

SUMMARY STATEMENT

1. My name is **Chessa Stevens**. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
2. I have prepared evidence on behalf of the Christchurch City Council (**Council**) to address Submission #825 by the Church Property Trustees (**CPT**) on Plan Change 14 to the Christchurch District Plan (the **District Plan; PC14**) relating to St James' Church (item number 465) and Setting (number 220) at 65 Riccarton Road.
3. Specifically, my evidence addresses the outcome being sought by CPT that both St James' Church and its Setting, be removed from Schedule of Significant Historic Heritage in Appendix 9.3.7.2 of the District Plan (the **Schedule**).

Significance of St James' Church and Setting in their current condition

4. It is my opinion that St James' Church and Setting meet the threshold of "Highly Significant" as set down in Policy 9.3.2.2.1 (b) of the District Plan in their current condition, as detailed in paragraph 51 of my primary evidence.
 - (a) They possess more than one of the values specified in Appendix 9.3.7.1 - being cultural, spiritual, architectural, aesthetic, technological and craftsmanship values - at a high level.
 - (b) They are of high overall significance to the Christchurch District, conveying some of the cultural and historical themes associated with the city's establishment as an Anglican settlement. Further, the devastating loss of built heritage in Christchurch that followed the Canterbury Earthquakes means that surviving buildings such as St James' Church are rarer than they were prior to the Earthquakes, adding to their overall heritage value and making a strong contribution to the district's identity.
 - (c) They have a high degree of authenticity, truthfully representing the original form, fabric, craftsmanship, location, context, and spiritual function of the place.
 - (d) Considering the seismic activity that the building has been subjected to, combined with over ten years of vacancy and minimal

maintenance, St James' Church remains largely whole and intact in the physical sense, and retains a high degree of integrity.

5. I strongly disagree with the statements made in CPT's submission, and the evidence of Mr Jonathan Cleese on behalf of CPT, that the heritage significance of St James' Church and Setting are degraded or diminished as a result of their condition to the extent that they no longer meet the scheduling criteria. I note that CPT have not provided an assessment of significance that supports their position.

Impact of repair and strengthening on heritage values (Policy 9.3.2.2.1 (c) (iii))

6. As part of their submission, CPT included a report prepared by Aurecon in 2013 titled *Consent Documentation for Remediation of St James' Church Concept Issue*. This report presents a scope of work for repairing earthquake damage and strengthening (upgrading) the Church to 34% NBS or 67% NBS.
7. I have used this report as the basis for evaluating the likely effect that the necessary repair and upgrade works will have on the heritage values, authenticity and integrity of St James' Church and Setting.
8. It is my opinion that it is possible for St James' Church to be repaired and strengthened to a minimum of 34% NBS in such a way that it would continue to meet the threshold of "Highly Significant" as set down in Policy 9.3.2.2.1 (b) of the District Plan. The restoration, reconstruction, maintenance, repair or upgrade work required would not (quote) "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".
9. Strengthening St James' Church to a minimum of 67% NBS will require more visible and invasive interventions to be made.
 - (a) Together, these interventions will have a moderate impact on the architectural, aesthetic, technological and craftsmanship values of the building resulting from:
 - (i) the visible intrusion upon, and obscuration of, the original form and features of the building;

- (ii) and the modification or loss of significant fabric, particularly decorated timberwork.
 - (b) The interventions will have an impact on the building's authenticity as the original form and fabric will be modified by the removal and addition of materials.
 - (c) Similarly, the interventions will have an impact on the building's integrity, as it will remain largely whole and intact but with some additional visible structure.
10. Taking these effects into account, it is my view that it is possible for St James' Church to be repaired and strengthened to a minimum of 67% NBS in such a way that it would continue to meet the threshold of "Significant", and may continue to meet the threshold of "Highly Significant", as set down in Policy 9.3.2.2.1 (b) of the District Plan.
11. My opinion on this matter remains unchanged by the evidence of Mr Peter Carney on behalf of CPT. It is my view that the strengthening scheme presented by Mr Carney would likely have a lesser impact on the heritage values of St James' Church and Setting than the 67% strengthening scheme proposed in Aurecon's *Consent Documentation for Remediation of St James' Church Concept Issue*.

Reasonability of the cost or engineering requirements (Policy 9.3.2.2.1 (c)(iv))

12. That St James' Church requires repair and strengthening work to be made safe for use is not disputed. The *Concept Issue of the Consent Documentation for Remediation of St James' Church* prepared by Aurecon in 2013 present options for repair and strengthening that can be designed in detail by appropriately experienced structural engineers and architects, and can be executed by a competent contractor. Therefore, I do not believe that it is unreasonable or inappropriate to schedule St James' Church and Setting on the basis of engineering factors.
13. I acknowledge that there will be a significant cost to repairing and strengthening the building. In their submission, CPT states that reinstating the Church is "not economically viable" for the Diocese. However, CPT has not provided any evidence in their submission that the costs of repairing the damage to the building and strengthening it to a minimum of >34%NBS would be "unreasonable" or "inappropriate" in the circumstances specific to St James' Church. I note that:

- (a) In their assessment dated 25 July 2023, Rhodes + Associates Quantity Surveyors and Cost Consultants stated that the cost of repairing and strengthening the building would be considerably less than the cost of replacement using like-for-like construction materials and techniques, or replication of the building in appropriate alternative materials.
 - (b) There are a variety of options for repairing and strengthening the building that may be implemented, as demonstrated by Aurecon's 2013 *Consent Documentation for Remediation of St James' Church Concept Issue*, and these will necessarily carry different costs that have not been estimated.
 - (c) Grants for restoration works, including the preparation of documentation required to inform the scope of works and decisions about how to carry out the works, are available through the Department of Internal Affairs Lottery Environment and Heritage fund. CPT is eligible for this fund.
14. It is therefore my opinion that removing St James' Church (item number 465) and Setting (number 220) from the Schedule cannot be justified in accordance with Policy 9.3.2.2.1 (c) (iv) of the District Plan.

Potential for adaptive reuse of St James' Church and Setting

15. At paragraph 41 of his evidence on behalf of CPT, Mr Jonathan Clease states that "*there is negligible prospect of the buildings being repaired and therefore ongoing listing simply subjects the owners to three unpalatable choices*" being:
- (a) to leave the building derelict;
 - (b) apply for Resource Consent for a non-complying activity;
 - (c) or sell the property in a damaged state.
16. I do not agree that these are the only choices available to CPT with regards to St James' Church and Setting. Other options include:
- (a) mothballing the building in line with best practice, which is different to "leaving the building derelict";

- (b) undertaking a minimum level of strengthening work so that it is no longer earthquake prone prior to putting it on the market; and
 - (c) strengthening and adapting the building for an alternative use that will generate revenue for CPT or make the building more saleable.
17. As described in paragraphs 91 to 109 of my primary evidence, I believe it is possible to adapt St James' Church and Setting to serve a different use with minimal impact on its heritage significance. The most compatible or "appropriate" use would be a civic facility. However, a hospitality venue, events venue, commercial or retail space would present opportunities to generate revenue to finance the cost of repair and strengthening work.
18. In his evidence on behalf of CPT, Mr Clease states that the cost of the works would mean that *"uses such as an office or retail/ café do not deliver a rate of return that would make alternatives plausible"*. However, he has not provided any evidence to support this.
19. In their respective evidence on behalf of CPT, both Mr Clease and Mr Carney discuss the potential implications that a change of use may have on St James' Church under the requirements of the Building Code. I do not consider that the likelihood that additional strengthening and/or upgrade works would be required to achieve a change of use is sufficient justification for removing St James' Church from the Schedule. I believe that there are a number of options available for adapting the building to ensure it meets Building Code requirements in a way that also protects its heritage values.
20. CPT's submission states that the Diocese has investigated the sale of the site, but the resounding feedback *"was that purchasers were reluctant to take on the risk"* of an earthquake prone building and *"the uncertainty around future use and potential cost of repair"*. In my view, it is likely that the property would present a more attractive opportunity to the market if it was no longer earthquake prone (i.e., if it was strengthened to >34% NBS).

Other matters raised by CPT's expert witnesses

21. At paragraphs 43 and 44 of his evidence, Mr Clease states that there are direct costs to the community as well as to the landowners associated with heritage scheduling if the building is not in use. I note that there is widespread and indisputable research that demonstrates how the retention of, and investment into, heritage buildings benefits communities. In this

respect, I suggest that investing in the strengthening and restoration of St James' Church, and/or selling it on so that it can be utilised by another party, would be aligned with CPT's mission to promote and provide social support.

Conclusion

22. It is my opinion that removing St James' Church (item number 465) and Setting (number 220) from Appendix 9.3.7.2 of the District Plan cannot be justified by Policies 9.3.2.2.1 or 9.3.2.2.8. I therefore oppose the relief being sought in CPT's submission. St James' Church and Setting should not be removed from the Schedule.
23. It remains open to CPT to make a case for demolition of St James' Church against Policy 9.3.2.2.8. However, CPT have presented no such case, nor any evidence to support demolition.

Date: 28 November 2023

Chessa Stevens

WSP Principal Conservation Architect and National Built Heritage Lead