

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER of the Resource Management Act 1991 (RMA)

AND

IN THE MATTER of the hearing of submissions on Plan Change 14
(Housing and Business Choice) to the Christchurch
District Plan

SUMMARY STATEMENT OF JOHN BROWN ON BEHALF OF CAMBRIDGE

137 LIMITED

HISTORIC HERITAGE

12 April 2024

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Summary Statement

- 1 My name is John Brown I am an independent Heritage Consultant. My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses are set out in my Evidence in Chief dated 20 September 2023 and I do not repeat those here.
- 2 I have prepared evidence on behalf of Cambridge 137 Limited (**Cambridge 137**) providing heritage evidence in respect of Cambridge 137's submission seeking Harley Chambers be removed from Appendix 9.3.7.2 Schedule of Significant Historic Heritage of the Christchurch District Plan (**Schedule**).
- 3 In preparing my evidence I visited the site both internally and externally, and I viewed relevant documentation in respect of the site history and the documented historical values of the site.
- 4 I have also undertaken additional independent research as to the history of the building and associated works by the Architect.
- 5 I have visited other areas of the city when considering my views on the possibility of facade retention, and I have reviewed the evidence of the Christchurch City Council in respect of the submission on Harley Chambers.
- 6 I have also undertaken expert conferencing with the Experts for Christchurch City Council (**CCC**) to further consider their views and evidence.
- 7 I rely on the evidence of a range of experts who have provided evidence on behalf of Cambridge 137 in relation to engineering, quantity surveying, valuation, insurance, and planning. I refer to these experts in my primary statement of evidence.
- 8 In particular, I rely on the evidence of the engineers and quantity surveyors as to the extent to which building fabric requires remediation, and this informs my assessment of the building's historical integrity following any remediation.
- 9 With regard to the proposal for removal of Harley Chambers from the Schedule:
 - (a) I agree that, at the time of the original listing with Heritage New Zealand and subsequent scheduling in the District Plan, the Harley

Chambers Building was clearly seen to merit 'significant' heritage status;

- (b) Significantly, the focus of this interest is, in my view, the interior technological interest of the building as an early example of bespoke technological services for the dental profession;
 - (c) While I acknowledge the exterior has some interest as a Commercial interwar building, its architectural expression is not unusual for the time period. I also note, when comparing the original design drawings, that the full expression of the intended design does not seem to have been realised, due to changes to the parapet and roof line, as built;
 - (d) I note however, that considerable time has passed since the inclusion in the Schedule. Substantial damage, vandalism and stripping out of the building has occurred since that time both as a consequence of the Canterbury Earthquake sequence, and subsequent unauthorised occupation of the building;
 - (e) As a result of previous damage, the integrity of this building has been reduced;
 - (f) Overall, on the basis of the information provided, I consider that following remediation the integrity of the site would be reduced to the point where it no longer merits inclusion on the Schedule;
 - (g) Primarily this is in relation to the loss of interior structural elements such as the hollow blocks, modifications through application of shotcrete, obscuring existing structure and removal of all fixtures and fittings as described.
- 10 I therefore disagree with Mr Pearson and Ms Ohs for CCC that, following remediation, the integrity and therefore heritage values of the Building would not be substantively reduced with regard to Policy 9.3.2.2.1 of the District Plan.
- 11 Regrettably I conclude that, in my opinion, the building would be highly doubtful as to its merits for scheduling on the basis of reduced integrity.
- 12 This includes options of partial demolition or only façade retention. I consider that both options reduce or remove not only the technological interest, but also the aesthetic and contextual value of the place.

- 13 In my opinion scheduling the façade only is not a preferable outcome from a heritage point of view, and it would be highly unlikely that any new heritage assessment of just a retained façade would conclude it should be included on the Schedule when considered against the criteria in Appendix 9.3.7.1.
- 14 In the context of the work required and given that interior works are not controlled by the District Plan, even a full restoration (the most expensive option) would result in considerable loss of integrity for those interior and structural elements of principal technological interest.
- 15 I therefore objectively conclude that removal of the Building from the Schedule is not inconsistent with the District Plan policies, including Policy 9.3.2.2.1.

Dated 12 April 2024



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John Brown