

**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 DR ANN ELIZABETH MCEWAN
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

QUALIFYING MATTERS: HERITAGE AND RESIDENTIAL HERITAGE AREAS

Dated: 11 August 2023

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EXECUTIVE SUMMARY

1. My full name is **Dr Ann Elizabeth McEwan**. I am an independent heritage consultant and since June 2021 I have been engaged by Christchurch City Council to assist with the preparation of Plan Change 13 as it relates to Residential Heritage Areas (**RHAs**).
2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of submissions made about Residential Heritage Areas to Plan Change 14 (**PC14**) to the Christchurch District Plan (the **District Plan**). This includes consideration of those submissions made on Plan Change 13 (**PC13**) where they are also within the scope of PC14.
3. My primary evidence before this hearing concerns the identification and assessment of RHAs in Christchurch and Lyttelton. This work was predicated on a study of residential Heritage Conservation Areas that was undertaken by Harrison Grierson in 2009-10; I was a member of the study team at that time.
4. The key points raised in my evidence concern the boundaries of the proposed RHAs, the inclusion of individual properties within them, and the potential for further RHAs to be scheduled.

INTRODUCTION

5. My name is **Dr Ann Elizabeth McEwan** and I am a heritage consultant with over 30 years' experience in the field. I hold a PhD in art and architectural history from the University of Canterbury, am an experienced peer reviewer and expert witness, and a full member of ICOMOS New Zealand.
6. Since I established Heritage Consultancy Services in 2006 I have undertaken the review of the built heritage schedules for the Kaipara, Thames-Coromandel, Waikato, Nelson, Waimakariri, Selwyn, Timaru and Gore district plans. I have also worked for Christchurch City Council on a number of heritage projects over the years, including assessing all of the currently proposed Residential Heritage Areas in the city.
7. I am the author of the 'Heritage Issues' chapter in *Planning Practice in New Zealand*, edited by Caroline Miller and Lee Beattie (LexisNexis, 2017/2022), which was given the John Mawson Award of Merit by the NZ Planning Institute in 2018. In 2015-16 and 2021 I was engaged as a Professional

Teaching Fellow in the School of Architecture and Planning at the University of Auckland. I have served on the Auckland, Hamilton and Waipa councils' Heritage Advisory Panels in the past.

8. In preparing this evidence I have:
 - (a) Read the submissions provided to me by the Council and referred to the corresponding RHA reports where necessary.
 - (b) Undertaken further field work on 18-20 June 2023 in order to view or review areas of the city raised in submission.
 - (c) Prepared 'Potential RHA review criteria template' reports, where necessary, to record my recommendation not to schedule streets nominated in submissions as potential RHAs.
 - (d) Revised individual record forms or RHA reports, where necessary, in response to submissions.
9. I am authorised to provide this evidence on behalf of the Council.

QUALIFICATIONS AND EXPERIENCE

10. I hold the qualifications of a PhD in Art and Architectural History from the University of Canterbury (2001).
11. I first worked for Christchurch City Council in the summer of 1995-96 when I was tasked with preparing assessment reports for scheduled items. I lectured in art and architectural history and heritage at the University of Waikato from 1996 until 2005 and thereafter established Heritage Consultancy Services.
12. I provide independent heritage consultancy services throughout New Zealand and appeared as an expert witness at the Christchurch Replacement Plan hearings in 2015. Previously, in 2009-10, I was part of an interdisciplinary team that undertook the identification and assessment of residential Heritage Conservation Areas for Christchurch City Council. This work formed a reference point for the more recent RHA project undertaken by Heritage Consultancy Services but was not determinative of it in light of the destruction caused by the Canterbury Earthquakes of 2010-11.

13. I am a full member of ICOMOS NZ, PHANZA (Professional Historians Association of New Zealand Aotearoa), and DOCOMOMO NZ.

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 matters:
- (a) RHA background & methodology;
 - (b) Chester Street East / Dawson Street RHA;
 - (c) Macmillan Avenue RHA;
 - (d) Inner-city West RHA;
 - (e) Heaton Street RHA;
 - (f) CPT North St Albans Subdivision (1923) RHA;
 - (g) Shelley/Forbes Streets RHA;
 - (h) Piko/Shand (Riccarton Block) State Housing RHA;
 - (i) Lyttelton RHA;
 - (j) Requested additional RHAs: Mary Street & Rayburn Avenue; Papanui War Memorial Streets, Beverley Street, Scott Street, Riccarton, Phillipstown, Dover Street; and
 - (k) Heritage significance of St James's Anglican Church, Riccarton
 - (l) Peer review of CCC heritage assessments.
16. I address each of these points in my evidence below.

RHA BACKGROUND & METHODOLOGY

17. The methodology for the identification and assessment of Residential Heritage Areas was formulated in 2009 for Christchurch City Council by an interdisciplinary team, of which I was a member, led by Harrison Grierson Consultants. Sidelined due to the impacts of the Canterbury Earthquakes, the 2009-10 Heritage Conservation Areas project established a matrix for identifying highly significant and representative residential heritage areas across the city. It also devised a ranking methodology with which to identify the extent to which each property within an area created, maintained or undermined the heritage values of the area as a whole.
18. Of the twelve residential Heritage Conservation Areas identified in 2009 for Christchurch City Council, seven were found to have retained sufficient heritage values to warrant scheduling as RHAs at this time. Three new areas (Chester Street East/Dawson Street, the Church Property Trustees' North St Albans Subdivision and Shelley & Forbes Streets in Sydenham) were identified as part of the current RHA project, based on new research and a consideration of the city's surviving heritage resources in the post-earthquake context. Given that the Lyttelton Heritage Conservation Area could not be progressed before the Canterbury Earthquakes, the assessment of the Lyttelton RHA is new although its values were identified in 2009.
19. Although not progressed in Christchurch via a plan change at the time, I was able to 'road test' the 2009-10 Heritage Conservation Areas report template and property categorisation in my work on the Thames-Coromandel District Plan in 2011-12. More recently I have used the same methodology as part of the review of the heritage schedule in the Timaru District Plan (2020). In principle and in practice I have found the RHA approach to be both workable and comparable to Heritage New Zealand Pouhere Taonga's historic area list entries.
20. With regard to the categorisation of properties within each RHA the distinction drawn between Defining, Contributory, Neutral and Intrusive sites is intended to have two outcomes or uses; first; to establish whether a potential area accommodates a sufficient number of Defining and Contributory elements to embody significant heritage values and, secondly, to provide the basis for a nuanced planning response to facilitate the ongoing protection of heritage values from inappropriate subdivision, use

and development. The definitions for each categorisation, which are included in each RHA report, rely on the key words 'establish', 'support', 'neither establish, support nor detract' and 'detract' to identify and explain the contribution each site makes to the heritage values of the area as a whole. Ranking of sites within the RHA is a qualitative process, underpinned by the 'Criteria for the assessment of significance of heritage values' contained within the District Plan (Appendix 9.7.3.1) and elaborated upon in the individual site record form for each property within the RHA.

21. I note that submissions # 814 (Carter Group Property Limited) and # 823 (Catholic Diocese of Christchurch) request that the definitions of Defining, Contributory, Neutral and Intrusive buildings and/or sites be deleted on the basis that they are 'vague' and provide 'little certainty' as to what would or would not constitute a property subject to one of the four ratings. I recommend the relevant submission points are rejected on the basis that without definitions the ratings would be vague, because they would offer no direction to owners or the Council as to the justification for an RHA, and create uncertainty around the implementation of the planning framework.
22. As part of the RHA work programme I reviewed 34 potential RHAs prior to notification of Plan Changes 13 and 14 and found that the methodology for RHA identification and assessment provided a rigorous benchmark against which nominated RHAs could be measured. I also found that the 'Potential RHA review criteria template' devised by Council staff to record my review of potential RHAs was fit for purpose and gave rise to concise documents for areas that did not meet the threshold for significant heritage value and thus scheduling. In the case of both the 'Residential Heritage Area Record Form' and the 'Potential RHA review criteria template' I believe that both place the appropriate emphasis on heritage significance, authenticity and integrity and give effect to the 'Criteria for the assessment of significance of heritage values'.
23. Several submissions to PC13 referred to the general intent and/or methodology used in the proposed scheduling of RHAs. Submission # 1028 (Rob Seddon-Smith) requested that a 'clear definition' of the heritage character of each area be provided by Council. This is the purpose of the RHA report for each area, wherein the contribution of each individual property to the subject RHA is also provided. I therefore consider that Council has already addressed the action requested by this submitter.

24. Submission # 1030 (Paul Mollard) opposed the identification and scheduling of all RHAs in Christchurch and questioned the existence of 'any unique or distinguishing features' in the RHAs that have been put forward in PC13. I consider that the assessment reports for each RHA identify the significant heritage values of each area, which therefore merit protection under RMA s6(f). Furthermore I can assure the panel that I was not subject to any advocacy from local residents, as is implied in the submission, to recommend scheduling of RHAs. I do not consider that this submission should be accepted, on the grounds that significant historic heritage resources deserve protection under the Act and according to the Canterbury Regional Policy Statement and Christchurch District Plan.
25. General support for the RHAs was offered in submissions # 145 (Te Mana Ora Community and Public Health), # 404 (Lawrence Kiesanowski) and # 428 (Sarah Wylie). I consider that these submissions should be accepted and the RHAs should therefore be retained within the Council's Schedule of Heritage Areas at Appendix 9.3.7.3.

CHESTER STREET EAST / DAWSON STREET RHA

26. A number of submissions were made in respect of the proposed Chester Street East / Dawson Street RHA. In several submissions, reference was made to a September 2022 decision by the Council to extend the RHA to take in the whole length of Chester Street East. I am informed that decision was rescinded at a Council meeting held on 1 March 2023. I was not aware of that recommendation when I supplied a boundary review report to the Council in October 2022, which confirmed the mapped extent of the RHA. The following comments are made on the basis of the RHA that I identified, assessed and mapped for the Council.
27. Submission # 1001 (Kerstin Rupp) requested that the Council's September 2022 decision to extend the RHA the full length of Chester Street East be adopted. The submitter considers that the recommended RHA would create a divide in the community that would undermine its sense of identity and character. While I acknowledge the community feeling evidenced by this and other similar submissions, the RHA has been assessed on the basis of the presence, or not, of significant historic heritage values embodied in the built environment. For that reason, and after careful consideration, I do not consider the eastern portion of Chester Street East merits scheduling as an RHA.

28. Submission #s 1002 (Keith Paterson & Helen Verity), 1022 (Bosco & Helen Peters), and 1024 (Marius and Roanna Purcaru) all requested that the RHA be extended the full length of Chester Street East. The submitters also requested that an enlarged RHA include the property bounded by Kilmore Street and Fitzgerald Avenue that is the former Ward's Brewery site. Heritage setting 374 encompasses both the scheduled historic heritage items on this site (heritage items 204 & 1295) as well as the building at 173 Chester Street East, which is the subject of submission # 22 (see below).
29. In the absence of a direct connection between the brewery and the residential development of Chester Street East I do not consider that extension of the RHA is either warranted or necessary to protect the heritage values of either the RHA or the former Ward's Brewery site. Furthermore I consider that the residential development on Chester Street East to the east of 147 Chester Street East (on the north side) and Chesterfields Park (on the south side) lacks sufficient authenticity and integrity to merit inclusion in the RHA. A similar approach to mapping the RHA can be seen, for example, in the Heaton Street RHA. The submitters refer, mistakenly in my opinion, to the use of a 'percentage-of-historic-dwelling calculation system' by me and suggest that recent demolitions in the street are somehow the result of the exclusion of the eastern end of the street from the RHA. I refute this assertion and confirm that I did not consider the eastern sector merited inclusion in the RHA before any demolitions to which the submitters refer. Furthermore I do not consider that there is a relationship between the Chester Street RHA and the Englefield Avonville RHA other than one of physical proximity. I therefore recommend that these submissions are rejected.
30. Submission # 1002 further requested that the RHA be extended to include the section of Kilmore Street bounded by Dawson Street in the east and Barbadoes Street in the west. This proposal appears to involve nine properties, including the scheduled heritage item overlooking the intersection of Kilmore and Barbadoes Streets (HID # 316). The submitters consider that such an amendment would add 'properties with significant historical, architectural and contextual values' to the RHA and also create a buffer to better protect the 'Defining' buildings lining Chester Street East. It is assumed from the submission that properties addressing Barbadoes Street between Kilmore and Chester Streets East would be excluded from the RHA if the submission was accepted. The submitters have provided

some commentary about the potential heritage values of the Kilmore Street properties and acknowledge that an assessment of the properties at 203-250 Kilmore Street would be needed before it could be incorporated into the RHA.

31. I undertook a site visit on Monday 19 June 2023 and while I observed some villa and bungalow style dwellings I do not consider that the section of street in question retains sufficient authenticity and integrity to merit scheduling. For that reason I recommend that this submission point be rejected.
32. Notwithstanding the recommendation above, I did observe on the same site visit that the cottages at 341, 345 and 347 Barbadoes Street warranted consideration as an extension to the RHA. Having established that they predate 1877, were erected as early rental accommodation, and would likely be rated as Defining (# 347) and Contributory (#s 341 and 345) features in the RHA, I recommend that the Chester Street East RHA be extended to encompass these three properties.
33. Submission # 1007 (Ian & Karen Shaw) also requested that the RHA be extended the full length of Chester Street East and amended to include the Kilmore Street properties that border the RHA, being directly to the north of 129, 131 and 133 Chester Street East. While this submission is narrower than that provided by Submission # 1002 it appears to have the same intent and has therefore been considered within the context of the more holistic submission discussed above. For the reason stated above I do not believe this submission should be accepted.
34. Submissions #s 1013 (Simon Adamson & Judith Hudson), 1014 (Susan Parle), 1015 (Mary Crowe, see also # 281), and 1052 (Bradley Nicolson for the Oxford Terrace Baptist Church) all requested that the RHA be extended the full length of Chester Street East.
35. Dr Anderson and M/s Hudson acknowledged that 'the Eastern quarter of Chester St East lacks the same density of historic structures' but contend that the RHA should, with particular reference to 173 CSE, encompass the full street to maintain the integrity of the community. Whilst understandable I believe that the identification of RHAs needs to be robust and defensible and that an extension to the east of the RHA would be inconsistent with the approach taken across the city. In my opinion the view stated in this submission, and others, that Chesterfields Park should be at the heart and not the edge of the RHA is a misunderstanding of the RHA methodology.

While this submission, and others, clearly demonstrate the cultural importance of the street as a whole to members of the community the properties that have been excluded from the RHA do not demonstrate sufficient authenticity and integrity to warrant inclusion in the RHA.

36. M/s Parle and M/s Crowe sought the extension to protect the 'character' of the street. Given that the RHAs are identified in order to protect significant heritage values and not to manage the maintenance of character features I do not consider that these submissions challenge the boundaries of the RHA.
37. No further information was supplied by Mr Bradley to support his request.
38. Submission # 1016 (Waipapa Papanui-Innes-Central Community Board) supported the RHAs in general and requested that the full length of Chester Street East be included in the RHA, partly in order to create a continuity of zoning between the Chester Street East and Englefield Avonville RHAs. This submission has not made me revise my opinion that the east end of Chester Street East does not merit inclusion in the RHA.
39. Submission # 22 (Peter Beck) also requested that the RHA be extended the full length of Chester Street East, in keeping with the cited Council decision. In making that request the submitter mistakenly suggests that I applied a 'percentage-of-historic-dwelling calculation system' when determining the boundaries of the RHA. What was taken into account were the low numbers of potential 'Defining' and 'Contributory' buildings in the eastern sector and the low level of authenticity and integrity at this end of the street.
40. Although the property at 173 Chester Street East may be in multiple unit titles it is nevertheless located on a single land parcel, which is the basic building block, so to speak, of the RHAs. I acknowledge that the building located at 173 Chester Street East evokes the form and historic relationship of the site with the scheduled heritage items to the east but do not agree with the submitter's characterisation of the assessment process undertaken in this case. Reconstruction does indeed compromise heritage values and in the case of 173 Chester Street East historic photographs demonstrate the way in which the building has changed and been redeveloped since it was erected as a warehouse for Ward's Brewery. I therefore stand by my characterisation of the building at 173 Chester Street East within the context of my boundary review report and the mapped extent of the RHA.

Furthermore I note that 173 Chester Street East is included in heritage setting 374, as discussed above.

41. Submission # 842 (Fire & Emergency NZ) requested that the FENZ property on the north side of Chester Street East be excluded from the RHA. The submitter is opposed to the partial inclusion of their large property in the RHA and provided a revised map of the RHA according to their submission. To create such a break in the continuity of the RHA would, in my opinion, be inconsistent with the approach taken to other RHAs and create the potential for a significant negative impact upon the contextual heritage values of the section of the RHA bounded by Madras Street in the west and Barbadoes Street in the east.
42. As notified, the boundary placement within the FENZ property was intended to recognise the historic development pattern of the Chester Street East frontage and allow for the management of future development on the site in sympathy with the heritage values of the area, which are strongly supported by local residents. The submitter notes that future development plans for that portion of the property within the notified RHA boundary are likely to involve 'single storey buildings and [be] similar to the built form which surrounds the site'. It does not therefore appear that the RHA will impede the submitter's use of the site.
43. On the basis of the submission and a site visit I made to Chester Street East on Monday, 19 June 2023, I now recommend that the RHA boundary line across the FENZ property be reduced to an approximately five-metre strip along the southern frontage of the site. This would be largely in line with the current security gate and the south elevation of the substation and would potentially create a setback for any future development on the FENZ property. To the east of the substation the boundary would follow the fence that is in situ, which visually creates a treed and grassed reserve space adjacent to the road boundary. Setback strips flanking the substation will, in my opinion, provide appropriate protection for the contextual values of the FENZ property within the RHA while not restricting necessary development within the larger site. A revised map of the RHA showing the detail for the recommended boundary is appended to the section 42A report of Glenda Dixon.

MACMILLAN AVENUE RHA

44. Submission # 1027 (Daniel Rutherford) requested the removal of the property at 20 Macmillan Avenue from the Macmillan Avenue RHA. The former Shaw house on this site was assessed as being a 'Defining' building within the RHA, which was mapped to closely follow John Macmillan Brown's 1908 Cashmere subdivision.
45. The inclusion of 20 Macmillan Avenue in the RHA maintains the integrity of the historic subdivision that underpins the historic, architectural and contextual heritage values of the area. The house has not been scheduled as an individual heritage item and therefore the heritage values relate to the area as a whole and do not rely, for example, on past or current ownership by highly significant local people. That said the c. 40 year occupancy by noted home economist Janet Shaw does contribute to the historic values of the RHA.
46. Removal of the property from the RHA could mean that it would be incorporated into the proposed Cashmere Residential Character Area, which would therefore still entail a level of Council oversight in consenting matters. The submitter does not appear to have considered this possibility.
47. I have reviewed the building documentation that Council holds in relation to this property but was not able to visit the site because the owners would not consent to such action. On the basis of the submission and council files I have not changed my opinion that the property at 20 Macmillan Avenue should be included in the RHA. Nor do I believe that having two land parcels commonly held provides a heritage rationale for their joint inclusion or exclusion from an RHA. For that reason I maintain my position that 20 Macmillan Avenue should be included in the RHA but that 20A Macmillan Avenue should not.
48. The submitter referred to a possible boundary adjustment with 20A Macmillan Avenue in the future. 20A is also owned by the owner of 20 Macmillan Avenue but has not been included in the RHA. Such a boundary adjustment, if it was deemed to be appropriate under the Act and in accordance with the planning provisions for RHAs, need not have a negative impact on the heritage values of the RHA. That said, as only a future possibility and within the context of RMA s6(f)'s requirement to protect historic heritage resources from inappropriate subdivision, I consider the submitter has not provided heritage grounds for the exclusion of 20

Macmillan Avenue from the RHA. The fact that a single owner holds both land parcels at 20 and 20A Macmillan Avenue is not relevant to the defensible boundary I believe has been mapped for the RHA.

49. Submission # 1079 (Dr Bruce Harding) requests clarity as to the rationale for the extent of the Macmillan Avenue RHA and asks that information about key people and properties within the RHA are indicated on council maps etc. To that end the RHA report identifies the extent of the RHA, describes its heritage values, and provides individual records for all properties within the RHA. It is not usual practice to delineate 'iconic citizens' within a district plan, save for, by implication, when those properties associated with such people that are scheduled as significant historic heritage resources. It would be expected, however, that the RHA reports be appended to the district e-plan and thus become part of the city's historic record.
50. Whereas in the past SAM 17 and 17a encompassed Hackthorne Road, Dyers Pass Road and Macmillan Avenue, the proposed Macmillan Avenue RHA and the Cashmere Residential Character Area will now supersede the earlier planning framework. It would appear that the submitter is not aware of this, judging from his submission. The proposed character area includes the west end of Macmillan Avenue, within which is located the last home of Professor Macmillan Brown ('Holmbank', 35 Macmillan Avenue). It is unclear from the submission whether the submitter wished to nominate 35 Macmillan Avenue to be scheduled as an individual heritage item.
51. In response to the submitter's commentary regarding the RHA report, I note that the report's function was not to record a history of the wider area but rather describe and substantiate the history and heritage values of the RHA. Nevertheless the information provided by the submitter is appreciated and I have reviewed the RHA report in light of his notes and made some minor revisions to it as a result.

INNER-CITY WEST RHA

52. Submission # 699 (Christ's College) is largely concerned with planning matters outside the scope of my expertise and engagement. In respect to the Inner-City West RHA the submitter objects to a number of properties owned by the College being included within the boundaries of the RHA. The submitter notes that they hold a Certificate of Compliance that will allow

them to demolish all non-scheduled buildings on the sites in question within the statutory timeframe (until 6 October 2027).

53. Notwithstanding the potential for the submitter to demolish all of the buildings on their holdings to the east of Rolleston Avenue, with the exception of two individually scheduled heritage items, I can confirm that the properties in question make a significant contribution to the heritage values of the area and exclusion of these properties from the RHA would be inconsistent with the heritage methodology and criteria applied by the Council. The RHA derives part of its heritage significance from its proximity of a number of the city's major cultural and educational facilities, including Christ's College's primary campus. Furthermore the College began acquiring residential property on the east side of Rolleston Avenue after World War I and thus the school is directly associated with the heritage values of the RHA.
54. Although the submission is largely concerned with planning matters, I note that the implied characterisation of the RHA as featuring 'small detached Victorian dwellings' (submission page 5) is not accurate and fails to take account of the variety of residential typologies throughout the RHA, which can therefore accommodate future development of a varied nature on currently vacant sites such as that at 21 Gloucester Street. I therefore recommend that this submission be rejected.
55. Submission # 1061 (Elizabeth Harris & John Harris) requested that the Cashel Street portion of the RHA, including the submitters' property at 31 Cashel Street, be deleted on the grounds that scheduling individual items alone is sufficient to protect the city's heritage values and that the buildings along the north side of Cashel Street between Rolleston Avenue and Montreal Street do not have significant heritage value.
56. I do not agree with the submitters' position, which is contrary to the RMA definition of historic heritage resources, and can confirm that I established the boundary for the RHA on the basis of the presence of significant historic, architectural and contextual heritage values. In the absence of information from the submitters that might challenge the evidential basis for the RHA I do not consider that the boundary should be adjusted to remove the Cashel Street properties from the area. Furthermore I note that I have rated the property at 31 Cashel Street as a 'Defining' element within the RHA and that the submitters provided no information that would cause me

to revise my assessment of this site. As the submitters state, the building at 31 Cashel Street is not a scheduled heritage item, and nor is it proposed to be; inclusion within the RHA is therefore considered proportionate to the heritage values of the property.

57. Submission # 1075 (Diana Shand) supports all of the proposed RHAs, including the Inner-City West RHA, and requests that it be extended to include Cranmer Square, which is already a scheduled heritage item (Heritage item # 157). While I concur with the submitter that residential use of buildings within the RHA helps to maintain and enhance heritage values, I do not consider that incorporating Cranmer Square into the RHA would be appropriate or serve any useful purpose. Where a park has been included within the boundaries of an RHA, as in Heaton Street for example, this is because the park is integral, rather than coincidental, to the heritage values of the area. I do not consider that Cranmer Square is integral to the heritage values of the Inner-City West RHA, even though there is a close physical association between the two.
58. The submitter (at submission point # 1075.5) also requests that commercial use in the wider area be confined to Oxford Terrace and that residential uses be encouraged in Cambridge Terrace, with an extension of the Medium Density Zone on the east side of Montreal Street, from 59 Gloucester Street in the north to 75 Cambridge Terrace in the south. While the submitter refers to the maintenance of heritage values as one rationale for this action, I do not believe that the block thus described in the submission embodies collective heritage value or will have a demonstrable impact on the heritage values of the RHA. I defer to other council experts in regard to the planning implications of the zoning for this area.
59. Submission # 814 (Carter Group Property Limited) requests that the former Christchurch Girls' High School site, which is at the east end of the block bounded by Armagh, Montreal and Gloucester Streets, be excluded from the RHA. Additionally the submitter requests that the scheduled heritage item at 32 Armagh Street / 325 Montreal Street (Heritage item # 390; Heritage setting # 287) be removed from Appendix 9.3.7.2 in the Christchurch District Plan. Submission # 823 (Catholic Diocese of Christchurch) also seeks the removal of the cottage at 32 Armagh Street from Appendix 9.3.7.2

60. As regards the scheduled heritage item, this building has been scheduled for some time and the submitter does not provide any substantive information to call into question the statement of significance for this building and the extent of its scheduled setting. While it is regrettable that the building is reported to be 'in a poor state of repair' that fact alone does not diminish the heritage significance of the item. Consequently I do not consider that the submitter's request to delete the heritage item from the district plan should be accepted.
61. While the submitter questions the heritage values of the RHA there is no substantive information provided to reconsider what is characterised as the 'questionable merit' of unspecified sites within the RHA. At paragraph 13 of the submission the submitter refers to 'errors' but does not elaborate further on what these might be. Furthermore the submitter states that the 'heritage listings and corresponding rules within the District Plan currently recognise and provide for the protection of historic heritage from inappropriate subdivision, use and development' and yet challenges the scheduling of the heritage building referred to above.
62. The submission goes on to request the deletion of all RHAs, although no discussion is provided about any RHA other than the Inner-City West RHA. Failing that the submitter seeks the deletion of the Inner-City West RHA, and, failing that, the removal of their property from the RHA. As the submission raises no substantive points in relation to the heritage values of any of the RHAs I remain of the opinion that the RHAs have been carefully assessed and robustly mapped; I therefore recommend that this submission be rejected.
63. In regard to this submission I do however recommend that the RHA map is revised, such that the three elements of the site, comprising the scheduled item, the former CGHS tuck shop and swimming pool changing rooms and the vacant lot, are distinguished from one another. This will mean that the RHA map accurately indicates the 'Defining' and 'Contributory' nature and extent of the house and former CGHS building and thus aligns with the site ratings described in the Inner-City West RHA report. With respect to the vacant portion of the lot, which is bordered by Montreal and Armagh Streets, it is now my recommendation that this is excluded from the RHA. Glenda Dixon will address this matter from a planning perspective in her evidence, for my part I believe that the large size of the lot, which is on the

periphery of the RHA, makes such a bespoke approach to mapping appropriate in the circumstances.

64. Having proposed a revision to the RHA map in response to the submission about to the former CGHS site I have reconsidered the status of the YMCA site, which is bordered by Hereford and Cashel Streets and Rolleston Avenue at the south-west corner of the RHA. Now that the 'Defining' house at 7 Cashel Street has been removed and a new building erected on the Rolleston Avenue frontage of the property I have recommended to the Council that this lot be removed from the RHA. These changes to the site all post-date my preparation of the Inner-City West RHA report and I believe they are appropriate and consistent with the response taken to the former CGHS site in the circumstances. It is noted that if the panel accepts these recommended changes to the extent of the RHA then the heritage report will need to be amended accordingly. Furthermore I advised the Council that both the former CGHS site and the YMCA should be subject to interface provisions because they are located in a part of the city with very high heritage values and their proximity to Cranmer Square, the Inner-City West RHA, the Arts Centre and the Christ's College, Museum and Botanic Gardens precinct means that, in my opinion, there are grounds for a precautionary approach enabling council to exercise some degree of discretion as to design, bulk, height etc.

HEATON STREET RHA

65. Submission # 37 (Susanne Trim) opposes the Heaton Street RHA on the basis that 'so much change' has already taken place. This submission point is accepted in part, given that the RHA boundaries are now limited to the south side of the street between Taylor's Drain and St George's Private Hospital; in 2009-10 the identified Heaton Street HCA extended the full length of both Heaton Street and also encompassed Circuit Street. The section of the street now included in the RHA has retained a high level of authenticity and integrity in comparison with the north side and easterly end. As it has been mapped I consider that the Heaton Street RHA embodies significant heritage values relating to the early 20th century residential development of part of the 'Elmwood' Estate. I therefore recommend that the submission be rejected.

CPT NORTH ST ALBANS SUBDIVISION (1923) RHA

66. Submissions # 1003 and # 135 (Melissa Macfarlane) included consideration of the CPT (Church Property Trustees) North St Albans Subdivision (1923) RHA. The submission asked that the RHA be deleted and the area retained instead as a residential character area.
67. Based on the historic heritage values identified and described in the RHA report I consider that the area demonstrates significant historic heritage values and therefore merits scheduling as an RHA. Site by site assessment has been undertaken in order to identify the extent of the RHA, confirm its high level of authenticity and integrity, and determine a rating for each property within it. I consider that the 'burden of proof' for all of the city's RHAs has been set at a high bar and is consistent with the level required for individual scheduled items. I therefore recommend that this submission point be rejected.
68. The submission also requests that the dwelling at 48 Malvern Street be re-rated as a 'Neutral' building within the RHA; it is currently a 'Defining' building. I have reviewed my assessment of the house in light of the submission and council building records and consider that it retains sufficient authenticity and integrity, at this time, to be rated as a 'Defining' building. John Chatfield's occupation was given as 'builder' in the electoral roll of 1928, by which time he and his wife Annie were resident at 48 Malvern Street. I believe that the Chatfields' owner/occupation, and the fact that the property once extended through to Roosevelt Avenue, explains the larger scale of the house in comparison with some of its contemporary neighbours within the RHA.
69. The addition to the front of the house, which dates to c.1960, is sympathetic in style and materials and I do not consider that the alterations and additions made to the rear and interior of the dwelling in c.1994 represent a substantial change to the building. If the alterations and additions shown in the resource consent drawings dated 25 January 2023 (see RMA2023965) had already been actioned then I would likely recommend revising the categorisation of 48 Malvern Street to 'Contributory'. Until then it is not best practice to revise a heritage assessment on the basis of work that may or may not be done in the future. I therefore recommend that the dwelling retain its 'Defining' categorisation within the RHA.

SHELLEY/FORBES STREETS RHA

70. Submission # 1005 (Kate Askew) requested that the dwelling at 10 Shelley Street within the Shelley/Forbes Streets RHA be reclassified as a 'Defining' feature in the area. As proposed, the house was given a 'Contributory' rating on the grounds that, although likely dating to the 1890s, it has been modified considerably.
71. The submitter, who also supports the RHA in general and the inclusion of her home at 11 Shelley Street in particular, states that the house at # 10 is currently being renovated. Following a site visit to Shelley Street on Monday 19 June 2023, I can confirm the 'Contributory' categorisation of this dwelling because the changes made to the house, including its plaster stucco cladding, veranda and replacement fenestration, all remain in situ. Furthermore, the categorisation of such a dwelling as 'Contributory' is consistent with the approach taken across the RHAs identified in PC13.
72. Submission # 1040 (Neil McNulty) opposes the inclusion of Forbes Street in the Shelley/Forbes Streets RHA on the grounds that there is 'little genuine heritage fabric left in this street'. As indicated in the RHA report for this area I do not agree with the submitter and consider that the RHA report provides a robust justification for the inclusion of properties in Forbes Street, including the submitter's own dwelling, in the RHA. Consequently I recommend that this submission be rejected.

PIKO/SHAND (RICCARTON BLOCK) STATE HOUSING RHA

73. Submission # 1053 (Jono De Wit) requests that the Piko/Shand RHA be deleted in its entirety or, failing that, be reduced to circa five of the 'most important houses'. The submitter's suggestion that the heritage values of the area as a whole could be identified and protected by scheduling a handful of houses overlooks the collective value of the area and the consistency with which this RHA has been assessed in comparison with others in the city, whether that be the Macmillan Avenue RHA or the Parade of Homes RHA. The submitter does not specify which houses might be deemed 'most important' and in the absence of any heritage information to the contrary I recommend that the RHA be scheduled as notified.
74. Submission # 834 (Kāinga Ora) also requests that the Piko/Shand RHA be deleted. The submitter questions the evidence base for the heritage assessment and contends that special character has been conflated with

historic heritage in the identification and assessment of this RHA. As the only state housing area identified as an RHA, although a large number were reviewed in other parts of the city, I am firmly of the opinion that the Piko/Shand RHA has significant heritage value and that its heritage status is entirely consistent with other scheduled state housing areas elsewhere in New Zealand, including Palmerston North (Savage Crescent) and Hamilton (Hayes Paddock).

75. The evidence base for assessing state housing areas is well established in New Zealand, with a number of substantial publications focusing on the history and heritage value of state housing.¹ Every house within the RHA was viewed and rated during the course of my assessment but it is not best practice to anticipate the outcome of 'unimplemented resource consents', given that such consents may never be actioned. I entirely refute the submitter's claim that the predominant focus of the RHA was on 'physical built form' and the RHA report demonstrates that all heritage criteria have been addressed. That said, the planning provisions necessarily address physical form as RMA s6(f) requires councils to protect historic heritage, which is defined as those natural and physical resources that embody New Zealand's history and cultures. It would be my expectation that any future consideration of consent applications to provide additional social housing within the Piko/Shand RHA, should any arise on the 19 properties currently owned by the submitter, would acknowledge that such an action could help to maintain the heritage values of the area as a whole. I therefore recommend that the submission be rejected.

LYTTELTON RHA

76. Submission # 1078 (Julie Villard) requested that the Lyttelton RHA be amended so that it only included those properties rated as 'Defining' and 'Contributory'. Such an approach would be inconsistent with the RHA methodology adopted by the Council and could lead to the loss of heritage values by, potentially, allowing for inappropriate subdivision, use and development in the RHA. As it is the collective values of the area that have been identified and assessed as having heritage significance a planning approach that fails to place some restrictions over 'Neutral' and 'Intrusive'

¹ C Firth *State Housing in New Zealand* Ministry of Works, Wellington, 1949; G Ferguson *Building the New Zealand Dream* Dunmore Press, Palmerston North, 1994; B Schrader *We Call it Home – A History of State Housing in New Zealand* Reed Books, Auckland, 2005.

sites within an RHA cannot, in my opinion, facilitate the protection of the area's heritage values in accordance with RMA s6(f).

77. Identification and assessment of the Lyttelton RHA was underpinned by the Heritage New Zealand Pouhere Taonga 'Lyttelton Township Historic Area' registration report of 2009 and Dr John Wilson's 'Banks Peninsula Contextual Historical Overview and Thematic Framework' (CCC, June 2014). The RHA can therefore be described as giving effect to the HNZPT historic area in the context of the Council's own historic understanding of the importance of Lyttelton as a port town. I recommend that this submission be rejected.
78. Submission # 289 (Cody Cooper) sought the entire removal of the Lyttelton RHA and requested instead that the Council 'pick a specific street or smaller area to designate as heritage'. The submitter does not nominate a street or smaller area for identification as an RHA and such an approach would be contrary to the HNZPT Historic Area and the assessment of significant heritage values across the RHA as proposed. I recommend that this submission be rejected.

REQUESTED ADDITIONAL RHAS

Mary Street & Rayburn Avenue

79. Submission # 37 (Susanne Trim) includes a comment that Mary Street and Rayburn Avenue in Papanui 'probably show off that mid 20th century suburban architecture more appropriately' than the Heaton Street RHA. Putting to one side that the Heaton Street RHA is typified by early 20th century Arts and Crafts style houses, I have reviewed both streets in the light of this submission.
80. Mary Street dates to c.1890 and runs from the Main North Road in the north-west to Grants Road in the south-east. Intersecting streets divide Mary Street into four blocks. While there are some bungalows along the street, and one square-plan villa towards the north-west end, there has also been considerable redevelopment; consequently I have been unable to identify the architecture to which the submitter referred.
81. Rayburn Avenue was originally called Ingmire Street and was formed in early 1913. The street runs from Grants Road in the north-west to Paparoa Street in the south-east and is intersected by Dormer and Perry Streets.

Rayburn Avenue features street trees and a combination of bungalows and modern housing stock.

82. The question as to the potential heritage value of Dormer, Rayburn and Perry Streets will be discussed in the next section. In response to submission # 37 I can find no evidence to suggest that either Mary Street or Rayburn Avenue are in any way comparable to the heritage values demonstrated by the Heaton Street RHA. I therefore recommend that this submission is rejected.

Papanui War Memorial Streets

83. A number of submissions concerned identifying streets in Papanui as RHAs. In this regard it is noted that the Papanui War Memorial Avenues (Alpha, Claremont, Condell, Dormer, Gambia, Halton, Hartley, Kenwyn, Lansbury, Norfolk, Perry, Scotson, St James, Tillman, Tomes, and Windermere) have been proposed for scheduling (HID # 1459) in PC13. I believe that this is appropriate heritage recognition and protection for this suite of Papanui streets.
84. Submission # 1004 (Sally Dixon) identified Windermere Road and St James Avenue as having 'character', which is being addressed for the Council by Jane Rennie of Boffa Miskell. Given that the submitter also referred to the 'history and heritage of this family area', I have considered the submission. I assessed St James Avenue in December 2021 and recommended that the Council 'review management status of memorial trees and consider whether Rev TN Griffin Memorial Gates (1931) should be scheduled as a heritage item'. I consider that the Council's decision to schedule the memorial streets was the appropriate response to my recommendation. My consideration of the potential heritage values of Windermere Road follows below.
85. Submission # 1041 (Ruth Morrison) requested that Papanui Street, Dormer Street, Rayburn Avenue and Perry Street be kept as 'heritage areas' and refers to a Council decision in 2016 to that effect. It is assumed that the submitter is referencing a former character area overlay, given that the RHAs are being introduced to the district plan for the first time. In addition to St James Avenue, I also assessed Papanui Street/Tomes Road in March 2022 as a potential RHA and concluded that the 'two streets do not meet the criteria for scheduling as an RHA. While they are near one another and retain some period housing, they lack a common historic development

narrative and sufficient authenticity'. Following additional field work undertaken on 18 and 19 June 2023 I have now prepared 'Potential RHA Review Criteria Template' reports for Dormer Street, Rayburn Avenue, and Perry Street and recommend that the submission be rejected on the basis that none meet the threshold for scheduling as RHAs. This recommendation also encompasses submission # 329 (Dominic Mahoney), in as much as that submission requested that Perry Street be not zoned for high-density residential development on the basis of its 'historical heritage nature'.

86. Submission # 709 (PK Tucker & CS Winefield) also requested that Windermere Road, its houses, trees and memorial plaques, be identified and scheduled as an RHA. As indicated above, Papanui's war memorial avenues, including their trees and plaques have been proposed for scheduling. This then leaves the houses to be considered for either RHA or character identification. The latter falls outside the scope of my expertise and engagement, but in regard to the former I can confirm that I have reviewed the information provided by the submitters and visited Windermere Road on Sunday 18 June 2023. Large areas on either side of the road remained undeveloped in the early 1940s and the 20th century history of Windermere Road principally arises from the educational and care home functions that originated with Catholic and Presbyterian church activity on sites extending through to Condell Avenue. Today the presence of Te Ara Hou Ōtautahi and the Bellevue Care Centre represents historic continuity but I do not consider that the houses in the street embody significant heritage values. I have prepared a 'Potential RHA Review Criteria Template' to this effect and recommend that the submission be rejected on that basis.
87. Submissions # 152 (Dylan Lange for Papanui Heritage Group) sought character recognition for Papanui's residential streets and did not specify any proposed for RHA status. As such the submission falls outside my engagement by Council.
88. Submission # 206 (Emma Wheeler) also identified Windermere Road and St James Avenue and requested that they are not zoned for intensification. This falls outside my engagement and it is noted that the war memorial heritage value of the two streets has been recognised by Council.

89. Submission # 765 (Margaret Howley) opposed intensification of the war memorial streets in Papanui in order to protect the heritage values of the memorial trees. As previously noted the memorial avenues have been proposed as a scheduled item and they fall outside my engagement by Council to identify and assess RHAs.

Beverley Street

90. Submission # 1008 (Mark Winter) requested that Beverley Street in St Albans be recognised by Council for its heritage and character status. I assessed this street in March 2022 and provided the Council with the following recommendation: 'Beverley Street, while it does possess character and amenity values, does not meet the criteria for scheduling as an RHA. Some houses within the street may merit consideration for scheduling as individual heritage items. Houses at 12 (Julia Green house, 1928, designed by Cecil Wood), 28 and 34 Beverley Street are especially notable examples of the Georgian Colonial Revival style, although 34 (Ivan Wood house, 1930, designed by Helmore & Cotterill) has been considerably enlarged. It is also interesting to note the apartment building and the duplex on the north side of the roadway (Nos. 11 & 23).'
91. I also noted in the 'Potential RHA Review Criteria Template' for Beverley Street that 'Houses retain a good level of authenticity but the street lacks the heritage narrative needed to establish a benchmark for defining and contributory features.' I have reviewed my earlier assessment of this street and stand by my conclusion that it does not meet the threshold for scheduling as an RHA. I note that it has been proposed as a Residential Character Area.
92. Submission # 1091 (Rosie Linterman) also requested that Beverley Street be recognised as a residential character street, notwithstanding that a reference was made in the submission to a 'residential heritage area'.

Scott Street, Sydenham

93. Submission # 1088 (Anton Casutt) requested that Scott Street in Sydenham be scheduled as an RHA or as a character area. The street runs from Brougham Street in the north to Browning/Burns Streets in the south and is intersected on the west side by Deyell Crescent. Originally known as Scott's Road, the street dates to the mid-1870s and is characterised by small, single-storey artisans' cottages.

94. Putting to one side its potential recognition as a character area, which is outside my area of expertise and engagement, I visited the street on 20 June 2023 and undertook historic research to determine whether it would meet the threshold for scheduling as an RHA. Consequently I have prepared a 'Potential RHA Review Criteria Template' report for the street, which I do not believe meets the criteria and significance threshold for scheduling as an RHA, in large part due to the degree to which the original artisans' cottages have been modified and/or redeveloped. I therefore recommend that this submission is rejected.

Riccarton

95. Submission # 1090 (Waipuna Halswell Hornby Riccarton Community Board) identifies, in general terms, residential character and/or heritage areas in Hornby, Hornby South, Sockburn, Hei Hei, Islington and Broomfield. These areas were largely developed in the latter half of the 20th century and are more likely to exhibit residential character than embody significant historic heritage values at this time, given the paucity of evidence required to make a determination of heritage significance. A review using Canterbury Maps and Google Streetview has not identified any potential RHAs in these suburbs and I defer to others in regard to potential character areas in these parts of the city.
96. The same submission also identifies an issue in regard to significant 'heritage settings' but it is not entirely clear what is meant by this, given that all individual heritage items and the proposed RHAs have been mapped and 'Contextual' heritage values (see Christchurch District Plan Appendix 9.3.7.1) have been addressed in all statements of significance for items and areas. That said it appears that the submitter is proposing that the suburb of Riccarton is identified as a 'heritage setting' on the basis that it forms the backdrop to a number and range of significant natural, cultural and historic heritage resources.
97. In light of this submission I can confirm that the settings of heritage items and areas are 'seen as significant' and, in the case of Riccarton Bush and House, for example, multiple heritage values can be present and identified within a single heritage site. It is not best practice however to connect disparate heritage items by applying a 'heritage setting' overlay to a suburb, or part thereof. The lack of clear boundaries and the fragmented nature of the suburb as a whole undermine the argument for a 'Riccarton Heritage

Setting RHA' in my opinion, whilst the submitter's discussion about buffers for heritage items and areas falls outside the scope of my engagement by Council. I recommend this submission is rejected, in as much as it touches upon heritage matters.

Phillipstown

98. Submissions # 1063 & # 734 (Marie Byrne) requested a new RHA encompassing, it appears, an area bounded by Cashel Street, Ferry Road, Bordesley Street and Nursery Road. It is assumed that the submitter intended to delineate the frame of a proposed RHA of workers' cottages, which would therefore also include Oliviers and Mathesons Roads, Leyden Street, Cross and Inglis Streets and the east end of St Asaph Street. This delineation would thus cover the middle third of the suburb, which extends from Fitzgerald Avenue in the west to Aldwins Road in the east, and is bounded by Cashel Street and Ferry Road in the north and south respectively.
99. Based on my desk-top study and fieldwork undertaken on Tuesday, 20 June 2023, I consider that the extent of modification and redevelopment is too great to consider the area as an RHA. The size of blocks within the nominated area has lent itself to considerable intensification from the mid-20th century to the present day. While small cottages and villas have survived there are also a considerable number of flats and townhouses. During my fieldwork I found that the streets mentioned above were of a highly variable nature, in terms of the age and style of residential buildings, and that none presented themselves as potential RHAs. That is not to say that the area lacks historic fabric and interest, but rather that the review criteria for a potential RHA could not be met. I therefore recommend that this submission be rejected and have prepared a 'Potential RHA Review Criteria Template' report to support my position on the matter.
100. During the course of my assessment of a potential RHA in Phillipstown the Ryan Street Residential Character Area came to my attention. While the street appears to be outside the area identified by the submitter, I am of the opinion that it would meet the threshold for scheduling as an RHA and that such an action might be considered to accept, in part, the submission made by Ms Byrne. To that end I have prepared a potential RHA template report for the street, which has been presented to the Council.

Dover Street, St Albans

101. Submission # 1016 (Waipapa Papanui-Innes-Central Community Board) requested consideration of the 'workers' cottages' in St Albans' Dover Street as an RHA. I visited Dover Street on Sunday, 18 June 2023 but found that the street lacks sufficient authenticity and integrity, in whole and in part, to warrant consideration as an RHA. While some small cottages are still extant in the street there has also been considerable redevelopment over the last fifty years. I therefore recommend that this submission be rejected and have prepared a 'Potential RHA Review Criteria Template' report to support my position on the matter.

Woodville Street, Edgware

102. Submission #775 (Margaret Stewart) requested that Woodville Street be protected as a character and/or heritage area. I prepared a potential RHA review report for Woodville, Cleveland (north) and Geraldine Streets in October 2022 and concluded that they lacked overall coherence and a distinctive and significant development history. I also noted in my report that: 'While small clusters of older (1910s) houses remain in all three streets, both individual housing modification and site redevelopment have undermined the authenticity and integrity of the houses and the streetscape as a whole.' The report is appended to my evidence and I recommend this aspect of the submission by Ms Stewart be rejected on the basis of my findings.

ST JAMES'S ANGLICAN CHURCH, RICCARTON

103. Submission # 825 (St James's Church) requested that the scheduled item at 69 Riccarton Road be deleted from Appendix 9.3.7.2 of the Christchurch District Plan. I have reviewed the heritage documentation held by the Council for St James's Anglican Church, which is scheduled as a 'highly significant' item in the District Plan (HID 465; heritage setting 220). Having written my Master of Arts thesis on the architectural practice of Alfred and Sidney Luttrell (University of Canterbury, 1988) I am especially well qualified to verify the Heritage Assessment - Statement of Significance that is appended to the Christchurch District Plan and dated 1 November 2014.
104. St James's was the last church, and the only Anglican one, designed by the Luttrell Brothers. The commission appears to have arisen out of the personal connection Alfred Luttrell had with his parish church. The church

was designed in an Early English Gothic Revival style and later enhanced by painted decoration designed by architects Robert and Margaret Munro. St James's is the only parish church designed by the Luttrells that is still extant in the city; the Catholic churches in Sumner and New Brighton having been demolished after the Canterbury earthquakes. As a bluestone and limestone building it is also significant as a surviving inter-war masonry church. Comparable to St Barnabas's Anglican Church on Fendalton Road (1926), St James's demonstrates the enduring popularity of the Gothic Revival style well into the 20th century as well as the growth and development of the city's Anglican congregation after World War I.

105. Notwithstanding that the owner of the St James' may choose in future to apply for consent to demolish the building, on the grounds that it is not feasible to remediate the damage caused by the Canterbury earthquakes, I do not consider that there is any evidence presented in the submission that would justify deleting the building from the heritage schedule. For that reason I recommend that the submission is rejected.

PEER REVIEW OF CCC HERITAGE ASSESSMENTS

106. In addition to the assessment of Residential Heritage Areas for the Council, I also peer reviewed a number of individual heritage item assessment reports that are relevant to this hearing. Assessment reports for the former Upper Riccarton War Memorial Library and Setting at 372 Riccarton Road, the former quarry stables and setting in Bamfords Road, Allandale, the former Governors Bay lock-up and setting at 153 Governors Bay-Teddington Road were supplied to me and I provided feedback that has been addressed in the final reports. I consider that all three buildings merit scheduling as significant historic heritage items in the Christchurch District Plan.
107. I reviewed a preliminary assessment report for the war memorial in Jane Deans Close, Riccarton. The subject of three submissions, I undertook a review of the Council's draft report and additional research to determine whether I considered that the memorial merited scheduling. Although I can appreciate that some members of the community will value the memorial purpose of this structure I concluded that it does not possess intrinsic heritage significance, given that it is a late 1990s interpretative road reserve feature rather than a historic memorial directly linked to the presence of the 1944-46 vocational training centre for disabled servicemen located on

Riccarton Road (demolished). For that reason I advised the Council against preparing a full assessment of the structure and recommending it be scheduled as a heritage item.

108. In response to the submission from Bruce Alexander requesting that the residential property at 111 Hackthorne Road be scheduled I undertook research on the building and concluded that it did not embody significant heritage value. Historic land information, aerial photographs and newspaper items, council building records, and family history web sites were searched and I determined that the house was likely built by Charles and Florence Salter in the later 1910s. Charles Salter was a solicitor and a notable, rather than significant, person in the city. As built the house appears to have been a standard bungalow before it was considerably altered in c.1973. I could not, however, find any evidence that the dwelling was the first on Cashmere Hill and I determined that as Hackthorne Road was quite built up by the later 1920s. In summary I consider that the modified bungalow possesses typical and representative qualities rather than any significant heritage value. For that reason I did not recommend to the Council that the building merited scheduling.

CONCLUSION

109. In considering the submissions made to PC13 and PC14 in regard to the proposed RHAs I consider that each area has been robustly assessed and that the boundaries for each are defensible.
110. I have considered all of the information provided by submitters, where it concerns the identification and assessment of RHAs, and consider that none of the submissions have persuaded me to delete the proposed RHAs or to recommend new ones for addition to the District Plan.
111. On the basis of some submissions I have reviewed and made minor revisions to some of the RHA reports and individual record forms for properties within the RHA.
112. I recommend that St James's Anglican Church remain on the schedule of heritage items given its demonstrable heritage significance.

11 August 2023

Dr Ann McEwan