

**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 DAVID ALAN PEARSON ON
BEHALF OF CHRISTCHURCH CITY COUNCIL**

CONSERVATION ARCHITECT

QUALIFYING MATTER: HERITAGE (137 CAMBRIDGE TERRACE)

Dated: 11 August 2023

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EXECUTIVE SUMMARY

1. My full name is **David Alan Pearson**. I am a registered architect and principal of the architectural firm DPA Architects.
2. I have prepared this statement of evidence on behalf of the Christchurch City Council (the **Council**) in respect of matters arising from submissions on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**).
3. My evidence relates specifically to the submission from Lee Pee Limited (**LPL**) (Submission 1092) seeking that 137 Cambridge Terrace (**Harley Chambers**) be deleted from Appendix 9.3.7.2 Schedule of Significant Historic Heritage' (the **Schedule**).
4. Having undertaken site inspections and reviewed the relevant documentation available for Harley Chambers, in my opinion, Harley Chambers should not be removed from the Schedule as I consider that it has significance under each of the criteria for the assessment of the significance of heritage values as found in Appendix 9.3.7.1 of the District Plan. In particular:
 - (a) The building has historic and social significance as an early example of a building that was purpose-built to accommodate in one location members of the medical and dental fraternity.
 - (b) Harley Chambers is a rare example in New Zealand of a building that has strong references to the American Chicago School and the Richardson Warehouse styles of the late nineteenth century. This movement was instrumental in the development of the multi-storey 'skyscraper' which went on to have a profound impact on the form of modern cities worldwide.
 - (c) The building has contextual significance as part of the Worcester streetscape which, in my opinion, is one of the most intact heritage streets in Christchurch with a wide range of architectural styles present.

INTRODUCTION

5. My full name is **David Alan Pearson**. I am a registered architect and principal of the architectural firm DPA Architects.
6. In preparing this evidence I have:

- (a) Reviewed publicly available information about the history of Harley Chambers;
- (b) Reviewed the Council's section 32 report for PC14 and associated appendices in-so-far as they relate to Harley Chambers¹;
- (c) Reviewed the draft evidence of Amanda Ohs in-so-far as it relates to Harley Chambers; and
- (d) Reviewed the Council's draft section 42A report on heritage prepared by Suzanne Richmond.

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

QUALIFICATIONS AND EXPERIENCE

- 8. In 1973, I graduated from the University of Auckland with the degree of Bachelor of Architecture. I am currently a registered architect and an Associate of the New Zealand Institute of Architects.
- 9. In 1996, I established my own architectural practice with the aim of specialising in heritage and conservation architecture. I have also attended specialist conservation courses at the University of York in the UK. Today, I remain principal of the firm, now known as DPA Architects.
- 10. Since it was established, DPA Architects has grown in size to a staff of 13. Conservation architecture continues to be the mainstay of the firm's work. Over the years, our work has been recognised by the receipt of a number of awards from institutions including the NZ Institute of Architects and UNESCO.
- 11. Since the Canterbury earthquakes of 2010-2012, DPA Architects has been extensively involved in numerous projects throughout Canterbury from Waiiau down to Timaru that required earthquake remediation and seismic upgrading.
- 12. In particular, I acted as the heritage architect for the comprehensive reconstruction and refurbishment of the Arts Centre of Christchurch for a period of 10 years between 2012 and 2022.

¹ [PC13-Section-32-report-for-notification-March-2023.PDF \(ccc.govt.nz\)](#)

13. On other projects, I acted as the heritage and project architect. Projects of note included various churches such as St Barnabas in Fendalton, St Patrick's in Akaroa and St Bartholomew's in Kaiapoi. DPA Architects also oversaw the reconstruction of the Lyttleton Timeball and the restoration and structural upgrading of the Hurunui Hotel in North Canterbury. I have also acted as the heritage architect for the restoration of the former Midland Club and the former Public Trust buildings, both in Oxford Terrace.
14. Currently I am acting as the on-site heritage architect for the comprehensive redevelopment of the Canterbury Museum, which includes the structural upgrading of the nineteenth-century buildings on the site and the Robert McDougall Art Gallery. I am also the resident heritage architect for the restoration and structural upgrading project of the Old Municipal Building, directly across the river from Harley Chambers, a building that was extensively damaged in the Canterbury earthquakes.
15. My experience also includes appearances at numerous council and local authority hearings, and I have previously appeared as a witness in the Environment Court.

CODE OF CONDUCT

16. 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

17. My statement of evidence addresses the submission by LPL seeking to delete Harley Chambers from the Schedule.
18. I address this point in my evidence below.

HISTORICAL BACKGROUND FOR HARLEY CHAMBERS

19. Harley Chambers was designed in 1924 by Gordon Tait Lucas as a purpose built medical and dental space for Mr A E Suckling. The structure was designed and built in 1928-29 in two stages. The Northern section

including the main entrance from Cambridge Terrace, was erected in 1929 with an addition to the south being constructed in 1934. The building changed ownership in 1933 passing from Suckling to Harley Chambers Limited.

20. The architect for the Harley Chambers building was Gordon Tait Lucas (image depicted in Figure 1), a registered architect who began practicing on his own in Christchurch in 1913, after nine years with the architectural firm of S & A Luttrell,² founded by brothers Edward Sidney and Alfred Edgar Luttrell.



Figure 1 – Image of Gordon Tait Lucas

21. Lucas' works included the Hays (former Farmers – shown in **Figure 2**) department store on Gloucester Street and Deaconess House in Latimer Square. He was also involved in a number of additions and alterations on buildings throughout Christchurch.³ In 1956, his practice was purchased by Miles Warren who subsequently went into partnership with Maurice Mahoney to create the architectural firm known to this day as Warren and Mahoney.

² 'Architect Details Openings', *The Press*, 20 April 1948, p6, accessed online at <https://paperspast.natlib.govt.nz/newspapers>

³ John Gray of Smart Alliances Ltd, *Harley Chambers: Heritage Impact Assessment*, report prepared for Lee Pee Ltd, November 2017, p23 Due to the large size of this document it has not been appended but can be made available on the Panel's request.

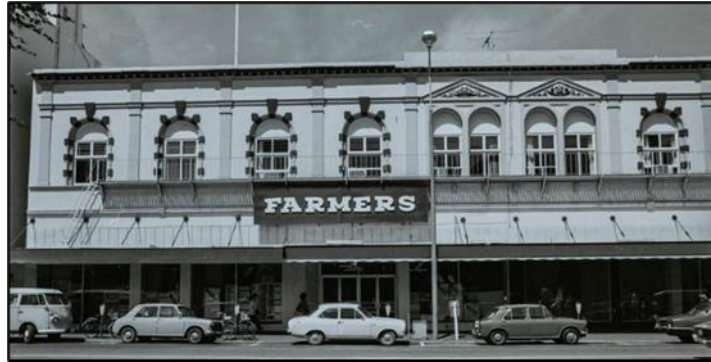


Figure 2 Hays (former Farmers) Department Store. Source: Digital NZ

ARCHITECTURAL INFLUENCES

22. Alfred and Sidney Luttrell arrived in Christchurch from Australia in 1902 and established what was to become one of New Zealand's most successful architectural practices, known as S & A Luttrell. In particular, the brothers were influential in introducing the modern American Chicago 'Skyscraper' Style to a city, which until that time, was predominantly constructing buildings that were based on English architectural influences.⁴
23. The Chicago School Style was pioneered by a group of architects and engineers in America in the late 19th Century and led to the development of what is now known as the skyscraper. Distinguishing features of the Chicago Style include a steel or concrete structural skeleton frame, expressed externally as a grid of intersecting pilasters and horizontal spandrels, decorative cornices, a flat roof with a modest cornice and bands of steel windows. The upper windows had curved heads.⁵
24. A notable figure of the time was Louis Sullivan who, after entering into a partnership with Dankmar Adler in 1881, designed the building known as the Chicago Auditorium. The building has a well-defined order of base, shaft and cornice and this is clearly defined on the facades. Some ornamentation was included such as decorative corbels.
25. Around the same time came a second style with similarities to the Chicago Style. This was the Richardson Warehouse Style, pioneered by American architect Henry Hobson Richardson. His best-known building is the Marshall Field Wholesale Store (built between 1885-87). The style featured

⁴ A E McEwan, *From cottages to 'skyscrapers': the architecture of A.E & E.S. Luttrell in Tasmania and New Zealand*, a thesis for the Degree of Master of Arts in Art History, University of Canterbury, 1988, accessible online at <https://ir.canterbury.ac.nz/items/34501b39-01dc-4a69-8282-6337ffa84f3d>

⁵ [https://en.wikipedia.org/wiki/Chicagoschool_\(architecture\)](https://en.wikipedia.org/wiki/Chicagoschool_(architecture))

multi-storied windows crowned by semi-circular arches, in order to create a unified structure.⁶

26. This building was constructed with an internal iron skeleton but, from the street, presented as a solid stone structure with massive red granite walls. The design of the building borrowed features from the Romanesque and Renaissance architectural traditions with an emphasis on symmetry and material components as opposed to superficial ornamentation.

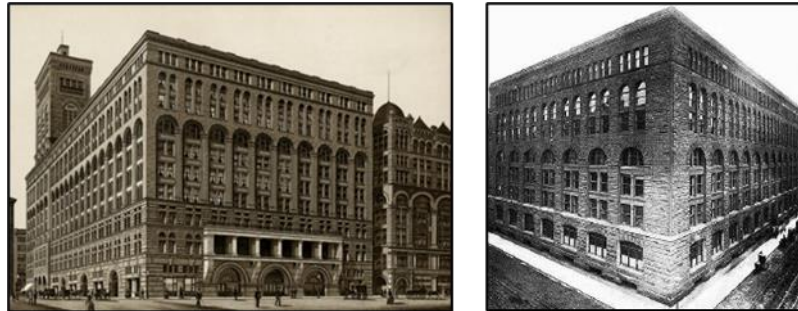


Figure 3 Sullivan and Adler’s Chicago Auditorium⁷ (left) and Richardson’s Marshall Field Wholesale Store⁸ (right).

27. The Luttrell Brothers were clearly taken with the trends in America. One of their first buildings showing this influence was the Lyttelton Times building in Cathedral Square in 1902 (**Figure 4**). This was followed by what was considered to be their most notable building – the seven-storey structure erected in 1905-06 for the New Zealand Express Company on the corner of Manchester and Hereford Streets (**Figure 4**). The building largely influenced by the Chicago Auditorium building and constructed with a reinforced concrete frame with brick piers that rose to the cornice line. The two Luttrell buildings were both demolished following the Canterbury earthquakes.
28. A number of other buildings designed by the Luttrell Brothers were demolished after the earthquakes, including the Regent Theatre building in Cathedral Square (**Figure 5**). Another building by the same architects that was also designed for the NZ Express Company, and which demonstrated similar influences, is located in Dunedin and was not affected by the earthquakes. It remains standing (**Figure 5**).

⁶ https://en.wikipedia.org/wiki/Henry_Hobson_Richardson

⁷ National Trust for Historic Preservation

⁸ Accessed online at http://www.greatbuildings.com/buildings/Marshall_Field_Store.html



Figure 4 Lyttelton Times Building⁹ (left) and NZ Express Co Building¹⁰ (right).



Figure 5 - Regent Theatre (left)¹¹ and former NZ Express Co building, Dunedin¹² (right)

29. When the time came for Lucas to set up his own practice, it is clear that after nine years with the Luttrell Brothers, he continued to be influenced by them and through them, by the American Chicago School and the Richardson Warehouse styles.
30. When he came to design Harley Chambers, there are, in my opinion, clear references to the American Chicago School and the Richardson Warehouse styles. There also appear to be similarities to buildings designed by the Luttrell Brothers such as the Regent Theatre and the two NZ Express Company buildings.
31. The elevations of the Harley Chambers are, like Sullivan's buildings, indicative of the functions within. The main public areas were located on the ground level and floor one. The importance of this area and the need to convey solidarity and stability can be seen on the exterior in the expansive

⁹ https://en.wikipedia.org/wiki/Lyttelton_Times_Building

¹⁰ https://en.wikipedia.org/wiki/Manchester_Courts

¹¹ Canterbury Museum, 2017.79.3310

¹² <https://en.wikipedia.org/wiki/ConsultancyHouse>

windows, the high stud and the solid columns. The middle section was reserved for general office functions and as these areas were not seen as having the same importance, the exterior of the building at this level is relatively simple. There is some classical ornamentation, and the windows on the first floor take the form of bay windows.

32. The two drawings below (**Figure 6**) show Lucas' design for the Harley Chambers building at left and the upper levels of the Chicago Auditorium at right. The drawing of Harley Chambers essentially shows a symmetrical façade with classical elements with the façade being divided into bays by pilasters in a manner reminiscent of Renaissance buildings. It also shows a typical Sullivan treatment of base, shaft and cornice.



Figure 6 Drawing of Harley Chambers as viewed from Worcester Street (left)¹³ and part elevation of the Chicago Auditorium building (right).

33. The Harley Chambers building was structurally and technically advanced for its time. The ground floor was constructed of timber, while the upper floors comprised a patented Innes-Bell reinforced waffle concrete system. The internal walls in the earlier section comprised hollow core Innes-Bell blocks, selected for their sound proofing qualities. The services throughout the building were also highly advanced. In particular, the building boasted a heated and humidified ducted air-conditioning system, concealed reticulated hot and cold water supplies to each room and the provision for a dental unit in each surgery. An automatic lift was also installed in the building.
34. Prior to the earthquakes, Christchurch could boast at least four buildings where the design was influenced by American trends of the late nineteenth century. With the demolition of the Lyttelton Times, NZ Express and

¹³ Extracted from plan of extensions to Harley Chambers, 1934, accessed online at <https://canterburystories.nz/collections/maps-plans/architecturaldrawings/harleychambers/ccl-cs-80240>

Regent Theatre buildings, Harley Chambers is now, to the best of my knowledge, the only surviving building in Christchurch that has any connection to a style that was to have a profound influence on the design of 'skyscrapers' worldwide.

SIGNIFICANCE OF HARLEY CHAMBERS

Christchurch District Plan

35. Harley Chambers is listed in the Schedule as a 'Significant' (Group 2) historic heritage place and it has an associated Setting comprising the entire site.
36. The Council's Statement of Significance considers Harley Chambers to be significant under the following criteria (summarised):¹⁴
- (a) **Historical and Social Significance.** The Council's Statement of Significance considers the building to have Historical and Social significance as a purpose built medical and dental rooms. It contained facilities for medical professionals to operate their practices and illustrates a shift away from home surgeries that had generally operated up until the time. The building was still occupied by some medical professionals at the time of the earthquakes.
 - (b) **Cultural and Spiritual Significance.** The Council's Statement of Significance considers the building to have Cultural and Spiritual significance, again as it demonstrates a move away from suburban medical practices to the development of dedicated premises and the grouping together of medical specialists. This trend was possibly due to increased numbers of people working in the inner city and improved transport. The Council assessment also considers that the building may have significance to tangata whenua for its location on a site that is close to the Avon River.
 - (c) **Architectural and Aesthetic Significance.** The Council's Statement of Significance considers Harley Chambers to have architectural and aesthetic significance as a three storey building built to provide accommodation for dental and medical professionals and for its use of

¹⁴ Christchurch City Council District Plan Heritage Assessment-Statement of Significance, Heritage Item 78, Harley Chambers, 137 Cambridge Terrace, Christchurch

neo-classical elements on window and door surrounds. The statement makes reference to G T Lucas as a prominent Christchurch architect. It notes that the majority of his commercial buildings no longer exist, although some of his domestic architecture remains.

- (d) **Technological and Craftsmanship Significance.** The Council's assessment considers that the building has technological and craftsmanship significance for its electrical fitout, air-conditioning and sound proofing. Also of note was the use of Innes-Bell blocks to create an innovative flooring system that removed the requirement for secondary beams in the floor slabs. The partition walls were also constructed of sound proof hollow blocks.
- (e) **Contextual Significance.** The building is considered to have contextual significance due to its proximity to a large number of heritage buildings including the adjacent Worcester Chambers, the Canterbury Club, the Worcester Street Bridge and the former Municipal Chambers. The building is also considered to be a prominent local landmark located, as it is, on the corner of Worcester Boulevard and Cambridge Terrace.
- (f) **Archaeological and Scientific Significance.** The building and setting are considered to be of archaeological and scientific significance because they have potential to provide archaeological evidence of past human activity as archival evidence records human activity on the site prior to 1900.

Assessment

- 37. I generally concur with the assessment of the Council in terms of the building's significance under the criteria in the District Plan. I also consider that its current rating of "significant" and listing as such in the Schedule is appropriate. I also consider that the following factors additionally support the Harley Chambers being considered "significant" as listed in the Schedule.

Architectural and Aesthetic significance

- 38. The Council's assessment of the significance of the building as provided in the Statement of Significance refers to the building's neo-classical elements

on the window and door surrounds and this is most clearly evident on the Cambridge Terrace elevation where stripped Classical details include the arched head above the main entry supported on pairs of columns and pilasters with simplified bases and capitals, the rusticated plasterwork to the columns on each side of the windows at ground floor level and the simplified capitals to the columns below the parapet. It also appears, looking at Lucas' drawings, that the building originally had a taller parapet along the street frontages and an ornamental cornice. The cornice is believed to have been removed and the height of the parapet reduced following the earthquakes as they were deemed to be a hazard.

39. I agree that the building has neo-classical details, however, as has been previously described, I consider that it also has strong references to the American Chicago School and the Richardson Warehouse styles of the late nineteenth century. References include the rusticated base, shaft and the cornice before it was removed. The arched heads to the windows is a common detail found in both American styles.

Contextual significance

40. The Council' assessment of the significance of the building as provided in the Statement of Significance considers the building has contextual significance due to its proximity with other heritage buildings, which I again agree with. However, Worcester Boulevard also includes a number of other heritage buildings extending from the Canterbury Museum and the Arts Centre at its western end and the former residences on the western side of Worcester Boulevard, a number of which are individually scheduled. At the eastern end of Worcester Boulevard is Cathedral Square and Christ Church Cathedral which is currently undergoing structural upgrading and restoration.
41. These buildings which have all survived the earthquakes contribute to making Worcester Boulevard one of the more historically intact inner city thoroughfares with its wide range of building types and styles. In my opinion, the Harley building makes an important contribution to this group, particularly due to its rarity as a building in Christchurch with architectural references to American nineteenth century styles.

42. Heritage New Zealand Pouhere Taonga has listed the Harley Buildings at 137 Cambridge Terrace as a category 2 Historic Place. The HNZPT account of the place is very similar to the District Plan account and it is recognised as having very similar attributes. These include its social and historical value as purpose-built structure containing professional rooms for doctors and dentists, its architectural value, being attributed to Christchurch architect G T Lucas and technological value for its electrical installation and regulated heating system.
43. The HNZPT listing recognises the neo-classical elements on window and door surrounds, the rusticated design of the ground floor, the round headed windows on the third floor and the main entry flanked by classical columns and arches, surmounted by a decorative round arch.

PREVIOUS HERITAGE ASSESSMENT

44. I have read the Heritage Impact Assessments of Harley Chambers (and Worcester Chambers) compiled by John Gray of Smart Alliances Ltd for Lee Pee Ltd, dated November 2017. I acknowledge the detailed and comprehensive historical account of Harley Chambers that forms part of this document.
45. In Section 2.0 'Understanding the place', in a paragraph headed 'Design background', Mr Gray considers that Harley Chambers is a mixture of architectural styles, with the underlying style being Neo-Romanesque Revival in the Chicago Commercial style. He also states that the building follows the general style of the Marshall Field Wholesale Store, noting that that building had a major impact on the development of modern building facades, including Harley Chambers. Features seen in the Harley building which Mr Gray considers were influenced by the style included its skeletal frame, expressed externally as a grid of piers and horizontal spandrels, decorative cornices, the flat roof, the curved tops to the uppermost windows and the Ogee arch above the entry.
46. In Section 5.0 'Significance assessment', Mr Gray assesses the significance of Harley Chambers using the criteria adopted by the Council in its Statement of Significance. Under the Historical and Social Value, he makes similar statements to the Council's evaluation, noting the building

was constructed as purpose built dedicated medical and dental facility and that it marked a move away from individual surgeries operated up until that time by doctors and nurses.

47. Under the criteria of cultural and spiritual value, Mr Gray notes that the building moved away from the traditional practice of private medical and dental surgeries. In his research, however, he was unable to find any documented direct association of the site with pre-European Māori.
48. Under the heading of 'Architectural and Aesthetic value', Mr Gray states that “the three storied Harley Chambers building, while relatively pleasing to the eye is not particularly innovative in its external design or use of materials of finishes to the facades”.¹⁵ He goes on to say, “In my opinion, the design of the exterior of the building was not particularly original or aesthetically significant, but the structural systems used within the building were of a more significant nature”.¹⁶ He gives no reason for his opinion regarding the architectural and aesthetic values of the building. He also considers that the architect, Mr G T Lucas was somewhat of an enigma¹⁷ as it was difficult to find much information about him, going onto conclude that Lucas was an architect or practice of lesser significance in Christchurch. This would appear to be an attempt to undermine the reputation of the architect and thence downgrade the significance of the building.
49. Under the Technological and Craftsmanship criteria, Mr Gray largely reiterates the statement in the District Plan and considers that the Harley building has significance for its construction techniques and the mechanical services including heated and humidified ducted air-conditioning system.
50. With respect to an assessment of the Contextual value of the building, Mr Gray states “The Harley Chambers has some extant contextual significance as a three storied building on a prominent site, [although] this was considerably reduced as a result of the 2010-2011 earthquakes and the subsequent vandalism to this building”.¹⁸
51. He makes reference to other heritage buildings in the vicinity including Worcester Chambers, the Canterbury Club, the Worcester Bridge and the

¹⁵ John Gray, *Harley Chambers: Heritage Impact Assessment*, p27

¹⁶ Ibid. p28

¹⁷ Ibid.

¹⁸ Ibid.

former Municipal Building and then states, “all of these structures are of considerably different style and of greater significance overall than the Harley Chambers building”.¹⁹

52. In the District Plan, contextual values are defined as those that that demonstrate or are associated with a relationship to the environment, a landscape, setting, group precinct or streetscape, a degree of consistency in terms of scale, form materials, texture, colour, style or detail, recognised.
53. In response, in my opinion, a building’s contextual value is not lessened by damage caused by earthquakes or vandalism. Its contextual values remain. It is also accepted that the other buildings referred to are of a different style, although in terms of the District Plan under this criterion, a building is only required to have a degree of consistency to have contextual values and does not have to have of an identical style. The other structures, with the exception of the Worcester Bridge which does not appear to be scheduled, are all rated as being highly significant. This does not in any way diminish the heritage values of the Harley building which is considered to be significant.
54. In Section 5.4 'the levels of significance', Mr Gray then introduces the “ladder” graphic from J S Kerr’s “Conservation Plan” in an effort to determine the significance of Harley Chambers. The levels of significance from that publication include A – Exceptional, B – Considerable, C - Some, D - Little and INT – Intrusive, C being the threshold for inclusion on most lists. He then gives examples of where he believes certain New Zealand buildings should be on the “ladder”. Although he doesn’t give an overall value to Harley Chambers in this section, elsewhere in his report, he considers that it should have a rating of “C”.
55. In my opinion, the introduction of Kerr’s ladder scale is largely irrelevant. The building is rated as being Significant in the District Plan and that is how it should be assessed.
56. In Sections 5.5 and 5.6 of his report, Mr Gray goes on to rate spaces and elements of the exterior and interior of the building under similar levels of significance with a capital letter being used to denote elevations or spaces

¹⁹ Ibid. p30

and a lower case letter to denote elements, items or components of which the building is comprised.

57. On the east elevation facing Cambridge Terrace, the arched detail supported on columns over the main entrance doors as well as the doors themselves and the glazed window above are rated “B”. All the other elements including plaster details and original steel window joinery are rated “C”. On the corner elevation and the elevation facing Worcester Boulevard, all elements are rated “C”. The three street facing elevations are then given an overall rating of “C”. The elements of the west elevation, central lightwell and north wall of the north building are also generally rated “C” with some drainage pipes being rated “D”. Again, each of these elevations is given an overall rating of “C’.
58. In my opinion, it is hard to comprehend how the street-facing elevations of a building with their extensive detailing that references an important era in American architecture which subsequently found its way to New Zealand could be afforded the same value as elevations with no detail that are largely out of sight. I consider that if this scale is to be used, the street elevations should be rated “B”, which equates to “considerable” significance.
59. In his conclusion on page 106, Mr Gray makes the following statement:

“...however, the post-earthquake occupation of the building by street people and their animals and the vandalism and destruction of the interior as a result, has seriously diminished the heritage significance of the building. This damage, together with infestation by pigeons has left the building in a very insanitary condition.”

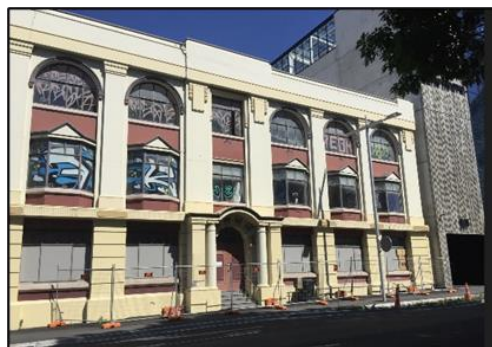


Figure 7 Harley Chambers, Cambridge Terrace façade showing neo-classical details influenced by American early twentieth century styles

**(left). Note the window openings have since been boarded up.
Typical Inner lightwell unadorned elevation (right).**

60. From my own visit to the site and inspection of the interior of the building, I agree that the building is insanitary, and that damage has occurred as a result of the earthquakes and subsequently. However, the condition of a building does not impact on its heritage values. In paragraph 8.2 of my evidence I list the criteria in the District Plan for assessing significance. The condition of a building is not included in the list of criteria.
61. The New Zealand Historic Places Trust Pouhere Taonga (now Heritage New Zealand Pouhere Taonga) in their Information Sheet 2 from their Sustainable Management of Historic Heritage Guidance series provided a list of assessment criteria to assist in the identification of Historic Heritage Values. Once again, the condition of a historic place does not appear as an assessment criterion in Heritage New Zealand Pouhere Taonga list.

STRUCTURAL CONSIDERATIONS

62. I have read the various structural reports and while I do not claim to have any professional expertise in this area, I have observed a large number of buildings that were damaged as a result of and the Canterbury earthquakes. I have also been involved in the refurbishment and structural upgrading of many of these buildings, notably at the Arts Centre of Christchurch, working alongside structural engineers and quantity surveyors.
63. Although not sighted, it is understood that a Detailed Engineering Evaluation (DEE) was prepared by Structex Metro Limited dated 8 November 2011. However, in a letter from CERA dated 27 September 2013 regarding occupancy and safety of the building, the DEE was noted by CERA as being out of date as it was written prior to a series of major aftershocks. CERA also considered that the building had critical structural weaknesses and as its NBS was less than 33, it was considered to be earthquake prone and potentially dangerous.
64. In response, Structex undertook a further survey of the building on 30 September 2013 and reported their findings in a letter dated 10 October 2103 (sic). The letter noted that the building had degraded further with new cracks having appeared, particularly on the north elevation. It was noted,

however, that the south building had suffered less damage and was in better overall condition.

65. Further correspondence was received from CERA dated 21 November 2013, the purpose of which was to advise Lee Pee Ltd of the fact that CERA considered the building to be dangerous in terms of the CERA Act and that it would need to be partially demolished. The work that was required was indicated in an appendix to the letter and appears to have been limited to the removal of a series of brick infill panels on the north elevation. It is believed that this work was carried out. The letter from CERA also questioned whether the northeast parapet might need to be demolished if no reinforcement was found. It is assumed there was found to be no need to undertake this particular piece of work. Structex ventured the opinion that the north building might be uneconomic to repair and went on to recommend that the North building be deconstructed as soon as possible. No basis was provided for this comment.
66. In December 2017, Quoin Structural Consultants (formerly Structex Metro Ltd) produced a structural report to accompany an Assessment of Environmental Effects and Resource Consent Application for Lee Pee Limited for a proposed hotel development at the Harley Chambers site. Among other requirements, the structural report was to:
- (a) Outline the repairs to restore the buildings to their pre-earthquake condition and minimum earthquake strength of 34% x NBS for Harley Chambers and 73% x NBS for Worcester Chambers.
 - (b) Provide concept design to earthquake strengthen the Harley Chambers Building to 67% X NBS and 100% x NBS.
 - (c) Provide concept design to retain the façade of Harley Chambers.
67. The Quoin structural report then described damage to the building which included severe and widespread cracking of unreinforced walls, differential settling of foundations, widespread cracking to concrete floors, walls, columns and plaster finishes, severe structural damage to the north-east corner column and widening of the joint between the north and south sections. The building was assessed as having an earthquake strength of 15% x NBS. The report considered that the building was structurally repairable and then set out in detail the work that would be required to

achieve that and to strengthen the building to 34% x NBS, 67% x NBS and 100% x NBS.

68. Section 4.6 of the Quoin structural report outlines the work that might be required to retain the façade. This would include the following.
- (a) Installation of screw piles to underpin the foundations.
 - (b) Installation of steel brace frames to be attached to the facade.
 - (c) Propping of the entry canopy.
 - (d) Propping of the building at the northeast corner due to damage to the concrete columns.
 - (e) Reconstruction of the north end column and part of the foundation beam.
 - (f) Releveling of the foundations at the northern end of the building.
 - (g) Demolition of the existing building behind the façade.
 - (h) Strengthening of the perimeter columns to the facade to 100% NBS with Sika CarboDur carbon fibre strips. This would require removal of external plaster.
 - (i) Removal of significant portion of external plaster.
 - (j) Repair of junction between the two sections of the building.
 - (k) General repair of cracks, possibly by epoxy injection.
 - (l) Strengthening of the canopy.
69. The Quoin structural report describes the work as being extensive and considers that it may be more expensive than the cost of a facade to a new building which is quite possible. From an engineering perspective, Quoin considered that the work is feasible.
70. The work that is proposed by Quoin is essentially no different from that which has been carried out on a number of other buildings in Christchurch.
71. On 13 June 2023, Mr Gilmore, a Chartered Engineer from Quoin again visited the Harley Chambers site and updated the previous report in a letter dated 12 July 2023 and reported that the building had suffered additional

damage. In particular, it was considered that the column in the north east corner could fail in a moderate-large earthquake, although the building will not fall over as a whole. Elsewhere some cracks had widened and although cracks in the parapet were more visible, they were considered safe. There were also some new cracks in the front facade.

72. The Quoin report again makes the comment that the northern section of the building is not economic to repair and goes on to make a similar comment regarding the building, as a whole. The report then makes the recommendation that the building as a whole should be deconstructed.
73. There are, however, no figures quoted in the report to back up the claim that to repair the building would be uneconomic.
74. On 14 July 2023, a report on Harley Chambers was issued by Centraus Structural Consulting. The report was termed a structural restoration feasibility report and was written to address the structural condition of the building. The report was to include:
 - (a) Observations of the general condition of the structure.
 - (b) Consideration of the required building work to restore the structure.
 - (c) Development of a budget cost to accomplish the works.
 - (d) Consideration of the potential safety in design issues to restore the structure.
75. It is noted that the report states that Centraus did not have an opportunity to review any original construction documents. There are, however, a number of original drawings including structural details for both sections of the building that are available, some of which were included in the 2017 Heritage Assessment. It is also noted that Centraus did not enter the building.
76. There appears to be a significant difference in the assessment of the building between the Quoin reports and the Centraus report which appears essentially to condemn the building in its entirety. The Centraus report repeatedly uses phrases such as 'excessive damage', 'major watertightness issues', 'extremely deteriorated' and 'severe deterioration'.

If the building is as damaged as it is claimed to be, I suggest it would have been demolished by now.

77. The Centraus report describes the roof support being questionable, whereas the Quoin report states that the suspended floors are well reinforced and perimeter beams tie into the column at each floor level. The Centraus report then even casts doubt on whether the building could be reconstructed, saying that if it were at all possible due to current building code requirements, it would be a very expensive endeavour. Elsewhere, it is stated that any work to the building would be extremely expensive with no evidence to back up this claim.
78. As I have previously stated I am not an engineer, although I have worked on many earthquake damaged buildings over the last 13 years and I consider that I have a good understanding on how buildings behave in the event of an earthquake. I have seen and have personally worked on a number of buildings that were in a far more damaged state than the Harley Chambers building and which have subsequently been repaired and rebuilt.
79. A good example is the former Biology building at the Arts Centre where the unreinforced stone observatory tower completely collapsed in the earthquakes. The tower was subsequently reconstructed using modern construction techniques. It is now one of the outstanding focal points of the Arts Centre and recently received a heritage award from the New Zealand Institute of Architects. The Rose Chapel in Colombo Street is another example of a similar structure that was rebuilt and then received a national heritage award from the Institute. By contrast, the Harley Chambers building was constructed of reinforced concrete with steel columns and beams and compared with those other buildings, appears to be relatively intact.
80. In conclusion, the Centraus report, in my opinion, appears to have been written with the aim of removing any consideration that the Harley Chambers building could be retained in any form and that the only logical outcome would be complete demolition and clearing of the site.

REQUIREMENTS OF THE DISTRICT PLAN FOR LISTED HERITAGE BUILDINGS

81. Section 9.3 of the District Plan seeks to protect and maintain the Christchurch District's historic heritage and contains Objectives and Policies aimed to encourage this. Section 9.3.2.1.1 Objective – Historic Heritage states that this will be achieved by enabling and supporting the on-going retention, use and adaptive reuse of historic heritage. The same section acknowledges the impact that the earthquakes as follows:

ii “recognises the conditions of the buildings, particularly those that have suffered earthquake damage and the effect of engineering and financial factors on the ability to retain, restore and continue using them, and

iii “acknowledges that in some situations demolition may be justified by reference to the matters in Policy 9.3.2.2.8.

82. Section 9.3.2.2 of the District Plan sets out the historic heritage policies. The Harley Chambers building is currently scheduled as a ‘Significant’ (Group 2). For a building to be categorised as meeting the level of ‘Significant’ (Group 2), the historic heritage is required to:

- (a) meet at least one of the heritage values in Appendix 9.7.3.1 at a significant or highly significant level; and
- (b) be of significance to the Christchurch District because it conveys aspects of the Christchurch District's cultural and historical themes and activities and therefore contributes to the Christchurch District's sense of place and identity; and
- (c) have a moderate degree of authenticity to justify that it is of significance to the Christchurch District; and
- (d) have a moderate degree of integrity to demonstrate that it is of significance to the Christchurch District.

83. Appendix 9.3.7.1. Lists the Criteria for assessment of significance of heritage values. The criteria are:

- (a) Historical and social value;
- (b) Cultural and spiritual value;

- (c) Architectural and aesthetic value;
 - (d) Technological and craftsmanship value;
 - (e) Contextual value; and
 - (f) Archaeological and scientific significance value.
84. In my opinion, the Harley Chambers building clearly meets the threshold for being scheduled as a significant historic heritage place as it has value in accordance with the majority of the criteria listed in Appendix 9.7.3.1. It is also of significance to the Christchurch District as it conveys aspects of its cultural and historical themes, therefore contributing to the district's sense of place and identity. I consider that the building has at least a moderate degree of authenticity and integrity that it is of significance to the Christchurch District.
85. Policy 9.3.2.2.1 c. of the District Plan seeks to schedule significant historic heritage as heritage items and heritage settings where the thresholds for Significant (Group 2) or Highly Significant (Group 1) as outlined in Policy 9.3.2.2.1 b are met and in the case of interior heritage fabric, it is specifically identified in the schedule, unless:
- iii the physical condition of the heritage item and any restoration, reconstruction maintenance repair or upgrade work would result in the heritage values and integrity of the heritage item being compromised to the extent that it would no longer retain its heritage significance; and/or*
 - iv there are engineering and financial factors related to the physical condition of the heritage item that would make it unreasonable or inappropriate to schedule the heritage item.*
86. In terms of c. iii, the reports by Quoin indicate that the work to remediate and structurally upgrade the building is feasible. Further, in my opinion, the work to the facades outlined in the Quoin report which, is essentially repairing cracks and replastering areas and potentially significant areas of the façade, will not compromise the building to the extent that it would no longer retain its heritage significance.

87. Policy 9.3.2.2.8 - Demolition of heritage items sets out situations where demolition of heritage items may be justified with reference to the following matters.

- (a) whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
- (b) whether the extent of the work to retain and repair the heritage item is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised;
- (c) whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable;
- (d) the ability to retain the overall heritage values and the significance of the heritage item through a reduced degree of demolition; and
- (e) the level of significance of the heritage item.

88. With respect to (i) above, it appears from the reports by Quoin that interim protection measures are able to be put in place to remove any threat to life and/or property. With regard to (ii), in my view the extent of the work to retain and repair the heritage item is not of such a scale that the heritage values and integrity of the heritage item would be significantly compromised.

89. On page 93 of his report, Mr Gray makes the following statement:

“From reading Mr Gilmore’s structural report as to the work required to achieve 34%, 67% or 100% x NBS, it is obvious that to achieve any of the work required, would involve very extensive modification to both the interior and exterior of the building. This, in my opinion, would be so intrusive and invasive upon existing heritage fabric, as to considerably reduce the overall significance of the building to the point of being of little value.”

90. I disagree with this statement. From reading the Quoin reports, I accept that some additional structural members may be required internally to structurally upgrade the building and these may end up being visible or could be concealed behind new linings. While the interior contains what I would describe as fabric and items of interest such as the main staircase

and internal doors, I note that the interior of the building is not protected under the District Plan and consequently any work to the interior will not impact on the heritage values for which it is scheduled.

91. The work to the exterior includes repairs to cracks, the removal of plaster to enable the columns to be wrapped with carbon fibre strips, the provision of holes to attach a temporary support frame in the event that the facades are retained and the removal of otherwise damaged plaster on the facades. Once the cracks are repaired and the carbon fibre strips installed, the areas concerned could be replastered and then repainted. The facades would then be returned to their pre-earthquake appearance and condition with a less than minor impact on the heritage values of the building.
92. On page 96 of his report, Mr Gray seeks to make a further case of the demolition of the building when he states:

“Typically, it would be the preferred option of this author to retain at least the street front facades of the south side building of the overall Harley Chambers building for incorporation into a new building on the site. However, following investigation and an overlay of the existing facade drawing over the proposed hotel façade, it becomes obvious that the floor levels of the two don’t match and the window fenestration of the existing building don’t match that required for the room layout of a modern 5 star hotel complex.”

93. This statement is now, of course, irrelevant as there is, to my knowledge, no current proposal to provide a hotel on the Harley Chambers site. Even if, in the future, such a use was again proposed, the Observatory Hotel at the Arts Centre is a good example of an existing, in this case stone, heritage building with fixed window locations and floor heights being adapted for a contemporary high-class boutique hotel. There are, of course, other uses to which the building could be as has been described elsewhere in my evidence.

POSSIBLE OPTIONS FOR THE BUILDING

94. A number of options might be available for the building, ranging from full restoration to complete demolition. Between these two extremes may be other options including partial deconstruction to varying degrees. These options are assessed in the following section.

Full restoration

95. Full restoration would involve essentially restoring the building to its pre-earthquake form. This option would ensure that its full heritage values would be retained and is therefore the preferred heritage option. Disadvantages include the likely significant cost of restoring and structurally upgrading the building. It is also noted that the building was constructed for a very specific purpose – that of providing premises for medical and dental personnel – which would make it difficult to adapt it for other purposes. It is, however, noted that the interior is not protected under the District Plan so changes to the internal layout could certainly be possible.

Partial demolition

96. One option may be to demolish the most damaged section of the building, this is the northern section, as proposed by Structex. While this option is possible, it is considered to be a poor heritage outcome. Although the building was constructed in two sections, there was only five years separation between their construction dates and Lucas clearly intended that it be read as a single building as seen in his drawing showing the complete elevation at the time the southern portion was proposed to be constructed. The main entrance to the building is also located on Cambridge Terrace and would be removed under this scenario.

Retention of facades

97. Retaining the facades only has traditionally been panned as being a poor heritage outcome, the argument being rightly that a building is more than just its façade. Documents such as the ICOMOS New Zealand Charter, for example, advocate minimum intervention, stating “intervention should be the minimum necessary to ensure the retention of tangible and intangible values and the continuation of uses integral to those values”.
98. In New Zealand, the landscape has changed somewhat since the Canterbury earthquakes with the realisation being that perhaps it is preferable to retain at least part of a building, rather than losing the entire structure. Consequently, in Christchurch, there are a number of buildings where the façade has been retained and a new building has been constructed behind. These include the former AJ Whites Furnishing Store on the corner of Tuam and High Streets and the Duncan’s Buildings, also in

High Street. In both cases, new buildings have been constructed behind the restored facades with there being little evidence from the street that any change has taken place.

99. Other examples where facades have been retained and new buildings constructed behind can be found throughout New Zealand and particularly Auckland where, in one instance, a seven storey façade, that of the Jean Batten Building in the CBD, was retained with a new building being constructed behind.
100. While this option is a far from an ideal heritage outcome, there are ways in which the impact can be at least partly mitigated. These include ensuring a building is still able to be read in three dimensions and if a new building is to be constructed behind, it should be set back from the heritage facades.
101. While retaining the facades of the Harley Building is not a perfect outcome, it may be an appropriate response. Being located on a corner, the building will still be able to be read in three dimensions. The site is also large enough for a new structure, possibly taller than the present building to be constructed behind the facades but stepped back from them so as to maintain a separation between the old and the new sections. An example where this has already occurred in Christchurch is the Press building located at 158 Gloucester Street where a new building rises five levels above an existing façade. The construction of a new taller building behind the Harley Building façades may make the project more financially viable.

POSSIBLE USES

102. As noted, the Harley Chambers building was originally constructed for a specific role – that of accommodating medical and dental practices. Consequently, the floor plate comprises a myriad of small spaces which included surgeries, waiting rooms, work rooms and offices, all opening off central corridors which led through to a main vestibule, accessed by a central stairwell which, in turn led to the main entrance on the ground floor which opens onto Cambridge Terrace.
103. Converting an existing building to have a new use always has its challenges and these would be magnified in a building such as Harley Chambers. Possible uses may be office accommodation, although modern office environments tend to be open planned. Other possible uses may include

backpacker accommodation or a boutique hotel. An excellent example of the latter is the conversion of the former physics and biology building at the Christchurch Arts Centre into what now functions as a high end boutique hotel named the Observatory Hotel.

104. If only the two street facades are retained as previously discussed, a new building that might be constructed behind could accommodate any number of uses, the only significant restraint being the positioning of the windows.

CONCLUSION

105. In my opinion, the Harley Chambers building remains significant and should therefore remain identified as such in the Schedule. The key reasons for this recommendation are (in summary):

- (a) The Council's Statement of Significance considers that Harley Chambers has significance under each of the criteria for the assessment of significance of heritage values as found in Appendix 9.3.7.1 and I concur with that.
- (b) I have also undertaken my own assessment and consider that Harley Chambers can be considered as 'Significant' under the Appendix 9.3.7.1 criteria. Harley Chambers has particular has significance under the following criteria:
 - (i) 'Architectural and aesthetic'. The building displays strong references to American architectural styles of the late 19th and early 20th centuries that lead to the development of the 'skyscraper' which had, and which continues to have, a profound influence on the shape of modern cities throughout the world.
 - (ii) 'Contextual' significance. Harley Chambers is prominently located on the corner of Worcester Boulevard and Cambridge Terrace and is visible from many viewpoints. Worcester Boulevard, I consider to be one of the most intact streets for heritage buildings from different eras and in different styles in the centre of Christchurch and Harley Chambers makes an important contribution to the character of this particular area of the city.

106. In conclusion, for these reasons and for the other reasons set out in my evidence I consider that Harley Chambers is an important building to

Christchurch and should remain as a 'Significant' historic heritage place in Appendix 9.3.7.2 Schedule of Significant Historic Heritage in the District Plan.

11 August 2023

David Alan Pearson