

SUMMARY STATEMENT

1. My name is **Glenda Margaret Dixon**. I am a Senior Policy Planner in the City Planning Team, Infrastructure, Planning & Regulatory Services Group of the Christchurch City Council (**the Council**).
2. I have prepared a section 42A report and rebuttal evidence on Plan Change 14 (**PC14**) on behalf of the Council, in relation to the topic of Residential Heritage Areas (RHAs).
3. My section 42A report refers throughout to matters of relevance in the section 32A report for Plan Change 13 (**PC13**). I was the principal author of the section 32 report for PC13, with Suzanne Richmond, the Council planning witness for heritage items, being a contributing author. I was not the author of the section 32 report for heritage as a Qualifying Matter for PC14, but this document is compatible with the section 32 report for PC13 and I agree with the statements made in it.
4. There were a number of submitters on the topic of RHAs, including on the identification and assessment of RHAs and of the buildings within them, which is addressed in the evidence of Dr Ann McEwan. My evidence concentrates on the planning provisions for Residential Heritage Areas.
5. An overview of how RHAs and associated planning provisions were developed, is provided in sections 6.1 and 6.2 of my section 42A report. RHAs are essentially a new concept for Christchurch, and the protection of areas which have collective heritage values as distinctive and significant residential environments, has been of considerable public interest.
6. In paragraph 6.1.6 of that report, I provide a condensed version of the criteria adopted for identifying a heritage area.
7. Over 90 areas of Christchurch were considered through background historical research and “filtered” via a template, and then further property by property assessment was undertaken by Dr McEwan for the 11 areas which did meet the criteria. Many areas could not meet the criteria because they were not sufficiently intact following the earthquakes, post-earthquake demolition and new development, or because of housing modification.
8. I believe that the identification and assessment process for RHAs was rigorous, which means that the RHAs which were notified in PC14 are essentially the “best” potential RHAs. i.e. those specific residential environments which are of most heritage significance to Christchurch District.

9. Within the proposed RHAs, Dr McEwan has rated the properties as defining, contributory, neutral or intrusive based on their particular heritage values and features and their contribution to that RHA's heritage value overall. While there are relatively succinct definitions of these categories in Chapter 2 definitions through PC14, there are more detailed descriptions of the categories near the end of each of Dr McEwan's overall Heritage Area reports¹, found under the subtitle "Key for Contribution to Heritage Areas". There will be links to these overall Heritage Area reports and Site Record forms from the Chapter 9 Appendix 9.3.7.3 Schedule of Significant Historic Heritage Areas.
10. The categories of defining, contributory, neutral and intrusive provide the basis for the activity rules which apply. Essentially those properties rated as defining and contributory (to the heritage values of the area) are subject to demolition control via restricted discretionary consent, whereas demolition of the "lower" two categories is permitted. New buildings and alterations to building exteriors are restricted discretionary activities under Rule 9.3.4.1.3 RD6, with some exceptions eg for small buildings located behind the main residential unit on a site.
11. My evidence addresses the submissions made on RHAs, under topic subheadings, with those relating to the planning provisions from Issue 10 onwards. I address the RHA interface areas at Issue 14. These would apply only on sites zoned HRZ which share a boundary with an RHA. The interface areas are primarily around the Chester St East RHA, with a few sites around some of the other RHAs. Maps of these sites will be at Appendix 9.3.7.9 to Chapter 9.
12. In general, I have recommended that the RHA provisions as proposed be accepted, with minor amendments.
13. The changes to provisions that I have recommended as a response to submissions are as follows:
 - (a) Small alterations to the boundaries of the Chester Street East and Inner City West RHAs;
 - (b) Amending the Matters of Discretion for new buildings and alterations in RHAs to clarify that the focus is primarily on the area and only secondarily on the building; deleting two matters of discretion and

¹ Eg at page 13 of the Heritage Area Report for HA2 Chester Street East/Dawson Street, which forms part of the PC14 provisions (appended to sub-chapter 9.3).

amending another; and amending the road boundary setback wording for RHAs in the MRZ zone; and

(c) Clarifying that RD1 (alterations to scheduled items) and RD6 (including alterations to RHA non-scheduled items) are mutually exclusive, and confining the application of P2 for repairs (for which there are activity standards) to defining and contributory buildings only.

14. In my section 42A report, I left my position on increasing the height limits in the various RHAs somewhat open. I would like to acknowledge that there is now an unintended discrepancy between the heights for the North St Albans, Piko/Shand and Englefield RHAs and the Character Area heights for the equivalent areas. Height limits of 5.5m have been recommended to be increased to 6.5m in these Character Areas in recognition of the existing heights in these areas, often resulting from typically high roof pitches, and I consider the same should be done for these RHAs.
15. In my rebuttal evidence, I have recommended a further amendment which provides for alterations to neutral and intrusive buildings not to require consent, even if they are visible from the street, since it is a permitted activity to demolish them entirely.
16. A final matter is that of the demolition policy which should apply in RHAs. The submissions and expert evidence of planners for Kāinga Ora, Carter Group and Christ's College did not support the wording of this policy in terms of how it would apply to RHAs. The proposed policy on demolition (Policy 9.3.2.2.8) does not vary between scheduled and unscheduled buildings, and I agree with the submitter evidence that there should be some distinction between these two in the policy.
17. I have now drafted a revised version of the wording which I append to this summary. I note that there are differences between experts on how (or possibly even whether) discouragement of demolition should be reflected in the policy, and whether and how the matters of discretion should recognise the benefits of demolition. However, in my view, while the rules are based on RDA status, the aim is to keep these areas as intact as possible. If the Plan does not try to discourage demolition, the RHAs would lose their effectiveness. I agree that there will almost certainly be flow-on benefits which demolition will facilitate. However if we considered, for example, enhancing the development potential of the land, any RHA in a favourable location in terms of proximity to centres, core public transport routes etc

would be at significant risk of its heritage values being compromised, irrespective of the importance of those values.

18. I remain of the view that demolition and rebuilds should be assessed separately, to provide more rigour to each stage of the process. I also consider if it was too easy to demolish buildings, especially defining buildings, over time there would be a considerable decrease in the overall heritage quality of the area.
19. Some of these RHAs are already “fragile”. The average degree of intactness² – percentage of buildings classed as definitive or contributory – is only about 65%, and wholesale demolition of buildings as contemplated by the certificates of compliance held by Kāinga Ora and Christ's College, would significantly decrease the intactness of those areas. The cumulative effects of demolition elsewhere are likely to have a similar effect.
20. My view is that the RHA provisions proposed in PC14, with the amendments I have recommended:
 - (a) appropriately support the protection of historic heritage from inappropriate use, subdivision and development as a matter of national importance under s6(f) of the RMA;
 - (b) support the relevant Canterbury Regional Policy Statement and District Plan objectives and policies; and
 - (c) limit intensification only to the extent necessary to accommodate the RHA qualifying matter, i.e. represent an element of “density done well”.

Date: 1 November 2023

Glenda Dixon

² Levels of intactness are shown in Table 4 on p39 of the PC13 section 32 report

PROPOSED POLICY WORDING (from Updated PC14 provisions on IHP website)

9.3.2.2.8 Policy – Demolition of heritage items

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 or a defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3, have regard to the following matters:
 - i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
 - ii. whether the extent of the work required to retain and/or repair the heritage item or building is of such a scale that the heritage values and integrity of the heritage item or building would be significantly compromised, and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1;
 - iii. whether the costs to retain the heritage item or building (particularly as a result of damage) would be unreasonable;
 - iv. the ability to retain the overall heritage values and significance of the heritage item or building through a reduced degree of demolition; and
 - v. the level of significance of the heritage item.

POTENTIAL AMENDMENTS TO WORDING

9.3.2.2.8 Policy – Demolition of scheduled historic heritage

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2, or a defining building or contributory building in a heritage area scheduled in Appendix 9.3.7.3, have regard to the following matters:
 - i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
 - ii. whether the extent of the work required to retain and/or repair the heritage item ~~or building~~ is of such a scale that the heritage values and integrity of the heritage item ~~or building~~ would be significantly compromised, and the heritage item would no longer meet the criteria for scheduling in Policy 9.3.2.2.1;
 - iii. whether the costs to retain the heritage item ~~or building~~ (particularly as a result of damage) would be unreasonable;
 - iv. the ability to retain the overall heritage values and significance of the heritage item ~~or building~~ through a reduced degree of demolition; and
 - v. the level of significance of the heritage item.
- b.
 - i. Within Residential Heritage Areas, demolition of defining buildings is strongly discouraged and demolition of contributory buildings is discouraged.
 - ii. In considering the appropriateness of the demolition of a defining or contributory building in a Residential Heritage Area scheduled in Appendix 9.3.7.3, regard must be had to b.i., and also to the following matters:
 - A. The effect of the proposed demolition on the collective heritage values and significance of the heritage area, including its overall integrity and coherence; and

- B. Whether the building is a defining building or a contributory building, and the specific contribution the building makes to the significance of the area; and
- C. Whether options for retention and repair have been thoroughly considered, and have been shown to be feasible or otherwise, including whether the preferred option for repair could compromise the heritage values and contribution category of the building.

Matters of Discretion

9.3.6.5 Residential Heritage Areas (excluding Akaroa Township Heritage Area) – demolition or relocation of a defining building or contributory building

- a. As the primary consideration, the effect of the works on ~~the heritage values of the building or site and~~ the collective heritage values and significance of the heritage area, including the overall integrity and coherence of the heritage area.
- b. Whether the building is a defining building or a contributory building, and the specific contribution the building makes to the significance of the area.
- c. The extent to which the ~~heritage fabric or heritage values~~ physical features of the building or site have been damaged by natural events, ~~weather and environmental and other~~ factors. ~~and the necessity and practicality of work to prevent further deterioration.~~
- d. Whether options for retention and repair have been thoroughly considered, including obtaining conservation advice where necessary, and the technical feasibility and likely costs of those options;
- e. ~~Whether the costs to retain the building on site would be unreasonable~~
- f. Whether repair would compromise the contribution the building makes to the heritage values of the building area to the extent that the building would no longer meet the definition for its current contribution category. ~~The ability to retain the overall heritage values of the building through an alternative proposal.~~
- g. The extent of photographic documentation that will occur prior to, during and on completion of the works.

RD7	<ul style="list-style-type: none"> a. <u>In a Residential Heritage Area Demolition or relocation of a defining building or contributory building, except where the building is also a heritage item scheduled in Appendix 9.3.7.2, in which case Rule 9.3.4.1.3 RD3, 9.3.4.1.4 D1, D2 or 9.3.4.1.5 NC1 will apply instead.</u> b. <u>Any application for demolition or relocation of a contributory building which is not a heritage item shall not be limited or publicly notified.</u> 	<ul style="list-style-type: none"> a. <u>Matters of discretion for demolition or relocation in Residential Heritage Areas (excluding Akaroa Township Heritage Area) - Rule 9.3.6.5.</u> b. <u>Where the site is also located in a Character Area, the Matters of discretion for Character Areas in Rule 14.15.27.</u>
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