised by the use of concrete in various forms.
- 15 The 'Wellington Teachers' Training College (former)' is included in the Heritage New Zealand List as a Category 1 Historic Place. The place is not included in the Heritage List of either the Operative or the Proposed Wellington District Plans.

- 16 The majority of the buildings on the Site have now been removed. However, the Allen Ward VC Hall and the Tennant Block, including the link between the two, along with the octagonal Oldershaw Building remain. These buildings will be structurally upgraded, refurbished and adapted to be integrated into the Proposed Village. The original entrance from Donald Street will also be restored. I consider that the retention and reuse of the remaining buildings to be a positive heritage aspect of the Proposed Village.
- 17 The retained buildings will form part of Building B01A, which will also include new components located essentially in the same locations as previous buildings on the Site. This layout will ensure that the central courtyard which was an integral part of the Teachers' College complex is also retained. In my opinion, the retention of the courtyard is a positive aspect of the Proposed Village.
- 18 I have been closely involved in the design of the new components of Building B01A, which have been designed to respect and acknowledge the former buildings, without resorting to replication. This will ensure that the new buildings area able to be differentiated from the original buildings.
- 19 A number of new buildings, for which I acted as consultant for their initial design, are also proposed for the Site. Building B01B will be located only generally in the area previously occupied by the Stage 2 former Teachers' College buildings but will have a different footprint. The other new buildings, denoted as Buildings B02 – B07, will be constructed in areas where there never has been buildings.
- 20 Accordingly, these buildings have been designed in a more contemporary style, while still respecting the retained former Teachers' College buildings. Their design has also been amended following feedback from Council officers. As a result, Buildings B02 – B07 will now have a more residential scale to ensure that they better relate to the surrounding environment. In conclusion, I consider the new buildings will have only a minor impact on the heritage values of the Site.
- 21 As part of the Proposed Village, the Lopdell Gardens will be retained as far as practicable and enhanced with new plantings. I consider the retention of the Lopdell Gardens to be a positive aspect of the Proposed Village.
- 22 Three submissions concerning heritage matters were received. The submission from Heritage New Zealand Pouhere Taonga supports the recommendations made in the report by Council's Senior Heritage Advisor. Of the other two submissions, one considered that the new buildings will detract from the heritage values of the Site and the other was concerned that Ryman was not maintaining the

Lopdell Gardens. I consider that the concerns of these submitters have all been addressed.

- 23 The report prepared by Council's Heritage Consultant agrees with my assessment in all material respects. It records some concerns in relation to proposed works that would alter the remaining heritage buildings and landscape areas, all of which have been resolved by amendments to the proposal or by conditions. Ms Smith concludes that that the Proposed Village is considered acceptable on heritage grounds, subject to consent conditions.
- 24 The Officer's Report attaches a set of draft conditions which I agree with and support.
- 25 In conclusion, I consider the Proposed Village will create a number of positive heritage benefits through the retention, strengthening and refurbishment of the retained Teachers' College buildings and that any potential adverse heritage effects can be mitigated.

SUMMARY OF THE ASSESSMENT OF EFFECTS ON HERITAGE VALUES

Teachers' College Heritage Values

- 26 The Site was previously occupied by the Wellington Teachers' Training College (*Teachers' College*).
- 27 The Teachers' College buildings were constructed in two stages between 1966 and 1977. Figure 1 shows the location of the Teachers' College buildings on the Site and identifies the buildings that comprised the two stages. It also identifies an area known as the Lopdell Gardens, named for Frank Lopdell, a former Teachers' College principal.

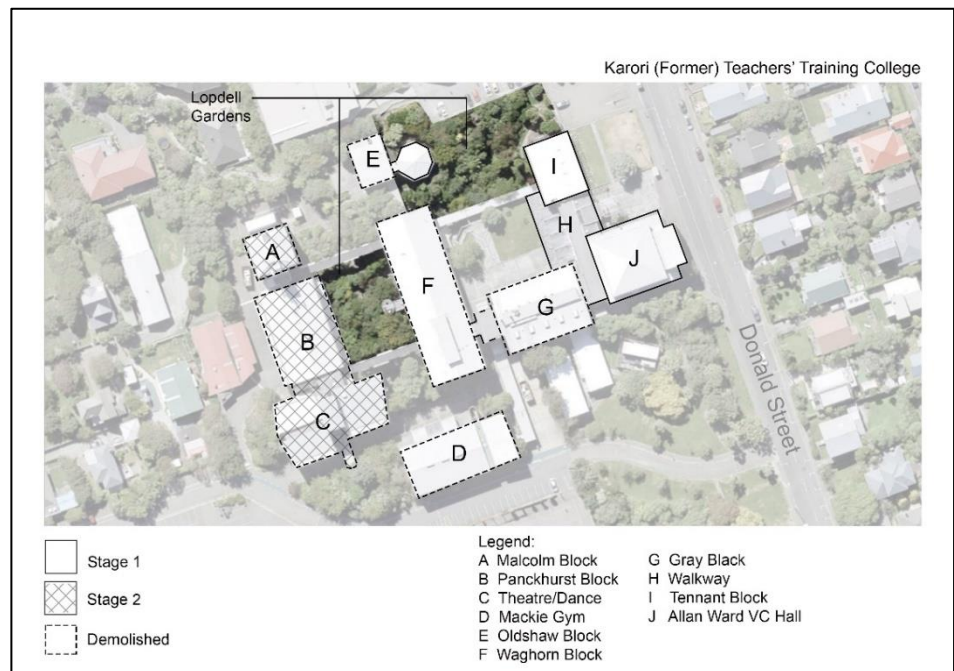


Figure 1 – Teachers' College buildings

- 28 The former Teachers' College buildings were designed by architect Bill Toomath of Toomath and Wilson, who employed a particular style known as "Brutalism". Brutalism is most often characterised by the use of concrete that retains the texture of the boxing such as a woodgrain finish imprinted from rough sawn timber. Elsewhere, concrete was poured against corrugated steel to reproduce that form.
- 29 The Wellington Teachers' Training College (former) is included in the New Zealand Heritage List as a Category 1 Historic Place. It is not however included in the Heritage List of the Operative Wellington City District Plan (*Operative District Plan*) or the Wellington City Proposed District Plan (*Proposed Plan*).
- 30 Section 4 of the Heritage Report provides an assessment of the heritage values of the place, including the remaining Teachers' College buildings and the Lopdell Gardens, in accordance with the assessment criteria in Part 4 of the Heritage New Zealand Pouhere Taonga Act 2014.

Proposed Village design

- 31 The majority of the Teachers' College buildings have now been removed from the Site. The buildings remaining are the Allen Ward VC Hall and the Tennant Block, including the link between those two buildings, as well as the octagonal Oldershaw building. The link between the Allen Ward VC Hall and the former Gray Block and the covered way between the Tennant Block and former Waghorn Building have also been retained.

- 32 The Proposed Village will retain and adapt these buildings to perform new functions within the retirement village as follows:
- 32.1 *Allen Ward VC Hall:* This building will be upgraded to meet earthquake standards, however, these works will be relatively unobtrusive. The external changes to this building will be minimal with the main change being the removal of a number of the precast aggregate-faced panels along the northern façade and their replacement with new (contemporary style) glazing to allow additional light into the building to enhance the internal environment.
 - 32.2 The existing timber window joinery will be replaced with new (but closely matching) timber joinery, which will be double glazed to reduce heat loss and lower power consumption.
 - 32.3 The Allen Ward VC Hall was the subject of an arson attack in December 2021, which damaged the interior fabric. These areas will be restored to their original form. The building will also be upgraded with new insulation to comply with modern building code requirements.
 - 32.4 *Tennant Block:* This building will be upgraded to meet earthquake standards, with the works chosen to have the least impact on the external form of the building. The existing timber joinery will be replaced with new, double glazed timber joinery.
 - 32.5 *The octagonal Oldershaw Block:* Minor changes will be made to this building where links to the rectangular Oldershaw Block have been removed.
 - 32.6 *Link between the Allen Ward VC Hall and the Tennant Block:* This link originally incorporated the main entry to the Teachers' College and has been extensively modified over time. It will be restored to its original form as seen in the original architects' drawings with the removal of the later additions and reinstatement of original details. The lower level of the link was originally open along the western side, but was later infilled with a student lounge. The lounge will be replaced with a simple glazed link.
 - 32.7 *Link between the Allen Ward VC Hall and the former Gray Block:* This link will be modified to become the main entrance to the Proposed Village, with a design based on the form of the original Donald Street entry. The link will incorporate a seismic gap as the Hall will remain on its existing foundations whereas the proposed building will be base isolated.

32.8 *Covered way between the Tennant Block and the former Waghorn Block:* This covered way will be retained and used as a shelter overlooking the bowling green.

33 The retained buildings will form part of Building B01A. This building will also include new components in the general locations of the former Gray, Waghorn and Oldershaw Music Blocks. This layout maintains the sense of community created by a series of buildings grouped around a central courtyard.

34 I have been closely involved in the design of the new components of Building B01A from the initial concept phase. In essence, I considered that the new components should more closely resemble the former Teachers' College buildings that they will replace than other new buildings on the Site, without resorting to replication. They should also be sympathetic to the retained Allen Ward VC Hall and Tennant buildings but have subtle design changes to enable them to be clearly identified as new structures. The design also provides for the functional and operational needs of the Proposed Village (for example, aluminium joinery will be used throughout to reduce maintenance costs).

35 I consider the design of the Proposed Village meets heritage architecture intentions. Further details on the design of Building B01A are set out in the Heritage Report.

36 The Proposed Village will also provide a number of other new buildings (B01B and B02-B07). I was also involved, as a heritage design consultant, at the concept stage for the external elevations of these buildings. Their concept design took cues from the former Teachers' College buildings, including the incorporation of precast concrete elements, to maintain continuity with the original architectural values of the place. They were, however, intended to have a more contemporary appearance to differentiate them from the retained original buildings and the new components of Building B01A.

37 The design of Buildings B01B and B02-B07 has been amended in response to feedback from Council officers. I understand the amendments to Buildings B02-B07 are intended to enable them to better address the character of the immediate streetscape and surrounding context by ensuring their design form and mass take on more of a residential scale. I do not have any concerns with those design amendments from a heritage perspective.

38 The Lopdell Gardens will be retained as far as practicable while allowing for the construction of the Proposed Village. Exotic and native trees and shrubs will be planted to complement the existing plantings. Other existing elements will also be preserved where practicable, including pathways, steps and retaining walls.

Assessment of heritage effects

Retained Teachers' College buildings

- 39 In my opinion, the retention of the Allen Ward VC Hall, the Tennant Block and the octagonal Oldershaw is an obvious positive effect of the Proposed Village as their survival for the future is ensured.
- 40 The retained buildings will all get new uses, with the Allen Ward VC Hall and the Tennant Block becoming part of the Village Centre and the octagonal Oldershaw building being used for resident activities. Some adaptation will be required to accommodate those uses as described at paragraph 32 above. I consider that the proposed new uses are appropriate in that the changes required, particularly to the exterior, will be relatively limited. Any adverse effects, therefore, will be minor and be balanced by the positive effects arising from the retention of the buildings.
- 41 I also consider the Proposed Village will provide the following additional positive outcomes:
- 41.1 The damage caused by the fire will be remediated to return the interior of the Allen Ward VC Hall to its original form; and
- 41.2 Intrusive elements added to the original buildings, including the student lounge and the later canopy facing Donald Street will be removed. The original entry from Donald Street will then be restored.
- 42 Overall, I consider the retention and reuse of the Teachers' College buildings will have a positive heritage effect.

New Components of Building B01A

- 43 As noted, the Stage 1 Teachers' College buildings were constructed around a courtyard as a way of creating a sense of community. The courtyard was therefore an integral part of the design of the Teachers' College.
- 44 In my opinion, the heritage values of the Site will be respected by deliberately positioning the new Building B01A components in locations that are as close as possible to those of the Gray, and Waghorn Buildings and the rectangular Oldershaw Music Blocks. Although the buildings will be new, I consider their grouping around the courtyard to reflect the location of the Teachers' College buildings is a positive aspect of the Proposed Village design.
- 45 The Gray, Waghorn and Oldershaw buildings could have been replicated. However, I consider replication of heritage buildings results in a loss of authenticity and is not an acceptable heritage outcome. Rather, the new buildings have been designed to respect and acknowledge the Teachers' College buildings, by taking cues from their design, their overall form and use of materials.

46 I consider careful consideration has been given to creating contemporary structures that utilise a new architectural vocabulary that will complement rather than replicate the Teachers' College buildings. This approach will enable the different phases in the life of the place to be identified and, over time, the new buildings will become part of the story of the former Teachers' College.

47 The location of the new components of Building B01A will ensure that an integral element of the Teachers' College, the internal courtyard, will be retained. In my opinion, this courtyard is an important positive aspect of the Proposed Village. Overall, the new Building B01A components will have a minor impact on the heritage values of the Site.

Building B01B

48 Building B01B will be located on the part of the Site that was previously occupied by the Malcolm, Panckhurst and Theatre Blocks and the Dance Studio. However, unlike the new B01A buildings, Building B01B will have a larger footprint than the buildings it replaces. Accordingly, I considered there was not the same need for this building to strongly complement the Teachers' College buildings, although it will still respect them by taking design cues from them.

49 This approach will ensure that the retained buildings continue to be recognised as part of the original Teachers' College complex.

50 The design of Building B01B has been amended in response to feedback from Council officers. However, it continues to reference elements of the former Teachers' College buildings, while ensuring it is sufficiently different to avoid the impression it has replaced one of the former Teachers' College buildings.

51 Accordingly, in my opinion, new Building B01B will have only a minor impact on the heritage values of the Site.

Buildings B02-B07

52 Buildings B02-B06 will be located along the southern boundary of the Site in an area that was previously occupied by the sports fields and courts. Accordingly, while the design of these Buildings will still take cues from the Teachers' College buildings, I considered there was not the same need to strongly complement them and that their architectural style could be more contemporary. This approach will again ensure that the new buildings can clearly be differentiated from the retained Teachers' College buildings.

53 Since they were originally designed, Buildings B02-B06 have been amended in response to feedback from Council officers. The current design focuses more on achieving a residential feel and a lower human scale, than the heritage buildings on the northern part of the

Site. I consider this approach is appropriate because, as noted, these buildings will be constructed on land that was never occupied by Teachers' College buildings.

- 54 Building B07 will also be located close to the Donald Street boundary in an area where there never has been buildings. Consequently, it will partly obscure the Allen Ward VC Hall when the Site is approached from the south along Donald Street. It is noted, however, that the Hall is presently partly concealed by the planting along this boundary.
- 55 As a way of respecting the Teachers' College buildings, buildings B02-B07 will be identifiable as new buildings as they will take cues from the existing buildings without emulating them too closely. Accordingly, in my opinion, Buildings B02-B07 will have only a minor impact on the heritage values of the Site.

Landscaping

- 56 The Lopdell Gardens with their established and mature plantings will be retained as far as practicable and enhanced by new native and exotic plantings to provide a place of relaxation and contemplation for the village residents.
- 57 Some areas of the Lopdell Gardens will be lost due to construction requirements. However, measures to mitigate their loss will include the enhancement of the retained areas and the preservation and reuse of some of the existing site elements including the pathways through the gardens and existing retaining walls and steps.
- 58 In my opinion, the retention of the Lopdell Gardens as far as practicable and reuse of site elements, along with the provision of additional plantings, is a positive outcome of the Proposed Village.

RESPONSE TO SUBMISSIONS

- 59 I have reviewed all of the submissions and have only identified three submissions that address heritage effects.
- 60 The submission of Heritage New Zealand Pouhere Taonga supports the recommendations of the report from the Council's Senior Heritage Advisor dated 3 September 2021. As noted earlier, I have been involved in a number of discussions with Ms Smith, Council's Senior Heritage Advisor, in relation to the design of the Proposed Village and heritage-related conditions of consent. As a result of those discussions, I consider all of those recommendations have been addressed.
- 61 One other submission says "*the most important buildings reflecting the heritage value of the Site have been demolished, removing the substantive proportion of heritage value ...*" and that new buildings

on the Site will detract from heritage values.¹ I understand the removal of the Teachers' College buildings is not relevant to this resource consent application as the removal has already occurred.

62 For the reasons set out above, I consider the retention and reuse of the Allen Ward VC Hall, Tennant Building and octagonal Oldershaw Building will result in positive heritage benefits. I consider that the new buildings will result in only minor adverse heritage effects that have been appropriately mitigated through their design and location.

63 The third submission says Ryman is not maintaining the Teachers' College native gardens.² As noted above, the Proposed Village will retain and restore the Lopdell Gardens to the extent practicable.

RESPONSE TO COUNCIL OFFICER REPORT

64 The assessment by Ms Smith, now Heritage Consultant to Council generally agrees with my assessment. In particular, she considers the retention of some former Teachers' College buildings and the Lopdell Gardens is positive and the new buildings will have little effect on the remaining heritage buildings and landscape areas.³

65 Ms Smith raised some concerns in relation to works proposed to alter the remaining heritage buildings and landscape areas. These concerns have either been resolved by amendments to the proposal or through conditions of consent. Her concerns were:

65.1 *Alterations to Allen Ward VC Hall.* Ms Smith notes that a condition that requires that alterations to the Allen Ward VC Hall be designed by a suitably qualified heritage architect will address her concerns that the alterations as proposed may have adverse effects on the heritage values of the Hall.

65.2 *Aluminium windows.* A condition that requires timber windows to be provided for the remaining heritage buildings will address any concerns that Ms Smith had in this regard.

65.3 *Reconstruction of the original Donald Street entrance.* Ms Smith noted that the reconstruction would be a positive heritage outcome of the Proposed Village. Ryman offered a draft condition that the design of the canopy would be consistent with the original architecture. Ms Smith considered that this condition will address any concerns she had.

¹ Submission 75 (King & McKinnon-King).

² Submission 41 (Fraser).

³ Council Officer's Report, Appendix 5 – Heritage – Moira Smith, paragraphs 11.5-11.10.

- 66 In conclusion, Ms Smith considered the Proposed Village is acceptable on heritage grounds, subject to consent conditions.

DRAFT CONDITIONS

- 67 The Council has proposed a set of draft conditions. Conditions 42 – 51 relate to heritage matters, which reflect those agreed in discussions with between Ms Smith and me. I agree with and support the draft heritage conditions.

CONCLUSION

- 68 In my opinion, the potential adverse heritage effects of the new Proposed Village buildings will be appropriately mitigated. The Proposal will also create a number of positive heritage benefits through the retention, seismic strengthening, refurbishment and reuse of the former Teachers' College buildings.

David Alan Pearson
29 August 2022