

SUMMARY STATEMENT

1. My name is **David Pearson**. I have acted as Principal of DPA Architects, specialising in heritage conservation, since 1996. Following the Canterbury earthquakes, I have been engaged as the conservation architect for a number of significant projects in Christchurch, including the Arts Centre and currently the Canterbury Museum redevelopment.
2. I have prepared a Statement of Primary Evidence and a Statement of Rebuttal Evidence on behalf of the **Christchurch City Council** in respect to Plan Change 14 to the Christchurch District Plan and in response to the submission from Cambridge 137 Limited seeking to delete 137 Cambridge Terrace (Harley Chambers) from Appendix 9.3.7.2 Schedule of Significant Historic heritage. I have also attended Expert Conferencing on the subject.
3. In preparing my evidence, I visited the site, viewed relevant documentation and undertook additional research into the building's provenance. As a result, I am of the opinion that Harley Chambers should not be removed from the Schedule for the following reasons.
4. Appendix 9.3.7.1 of the Christchurch District Plan lists six criteria that may be used for assessing the heritage values of a historic heritage place. In my opinion, Harley Chambers can be considered to have heritage values under all six criteria, although I note that a place only needs to meet one of the criteria to be considered for inclusion in the Schedule.
5. Although I believe Harley Chambers has significance under all six criteria, I consider it has particular significance under the following criteria:
 - (a) Historical and social value. The building was constructed as a purpose built facility to be occupied by the medical and dental professions.
 - (b) Architectural and aesthetic value. The building was designed by Gordon Lucas who had previously worked for the Luttrell Brothers, a well-known architectural firm in Christchurch. The brothers were strongly influenced by the American Chicago School and Richardson Warehouse architectural styles of the late nineteenth century which lead to the development of the multi storey 'skyscraper', a typology that continues to have a profound effect on the form of modern cities.

Lucas was obviously also influenced by the American architectural styles and this can be seen in the design of Harley Chambers. Prior to the Canterbury earthquakes, Christchurch boasted a number of buildings in the style, however, I believe that Harley Chambers is now the only example remaining in Christchurch.

- (c) Contextual Value. Although Christchurch lost a large number of heritage buildings, Worcester Boulevard extending from Canterbury Museum through to Christchurch Cathedral and beyond remains, in my opinion, one of the most intact streets for heritage buildings in Christchurch. Harley Chambers occupies a prominent location at the corner of Worcester Boulevard and Cambridge Terrace and makes an important contribution to the character of Worcester Boulevard and the wider townscape of Christchurch.
6. A number of reports have been prepared describing the building's structural and material condition. Although a report by Centraus recommends complete demolition of the building, reports by Quoin indicate that it is realistic and feasible for it to be repaired and structurally upgraded to achieve 67% NBS (New Building Standard) with minimal impact on the building exterior. Inexplicably, the Quoin report then recommends that the building be deconstructed.
 7. I consider that there are a number of options available for Harley Chambers, ranging from full retention to full demolition. Full retention may not be financially viable and full demolition would obviously completely extinguish all of the building's heritage values.
 8. A third option would be partial demolition which may involve the removal of the interior while retaining the two street facades. Although façade retention is not a perfect heritage outcome, in this particular case, as a corner building, the full extent of the original building could still be discerned. I would also suggest that since Christchurch has lost so many heritage buildings, the retention of the facades where a building is retained in part may be a more acceptable outcome than complete demolition.
 9. Mr John Brown in paragraph 70 of his evidence considers that the building's greatest heritage value lies in its technological value and its interior configuration. I strongly disagree with Mr Brown's opinion in this regard. As previously noted, I believe the building's most significant values lie elsewhere.

10. Mr Brown also suggests that if the interiors were to be stripped out, its heritage values would essentially be lost. I would note that should the building be removed from the Schedule as Mr Brown is advocating, total demolition is then a likely outcome which will obviously also result in the loss of any technological values the building may have.
11. I would maintain that the building's architectural and aesthetic values, as well as its contextual values would essentially be retained even if the interior was to be stripped out. I also note that the interior of the building is not protected under the Christchurch District Plan. Consequently, the interiors could be removed without materially affecting the exteriors as scheduled in the District Plan.
12. In my opinion, the site might lend itself to a development whereby a new tower could be constructed behind the retained facades as has happened on other sites in Christchurch and elsewhere in New Zealand as well as overseas.
13. I am familiar with the requirements of Chapter 15 COMMERCIAL of the Christchurch District Plan as proposed to be modified by PC 14 regarding the proportions and height of a tower building behind a heritage façade.
14. Within those constraints, it may be possible to construct a new tower behind the facades of Harley Chambers to make retention of the facades possible. To my knowledge, no costings have been produced to test the financial viability of such a proposal.
15. I am also familiar with Policy 9.3.2.2.1 c. of the Christchurch District Plan which has been quoted by Mr Brown as justifying the removal of Harley Chambers from the Schedule and particularly sub clauses iii and iv that indicate that the physical condition of a heritage item can be considered when assessing building for inclusion in the Schedule and that engineering and financial factors can also be considered.
16. In response, the principal stated aim of Policy 9.3.2.2.1 is the identification and assessment of historic heritage to enable it to be scheduled in the District Plan in accordance with the criteria in Appendix 9.3.7.1. It is noted that the condition of a building is not included as a criterion, nor does building conservation philosophy generally consider that the poor condition of a building negatively impacts on its heritage values, in this case, to the point where it should no longer be scheduled.

17. While the submission to remove the building from the Schedule of Historic Heritage is not an application to demolish the building, the aim is clearly to enable this outcome to be achieved.
18. For the reasons outlined in my Statement of Evidence and this summary, I strongly believe that Harley Chambers is worthy of being retained as a Significant item in the Christchurch District Plan Schedule of significant historic heritage and I believe its loss would have a significant impact on Christchurch's historical architectural record.

Date: 23 November 2023

David Alan Pearson