

**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

AND

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

**STATEMENT OF PRIMARY EVIDENCE OF TIMOTHY DAVID HOLMES ON
BEHALF OF CHRISTCHURCH CITY COUNCIL**

HERITAGE

QUALIFYING MATTER: HERITAGE (LISTED HERITAGE ITEMS)

Dated: 11 August 2023

TABLE OF CONTENTS

EXECUTIVE SUMMARY	1
INTRODUCTION	1
QUALIFICATIONS AND EXPERIENCE	3
CODE OF CONDUCT	4
SCOPE OF EVIDENCE	4
325 MONTREAL STREET, BLUE COTTAGE (SUBMISSION #824, GARTER GROUP LTD)	4
PORTSTONE 471 FERRY ROAD (SUBMISSION #1043, CAMERON PARSONSON)	8
THE MITRE HOTEL LYTTLETON (SUBMISSION #1056, MITRE HOLDINGS LTD.)	10
CONCLUSION	12

EXECUTIVE SUMMARY

1. My full name is **Timothy David Holmes**. I am employed as an architect and heritage specialist at Warren and Mahoney architects limited.
2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from the submissions and further submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
3. I have been asked to provide technical heritage evidence in regard to heritage as a Qualifying Matter specifically in relation to the following three submissions received on PC14 that seek to remove three properties from Appendix 9.3.7.2 Schedule of Significant Historic Heritage (**Schedule**):
 - (a) 325 Montreal Street, Blue Cottage (Submission# 824);
 - (b) Portstone, 471 Ferry Road (Submission #1043); and
 - (c) Mitre Hotel, Lyttleton (Submission # 1056).
4. Having reviewed the relevant documentation pertaining to the heritage value of the above three properties and assessed the historical significance of the above three properties, in my opinion all properties should remain heritage items identified in the Schedule.
5. Although each building has fallen into a state of disrepair or requires seismic strengthening to a greater or lesser degree, in the case of
 - (a) The Blue Cottage and Portstone, the extent of the works required will not affect the cultural heritage value of the building; and
 - (b) Mitre Hotel the works will result in a loss of heritage value, however the potential to retain the façade will result in a retention of a reasonable degree of heritage value.

INTRODUCTION

6. My name is **Timothy David Holmes** and I have been employed by Warren and Mahoney architects since December 2015, having begun practice in New Zealand in 2013 with Wilkie and Bruce architects. Prior to that I was located in Guernsey, Channel Islands where I was in practice for 18 years working on many heritage buildings and a wide range of projects. I carried

out a Postgraduate certificate in Heritage and archaeology 2020-2021 and am a certified Heritage professional in terms of the District Plan definition.

7. I was commissioned by Council, along with a structural engineer and a quantity surveyor to review three properties that are the subject of submissions seeking that the sites be removed from the Schedule. My role is to:
 - (a) review the submissions;
 - (b) review the repair and strengthening methodologies required to restore the properties and the effect repair and strengthening would have on the heritage fabric, its heritage value, significance, integrity and authenticity; and
 - (c) to consider alternative methods, potential for re-use of the properties and to comment on the heritage significance assessment.

8. In preparing this evidence I have:
 - (a) Reviewed the Council's Heritage Assessment – Statement of Significance for each property, read and considered the scope of works provided by the submitter, or where not provided, the most recent available information or assessment prepared as part of the Council's evidence in respect of a previous heritage submission and plan change process.
 - (b) Reviewed the submitters' heritage evidence and previous submissions and Council heritage evidence where provided.
 - (c) Carried out additional research as was reasonably practical within the short timeframes for preparing this evidence. This was internet based and in the main visual, through historic imagery on Google street view and Canterbury maps aerial photo viewer and historic photo layers¹.
 - (d) Met with Council Heritage Advisor Mr Gareth Wright and Structural engineer Ms Clara Caponi, regarding Portstone in the Warren and Mahoney offices on 19 July 2023. I have met Mr Wright Quantity Surveyor, Gavin Stanley, Clara Caponi and the building owner on site at Portstone on 24 July 2023. I met with Mr Stanley, Ms Caponi and

¹ <https://mapviewer.canterburymaps.govt.nz/>.

Council Heritage Advisor Amanda Ohs on site at the Mitre Hotel in Lyttleton on 24 July 2023.

- (e) Visited 325 Montreal Street alone to view the building fabric from the surrounding grounds and carpark on 25 July 2023.
- (f) Reviewed the Council's section 32 report relevant to the Schedule and more specifically the three properties raised in submissions.
- (g) Reviewed the Council's draft section 42A report on heritage prepared by Ms Suzanne Richmond.
- (h) Reviewed the draft evidence of Amanda Ohs in so far as it relates to 325 Montreal Street and the Mitre Hotel.

9. I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

- 10. I hold the qualifications of a BA Honours Degree in Architecture from Kingston University, a Professional diploma in architecture from London Metropolitan University, an RIBA Part 3 professional diploma from the University of Portsmouth, a Post Graduate certificate in Heritage and Archaeology from the University of Leicester, all in the United Kingdom. I was a Chartered member of the Royal Institute of British Architects from 2000 to 2013.
- 11. I have 29 years' experience of architectural work with heritage buildings, in England 1994-1996, Guernsey 1997-2013 and for the last 10 years in New Zealand.
- 12. I have worked on the Christ College Kitchen Tower strengthening project with Wilkie and Bruce, F-Block at The Arts centre of Christchurch, in a conservation architect role on a number of small building projects for Council Parks department, on the strengthening and refurbishment of Turnbull House in Wellington for Heritage New Zealand and I am project architect on the Christchurch Cathedral reinstatement project (since 2020) and one of the team of Heritage professionals on that project. I have been employed by Warren and Mahoney architects for eight years working on a variety of heritage and commercial projects.
- 13. I am a full member of ICOMOS New Zealand, a registered architect with the New Zealand Registered Architects board, a member of the New Zealand

institute of Architects and a registered architect with the UK Architects registrations board.

CODE OF CONDUCT

14. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

SCOPE OF EVIDENCE

15. My statement of evidence addresses the following submissions and related properties:
- (a) 325 Montreal Street, Blue Cottage (Submission# 824);
 - (b) Portstone, 471 Ferry Road (Submission #1043); and
 - (c) Mitre Hotel, Lyttleton (Submission # 1056).
16. I address each of these matters in my evidence below.

325 MONTREAL STREET, BLUE COTTAGE (SUBMISSION #824, GARTER GROUP LTD)

17. The Blue Cottage at 325 Montreal Street is a significant building with high contextual value as one of a group of early colonial houses that remain in the streets between Montreal Street and Hagley Park. The cottage is on the edge of a group of early colonial buildings within the cultural precinct of the Christchurch.
18. The building has not been properly maintained and although in a generally sound condition is currently in a state of disrepair.
19. The Council's Heritage Assessment and Statement of Significance² note the building's historical significance as a colonial cottage and former home for noted pianist Ernest Empson and also of William Townsend, well known chemist and male midwife. As an example of a colonial cottage displaying

²<https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Statement%20of%20Significance/Central%20City/HID%20390.pdf>
https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Planning%20Maps/Heritage%20Aerial%20Maps/HeritageBatchRevised_HAM184.pdf.

modest wealth it provides an interesting comparison to the architecturally more sophisticated Orari on the Southern corner of the Montreal street, Gloucester street intersection. I concur with the Statement of Significance.

20. Perhaps the most significant aspect of the Cottage is its corner setting and context as a landmark garden dwelling on the East side of the cultural precinct of the Central City.
21. Heritage or conservation architect reports have not been provided by the submitter, nor has a scope of work to support their submission. I have therefore referred to the earlier conservation evidence by Jackie Gillies³ and scope of work prepared for Christchurch city council by Mr Stanley in 2015 for The Christchurch Replacement District Plan Independent Hearings Panel.⁴
22. The current lack of use and state of disrepair does not diminish the significance of the building, however its heritage value is currently muted without use. The Ms Gillies' evidence in 2015 states "*I would suggest that as the sole remains of the Girls High School, its significance has increased.*" I agree with that view and would suggest that with the imminent completion of two houses, named Gallery Villas on the opposite, North East corner of the intersection of Montreal and Gloucester street, the Cottage regains its context as one of four standing buildings making up the intersection, along with the Christchurch Art Gallery and Orari on the South side of Gloucester street.
23. The scope of works developed by Ms Gillies had little impact on the heritage values of the building and set out to return the building to use by carrying out deferred maintenance work and decorations to make good.
24. I visited the property on 25th July 2023 to view the current state of the building from the outside only. It was not possible to gain a full understanding of the extent of disrepair due to this limited external viewing, however the building appears to be enduring its neglect remarkably well and is eminently capable of repair. As a timber building, repairs are relatively low cost and straightforward even with more exacting work methodologies demanded by heritage listed buildings.

³ <https://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3723-CCC-Evidence-of-Jackie-Gillespie-9.3-Heritage-EIC-3-12-2015.pdf>.

⁴ <https://chchplan.ihp.govt.nz/wp-content/uploads/2015/08/3723-CCC-Evidence-of-Gavin-Stanley-9.3-Heritage-3-12-2015.pdf>.

25. The Cottage has had the windows boarded up at some point between August 2020 and March 2022 (google street view) and has been allowed to fall into a further state of disrepair recently, where over last 12-18 months the Cottage has become covered in graffiti, which remains visible.
26. There are numerous areas on the façade of the building where maintenance is required. Given the lack of maintenance in the last 20 years the 2003 Dave Pearson Architects Conservation Plan⁵ reviewed for the purpose of drafting this evidence is no longer current and requires updating in light of the degradation that has taken place in the period since.
27. It appears as though no maintenance has been carried out for a number of years and weather boards with missing paint visible in the 2014 photograph featured on the front of the Heritage Assessment – Statement of Significance, remain undecorated.
28. There is evidence of historic borer, also mentioned in Dave Pearson Architects Conservation Plan, however the weather boards, although in need of some repairs and complete redecoration, are generally in a sound state. It is likely that the weatherboards are native timber from local sources that were productive in the 1870s, the only reference to timber species in the 2003 Conservation Plan, is to likely Kauri joinery to the windows.
29. There are areas of framing that will need to be replaced or repaired and extensive deferred maintenance and decoration which needs to be carried out. The rainwater goods generally need to be cleared of debris and repaired where required.
30. I cannot comment on the state of the internal building fabric as I have not been granted access.
31. I have discussed the building with structural engineer Ms Caponi, who has some concern over the condition of the foundation stones to the North and potentially others that cannot be seen at present. These can be repaired where broken and a methodology developed to connect new sections of framing to the reinstated stone or new sections of foundation, if this is proved to be necessary from further investigation.

⁵ Conservation plan "The Caretakers Cottage Cranmer Centre Christchurch" by Dave Pearson Architects prepared for Christs College, owners of the property at the time.

32. There are a wide range of uses that the restored building could be put to and few that would be incompatible with the cultural heritage value of the Cottage. The obvious and original use is residential, however there are a variety of other uses that could complement and support the wider development aims on the site as a whole, with numerous examples of similar, less significant, weatherboard colonial cottages being used in commercial ways. From consultancies, retail, tourism, hospitality, museums, or galleries etc.
33. The presence of the Cottage does not allow unfettered development of the site as a whole; however it does not restrict the site in a substantial way since it sits on the South edge and completes the Gloucester street residential street scape as it meets Montreal street.
34. I support Amanda Ohs suggestion of a reduced heritage setting⁶, on the basis that there was a dwelling to the West and a fence to the North, on those boundaries historically.
35. There are numerous massing arrangements that could be employed on the remainder of the site to respect the setting of the Cottage and maximise the value of this important urban site, in both heritage terms and otherwise, with significant boundaries to Montreal and Armagh Street and Cranmer square to the North.
36. When Christ's College sought to have the listing removed with a plan change submission in 2015, Jackie Gilles stated in her evidence then that "*Overall, both the interior and exterior could be repaired and made attractive, with little work.*" Although there has been further deterioration due to the lack of maintenance, I concur with that view now. The extent of work and the cost to carry it out have both increased and will continue to do so, however this is a modest timber framed building that stood up well to the 2010-11 earthquake sequence. It does not require significant strengthening and the most significant detrimental effects have been the lack of use and maintenance, waterproofing repairs and securing of the site.
37. In conclusion, I do not support the submission that the Blue cottage at 325 Montreal Street should be removed from the Schedule.

⁶ Diagram in Amanda Ohs Evidence Appendix 21.

PORTSTONE 471 FERRY ROAD (SUBMISSION #1043, CAMERON PARSONSON)

38. Portstone is a stone cottage constructed by Irish stone mason James Courtenay in 1863 from stone believed to come from the Moorhouse (Lyttleton) rail tunnel, being constructed at the time. It was damaged in the 2010 & 2011 earthquakes and without insurance, the owner has been unable to afford to complete the required strengthening and repairs.
39. The building is currently largely hidden behind overgrown trees and shrubs. This growth is putting the building at risk of further decay and should be cut back, however beyond this the building fabric, albeit in a damaged state that requires repair, is in otherwise in generally sound condition and capable of being repaired.
40. The strengthening works required to the external walls are extensive, however the majority of the walls do not require disassembly for the strengthening works to be carried out. The strengthening design which has been tabled by engineers Downing Thornton is in my opinion pragmatic and minimally invasive and in my experience of the seismic strengthening solutions for unreinforced masonry walled buildings, could be considered a light touch.
41. The strengthening solution utilises 10mm stainless steel rod pins, connecting through the walls to form a mesh of 6mm stainless steel wire, embedded within the main mortar joints externally. These are then hidden from sight by repointing the mortar joints and reapplying a rendered finish internally. Remarkably this engineering design solution requires no additional works to the foundations of the main external stone walls.
42. The owner stated that the roof is relatively new however, we were not able to verify this through internal inspection or documentation to support this. Noting that it appeared to be in sound condition and keeping the internal building fabric dry.
43. Community interest in heritage buildings is usually determined by their active use and the ability of the community to engage whether physically or visually with the building. When a building falls out of use it falls out of sight and out of mind. Therefore its potential as a heritage asset to the community, will not be realised until it is brought back into use and visibility. A moderate amount

of landscaping on the site will open visual and physical access to Portstone as deemed necessary by the owner.

44. The adaptive reuse of heritage buildings provides users with a connection to the past through the ability to interact with the historic setting of traditional materials and vernacular form of heritage buildings. This often provides a point of difference with similar accommodation or businesses in the locality and gives the locality a sense of gravitas and attraction beyond the use itself.
45. There are a wide range of uses that this building could be put to that would maintain the cultural heritage value of Portstone however, I understand that the costs associated with repairs and strengthening of a masonry building are high. This means that the works are likely to be uneconomic for few people beyond builders or stone masons who are able to carry out the works themselves.
46. I agree with the Council's Heritage Statement of Significance⁷, the wider connections that the builder and first occupier of Portstone, James Courtenay, brings to the building, its potential landmark status on Ferry Road and the fact there are so few stone houses left standing in Christchurch after the 2010/11 earthquakes, gives this building a unique story with connections to significant heritage sites in the wider City. It is a small yet significant building that is important among few stone buildings remaining in the City.
47. I have discussed other strengthening options and ideas of doing less work to the walls, with structural engineer Ms Caponi, to the point where I understand the efficiency in the methods proposed by Alistair Cattnach of Dunning Thornton and his design⁸. The main reason for this is that any additional internal structure would require substantial foundation works that would undermine the existing stone walls and require expensive and potentially extensive additional underpinning and foundation work to them.
48. In conclusion, I do not support the submission for removing Portstone from the Schedule.

⁷ <https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Statement%20of%20Significance/Central%20City/HID%20390.pdf>
https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Planning%20Maps/Heritage%20Aerial%20Maps/HeritageBatchRevised_HAM184.pdf

⁸ Ferry 471 (Portstone) Dunning Thornton Formalised Preliminary Design 2013-12-03 This document has not been appended due to size but can be provided to the Panel on request.

THE MITRE HOTEL LYTTLETON (SUBMISSION #1056, MITRE HOLDINGS LTD.)

49. The Mitre Hotel was constructed in 1926 as a replacement for the prior 1876 hotel which had burnt down in a fire. The current building was constructed in concrete and is a representation of the previous hotel. It was damaged in the 2010-11 earthquake sequence and has not been repaired and strengthened since.
50. I have reviewed the documents submitted as part of a 2020 resource consent application made by the owner (RMA20201325). These contain a statement of effects, Heritage impact statement, Heritage Report (both by the owner) structural engineers report by Structex, a costed builders report by Wheelers and letters between the owners and the council answering a Request For Information to the resource consent.⁹
51. Following the earthquakes some stabilisation measures were put in place to prevent the building from collapse. This has left the building with damage to the building envelope allowing weather to enter and has caused degradation to the internal fabric. The owner states that in 2013 sewage leaked through the building and the consequence of subsequent neglect to rectify this and make the building weathertight, has meant that the building is now in an unsanitary state and has been issued with a Dangerous and Insanitary Building Notice by the Council.
52. The loss of internal building fabric through removal by vandals and weather damage, combined with the earthquake damage mean that substantial repairs and replacement of heritage building fabric will be required.
53. The strengthening and reinstatement of the existing building fabric as it stands has been discounted as an option by the owner, since it is considered so disproportionately expensive in relation to the repair and reinstatement of contaminated and relatively low heritage value building fabric, that would involve intricate removal with complicated procedures in an unstable structural environment. I recognise this and support this pragmatic approach.
54. To bring the building back into use and maintain cultural heritage value and complete these works safely and efficiently, the entire building behind the

⁹ These documents have not been appended due to their size but can be provided to the Panel on request.

concrete façade requires removal and replacement. This would result in a loss of heritage value and degrade the significance of the building.

55. Façade retention is not an ideal heritage outcome. The 1920's concrete façade is not of high architectural value and would lose its integrity out of context of the prior building, in relation to a new structure and roof. To retain the façade a stabilisation structure would need to be installed to support the facade while works are carried out behind and the façade tied to it. This would involve closing the surrounding pavements and potentially a road lane for the period of the work, giving the work an impact beyond the site.
56. Were the Mitre to be repaired in its current form there are a number of uses that it could be adapted to, were the hospitality and residential accommodation of its current form is not viable. The site is in a prominent location at the front of the Lyttleton township facing the port on Norwich Quay and it has the potential to be a landmark in the town, as such it would continue the cultural heritage value of being the first building to visit following arrival for ship and port workers or yachtsmen.
57. I have discussed alternative approaches with Structural engineer Ms Caponi and it is not possible to fully assess the building without internal access. However, reading previous structural engineers assessment and builders costing proposals complete replacement of the building fabric with the exception of the facades to Canterbury street and Norwich Quay is the logical and achievable retention option available.
58. Ms Caponi advised that it would be feasible to repair the two concrete street façades and I can see that the window and door joinery, along with architectural details attached to the façade are capable of recovery and re-use.
59. The facade to the West is in a poor state of repair and has cracks which require repair and make its retention unviable. The façade to the North is difficult to assess given the limited access, however its removal would enable the contaminated and unstable building fabric to be removed and replaced efficiently.
60. I agree with the Councils' Statement of Significance¹⁰ and would confirm that the building retains its heritage significance despite the neglect and

¹⁰<https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Statement%20of%20Significance/Banks%20Peninsula/HID%201060.pdf>https://districtplan.ccc.govt.nz/Images/DistrictPlanImages/Planning%20Maps/Heritage%20Aerial%20Maps/HeritageBatchRevised_HAM387.pdf

dilapidated state which the building finds itself in due to the cultural heritage values of the building.

61. The architectural style and the form of the concrete and brick building is not of particularly high architectural quality or fashionable at this time, however it does represent a rough-edged colonial utilitarianism, befitting of an active port and the clientele it served. It is therefore appropriate that the building is scheduled.
62. I consider the highest cultural and heritage value of this place to be the social history that comes with the use of the site as a hotel and tavern. This is a place where significant departures and arrivals have been made to and from a building of a relatively low architectural quality. I therefore find the submission to remove the Mitre from the heritage list to be finely balanced, given the amount of heritage fabric that needs to be removed to clear, make the site sanitary, reinstate and strengthen the building with new material retention of the façade is the most realistic result. As stated above this is not an ideal outcome as there will be a loss of authenticity and integrity to the building.

CONCLUSION

63. In my opinion, the three properties discussed above have significant heritage value and should therefore remain in the Schedule. The key reasons for this recommendation are (in summary):
 - (a) 325 Montreal Street, Blue Cottage:
 - (i) Has high contextual value as an early colonial house in the central city.
 - (ii) Is the sole original building remaining on its site, where it predated the Christchurch girls high building that was demolished following earthquake damage in 2011.
 - (iii) Is capable of repair without reduction in cultural heritage value.
 - (iv) Could be put to a wide range of uses if the residential use is not retained without diminishing its cultural heritage value.
 - (b) Portstone, 471 Ferry Road:

- (i) Has high cultural heritage value as one of only a few remaining stone buildings in the City.
 - (ii) Is capable of repair without reduction in cultural heritage value.
 - (iii) Could be put to a wide range of uses if the residential use is not retained without diminishing its cultural heritage value.
- (c) Mitre Hotel, Lyttleton:
- (i) Has cultural heritage value with its social history of significant visitors and as the first or last building visited by generations using the Port.
 - (ii) Has a façade that is capable of being retained and therefore could retain the heritage values of the hotel.

Date: 11 August 2023

Timothy David Holmes