

# Memo

**To:** Ross Cooper  
**From:** John Brown  
**Authored by:** Stephen Curham (Built Heritage), Vanessa Tanner (Archaeology), Nick Stott (Scheduled Heritage Trees),  
**Reviewed, compiled and revised by:** John Brown  
**Project :** City Rail Link (CRL) Notices of Requirement (NOR) Assessment  
**Date:** Thursday, May 30, 2013

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## 1 Introduction

The City Rail Link project involves the building of two tunnels, to link the Britomart rail station through to Mount Eden, thus completing a continuous loop through the city. This loop line will increase the efficiency of the network, and will allow trains to deliver people to destinations stations that are located close to city workplaces and destinations.

### 1.1 Purpose of Report

This report will consider the impact that the construction of the CRL will have on heritage buildings that are on the route it will take. The assessment is being carried out by the built heritage implementation team. This team provide specialist input into heritage matters for council planners involved in processing resource consent applications at Auckland Council. The team is involved in the processing of resource consents which involve listed heritage buildings, character buildings, that have status in relation to centre plans, and historic character houses in the residential one, two and three zones.

### 1.2 Experience

Stephen Curham: Conservation architect, Built Heritage Implementation, Auckland Council Heritage Unit

Stephen Curham has the qualifications of a Bachelor of Architecture (University of Auckland), has carried out studies in the field of Architectural Conservation (Short Course, David Young, Adjunct Associate Professor at the Universities of Canberra and Melbourne), and is a registered architect (NZRAB). He has 23 years of experience in architectural practice and, since 2010, has worked for Auckland Council and the Auckland City Council as conservation architect, in the fields of architectural conservation, environmental impact assessment and heritage planning.

John Brown: Team Leader for Built Heritage Implementation, Auckland Council Heritage Unit.

John Brown has the qualifications of Bachelor of Archaeology (University of Newcastle upon Tyne) Master of Archaeology (Institute of Archaeology, University College London), and is a registered member of the UK Institute for Archaeologists (AIFA). John has been an affiliate member of the UK Institute for Historic Building Conservation (IHBC), and is registered as an external supervisor with the School of Architecture, Auckland University. He has carried out courses in the field of

archaeological and architectural study and conservation (Archaeology of Stone, University of Portsmouth; historic paint analysis, Salmond Reed architects; conservation of historic building materials, David Young short course, Adjunct Associate Professor at the Universities of Canberra and Melbourne). John has twenty years of experience in the heritage sector, in commercial archaeology, museums, historic building recording and conservation, environmental impact assessment and heritage planning. Companies include Pre-Construct Archaeology Limited, Museum of London, Gifford, Arup, and English Heritage, as well as freelance consultancy.

Vanessa Tanner: Senior Archaeologist, Cultural Heritage Implementation, Auckland Council Heritage Unit.

Vanessa Tanner is currently employed as the Senior Archaeologist at Auckland Council, a position held since 2010. She holds a Master of Arts in Anthropology, majoring in archaeology from the University of Otago. She also holds a Bachelor of Arts combined honours degree in Geography and Anthropology from the University of Otago. She is a member of the New Zealand Archaeological Association, and has 16 years experience in the field of archaeology including survey and investigation, analysis and report preparation, and in particular archaeological assessments relating to the Historic Places Act 1993 requirements. Her work has covered a variety of time periods and geographic locations in New Zealand.

Nick Stott: Heritage Arborist, Cultural Heritage Implementation, Auckland Council Heritage Unit.

Nick Stott is currently employed as a heritage arborist with Auckland Council, a position held since amalgamation in 2010. Prior to this he was employed by Auckland City Council for approximately 7 years in the regulatory consenting team. He holds an Advanced Certificate of Horticulture and an Advanced Certificate in Arboriculture (Waikato Polytechnic 1999). He has been an arborist for approx 14 years, with experience in all forms of manual tree work including large tree transplantation (for the Specimen Tree Company Ltd).

Both Stephen Curham (2013) John Brown (2012) and Rebecca Freeman (2012) have walked the route specifically as part of the process of preapplication discussion and assessment of effects. In addition, all contributors are familiar with the area because of working regularly in the locality in the normal course of their duties.

### **1.3 Documents considered**

The following documents have been provided. In addition to a general overview of the application documents, assessment has been undertaken by subject matter specialists in relation to Built Heritage (Stephen Curham, John Brown) and Archaeology (Vanessa Tanner, John Brown). The Tree Assessment was reviewed by an external arborist consultant Grant Sirl, and recommendations reviewed and approved by Auckland Council Heritage Arborist Nick Stott.

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Tree assessment (PDF 3.8MB)  
Urban design part 1 (PDF 5MB)  
Urban design part 2 (PDF 3.8MB)

## **2 Overview of built heritage matters**

There is evidence that completion of a rail loop line serving central Auckland has been mooted for more than 80 years.

When the rail causeway across Hobson Bay opened as part of the Westfield deviation in the late 1920s the continuation of the network to link with the North Auckland Line was under consideration. The construction of the deviation was part of a process of iterative improvement to the rail network.

*"The deviation of the Main South line to a low level route 9 ¼ miles in length between Auckland and Westfield has been closely associated with the work in Auckland yard, and has a very important bearing on the general layout.*

*The surveys and plans for the deviation were initiated by the Railway Department, but the main construction work (which includes a number of substantial bridges and a double track tunnel 30 chains in length) has been in the hands of the Public Works Department.*

*While this new loop line is somewhat longer than the old route via Newmarket and Remuera, it has great advantages in the matter of elevation and grades. Whereas the highest point in the new line*

*is only 78ft., and the limiting grade 1 in 132, the highest point in the old line is 265ft., with approaching grades in each direction of 1 in 41. The new low level line comes into full use with the opening of the new station. It not only provides an improved rail outlet from Auckland, but makes contact with some fine residential areas capable of carrying a large suburban population in the future.*

*Another project also closely associated with the work under review was the construction of a northern outlet under the city, making connection with the North Auckland line at Morningside. Present traffic conditions, however, do not justify this proposal, which would involve heavy expenditure."*

The New Zealand Railways Magazine, Volume 5, Issue 8 (February 1, 1931)

Thus, the project itself can be seen as having been considered over a considerable length of time, in a variety of forms. The tunnelling methodology and the route option selected represent the approach with the least potential environmental effect on historic heritage generally, and on built heritage in particular. In principle, it has the strong support of the built heritage implementation team.

## **2.1 Key issues relating to built heritage**

Throughout the world 184 cities have underground rail system. The first metro system, the London Underground, was opened in 1863. The first deep-level tube line, the City and South London Railway, consisted of two 3.10 m diameter circular tunnels. It opened in 1890, and the trains were electric. Passengers accessed rail platforms by lift.

World wide, there is considerable experience available with regard to such systems. Deep tunnelling is generally thought to cause negligible vibration and settlement effects, although this varies with local geology. Cut and cover for the construction of stations and shallow tunnels generally has greater potential for effects on above ground buildings. The engineering of foundation underpinning works and shoring works are of key importance here. The construction of risers and above ground facilities for stations deep underground also has the potential to effect buildings above ground.

Local experience in tunnelling, which has previously occurred close to the tunnels of the CRL is available for reference, when considering measures to prevent damage to buildings along the route. A tunnel was constructed under Hobson St from 1999 to 2001, by Vector and Mercury Energy in order to bring a secure power supply into the city.

## **2.2 Summary of Key Issues raised in Submissions**

Fourteen submissions have been received regarding heritage matters in relation to the CRL. Many of these submitters raised noise related issues. Noise is not a heritage concern, so will not be discussed further here.

Some of these submissions are from organisations and people who regularly provide the council with input regarding district plan matters. These include New Zealand Historic Places Trust Pouhere Taonga, Alan Matson, Iain McManus on behalf of the Roman Catholic Bishop of the Diocese of Auckland, Institution of Professional Engineers New Zealand and from Cooper and Company. Four other submissions, which were less detailed, were also received.

There is commonality of themes across these submissions. All are concerned with possible damage of buildings along the route, due to vibration and settlement caused by construction activities. Some were concerned with the loss of heritage buildings where removal is possible due to above ground station works.

No public submissions were received with regard to archaeological issues.

Submissions relating to scheduled heritage trees were considered by Grant Searle elsewhere, alongside general tree protection issues and proposed conditions or mitigation responses discussed with Nick Stott, Heritage Unit Arborist.

### 2.3 Other issues

Individual submitters raised issues particular to their properties. These included concern about the loss of future development rights. A submitter seeks to have a full independent structural assessment of their building, involving both a structural and geotechnical engineer. This assessment would include monitoring focused on their building, and a proposal for structural strengthening. A submitter has a building located close to where the tunnel emerges to link to the North Auckland line, where a construction yard is to be sited. Concerns were raised in regard to the effects of this yard on their building.

Two submissions were particularly focused on heritage building losses. One raised the issue of the land included in the Notice of Requirements. This submission was particularly concerned about the loss of heritage buildings for station building at 229-231 Symonds St, and at 51-63 Victoria St. This submission was also concerned with the design of new station buildings which will be placed in the context of a surviving streetscape of historic buildings. The other submission, from the New Zealand Historic Places Trust had further concerns about the loss of two underground toilet facilities, and the loss of a building at 32 -42 Wellesley St. The trust also wishes to be involved in work leading to further investigation of the heritage values of the buildings to be lost, and the preparation of conservation plans.

## 3 Assessment of the effects of the CRL on heritage buildings

There are few built heritage controls in the Auckland Council District Plan - Operative Auckland City - Central Area Section 2005 and the Auckland Council District Plan - Operative Auckland City - Isthmus Section 1999, relevant to the proposed works. Therefore the assessment will be structured with regard to heritage buildings that do have district plan status and those that do not.

### 3.1 Description of effects

55 heritage buildings identified as being slightly or moderately effected. Of these, 49 Buildings will be potentially subject to either slight or slight to moderate settlement and vibration effects. Settlement and vibration due to tunnelling may lead to cracking of building fabric. Cracks will then need to be filled, usually by repointed brickwork, or repairing damaged plaster. In rare cases there may be the need to reconstruct sections of damaged brickwork.

Given that the effects on these 49 buildings are minor in relation to scale and scope of the project, and given that successful tunnelling has been completed under nearby Albert St, and in 184 other cities that have underground railways around the world a discussion of the effects in relation to each of these 49 buildings is not proposed.

The assessment of the extent of settlement and vibration effects has been undertaken by engineers skilled in the domain, and this is appropriate. A Construction Environmental Management Plan will be further developed as the project proceeds, as a key management tool in managing these effects. All these measures are appropriate in terms of the preservation of built heritage, and have the support of the built heritage implementation team.

The remaining six heritage buildings are more significantly effected by the works. These buildings will be described below in a table and then referred to consistently throughout this memo using the nomenclature given in the “known as” column.

Salmond Reed ref	address	Description	Known as	nor allows for	District plan protections
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91	12 Queen Street	Former CPO - Britomart Transport Centre	Central Post Office	Not cover by CRL NoR - covered under existing designation	yes
8	76-86 Albert St	Historic Toilets, etc under roadside	Albert St Toilets	demolition	yes
142	51-53 Victoria Street West	Martha's Corner	Martha's Corner	demolition	yes
153	42 Wellesley Street	Griffiths Holdings Building	Griffiths Building	demolition	no
236	2 Beresford Square	Former public toilets	Beresford Toilets	demolition	no
130	223-227 Symonds Street	terraced shop residence	Symonds St shop/residence	partial demolition	yes

Of the six, two will be demolished to make way for the CRL. Building 8, the Albert St Toilets, has Category B status under the Auckland Council Operative District Plan; Central Area Section. Building 236, the Beresford Toilets, has no status under the Plan.

Two others may be subject to adaptive reuse, depending on the finalised station design. However, the notice of requirement application does allow these buildings to be demolished if the project team decide that demolition is appropriate. These two buildings are Building 142, Martha's Corner and Building 153, the Griffiths building. Martha's corner has statutory protection, conferred by a character overlay. A part of the original fabric of Building 130, 223-227 Symonds St shop/residence is to be demolished. Alterations to this building are conferred by the upper Symonds Street character overlay.

Building 91, The former Central Post Office will remain, but significant foundation works will be required on order for the underground railway to continue from the existing station. The Central Post Office is a category A scheduled building under the Central Area Section of the District Plan. The building itself will not be modified. Auckland Transport are relying on an existing designation in relation to this building, so further consideration of the project in relation to the Post Office need not be included in this memo.

A weakness in the methodology of the built heritage study undertaken by Salmond Reed, is that it does not distinguish adequately between buildings that may suffer from settlement and vibration effects, and those that will be more significantly effected by station building. Thus it is difficult to fully assess the significance of the heritage losses that will occur as a result of the proposed demolition.

In order to rectify this situation a request for information regarding the heritage buildings that will be demolished was made in a memo dated 19 September 2012. Detailed heritage assessments of each of these was suggested using the standard methodology described in clause 10.9.13 of the Central Area Section of the District Plan. However, no further information has been received by the heritage unit at this time.

In the normal process for resource consent to demolish a building that had heritage status in a District Plan, the built heritage implementation team would not support such an application unless there was a detailed assessment of the building in question. Such an assessment would include an assessment of environmental effects that evaluated the proposed works (demolition) against the relevant heritage criteria given in the district plan. Good practice would include the consideration of other options that might avoid demolition, an accurate drawn record of the building to be demolished, recent and historical interior and exterior photography, a history of the land the building sits on and a history of the building.

It is understood, after conversation with the processing planner, Ross Cooper, that the notice of requirement process differs from a standard resource consent process. The requiring authority, in

this case Auckland transport, has the power to grant consent to the project it is proposing. This happens after public consultations and a public hearing with independent commissioners has occurred.

In the absence of additional requested information, and in order to fully and accurately assess the significance of these buildings further information is needed. I am providing quick assessments of these buildings, in order to assist the Notice of Requirement process. The Resource Management Act defines historic heritage as follows:

Historic heritage—

(a) means those natural and physical resources that contribute to an understanding and appreciation of New Zealand's history and cultures, deriving from any of the following qualities:

(i) archaeological

(ii) architectural

(iii) cultural

(iv) historic

(v) scientific

(vi) technological; and

(b) includes—

(i) historic sites, structures, places, and areas; and

(ii) archaeological sites; and

(iii) sites of significance to Maori, including wahi tapu; and

(iv) surroundings associated with the natural and physical resources.

The process for making quick assessments of the heritage values associated with a historic building is based on conservation architecture practice, which focuses in particular on values relating to architectural quality, aesthetics, technology, historic and cultural interest, and amenity represented by contribution to surroundings. A useful summary of such values is outlined by Feilden:

*"What is an historic building?"*

*Briefly, an historic building is one that gives us a sense of wonder and makes us want to know more about the people and culture that produced it. It has architectural, aesthetic, historic, documentary, archaeological, economic, social and even political and spiritual or symbolic values; but the first impact is always emotional, for it is a symbol of our cultural identity and continuity—a part of our heritage. If it has survived the hazards of 100 years of usefulness, it has a good claim to being called historic."*

Bernard M. Feilden, Conservation of Historic Buildings.

### **3.2 Buildings not scheduled in the Auckland Council Operative District Plan.**

Building 236: The historic toilets, under the road at 2 Beresford St

These underwent a major refurbishment in the 1990's. Little original fabric is reported to survive, although the interior has not been assessed by any of the heritage specialists involved in the project, other than a brief visual assessment through the service/loading doors.

Using the toilets is not a notable aesthetic or architectural experience. They do have some remaining social and historical significance. They do not confer a sense of wonder or make us want to know more about the people and culture that produced them. It is arguable that they have not survived 100 years of usefulness intact.

There is always some degree of loss associated with the demolition of buildings that possess heritage value, even when this value is weakly held. However, this loss may well be offset by other benefits, not necessarily related to the significance or insignificance of the heritage object in question. In this case, the building is not identified as having significant heritage value through inclusion in the District Plan, and because the portion available for viewing does not possess a

high level of social and historical significance, the effect of this possible demolition is regarded, in the absence of a full assessment, as likely to be less than minor.

#### Building 153: The Griffiths Building

The Griffiths Building is an interwar period unreinforced masonry building constructed of plastered brick. It has detail that relates to the then current Art Deco style. It is a relatively plain example of Art Deco though. The building has undergone considerable internal modification, and its original shopfronts do not survive. There are signs of structural issues. Cracking is present in brickwork and there is spalling concrete in places.

The heritage significance of this building is largely derived from its location on Wellesley St. It is close to some lovely interwar period buildings, such as the Civic Theatre and the Smith and Caughey's building. Therefore it does make a contribution to a group of important buildings.

This group does have the ability to inspire a sense of wonder, and does offer a very satisfying architectural and aesthetic experience. When considered in isolation from this context, the Griffiths building alone is architecturally unremarkable. It would not invoke an emotional response in most who viewed it. There are many other buildings of similar date and significance which survive across the Auckland Isthmus, in tramway suburbs such as Balmoral and Sandringham.

According to Auckland Transport's proposal the building may undergo adaptive reuse as part of station works, or it may be demolished. A full heritage assessment is needed here, but it is likely that a convincing heritage argument could be made for either outcome. If demolition is to be the outcome, then it is imperative that the design of a new station building be of similar quality to that of the Civic Theatre and the Smith and Caughey's building. In addition the design must be a sensitive and informed response to this historic setting. Further information regarding this issue will follow, later in the memo.

### **3.3 Buildings scheduled in the Auckland Council Operative District Plan**

Heritage buildings that will be demolished include a category B listed building, listed in appendix 1 of the central area section of the district plan.

#### Building 8: The historic toilets, Albert Street, City (Durham Street intersection)

Demolition of this building is a restricted discretionary activity. The criteria for restricted discretion are given in clause 10.9.12 of the Central area plan. These criteria have not been addressed by Auckland Transport anywhere in their assessment of the Central Rail Link project.

*In considering an application the Council will have regard to:*

- a) The provisions of Part 15 of the Plan.*
- b) Removals of later unsympathetic additions which detract from the assessed heritage values for which the item was scheduled.*
- c) The category in which the heritage place is scheduled and the reasons for which it has been scheduled.*
- d) The nature, form and extent of the proposed development, alteration or change. The effect of the proposal on the heritage values of the scheduled item including the values for which it was scheduled.*
- e) Any alternative methods which may be available in the achievement of the applicant's objectives.*
- f) The provisions of the ICOMOS NZ Charter (refer Appendix 4).*
- g) The Conservation Plan, if required (refer 10.9.13), and more particularly the stated conservation policies and strategies for the property, will form the basis of the Council's heritage approach.*
- h) The balancing of heritage objectives with other resource management issues, including the positive effects of development for the community.*

In this case it may be that the effect of the proposal on the heritage values of the scheduled item including the values for which it was scheduled may not be significant. During a site visit it was evident that there is little remaining of original fabric that relates to the time when the building opened. Fixtures, fittings and the screen at the entrance, now in welded mild steel rather than wrought iron appear to be recent in date. There are some painted decorative screens between cubicles that are original. It may be that these could be reused elsewhere in the CRL.

At this stage insufficient information is available to undertake a full assessment against the above criteria. In the absence of such information, the built heritage team will reluctantly support the demolition of this building with regard to Criterion 10.9.12 h). This is on the basis that positive wider effects of the development for the community, and for other heritage places in the CBD is realised through a significant reduction in future car traffic, and greater opportunity for public visitation and appreciation of the area as a result of improved public transport infrastructure. However, it is strongly recommended that provision be given to develop detailed design with regard to criteria d) and e).

Heritage buildings that may be subject to unknown modification or demolition for station construction include two buildings that are included in character overlays.

#### Building 142: Martha's Corner

This building is included in appendix 13 character overlay of the Auckland Council District Plan Operative Auckland City - Central Area Section 2005. Demolition of this building is a restricted discretionary activity. The criteria for restricted discretion are given in clause 5.6.3.1, (d) Demolition, removal or partial demolition of buildings identified on the Character Overlay in Appendix 13. These criteria have not been addressed by Auckland Transport anywhere in their assessment of the Central Rail Link project. The criteria are quoted below in italic text.

#### *Criteria for demolition, removal or partial demolition*

*Any proposal for the demolition, removal or partial demolition of buildings identified on the Character Overlay in Appendix 123 shall be assessed against the following criteria:*

- 1) The extent to which demolition or removal of the building, or a part of the building, will adversely affect the built character of the area. This includes regard to the following as appropriate:
  - i) Whether the existing building forms part of a cohesive group of buildings in terms of similarity of age, scale, proportion or design and the extent to which the building's demolition would detract from the shared contribution that group makes to streetscape.*
  - ii) The contribution the individual building makes to the cohesiveness of the streetscape through its landmark qualities (particularly on prominent or gateway sites).*
  - iii) The contribution the building makes to adjoining or nearby scheduled buildings, either through the context and the relationship of the building to the scheduled building or through the building's mass, height or rhythm of facades, and whether its demolition would adversely impact on the heritage values of the scheduled building.**
- 2) The extent to which the applicant has considered development options incorporating the adaptive re-use of the character building and in particular, whether reasonable use of the site can be achieved through adaptive re-use of the building rather than through its demolition and replacement.*
- 3) The extent to which the building is beyond restoration in terms of demonstrated poor structural or physical condition and whether retention of the building would, in these circumstances, put an unreasonable financial burden on its owner.*
- 4) The extent to which any replacement building maintains or enhances the contribution to character or streetscape made by the existing building (either as an individual or as part of a cohesive group) and the extent to which that contribution is recognised and provided for in the design of the new building. This may include, but is not limited to, reference to or inclusion of elements of the existing building in the new building. For consideration under this criterion, an application for the building's replacement shall be lodged concurrently with the application for the removal or demolition.*
- 5) The matters set out in 5.6.1.1.*

Insufficient information is available to undertake a full assessment against these criteria. There is more information available on this building than on the others here discussed, on page 43 of the Salmond Reed City Rail Link Built Heritage Technical Expert Report. Here it is stated that the Martha's Corner buildings are significant.

*“Their significance derives from their completeness as a group and significant presence of unaltered pre-1900 historic fabric including, for instance, original shop windows, being representative of the particular era of construction, as well as a colourful history. “*

The building is identified as significant, and, on the basis of information provided to date, the built heritage implementation team do not support demolition of this building. It is likely that the team would not support demolition even if further information becomes available, as additional information would in all probability serve to identify more fully the heritage values of the place. A condition requiring the adaptive reuse of this building is therefore proposed. An appropriate level of adaptive reuse would include retention of the street façade, in three dimensions, where it turns the corner. Floor levels in any new building should align with the original floor levels of the building. Where possible, fabric behind the façade should be retained as well.

#### Building 130: 229-231 Symonds St

This building is included as a character defining building in map C08-31 of the appendices to the maps of the Auckland Council District Plan Isthmus Section - Operative 1999. Demolition of character defining buildings is a restricted discretionary activity.

The criteria of clause 5C.7.10.3 of the Auckland Council Operative District Plan - Isthmus Section, 1999; regarding character overlay areas are relevant to this proposal.

#### *Criteria for assessing applications for resource consent*

*In considering an application for a restricted discretionary activity, the Council will have regard to Part 4 of the District Plan, General Provisions and Procedures, and assess the application against the following matters:*

- a) The Design Guidelines for Traditional Town Centres (refer Appendix 11 of the District Plan);*
- b) Demonstration that any demolition or removal and consequent replacement of a building will not significantly affect the streetscape appearance of the town centre and will not destroy the area's distinctive character. A resource consent shall be obtained for the buildings replacement either prior to, or concurrently with this application;*
- c) Consideration of the building's surrounding context in terms of any adverse effect on the shared character with other character-defining, character-supporting, or scheduled buildings, whether they are adjoining, next to, directly opposite (across the road), or diagonally opposite (across an intersection);*
- d) The nature, form and extent of the development, alteration or change and its effect on the particular character of the character-defining building; and such following matters:*
  - Additions or alterations to the street elevation of the building are to be avoided unless they maintain an appearance generally similar to the original;*
  - Additions are to be so positioned or modifications so designed so as not to detract from the continuity of the front facade alignment of the building or adjoining buildings or an established horizontal or vertical modulation;*
  - Consideration shall be given to ensuring that any external addition or alteration is of a design and materials similar or in sympathy to those originally used which do not detract from the architectural character and detailing of the building;*
  - Alterations and additions are to be in keeping with the architectural form, proportions and style of the existing building(s) on the site;*
  - Refurbishing, restoring and adapting parts of the existing building rather than replacing them;*

Again, insufficient information is available to undertake a full assessment against these criteria. There is no evidence provided in the notice of requirement documents that the authors of the built heritage technical report have viewed the part of the interior that will be lost, or been on site to

closely examine the exterior fabric. However, given that the street façade, and at least the front two rooms of this building will remain it is likely that the above criteria would be met, if the applicant were to address the retention of these aspects appropriately in the design process. The criteria are focused on maintaining streetscape values on the main street frontage, and are not as concerned with what happens at the back of the building. Confirmation of the aspects of the interior to be lost, assessment of any adverse affects and the appropriate mitigation of any loss through detailed recording and opportunities for restorative change, would be a minimum expectation.

### **3.4 New buildings in historic settings.**

The regulatory controls relating to new buildings in historic settings vary from station to station. There are formal controls for Karangahape Rd and for Upper Symonds St. There are also recent publications from overseas heritage jurisdictions that are very relevant here. It is noted that the urban design plan does not address this issue in a thoroughgoing manner, and would benefit from incorporating more guidance regarding new buildings in historic settings.

The Upper Symonds St character overlay given in the Auckland Council District Plan Isthmus Section - Operative 1999 contains criteria relating to new buildings. This overlay is more recent than the Karangahape Rd one, and therefore more relevant to contemporary practice.

#### *5C.7.10.3 Criteria for assessing applications for resource consent*

*In considering an application for a restricted discretionary activity, the Council will have regard to Part 4 of the District Plan, General Provisions and Procedures, and assess the application against the following matters:*

- a) The Design Guidelines for Traditional Town Centres (refer Appendix 11 of the District Plan);*
- b) The extent to which the new or relocated building or additions to the existing building is complementary to the character of the town centre (refer to Appendix 11: Character overlay summary statements). The design of the ground/street level should contribute to the continuity of pedestrian interest and vitality, particularly for those frontages where compliance with the retail frontage control is required.*
- c) Where new buildings or additions to existing buildings are proposed abutting or adjacent to those buildings identified as being character-defining or character-supporting or are scheduled, such development is to be sympathetic to such buildings. Such developments should not attempt to replicate or imitate their architectural detailing or style but rather be complementary to it;*
- d) Where existing sites are amalgamated and/or larger buildings are proposed to replace more than one smaller building, the extent to which the frontage design has regard to the existing 'grain' of developments in the town centre (original street frontage, subdivision patterns) and is detailed to mitigate any perception of unsympathetic scale or bulk. This could be achieved by providing relatively complex and modulated facades to break up the visual appearance of the structure;*
- e) Consideration shall be given to ensuring new developments have regard to existing buildings in the vicinity in terms of such matters as frontage height and design, and a varied but sympathetic silhouette of pediments, sloped roofs and parapet features;*
- f) There shall be regard given to having a balance of vertical elements (such as structural bays and windows) with horizontal elements (such as verandahs, cornice and parapet lines). Blank walls visible from surrounding streets should be avoided where possible;*
- g) Buildings are to be designed to address and align to the street boundary (particularly buildings on corner sites), concentrating main entries and windows on frontages facing the street;*
- h) Regard shall be given to designing any recessed frontages, whether to the front of the building or to the side, so as to create open spaces for outdoor dining/seating, planting or other uses where possible;*
- i) Parking and vehicle circulation areas should not visually dominate views of the site from the surrounding public realm. Regard shall be given to providing planting to break up the visual impact of any parking areas, where appropriate;*
- j) Consideration should be given to the verandah controls in Clause 8.8.1.3 of the District Plan and section 4, verandahs, of the character overlay;*
- k) The extent to which such buildings are distinctive in their own right while avoiding being plain or imitative or mocking of existing buildings that have character qualities*

Design methods that will meet these criteria should be included in conditions relating to the notice of requirement. The criteria themselves could follow, adapted after discussion and agreement between the built heritage implementation team and Auckland Transport.

The following words are proposed. These are an amalgam of text from The Salmond Reed expert report, and from “New Buildings in Historic Settings”, Scottish Heritage, 2010. The Scottish document would also be a useful reference document when developing graphic materials for any revisions to the urban design framework.

Text proposed for incorporation as an introduction to a condition regarding new buildings in historic settings.

“The success of any proposal that alters the historic environment is likely to be measured by its relationship to the context of which it is part. The effect of the proposal on the setting of an historic place, historic area, or a scheduled or any significant heritage structure is a material consideration in determining the suitability of such proposals. Setting is effectively the surroundings in which a historic environment is experienced and is, therefore, both a heritage and an urban design concern in relation to the CRL.

Deep knowledge and a thorough understanding of this context should form part of the design process. Design concepts will need to be progressed to a level that is sufficient to enable adverse landscape / townscape impacts and impacts on visual amenity to be defined and appropriate mitigation identified. The design of any new building and structure should respond to its context. Care should be taken to ensure that design proposals within historic contexts are properly founded and based on a thorough understanding of this. Historical pastiche or conjectural restoration should be avoided.

New development should respond to:

- Urban structure
- Urban grain
- Density and mix
- Scale
- Materials and detailing
- Landscape
- Views and landmarks
- Historical development

These principles are relevant, whatever design solution is arrived at, from the reticent and recessive to the boldly contemporary. Architects of new buildings must consider all the principles and balance them rather than focus on particular aspects. Meeting one of these principles is unlikely to produce a quality design. Conversely, applying all principles in a tick box manner may not result in design quality either.

Much reliance must still be placed on the knowledge, creativity and talent of designers and architects as they respond to their stakeholders. A very important first step prior to developing a design response is an analysis of the historical setting, and context, both as it exists now, and has existed in the past. If the analysis is not done then the setting is unlikely to inform the design response.”

A table from “New Buildings in Historic Settings”, Scottish Heritage, 2010 follows. This table is indicative of how a context analysis might be approached. The document is available online here:- <http://www.historic-scotland.gov.uk/new-design-in-historic-settings.pdf>

Analysis	How?	Outcome
Urban Structure	Carry out an analysis of how the development’s streets, blocks, buildings and open spaces link together. <ul style="list-style-type: none"> <li>• Is the urban structure coherent and well-defined?</li> <li>• Is there an obvious hierarchy of various elements?</li> <li>• Where does the development sit within this hierarchy?</li> <li>• Where was it derived from – single period or multiple factors?</li> </ul>	<ul style="list-style-type: none"> <li>• An understanding of the urban structure and an initial idea of whether the site needs to ‘fit in’ or to help re-establish structural coherence.</li> </ul>
Urban Grain	The urban grain around the site should be examined and the general pattern established. <ul style="list-style-type: none"> <li>• Does the site sit comfortably within the surrounding urban grain?</li> <li>• Is there scope to open up new routes through the site that would contribute to the urban grain?</li> </ul>	<ul style="list-style-type: none"> <li>• A record of the urban grain in the areas adjacent to the site.</li> <li>• An understanding of the need and capability of the site to contribute to that urban grain.</li> </ul>
Density and mix	Historic environments, particularly in urban locations, are often densely built up. the assessment should examine the site, which may be in an area which has a mix of uses or where the mix is defined by a single predominant use. <ul style="list-style-type: none"> <li>• How does density vary in the area?</li> <li>• How high are the densities around public transport nodes, towards town centres, parks and waterfront areas?</li> <li>• What is the mix of uses in the area?</li> <li>• Is there a mix of housing types?</li> </ul>	<ul style="list-style-type: none"> <li>• An understanding of the variations in density and mix in the area and the scope to translate these to the site.</li> </ul>
Scale: Height and Massing	the height and massing of the area should be examined. <ul style="list-style-type: none"> <li>• What is the prevailing height of the area?</li> <li>• Are there any significantly taller buildings?</li> <li>• Is the size of the site large enough to require the massing to be broken down?</li> <li>• If so, are there any existing buildings that have used a particular technique to break down massing?</li> </ul>	<ul style="list-style-type: none"> <li>• A clear indication of the general height and massing in the area.</li> <li>• An indication of landmarks and taller buildings.</li> </ul>

#### 4 Auckland Transport assessment and proposed mitigation for built heritage

The following is a summary of effects and proposed mitigation with regard to built heritage, provided by Auckland Transport. Effects are given in plain text, with mitigation following each in italic text. Abbreviations are used in the summary and these are given here as an aid to clarity.

- AT Auckland Transport
- CEMP Construction Environmental Management Plan
- CMJ Central Motorway Junction
- CRL City Rail Link
- NAL North Auckland Rail Line
- NoR Notice of Requirement
- UDF Urban Design Framework

- Regeneration activities following the completion of construction of the CRL which provide an opportunity to enhance areas with sensitive developments which recognise the existing heritage character. Areas include sites in the vicinity of Aotea Station, the area above Karangahape Station between Karangahape Road and the CMJ, the area where the CRL connects to the NAL including the main site construction area.

*Good design outcomes will be determined by implementation of the principles set out in the UDF.*

The removal of the Albert Street scheduled toilets located at the western end of Durham Street west resulting in a loss of heritage associated with early central Auckland. ● The historic Blue stone wall, also in this location and also scheduled, can be protected during construction in Albert Street and therefore any effects on it are considered to be minimal and able to be managed. ● The toilets and the Blue stone wall are located above the anticipated depth of the two tunnels, however the cut and cover construction methodology proposed requires excavation through the toilets, which extend under Albert Street, to the tunnel depth below. The land above the tunnels will be reinstated following construction, however it is not considered practical or feasible at this stage to reinstate the toilets. The Blue stone wall due to its location to the eastern side of Albert Street can be retained and protected during construction as excavations for the two tunnels will occur between it and the western side of Albert Street.

- *The development and implementation of the CEMP which:* ● *Assesses the ability to reuse some of the toilet elements within Aotea Station;* ● *Confirms an appropriate process for the demolition of these toilets which incorporates the ability to safely remove items for reuse.* ● *An authority under the HPA to modify or destroy a scheduled item will be required. This will be applied for at the time of construction and the necessary assessment undertaken to satisfy the requirements of the authority application.*

The removal of the toilet building (currently used by the Supper Club) in Beresford Square resulting in a loss of heritage associated with early central Auckland. ● The removal of the toilet building is required in order to construct the main entry shaft for Karangahape Station, linking the surface with the underground station area. ● It is noted that the Supper Club building which is also located within Beresford Square and attached to these toilets is a more recently constructed building.

- *The development and implementation of the CEMP which:* ● *Assesses the ability to deconstruct and reuse some of the building elements within Karangahape Station or the station precinct area surrounding the station entrance;*

- *Confirms an appropriate process for the demolition of these toilets which incorporates the ability to safely remove items for reuse (if applicable).*

- The construction of the tunnels via cut and cover between Britomart and Aotea station, the construction of Aotea Station via top down / cut and cover, and the construction of the two shafts by mining / cut and cover techniques at both Karangahape and Newton Stations has the potential to induce surface, sub-surface and lateral ground movement resulting in effects on the foundations of identified built heritage buildings and structures. ● Potential damage is likely to range between small internal cracks through to effects on the structure stability. ● In terms of built heritage the elements that are often at risk are decorative plasterwork, joinery and glazed items. ● Settlement contours have been produced and these are contained within the structural engineering technical assessment (Appendix 10: Volume 3 CRL NoR suite of documents). From these contours identification of the built heritage at risk can be seen. ● The structural assessment concludes that the level of damage associated with settlement will be in the 'negligible' to 'slight' categories and is aesthetic in extent.

- *The development and implementation of the CEMP which:* ● *Confirms the process to be undertaken to re-confirm the built heritage buildings and structures which fall within the settlement contours and will require monitoring during the construction period, including building survey's pre*

*and post construction; • Confirms the process to be undertaken to restore any damage to the above identified built heritage buildings and structures; • Resource consent will be sought for groundwater take / drawdown in future stages of the project.*

The modification of buildings (known as the 'Griffiths building' on the southeast corner of Albert and Wellesley Streets, and the group of buildings on the northwest corner of Albert and Victoria Streets known as 'Martha's Corner'), not formally scheduled but recognised to have historic merit, within the designation footprint associated with Aotea Station, resulting in a loss of history in this part of the city centre area.

*• AT is committed to exploring in future stages of design and construction the ability, where practicable, to retain all or elements of these buildings for adaptive reuse demolition of these buildings is provided for, however if retention is not practicable. • The development and implementation of the CEMP which: • Confirm the process to be undertaken to record the built heritage of these buildings; • Confirm the options considered for the retention of these buildings, and if not to be retained the reasons why; • If to be retained, confirmed whether whole, partial or adaptive reuse and the provision of plans to show this; • If not to be retained what the proposed salvage strategies are, including the elements to be salvaged.*

Potential physical damage to built heritage buildings and structures located in close proximity to surface construction works.

*• The CEMP for the construction of the CRL will include measures for protection of the construction site areas where surface works are occurring. These measures will include the identification and confirmation of any built heritage buildings or structures which require particular protection measures.*

Generally, the assessment of effects is correct, and the measures for mitigation are sensible. It is understood that only the preliminary stages of project design are complete, and that considerable further information will be available as the work proceeds. The level of resolution of the design issues is also sensible, at this stage

There are some areas where further information was sought prior to the NoR being made. These included heritage assessments of buildings that currently have heritage status that prevents their demolition, that will be able to be demolished once the NoR is in place. This issue has been discussed in detail in Section 3 above.

#### **4.1 Submitter issues**

The issue of possible damage of buildings along the route, due to vibration and settlement caused by construction activities has been addressed in the assessment of the effects of the CRL on heritage buildings, and in the applicant's assessment and proposals for mitigation. The issue of demolition and adaptive reuse of heritage buildings where removal is proposed or is possible due to above ground station works has also been addressed. Further conditions regarding both these issues are suggested.

The New Zealand Historic Places Trust has also raised a need for further assessment, and the consideration of alternatives, where the project would require significant modification or complete demolition of the building. It has also requested that conditions that requiring preference to be given to adaptive re-use or alternatives that are less destructive of built heritage be included. It suggests the inclusion of a condition requiring consultation with the NZHPT in the preparation of additional assessments and conservation plans.

As the buildings which the trust would like conservation plans prepared for will no longer have any protection against demolition once the NoR is in place requiring the preparation of conservation plans for buildings that will be demolished is not productive. If adaptive reuse is decided on at Martha's corner then a conservation plan should be prepared as part of the design process.

A further issue raised by a submitter relates to the design of new buildings in historic settings or contexts. This is of relevance for the Aotea station, the Karangahape Road Station and the Newton station. A condition is proposed to address this issue.

Submitters also raised issues relating to the ownership of their sites. These included possible loss of property rights, and requirements for structural works at cost to the project, over and above the remedial and protective measures proposed by Auckland Transport. These issues fall beyond the purview of heritage expert opinion.

## 6 Proposed Conditions relating to built heritage

In addition to any proposed conditions presented by Auckland Transport, which are considered in general terms to be acceptable, the following issues are raised as an aid to drafting a complete set of conditions. Proposed conditions are provided in italics.

### 6.1 Built heritage conditions

#### General conditions

It will be appropriate that members of the built heritage implementation team and staff from the New Zealand Historic Places Trust should be included in the team that agrees an appropriate design and construction methodology to mitigate any effects on the foundations of heritage buildings. Conditions relating to monitoring, settlement and vibration are suggested. It is anticipated that these will be developed with input from specialist geotechnical advisors and structural engineers. The conservation architects in the built heritage implementation team are available to assist with advice on traditional materials and construction techniques:

*Auckland Transport will develop an appropriate design and construction methodology to mitigate any effects on the foundations of heritage buildings relating to monitoring, settlement and vibration, to be agreed in writing with the requiring heritage authority. Additionally Auckland Transport will invite comment from New Zealand Historic Places Trust for advice on the appropriateness of any methodology.*

Evidence that all possible options other than demolition have been explored could be provided under the outline plan of works process. A full discussion of the demolition in relation to the district plan criteria should be included. A weighing of the effects of demolition versus the effects of adaptive reuse in the context of the benefits of the Central Rail Link project should be included:

*Evidence that all possible options other than demolition have been explored is to be provided under the outline plan of works process. A detailed assessment of environmental effects (AEE) will be undertaken on those buildings identified as having more than minor adverse affects (see table below). Appropriate mitigation to minimise these affects as much as possible is to be proposed and agreed in writing between the requiring heritage authority and Auckland Transport.*

<b>Applicant building # ref</b>	<b>address</b>	<b>Description</b>	<b>Known as</b>
91	12 Queen Street	Former CPO - Britomart Transport Centre	Central Post Office
8	76-86 Albert St	Historic Toilets, etc under roadside	Albert St Toilets
142	51-53 Victoria Street West	Martha's Corner	Martha's Corner

153	42 Wellesley Street	Griffiths Holdings Building	Griffiths Building
236	2 Beresford Square	Former public toilets	Beresford Toilets
130	223-227 Symonds Street	Terraced shop residence	Symonds St shop/residence

*Buildings that are to be demolished or significantly adapted should be recorded in their current context prior to removal. Where buildings are to be removed recording to Level 2 of the NZHPT Guidelines for Buildings Investigation and Recording 2/6/06 should take place. Where buildings are to undergo significant alteration for adaptive reuse a Level 3 record will be adequate.*

Members of the built heritage implementation team and staff from the New Zealand Historic Places Trust should contribute to the design decision making leading to any adaptive reuse. It may be of use to the project to have team members contribute as design develops, rather than merely saying yea or nay to a well developed design, as part of the outline plan of works process.

Members of the built heritage implementation team and staff from the New Zealand Historic Places Trust could also contribute to design decision- making leading to new buildings in historic settings. This contribution could be made alongside colleagues from the discipline of urban design.

A condition regarding guidance and criteria for the design of new buildings in historic settings is suggested. This condition will use as its basis the text suggested in Section 3:

*Auckland Transport will, through discussion and written agreement with the requiring heritage authority, ensure that design proposals are based on a thorough understanding of historic contexts. Additionally Auckland Transport will invite comment from New Zealand Historic Places Trust. Historical pastiche or conjectural restoration shall be avoided. In particular, New development shall respond to:*

- *Urban structure*
- *Urban grain*
- *Density and mix*
- *Scale*
- *Materials and detailing*
- *Landscape*
- *Views and landmarks*
- *Historical development*

### **Specific conditions**

A condition requiring the adaptive reuse of the building at 51-53 Victoria Street West known as Martha's Corner is proposed. An appropriate level of adaptive reuse would include retention of the street façade, in three dimensions, including where it turns the corner. Floor levels in any new building should align with the original floor levels of the building. Where possible, fabric behind the façade should be retained as well. A conservation plan should be prepared as part of the design process. If Auckland Transport, as the requiring authority, are unwilling to offer such a condition then a condition requiring that demolition of this building only occur as a last resort, after all over avenues of possibility regarding adaptive reuse are exhausted, is desirable:

*Auckland Transport will explore the adaptive reuse of the building at 51-53 Victoria Street West known as Martha's with regard to the Auckland Council District Plan Operative Auckland City - Central Area Section 2005, clause 5.6.3.1, (d). An appropriate level of adaptive reuse would include retention of the street façade, in three dimensions, including where it turns the corner. Floor levels in any new building should align with the original floor levels of the building. Where possible, fabric behind the façade should be retained as well.*

Two historic public toilets are to be lost in order to build the CRL. An analysis of the history of these, in relation to the tram network is needed. Other surviving "under the street" public toilets (eg near Ponsonby ex Post Office) should be located and discussed in relation to the two that will be lost. It may be more acceptable to lose these two if another representative example is located and any opportunity for restoration and or scheduling of the surviving example is identified.

*Auckland Transport will undertake to provide additional historic analysis of the two historic public toilets (Albert Street and Beresford Street toilets) that are to be lost in order to build the CRL. Other surviving "under the street" public toilets within the project envelope should be located and discussed in relation to the two that will be lost and any opportunity for restoration and or scheduling of these is to be explored.*

## **7 Conclusions with regard to Built Heritage**

In conclusion, the built heritage implementation team support the implementation of this project as it is a project with a strong relationship to the history and heritage of Auckland City, having been under discussion since the 1930's. The team also note that issues to do with environmental sustainability are now seen by many experts in the domain to be part of good conservation architecture practice. Clearly, the construction of the CRL is likely to deliver major environmental sustainability benefits including the reduction of car traffic, increase of pedestrian activity and opportunities for further appreciation and understanding of the built heritage for the Central Area, that will more than offset any loss of heritage buildings along the route.



Stephen Curham, Conservation Architect, Auckland Council

## **8 Overview of Archaeological Matters**

No public submissions were raised on matters of archaeological interest. Matters

An initial assessment and review of prelodgement documentation was undertaken by Vanessa Tanner and provided on 19 September 2012. No changes were observed the formal submission material in relation to this comment other than document revision numbers. Therefore the comment of the September 2012 memo is still considered relevant, and is repeated here.

### **8.1 Assessment of the effects of the CRL on archaeology**

The report documents the fact that the designation requires areas with significant historic heritage value that relate to the earliest historical period of Auckland city and its subsequent occupation, development and use; as such the area is an important component of Auckland's identity and character. The report considers that the archaeology of the area required for the designation could add value to our understanding of the history of Auckland.

The Clough and Associates (July 2012) report does not deal with Maori cultural values as such an assessment can only be provided by tangata whenua. The present Memo does not consider cultural heritage values other than archaeology alone.

As Clough and Associates (July 2012) quite rightly report the actual effects on archaeology cannot be determined until detailed design of the rail link, its stations and required earthworks has been completed. Once design has been finalised Clough and Associates (July 2012) recommend further detailed historical research on individual properties be carried out. Following detailed research on individual properties that will be affected it will still be difficult to predict the exact location of archaeological features, beyond reasonable cause to suspect that they are there, and the effects the proposed development will have on them. As made clear in the Clough and Associates (July 2012) report there will likely be effects on archaeological evidence at a number of locations required for the designation including Queen Elizabeth Square, the CPO, up Albert Street, within the footprint of Aotea Station and at 257 Symonds Street with lesser chance of effects at the Newton and Karangahape Stations all pending further research. The nature, extent and significance of archaeology will largely been unknown until it is exposed as a result of earthworks associated with the project.

### **8.2 Auckland Transport assessment and proposed mitigation for archaeology**

Proposals like the City Rail Link present an opportunity to identify important elements of our history and to raise the profile of historic heritage to Aucklanders; contributing to their sense of place, their identity and the character of Auckland.

Clough and Associates (July 2012) suggest that appropriate mitigation of effects be via the provisions of the Historic Places Act 1993 (HPA) which control the destruction of archaeological sites.

Any assessment of environmental effects must address s 6 (f) of the RMA and proposed mitigation for adverse effects on heritage should recognise and provide for historic heritage as a matter of national importance. The Clough and Associates (July 2012) report considers that mitigation of effects is appropriate despite the fact that effects are not fully identified and therefore the potential effects remain unknown. The scale of effects and possibility of avoidance are not discussed. Given the assumption that effects on archaeology will not be able to be avoided as they will only really present themselves during the construction phase of the project, mitigation of the effects is the only option presented. Simply mitigating effects on archaeology under the HPA is not necessarily

considered appropriate mitigation for effects on historic heritage under the RMA. The Clough and Associates (July 2012) report does not present a range of potential mitigation options.

It is recommended that consideration be given to accommodating additional or alternative methods of historic heritage mitigation into the proposal. Such methods might include keeping design flexible enough to identify opportunities to incorporate or preserve *in situ* or interpret archaeological features or findings where possible or practicable where it might add value to Aucklanders understanding and appreciation of the history and development of Auckland.

### **8.3 Conclusions/Recommendations on matters relating to archaeology:**

- The NoR encompasses an area of Auckland containing significant historic and cultural heritage values
- The effects on archaeology remain unknown and will only be fully realised as a result of detailed historical research following project design and more likely through the construction phase of the project
- The proposal is to mitigate effects on archaeology through the controlled destruction of the resource under the provisions of the HPA
- Mitigation of effects under the HPA is not necessarily adequate mitigation of effects on historic heritage under the RMA
- Consideration should be given to other methods of mitigating effects on archaeology.

#### **Vanessa Tanner**

Senior Archaeologist

Cultural Heritage Implementation

Environmental Strategy and Policy

## **9 Proposed Conditions relating to archaeology**

Essentially it is considered that potential environmental effects of the proposal could be better understood and therefore avoided, remedied and mitigated more appropriately if archaeological investigation was undertaken before the final design of the project was completed. That way effects on *in situ* archaeological evidence might be avoided or reduced through the design process, and any significant archaeological remains might be incorporated into the design, if appropriate, as a method of mitigating effects.

It is recommended that in addition to Auckland Transport's proposed conditions relating to the statutory provisions of the Historic Places Act, the consideration be given to the following as conditions relevant to statutory provisions of the Resource Management Act:

*The Applicant will engage a suitably experienced archaeological consultant, to undertake evaluation (in the form of archaeological trial investigations) prior to detailed project and construction design. The methodology and process, including opportunities for public access and interpretation, reporting and conservation of materials as appropriate, of the evaluative investigation will be approved in writing by the requiring Heritage authority at least two weeks prior to such works commencing.*

*The Applicant will make provision for sufficient time in the project schedule for reporting on the results of the evaluative archaeological investigation in order to inform the final project and construction design. In particular so that:*

- *where possible adverse effects on in-situ archaeological evidence may be avoided;*

- where appropriate archaeological evidence and information be incorporated into the project design.
- Written approval of final design and methods of investigation and mitigation may be provided by the requiring Heritage Authority at least four weeks prior to such works commencing.

The Applicant will provide, in agreement with the requiring heritage authority, for suitable opportunities for public interpretation, dissemination and access to the historic heritage affected by the project, including:

- Site access and interpretation during construction where appropriate;
- Opportunities for long term display of materials and knowledge obtained as a result of the project;
- Provision for 'post-excavation' assessment analysis and publication of material.

The Applicant will engage, in agreement with the requiring heritage authority, a suitably experienced consultant (or consultants as appropriate), to undertake cataloguing, archiving and conservation (as appropriate) of the resultant historic heritage archive generated by the project, including:

- physical artefacts;
- Site-generated records including all written, drawn, photographic and digital materials as appropriate;
- 'post-excavation' assessment analysis and publication material;
- That this archive will be maintained in a suitably stable environment for a minimum period of 10 years or until it may be accepted by a third party

## 10 Overview of Scheduled Tree Matters

The Tree Assessment was reviewed by an external arborist consultant Grant Sirl, and recommendations reviewed and approved by Auckland Council Heritage Arborist Nick Stott, and are discussed elsewhere. An additional note is provided by Nick Stott:

*I have read through Grant's comments and recommendations. I am comfortable with what Grant has provided. Also thought it was prudent to back Grant's comments in relation to Vincent Street. The London Plane trees are some of the oldest 'scheduled' trees in Auckland and as Grant states in his report, the area should be considered a total exclusion zone.*

**Nick Stott| Heritage Arborist  
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## 11 Overall conclusions

I have reviewed and compiled the material above, and present the combined view of the Officers and the Heritage Unit Implementation teams. In conclusion:

It is clear that construction of this magnitude will necessarily impact on historic heritage resources in the central CBD area. It is also clear that the chosen route seeks to minimise, through avoidance of more sensitive areas, the adverse environmental impact of such a proposal on the historic heritage of Central Auckland.

Provided the proposed conditions presented by Auckland Transport, and the proposed conditions presented in this memo are adopted, the construction of the CRL is likely to deliver major environmental and general benefit to the public good that will offset any loss of heritage buildings along the route. On this basis, the assessing officers of built and cultural heritage implementation teams support the implementation of this project.



**John Brown | Team Leader**

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