

SUMMARY STATEMENT

1. My name is **Suzanne Richmond**. I am a Heritage Advisor specialising in planning in the Heritage team at **Christchurch City Council**. I will cover the following in my summary:
 - (a) My involvement in the preparation of heritage documentation for Plan Changes 14 and 13.
 - (b) The coverage of my primary and rebuttal evidence in relation to the Heritage Items topic for heritage sites, and changes recommended in my rebuttal evidence.
 - (c) Further clarification on the matters considered to be part of PC14 and those that are PC13 only.
 - (d) An overview of the operative and proposed heritage provisions framework in relation to the management of Heritage Items in the District Plan, in response to a request from the panel at my earlier appearance.
2. Of relevance to the preparation of the heritage documentation for Plan Changes 14 and 13, I led the drafting of amendments to the Heritage Items provisions applying to individual sites across the District, and I assisted Glenda Dixon who led the drafting of the Residential Heritage Area provisions.
3. I have read the relevant section of the PC14 s32 relating to Qualifying Matters¹. While I was not the author of that evaluation, I provided the relevant background information from the PC13 Heritage s32 report. I was a contributing author to the PC13 Heritage s32 report² led by Glenda Dixon, which I have relied on in my section 42A report. The proposed amendments to heritage provisions were notified as a package in Plan Change 13 and concurrently in the relevant chapters of Plan Change 14, with rules and sites highlighted where they were located in zones outside of the PC14 urban environment. I prepared PC13 Appendix 2 - Table of reasons for rule amendments³

¹ See section 6.6, page 76: <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC14/Section-32/Plan-Change-14-HBC-NOTIFICATION-Section-32-Qualifying-Matters-Part-2.pdf>

² <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC13/PC13-Section-32-report-for-notification-March-2023.PDF>

³ <https://www.ccc.govt.nz/assets/Documents/The-Council/Plans-Strategies-Policies-Bylaws/Plans/district-plan/Proposed-changes/2023/PC13/Plan-Change-13-s32-Appendix-2-Reasons-for-Rule-Amendments-for-notification-2023-03-17.PDF>

(linked from this document) which provides a detailed explanation for all notified changes to the heritage rules across chapters in the District Plan.

4. All issues covered in my primary evidence are relevant to the Heritage Items topic for the city-wide Heritage Items Qualifying Matter relating to heritage sites, noting that Issue 7 (page 96) of my primary evidence has already been addressed in the Central City topic, with the exception of Hagley Park, Cranmer and Latimer Squares.
5. Submissions from Historic Places Canterbury and Christchurch Civic Trust⁴ sought “buffer zones” or a reduced height Qualifying Matter for sites adjoining Hagley Park, Cranmer and Latimer Squares. In primary evidence⁵, both Amanda Ohs and I agreed that there are potential visual impacts of enabled taller building heights⁶ on the heritage values of these Highly Significant heritage items, although this had not been tested via three-dimensional modelling or sun studies.
6. Amanda Ohs and I have since considered this issue further in relation to the existing receiving environments - built and consented developments, location of protected heritage items and settings, and the age and nature of the building stock. The CCZ zone with the greatest enabled heights to the west of Latimer Square contains the Christchurch Club heritage item and setting, and low-rise, newly constructed apartments. The vast majority of sites adjoining Latimer and Cranmer Squares in HRZ and RGA zones have been redeveloped, or are currently being redeveloped at low-rise heights, contain heritage items and settings, or contain modern apartments or travellers’ accommodation, where the likelihood of redevelopment in the foreseeable future appears to be relatively low.
7. There are a limited number of dispersed sites around the perimeter of Latimer and Cranmer Squares, and some large sites dotted around Hagley Park that have potential to be redeveloped in the foreseeable future, and could have visual impacts for users of these Highly Significant open spaces, although the proposed HRZ zone rules at the street interface do offer some mitigation. I have concluded that there is no coherent group of sites that would justify an NPS-UD Policy 4 Qualifying Matter response in my view. There is limited specific recognition of the heritage values of these Highly Significant open space heritage items in the matters of discretion for the adjoining

⁴ Historic Places Canterbury S835.1, S835.12-S835.15 and Christchurch Civic Trust S908.1 and S1089.10.

⁵ Hagley Park, Cranmer Square and Latimer Square “buffers” or height overlays are discussed in my primary evidence at paragraphs 8.1.188 – 8.1.200 and in the primary evidence of Amanda Ohs at paragraphs 137-150.

⁶ Proposed amended heights via s42A reporting: CCZ enabled height 90 metres (see evidence of Andrew Willis), HRZ and RGA enabled height 39 metres (see evidence of Ike Kleynbos).

zones, however there is general consideration of the relationship of developments with open spaces and heritage values.

8. In my rebuttal evidence, I have identified two changes to the conclusions reached in my primary evidence relevant to this hearing.
9. At paragraph 40 of my rebuttal evidence, I agree to a minor change to the wording in the proposed definition of Heritage Setting, having considered the evidence of Mr Clease⁷. I have attached my recommended wording as Appendix 1 to this summary, with a minor further amendment for clarity (highlighted in yellow).
10. At paragraphs 10-16 of my rebuttal evidence, in response to planning evidence from Mr Bonis on behalf of Cambridge 137 Limited⁸, I accept that it is neither efficient nor effective in terms of sustainable management to retain Harley Chambers, 137 Cambridge Terrace on the schedule of heritage items.
11. In relation to the Mitre Hotel, formerly located at 40 Norwich Quay, Lyttelton, which as noted in legal submissions has now been demolished, I attach in Appendix 2, the Council's letter to the owner/submitter⁹ confirming that, as a result, the building will now be removed from the Council's Earthquake Prone Buildings Register.
12. During the hearing of Residential Heritage Areas in the Residential topic, as I understand it, the panel sought to test the appropriateness of heritage demolition rules as a Policy 4 NPS-UD response, and referred to the principle in the *Forest and Bird* decision that the least restrictive activity status should be applied that will address the effects of the activity and protect the resource.¹⁰ In my view, the heritage rules package for RHAs and Heritage Items strikes an appropriate balance between restricting development only to the extent necessary to accommodate the QM under Policy 4, having regard to *Forest and Bird*, while achieving protection of historic heritage from inappropriate subdivision, use, and development under s6f of the RMA. I consider that demolition rules are fundamental to meeting the Council's obligations under s6f. I clarify here, that for the Heritage Items topic, there is no change proposed to the activity status for the operative demolition rules¹¹. In response to the panel's

⁷ Planning evidence of Jonathan Clease at paragraph 81 for Daresbury Limited and Church Property Trustees.

⁸ Planning evidence of Mr Bonis at paragraph 30 for Cambridge 137 Limited.

⁹ Submission of Mitre Hotel Holdings Limited S1056.1.

¹⁰ Royal Forest and Bird Protection Society of New Zealand Inc. v Whakatane District Council, [2017] NZEnvC 51 Environment Court, Auckland, paragraph 59.

¹¹ Demolition was a non-complying activity for Group 1 and 2 heritage items in the City Plan and is non-complying for Highly Significant heritage items in the Operative District Plan. Demolition was a fully discretionary activity for Group 3 and 4 heritage items in the City Plan and is discretionary for Significant heritage items in the Operative District Plan.

request to understand the management of Heritage Items in the Operative District Plan, I have included the operative objectives and policies as a set for reference in Appendix 7, as some of these have no proposed amendments so do not appear in PC14 and 13 documentation. I have also attached a table in Appendix 6 comparing the operative and proposed activity status for rules for Heritage Items.

13. In my primary evidence, beginning at paragraph 7.1.4, I discuss the scope of this plan change in relation to the Heritage Items topic notified in PC14 and 13. I have also included a table in Appendix 3 setting out the components of the proposed heritage provisions package with links for ease of navigation, and Appendix 4 and Appendix 5 contain the lists of proposed new heritage items and interiors highlighting the “PC13 only” sites outside of the urban environment.
14. Aside from the points noted earlier in my summary, I remain of the views expressed in my primary and rebuttal evidence.

Date: 28 November 2023

Suzanne Richmond

Appendix 1 – Proposed wording of Heritage settings definition amended by s42A reporting

Text in purple bold underline and/or ~~purple bold strikethrough~~ is recommendations in response to submissions through s42A reporting on PC14.

Heritage setting

means an area surrounding a heritage item, and shown on the Heritage Aerial Map for that item, which is integral to its contextual heritage values and entry in Appendix 9.3.7.2 Schedule of significant historic heritage which, together with the associated heritage item, has met the significance threshold for listing in the District Plan. A heritage setting is the area around and adjacent to a heritage item that is

~~integral to~~ its function, meaning and relationships. ~~Heritage settings have not been assessed as meeting the significance threshold for scheduling as and may include~~ individually listed Heritage settings are not in themselves part of scheduled heritage items. Heritage settings may include:

- a. buildings;
- b. multiple heritage items
- c. ~~b-~~ structures or features, such as fences, walls and gates, bridges, monuments, gun emplacements, whale pots, lamp stands and public artworks;
- d. ~~c-~~ gardens, lawns, mature trees and landscaping, water features, historic landforms;
- e. ~~d-~~ access, walkways and cycle ways, circulation, paths and paving;
- f. ~~e-~~ land which is open space; and
- g. ~~f-~~ spatial relationships.

Heritage settings exclude entries in Appendix 9.3.7.2 Schedule of significant historic heritage where the associated heritage item has been demolished or relocated from the setting.

Appendix 2 – Mitre Hotel, 40 Norwich Quay, Lyttelton - Demolition

21 September 2023

Mitre Hotel Holdings Limited
178 Bridle Path Road
Heathcote
Christchurch 8022

Dear Mitre Hotel Holdings Limited

Your building will be removed from the earthquake prone building (EPB) register

Building Name: Mitre Tavern
Site Address: 40 Norwich Quay, Lyttelton
Legal Description: Pt Sec 9 Lyttelton Town

We have now received evidence that the building has been demolished, therefore the section 133AL earthquake prone building notice (EPB) has been complied with and we will remove the building from the EPB register.

If you would like to talk to us you can call 03 941 8999 and ask to speak to a member of the earthquake prone buildings team or email DEEs@ccc.govt.nz.

Yours sincerely



Richard L Gant
Technical Advisor / Engineer
Earthquake Prone Buildings Structures
Building Consenting Unit

Appendix 3 – PC13 and PC14 Provisions: scope of components and navigation (including links)

Development of proposed heritage provisions

A set of amendments to heritage provisions was developed as Draft Plan Change 13 prior to the development of Plan Change 14, and then on the basis that historic heritage is a Qualifying Matter, these provisions were duplicated in PC14 with “PC13 only” provisions and sites highlighted that were located in zones outside the urban environment subject to PC14. As PC14 and PC13 were notified together they had joint communications, a joint public notice and a joint summary of submissions process¹². Permission was sought from submitters who had made submissions on one plan change that were instead (or also) partly or entirely “on” the other plan change to have the relevant parts of their submission heard on the other plan change¹³.

Components of proposed heritage provisions	PC14 Heritage Items qualifying matter	“PC13 only” ¹⁴
<ul style="list-style-type: none"> • An update of district-wide heritage provisions across district plan chapters comprised of: <ul style="list-style-type: none"> (a) limited changes to policies and to activity statuses (see Appendix 7 to this summary and the Waikanae case table on page 26 of Suzanne Richmond’s primary evidence¹⁵). (b) numerous minor changes to rules seeking to improve clarity. <p>Notified PC13 heritage provisions This link provides the whole proposed heritage provisions package in one place corresponding with the content which was duplicated throughout the</p>	<ul style="list-style-type: none"> • Proposed heritage policies and rules apply city-wide across all scheduled heritage items including operative and proposed heritage items on sites in the urban environment subject to PC14. • Proposed heritage items provisions as amended by s42A reporting: <ul style="list-style-type: none"> - PC14 for s42A - Chapter 2 Abbreviations and Definitions - Sub-chapter 6.8 Signs (as notified) - PC14 for s42A - Chapter 8 - (8.1-8.9) Subdivision, Development and Earthworks - Earthworks amendments proposed - evidence of Marcus Langman on 	<ul style="list-style-type: none"> • Specific highlighted references to rules relating to sites outside the urban environment subject to PC14, generally relating to the Akaroa Township Heritage Area. <p>Sub-Chapter 9.3 Historic Heritage – Appendix 9.3.7.2 pp29 – 74 (s42A version)</p>

¹² Council web page communication on PC14 and 13 joint submissions process: <https://ccc.govt.nz/news-and-events/public-notice/show/1085>

¹³ This comment is relevant to both heritage and non-heritage submission points, as some submitters submitted only on PC13 but should have submitted on PC14 e.g. character submission points. Some submitters on heritage matters submitted on PC14 only, some submitted on PC13 only, and others submitted on heritage points in both plan changes.

¹⁴ “PC13 only” term referred to in communications for combined Summary of Submissions for PC13 and 14.

¹⁵ [07 Suzanne Richmond Section 42A Report final](#) (link)

<p>separate notified chapters in PC14 (see column two).</p> <p>Updates to the notified Heritage Items provisions in response to s42A reporting are reflected in PC14 links in the second column and are limited to:</p> <p>Subchapter 8.9.2 and 8.9.3 Earthworks (Council submission)</p> <p>Subchapter 9.3 Historic Heritage</p> <ul style="list-style-type: none"> - changes to Schedule of historic heritage items in 9.3.7.2 - minor change in 9.3.4.1.1 P14. <p>Subchapter 9.4 Significant and other Trees</p> <ul style="list-style-type: none"> - minor changes to 9.4.4.1.1 P5, P6 and P12) (cross-references to heritage provisions). 	<p>behalf of Council para 87 (bb), (cc)</p> <ul style="list-style-type: none"> - PC14 for s42A - Sub-Chapter 9.3 Historic Heritage (see also Appendix 2 to this Summary Statement of Suzanne Richmond - suggested Demolition policy amendments). - Sub-chapter 13.2 SP Cemetery (as notified – proposed amendments to Appendix 13.2.6.1 and 13.2.6.2 only) - PC14 for s42A - Chapter 15 - Commercial - Chapter 15.15 - Appendices (as notified – proposed amendments to Appendix 15.15.7 only). 	
<ul style="list-style-type: none"> • Corrections and updates to the operative heritage items schedule in Appendix 9.3.7.2, linked heritage aerial maps and planning maps, including to reflect changes in the existing environment such as demolitions, and to give effect to resource consents for demolition, partial demolitions and subdivisions. 	<ul style="list-style-type: none"> • Includes amendments and reduced heritage protection/restrictions in relation to sites containing heritage items and settings in the urban environment subject to PC14: Sub-Chapter 9.3 Historic Heritage – Appendix 9.3.7.2 pp29 – 74 (s42A version) 	<ul style="list-style-type: none"> • Includes amendments to heritage items and settings in zones outside the urban environment (see various amendments to highlighted items): Sub-Chapter 9.3 Historic Heritage – Appendix 9.3.7.2 pp29 – 74 (s42A version)
<ul style="list-style-type: none"> • Proposed scheduling of 44 additional heritage items and settings (plus proposed addition of Spreydon Lodge via Council submission).¹⁶ 	<ul style="list-style-type: none"> • Proposed 17 new heritage items and settings located in the urban environment subject to PC14. Subject to operative and proposed rules of existing Heritage Items QM. • See also Waikanae case table on page 26 of 	<ul style="list-style-type: none"> • Includes proposed heritage items and settings in zones outside the urban environment which are “PC13 only” • See highlighted proposed items on

¹⁶ [Evidence of Marcus Langman on behalf of Council para 81\(a\) \(link\)](#)

	primary evidence of Suzanne Richmond.	the list on the following pages.
<ul style="list-style-type: none"> Proposed scheduling of 26 additional heritage interiors. 	<ul style="list-style-type: none"> 25 of the additional proposed interiors for protection are for heritage items located in the urban environment subject to PC14, including 9 interiors for proposed new heritage items and settings. Protection of interiors of heritage items has very limited impact on development capacity, although it does restrict internal subdivision of the heritage item. 	<ul style="list-style-type: none"> Includes 1 interior for a proposed heritage item and setting in a zone outside the urban environment which is "PC13 only" i.e. 524 Pound Road, Yaldhurst (Rural Urban Fringe Zone). See highlighted proposed interior on the list on the following pages.
<ul style="list-style-type: none"> Proposed scheduling of 11 Residential Heritage Areas 	<ul style="list-style-type: none"> Proposed Residential Heritage Areas duplicated in PC14 chapters (links above). All proposed areas are in the urban environment subject to PC14. S42A reporting by Glenda Dixon and Dr Ann McEwan. Operative areas policy and Akaroa Heritage Area subject to matters of discretion (no area-based rules). Amended policies and new rules package proposed to support introduction of RHAs. This relates to the mechanics of how the Qualifying Matter works to be less enabling of development in order to meet s6f RMA obligations. Proposed Residential Heritage Areas provisions as amended by s42A reporting: <ul style="list-style-type: none"> - 06 Glenda Dixon Section 42A Report FINAL - 06 Glenda Dixon - Summary Statement - Hearing 01 November 2023 	

Appendix 4 - Proposed heritage items in Plan Changes 13 and 14 (“PC13 only” sites outside of PC14 urban environment **highlighted)**

	Street #	Street Address	Location	Description and/or Name	Significance	New Listing or New Interior
1.		Alpha Avenue, Claremont Avenue, Condell Avenue, Dormer Street, Gambia Street, Halton Street, Hartley Avenue, Kenwyn Avenue, Lansbury Avenue, Norfolk Street, Perry Street, Scotston Avenue, St James Avenue, Tillman Avenue, Tomes Road, Windermere Road	Papanui	Papanui War Memorial Avenues	Highly Significant	New Listing
2.	28	Bealey Avenue	Central City	Knox Presbyterian Church and Setting	Highly Significant	New Listing of exterior – previously interior only listed
3.	25	Butterfield Avenue	Linwood	Linwood Cemetery	Highly Significant	New Listing
4.	9	Ford Road	Opawa	Dwelling and Setting	Significant	New Listing and new interior
5.		Harper Avenue, Bealey Avenue, Carlton Mill Road, Park	Central City	Carlton Bridge and Setting	Significant	New Listing

		Terrace intersection				
6.		Hereford Street, between Cambridge-Oxford	Central City	Hereford Street Bridge and Setting	Significant	New Listing
7.	167	Hereford Street	Central City	Commercial Building and Setting	Significant	New Listing
8.	129	High Street	Central City	Commercial Building and Setting, Former Bank of New Zealand	Significant	New Listing and new interior
9.	29	Major Aitken Drive	Cashmere	Former Cashmere Sanatorium Open Air Hut and Setting	Significant	New Listing and new interior
10	159	Manchester Street	Central City	Commercial Building and Setting, Former Canterbury Terminating Building Society	Highly Significant	New Listing and new interior
11	213	Marine Parade	New Brighton	New Brighton War Memorial, Amphitheatre and Setting	Highly Significant	New Listing
12	152	Oxford Terrace	Central City	Commercial Building and Setting, Former Public Trust Office	Highly Significant	New Listing and new interior
13	524	Pound Road	Yaldhurst	Yaldhurst Memorial Hall and Setting	Significant	New Listing and new interior
14	35	Rata Street	Riccarton	Dwelling and Setting	Significant	New Listing and new interior
15	34	Roker Street	Somerfield	Sydenham Cemetery	Highly Significant	New Listing
16	7	Rue Pompallier	Akaroa	French Cemetery	Highly Significant	New Listing
17	47	Studholme Street	Somerfield	Somerfield War Memorial Community Centre and Setting	Significant	New Listing and new interior

18	5	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
19	7	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
20	8	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
21	9	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
22	34	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
23	35	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
24	36	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
25	37	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
26	38	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
27	39	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
28	40	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
29	41	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
30	42	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
31	43	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
32	44	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
33	45	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
34	46	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
35	48	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
36	51	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
37	52	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
38	55	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
39	58	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
40	60	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing

41	69	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
42	70	Taylor's Mistake Bay	Scarborough	Bach and Setting	Significant	New Listing
43	20	Templar Street	Richmond	Former Dwelling/Studio, Garden and Setting, The Sutton Heritage House and Garden	Highly Significant	New Listing and new interior
44	157	Woodham Road	Avonside	Former Woodham Park Caretaker's House and Setting	Significant	New Listing and new interior

Appendix 5 - Proposed additional building interiors for protection in Plan Changes 13 and 14 (“PC13 only” site outside of PC14 urban environment **highlighted)**

	Street #	Street Address	Location	Description and/or Name	Scheduled Interior	Significance	New Listing or New Interior
1.	9	Ford Road	Opawa	Dwelling and Setting	Yes	Significant	New Listing and new interior
2.	129	High Street	Central City	Commercial Building and Setting, Former Bank of New Zealand	Yes - limited to ...	Significant	New Listing and new interior
3.	159	Manchester Street	Central City	Commercial Building and Setting, Former Canterbury Terminating Building Society	Yes - limited to ...	Highly Significant	New Listing and new interior
4.	152	Oxford Terrace	Central City	Commercial Building and Setting, Former Public Trust Office	Yes - limited to ...	Highly Significant	New Listing and new interior
5.	524	Pound Road	Yaldhurst	Yaldhurst Memorial Hall and Setting	Yes	Significant	New Listing and new interior
6.	35	Rata Street	Riccarton	Dwelling and Setting	Yes	Significant	New Listing and new interior
7.	47	Studholme Street	Somerfield	Somerfield War Memorial Community Centre and Setting	Yes	Significant	New Listing and new interior
8.	20	Templar Street	Richmond	Former Dwelling/Studio, Garden and Setting, The Sutton Heritage House and Garden	Yes	Highly Significant	New Listing and new interior
9.	29	Major Aitken Drive	Cashmere	Former Cashmere Sanatorium Open Air Hut and Setting	Yes	Significant	New Listing and new interior
10.	157	Woodham Road	Avonside	Former Woodham Park Caretaker's House and Setting	Yes	Significant	New Listing and new interior
11.	49	Bryndwr Road	Fendalton	St John's Methodist Church, Lychgate and Setting	Yes	Highly Significant	New Interior
12.	65	Cambridge Terrace	Central City	Commercial Building and Setting	Yes	Highly Significant	New Interior

13.	86	Chester Street East	Central City	Dwellings and Setting	Yes	Significant	New Interior
14.	88A	Clyde Road	Fendalton	Dwelling and Setting, Kooringa	Yes	Significant	New Interior
15.	2	Cunningham Terrace	Lyttelton	Dwelling and Setting	Yes	Significant	New Interior
16.	66	Derby Street	St Albans	Dwelling and Setting	Yes	Significant	New Interior
17.	66	Gloucester Street	Central City	Former CSA / CoCA Gallery and Setting	Yes	Highly Significant	New Interior
18.	272	Hereford Street	Central City	St Luke's Chapel and Setting	Yes	Significant	New Interior
19.	59	Hewitts Road	Merivale	St Andrew's Church and Setting	Yes	Highly Significant	New Interior
20.	16	Kahu Road	Fendalton	Former Dwelling and Setting, Deans Cottage	Yes	Highly Significant	New Interior
21.	24	McDougall Avenue	St Albans	Former Dwelling and Setting, Fitzroy	Yes	Highly Significant	New Interior
22.	381	Montreal Street	Central City	Dwelling and Setting, Ironside House	Yes	Significant	New Interior
23.	399	Papanui Road	Papanui	Dwelling and Setting, Woodford	Yes	Significant	New Interior
24.	51	Radley Street	Woolston	Dwelling and Setting	Yes	Significant	New Interior
25.	33	Rolleston Avenue	Central City	Christ's College Former Hare Memorial Library and Classrooms and Setting	Yes	Highly Significant	New Interior
26.	37	Valley Road	Cashmere	Former Dwelling and Setting, Ngaio Marsh House	Yes	Highly Significant	New Interior

Appendix 6 - Operative management of heritage items in the Christchurch District Plan and proposed changes to activity status for existing heritage items Qualifying Matter

Operative District Plan	PC14 activity status
<p>Signage: freestanding signage and signage on heritage items (buildings), on buildings in heritage items which are open spaces, and in heritage settings subject to:</p> <ul style="list-style-type: none"> - signage built form standards in 6.8.4.2 (Permitted if comply) or activity rules 6.8.4.1.3 RD and 6.8.4.1.4 Discretionary - heritage signage activity standards in 9.3.4.1.1 P6 and RD7. 	<p>Permitted/RD/D - No change Activity standards in 9.3.4.1.1 to be deleted (one retained).</p>
<p>Subdivision of land which includes a <u>heritage item</u> or <u>heritage setting</u> listed in Appendix 9.3.7.2:</p> <ul style="list-style-type: none"> - subject to 8.5.1.3 RD10. 	<p>RD - No change</p>
<p>Earthworks – subject to activity standard 8.9.2.1 i. (consent threshold below) and 8.9.2.3 RD1.</p> <p><u>Earthworks</u> shall not occur within 5 metres of a <u>heritage item</u> or above the volumes contained in Table 9 within a <u>heritage setting</u> listed in Appendix 9.3.7.2.</p> <p>Exemptions include:</p> <p>iv. Any <u>earthworks</u> subject to an approved <u>building</u> consent where they occur wholly within the footprint of the <u>building</u>.</p> <p>x.ii. <u>Earthworks</u> undertaken by <u>Council</u> or Canterbury Regional Council to maintain or upgrade their own parks and <u>reserves</u>.</p>	<p>Permitted – (amended activity standard 8.9.2.1 i. for submitting temporary protection measures), or 8.9.2.3 RD1 applies – No change.</p> <p>More permissive in most cases, but iv. and xii. scenarios also required to meet activity standard.</p>
<p>Maintenance - Permitted (activity standards) 9.3.4.1.1 P1</p>	<p>Permitted (activity standards) – No change</p>
<p>Repair - Permitted (activity standards) 9.3.4.1.1 P2 (includes minimum Building Code compliance)</p>	<p>Permitted (activity standards) – No change, other than for Building Code compliance component which moves to Heritage upgrade works/Heritage Building Code works RD – see below)</p>
<p>Heritage investigative and temporary works – Permitted (activity standards) 9.3.4.1.1 P3</p>	<p>Permitted (activity standards) – No change</p>
<p>Temporary Buildings - in heritage items which are open spaces, and in heritage settings - Permitted (activity standards) 9.3.4.1.1 P4/P5 or RD</p>	<p>Permitted (activity standards) or RD – No change, removal non-notification clause</p>

Development above underground heritage items - Permitted (activity standards) 9.3.4.1.1 P7	Permitted (activity standards) – No change
Works under CER Act 2011 - Permitted 9.3.4.1.1 P8	Permitted – amended to emergency legislation generally – no change
Boulder Bay or Taylors Mistake Bay baches - No rule	Permitted - Demolition works to Boulder Bay or Taylors Mistake Bay baches where licence to occupy cancelled 9.3.4.1.1 P7 (amended numbering)
Replacement of non-scheduled structures required as a result of earthquake damage in heritage settings or in heritage items which are open spaces – Permitted 9.3.4.1.1 P9 (no qualifying activity standards)	Permitted removal in heritage settings - no change , or RD for new buildings and alteration to structures in heritage items which are open spaces
Works to non-scheduled structures in heritage settings - Permitted (not explicitly covered in rules)	Permitted – no change (but made explicit in rules)
Heritage upgrade works (<i>proposed to be renamed Heritage Building Code Works</i>), Reconstruction & Restoration – Highly Significant damaged items and Significant items - Permitted (activity standard – Heritage Works Plan) 9.3.4.1.1 P10, P11, or 9.3.4.1.2 C1/C2	Permitted (activity standard – Heritage Works Plan) - no change or RD , removal non-notification clause
Temporary lifting - Permitted (activity standards) 9.3.4.1.1 P12, or 9.3.4.1.2 C4 Temporary moving 9.3.4.1.2 C5 (<i>These activities generally form part of a wider scope of Building Code compliance works.</i>)	Permitted (activity standard – Heritage Works Plan for Heritage Building Code works) – no change in activity status for Temporary lifting, more permissive for Temporary moving, or RD (Heritage Building Code works), removal non-notification clause
Service systems - Permitted (activity standards) 9.3.4.1.1 P13 or RD1	Permitted (activity standards) or RD – no change
Works to monuments in church graveyards and cemeteries - Repair – Permitted (activity standards) 9.3.4.1.1 P2 or Alteration 9.3.4.1.3 RD1	Permitted - more permissive (works in Council cemeteries continue to be subject to Council permit)
Transplanting, or removal of a compromised mature tree in a heritage item which is an open space - Permitted (exclusion from Alteration definition)	Permitted (activity standard) – no change , makes activity status explicit in rules, or RD
Alteration and Partial Demolition 9.3.4.1.3 RD1 (external except where interior features identified in schedule)	RD - No change
New buildings in heritage settings and heritage items which are open spaces 9.3.4.1.3 RD2/RD3	RD - No change
Relocation within heritage setting - 9.3.4.1.3 RD4	RD - No change
Relocation beyond heritage setting 9.3.4.1.4 D1	D – No change
Demolition (Significant) 9.3.4.1.4 D2	D - No change
Demolition (Highly Significant) 9.3.4.1.5 NC1	NC - No change

Appendix 7 - Management of heritage items in the Operative District Plan: operative heritage objective and policies

Those objectives and policies proposed to be amended are identified with blue hyperlinks in the Operative District Plan like this underneath (not linked in this document):

[\(Proposed Plan Change 13 - This policy has immediate legal effect\)](#)

[\(Proposed Plan Change 14\)](#)

9.3.2 Objectives and Policies

9.3.2.1 Objectives

9.3.2.1.1 Objective - Historic heritage

- a. The overall contribution of [historic heritage](#) to the [Christchurch District's](#) character and identity is maintained through the protection and conservation of significant [historic heritage](#) across the [Christchurch District](#) in a way which:
 - i. enables and supports:
 - A. the ongoing retention, use and adaptive re-use; and
 - B. the [maintenance, repair, upgrade, restoration and reconstruction](#); [of historic heritage](#); and
 - ii. recognises the condition of [buildings](#), particularly those that have suffered earthquake damage, and the effect of engineering and financial factors on the ability to retain, restore, and continue using them; and
 - iii. acknowledges that in some situations demolition may be justified by reference to the matters in Policy [9.3.2.2.8](#).

9.3.2.2 Policies

9.3.2.2.1 Policy - Identification and assessment of historic heritage for scheduling in the District Plan

- a. Identify historic heritage throughout the Christchurch District which represents cultural and historic themes and activities of importance to the Christchurch District, and assess their heritage values for significance in accordance with the criteria set out in [Appendix 9.3.7.1](#).
- b. Assess the identified historic heritage in order to determine whether each qualifies as 'Significant' or 'Highly Significant' according to the following:
 - i. to be categorised as meeting the level of 'Significant' (Group 2), the historic heritage shall:
 - A. meet at least one of the heritage values in [Appendix 9.3.7.1](#) at a significant or highly significant level; and
 - B. be of significance to the Christchurch District (and may also be of significance nationally or internationally), because it conveys aspects of the Christchurch District's cultural and historical themes and activities, and thereby contributes to the Christchurch District's sense of place and identity; and
 - C. have a moderate degree of authenticity (based on physical and documentary evidence) to justify that it is of significance to the Christchurch District; and
 - D. have a moderate degree of integrity (based on how whole or intact it is) to clearly demonstrate that it is of significance to the Christchurch District.
 - ii. to be categorised as meeting the level of 'Highly Significant' (Group 1), the historic heritage shall:
 - A. meet at least one of the heritage values in [Appendix 9.3.7.1](#) at a highly significant level; and
 - B. be of high overall significance to the Christchurch District (and may also be of significance nationally or internationally), because it conveys important aspects of the Christchurch District's cultural and historical themes and activities, and thereby makes a strong contribution to the Christchurch District's sense of place and identity; and
 - C. have a high degree of authenticity (based on physical and documentary evidence); and
 - D. have a high degree of integrity (particularly whole or intact heritage fabric and heritage values).
- c. Schedule significant historic heritage as heritage items and heritage settings where each of the following are met:
 - i. the thresholds for Significant (Group 2) or Highly Significant (Group 1) as outlined in [Policy 9.3.2.2.1](#) b(i) or (ii) are met; and
 - ii. in the case of interior heritage fabric, it is specifically identified in the schedule;

unless
 - iii. the physical condition of the heritage item, and any restoration, reconstruction, maintenance, repair or upgrade work would result in the heritage values and integrity of the heritage item being compromised to the extent that it would no longer retain its heritage significance; and/or
 - iv. there are engineering and financial factors related to the physical condition of the heritage item that would make it unreasonable or inappropriate to schedule the heritage item.

(Proposed Plan Change 13 - This policy has immediate legal effect)

(Proposed Plan Change 14)

9.3.2.2.2 Policy - Heritage areas

- a. Identify groups of related historic heritage within a geographical area which represent important aspects of the Christchurch District's cultural and historic themes and activities and assess them for significance and their relationship to one another according to:
 - i. the matters set out in Policy 9.3.2.2.1; and
 - ii. the extent to which the area is a comprehensive, collective and integrated place.
- b. Schedule historic heritage areas that have been assessed as significant in accordance with Policy 9.3.2.2.2 (a).

(Proposed Plan Change 13 - This policy has immediate legal effect)

(Proposed Plan Change 14)

9.3.2.2.3 Policy - Management of scheduled historic heritage

- a. Manage the effects of subdivision, use and development on the heritage items, heritage settings and heritage areas scheduled in Appendix 9.3.7.2 and 9.3.7.3 in a way that:
 - i. provides for the ongoing use and adaptive reuse of scheduled historic heritage in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long term retention, use and sensitive modernisation and the associated engineering and financial factors;
 - ii. recognises the need for a flexible approach to heritage management, with particular regard to enabling repairs, heritage investigative and temporary works, heritage upgrade works to meet building code requirements, restoration and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage; and
 - iii. subject to i. and ii., protects their particular heritage values from inappropriate subdivision, use and development.
- b. Undertake any work on heritage items and heritage settings scheduled in Appendix 9.3.7.2 in accordance with the following principles:
 - i. focus any changes to those parts of the heritage items or heritage settings, which have more potential to accommodate change (other than where works are undertaken as a result of damage), recognising that heritage settings and Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items;
 - ii. conserve, and wherever possible enhance, the authenticity and integrity of heritage items and heritage settings, particularly in the case of Highly Significant (Group 1) heritage items and heritage settings;
 - iii. identify, minimise and manage risks or threats to the structural integrity of the heritage item and the heritage values of the heritage item, including from natural hazards;
 - iv. document the material changes to the heritage item and heritage setting;
 - v. be reversible wherever practicable (other than where works are undertaken as a result of damage); and
 - vi. distinguish between new work and existing heritage fabric in a manner that is sensitive to the heritage values.

(Proposed Plan Change 13 - This policy has immediate legal effect)

(Proposed Plan Change 14)

9.3.2.2.4 Policy - Archaeological sites

- a. Assist Heritage New Zealand Pouhere Taonga in the identification and protection of archaeological sites.

9.3.2.2.5 Policy - Ongoing use of heritage items and heritage settings

- a. Provide for the ongoing use and adaptive re-use of heritage items and heritage settings scheduled in [Appendix 9.3.7.2](#) (in accordance with [Policy 9.3.2.2.3](#)), including the following:
 - i. repairs and maintenance;
 - ii. temporary activities;
 - iii. specific exemptions to zone and transport rules to provide for the establishment of a wider range of activities;
 - iv. alterations, restoration, reconstruction and heritage upgrade works to heritage items, including seismic, fire and access upgrades;
 - v. signs on heritage items and within heritage settings; and
 - vi. new buildings in heritage settings.

([Proposed Plan Change 13](#) - This policy has immediate legal effect)

([Proposed Plan Change 14](#))

9.3.2.2.6 Policy - Relocation of heritage items within and beyond heritage settings

- a. Provide for the relocation of a heritage item within its heritage setting scheduled in [Appendix 9.3.7.2](#), where the relocation will maintain the heritage significance of the heritage item.
- b. Protect a heritage item from relocation beyond its heritage setting, except:
 - i. when alternatives which retain the item within its heritage setting have been explored, and relocation is demonstrated to be the only reasonable option to provide for the retention and ongoing viable use, including adaptive re-use of the heritage item and maintaining heritage significance; and
 - ii. where the location provides a setting compatible with the item's heritage value.

([Proposed Plan Change 13](#) - This policy has immediate legal effect)

([Proposed Plan Change 14](#))

9.3.2.2.7 Policy - Utilities

- a. Ensure that utilities, where they are required by their locational, technical or operational requirements to be located within, or on, a heritage item or heritage setting scheduled in [Appendix 9.3.7.2](#) are appropriately designed, located and installed to maintain, as far as practicable, the particular heritage values of that heritage item or heritage setting.

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](#) 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 is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised;
 - iii. whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable;
 - iv. the ability to retain the overall heritage values and significance of the heritage item through a reduced degree of demolition; and
 - v. the level of significance of the heritage item.

(Proposed Plan Change 13 - This policy has immediate legal effect)

(Proposed Plan Change 14)

9.3.2.2.9 Policy - Awareness and education of historic heritage

- a. Enhance the community's awareness and understanding of the values of historic heritage, including sites of Ngāi Tahu cultural significance, through education initiatives.
- b. Promote the use of conservation plans.

9.3.2.2.10 Policy - Incentives and assistance for historic heritage

- a. Provide incentives (including financial incentives) and technical advice to assist in achieving the retention, conservation and ongoing use of historic heritage, including earthquake repairs and seismic strengthening, in recognition of the public good value of heritage to the community.

9.3.2.2.11 Policy - Future Work Programme

- a. The Council will facilitate further identification and assessment of heritage items, including interior heritage fabric, heritage settings and heritage areas for inclusion in the District Plan over time.

ADDENDUM TO SUMMARY STATEMENT – SUZANNE RICHMOND

1. The following are responses to questions raised by the Panel at the PC14 hearing on the Heritage Items topic on 23 November 2023. I address:
 - (a) Consultation with / level of agreement of owners of currently scheduled properties;
 - (b) Consultation / signalling of the nature of the changes proposed via PC14/PC13;
 - (c) Specific queries re two individual sites:

Consultation with / level of agreement of owners re existing heritage items

2. Prior to notification of the Christchurch Replacement District Plan, Council's Heritage team made direct contact with all owners of proposed new heritage items seeking their consent to include their property on the heritage schedule. Properties were not put forward for scheduling where the owner's consent was not obtained. My understanding is that letters were sent to owners of properties already scheduled in the operative City Plan and Banks Peninsula District Plan where the item had been confirmed as meeting the threshold for scheduling, informing them that their property would be proposed for scheduling in the Proposed Christchurch Replacement District Plan, and that they could make a submission on the proposal at public notification.

Consultation with heritage owners re PC14 and PC13

3. Again, during the preparation of PC14 and PC13, Council's Heritage team consulted with all owners of proposed new heritage items and interiors seeking their consent to include their property on the heritage schedule. Further detail on community/stakeholder pre-notification engagement is set out in section 3.5 of the PC13 heritage s32 report.¹
4. In relation to proposed amendments to heritage provisions at notification of PC14 and PC13, Council's joint consultation documentation in my view gave a reasonable signal to owners of the general nature of changes to provisions as the wording included: "strengthening of some rules".²

Submission seeking removal of Daresbury, 9 Daresbury Lane, from the heritage schedule in Appendix 9.3.7.2 (Daresbury Limited S874.14)

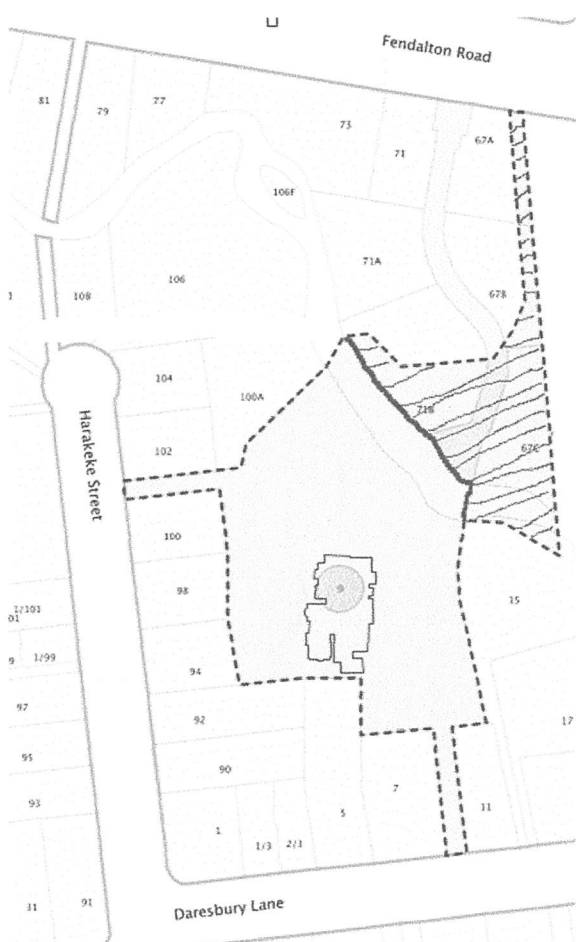
5. There are a number of protected trees on the immediate land parcel of the Daresbury homestead on the southwest side of the Waimairi Stream, which are within the heritage

¹ <https://www.ccc.govt.nz/the-council/plans-strategies-policies-and-bylaws/plans/christchurch-district-plan/changes-to-the-district-plan/proposed-changes-to-the-district-plan/pc13/>

²Online consultation documentation on PC13 referenced proposed strengthening of some provisions (Other Proposed Heritage Rule Changes heading): <https://ccc.govt.nz/the-council/community-consultation-archive/show/506> . PC13 information linked from PC14 communications: <https://ccc.govt.nz/the-council/community-consultation-archive/show/505> .

setting of the Daresbury heritage item, and are identified on page 13 of Appendix 9.4.7.1 Schedules of significant trees, under 9 Daresbury Lane.³

6. The part of the heritage setting to the northeast of the Waimairi Stream (on the opposite side of the stream from the homestead) has recently been subdivided.⁴ Council's GIS system had not been updated to reflect this at the time of preparation of amendments to the heritage schedule and mapping for notification of PC14 and PC13.



Above: Snip of Council's GIS heritage layer annotated (hatched) to show area of heritage setting to northeast of Waimairi Stream for which subdivision consent has been obtained under RMA/2020/2930.

³ PC14 for s42A - Sub-Chapter Appendix 9.4.7.1 Schedule of Significant Trees (link)

⁴ Subdivision consent RMA/2020/2930 granted 24/9/21, s224 certificate issued 19/12/22. A resource consent is currently being processed - RMA/2023/2100 for six two storey units on the lots to the northeast of the stream.

Submission seeking removal of Harley Chambers, 137 Cambridge Terrace, from the heritage schedule in Appendix 9.3.7.2 (Wynn Williams for Cambridge 137 Limited S1092.1 and S1092.2)

7. During the hearing last week, the Panel asked about the options that had been considered by the Council experts in terms of the retention of the Harley Chambers scheduled item, including façade retention.
8. In his evidence for Council⁵, Gavin Stanley has priced a range of options based on the Council's heritage engineering evidence of Stephen Hogg. These options include full repair and reinstatement of the building, demolition and construction of a new commercial building of equivalent area, and façade retention with a new commercial building behind, and have been compared with the equivalent submitter's costings.
9. I agree with Ms Ohs' conclusion, at paragraph 251 of her primary evidence, that the façade alone of this landmark central city heritage building could meet the heritage scheduling criteria in policy 9.3.2.2.1, noting that I have accepted that scheduling the façade or the whole building may be financially unreasonable under c. iv. of the policy. The operative heritage item extends almost to the property boundary and the heritage setting currently extends to the full land parcel. If space for a heritage setting is allowed behind a retained façade, as has been the practice with other scheduled façade only heritage items, this would allow for the assessment, via a restricted discretionary resource consent, of a new building in a heritage setting to ensure it retains the heritage significance of the heritage item.⁶

Date: 28 November 2023

Suzanne Richmond

⁵ Quantity Surveying evidence for Council of Gavin Stanley - summary statement, paragraph 4.5, and rebuttal evidence paragraph 57.

⁶ Façades scheduled as heritage items in the Christchurch District Plan include the Former AJ Whites (McKenzie and Willis) building, Duncans Buildings, Cotters, and Watson's Auctioneers buildings in High Street, and the Theatre Royal in Gloucester Street – primary evidence of Amanda Ohs, paragraph 157. Depending on the site layout, the approach to the mapping of the heritage setting for façade only heritage items has been to retain the extent of the heritage item's immediate land parcel or the outline of the demolished building as the heritage setting.