

**BEFORE THE INDEPENDENT HEARING COMMISSIONERS
IN CHRISTCHURCH**

TE MAHERE Ā-ROHE I TŪTOHUA MŌ TE TĀONE O ŌTAUTAHI

IN THE MATTER OF 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

**JOINT STATEMENT OF CONSERVATION ARCHITECTURE, HERITAGE
ENGINEERING AND QUANTITY SURVEYING**

4th October 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of Conservation Architecture. Heritage Engineering and related Quantity Surveying. The conference was limited to the heritage scheduling of 127 Cambridge Terrace known as Harley Chambers.
2. The expert conferencing was held on 27th September 2023, facilitated by Paul Thomas.
3. Attendees at the conference were:
 - (a) Amanda Ohs, David Pearson, Stephen Hogg and Gavin Stanley Christchurch City Council. Amanda Ohs is the author of a statement of evidence on listed heritage items. Steven Hogg is the author of Engineering evidence on three heritage buildings including Harley Chamber and Gavin Stanley is the author of Quantity Surveying evidence regarding a number of heritage buildings including Harley Chambers. David Pearson is the author of conservation architecture evidence for Harley Chambers. These are all dated 11 August 2023.
 - (b) John Brown, Keely Pomeroy and Brett Gilmore for Cambridge 137 Ltd. John Brown is the author of evidence dated 20 September 2023 on the heritage value of Harley Chambers. Brett Gilmore is the author of engineering evidence on the building dated 20 September and Keely Pomeroy is the author of Quantity Surveying evidence of the same date.
 - (c) Also observing the conference were Chessa Stevens, Timothy Holmes, Phil Griffiths and Clara Caponi who have authored heritage related evidence which does not address the subject of this conference.

CODE OF CONDUCT

4. This joint statement is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
5. We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

PURPOSE AND SCOPE OF CONFERENCING

6. The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement on the continued scheduling of Harley Chambers as a significant heritage item.
7. This follows an earlier conferencing of heritage experts on this matter. This is covered in a JWS dated 21st September which involved Amanda Oh's and John Brown.
8. Conferencing generally covered all matters on a preliminary agenda which had been discussed by the experts in advance of the conferencing.
9. All attendees reviewed relevant evidence in advance of the conferencing.
10. **Annexure A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

Date: 4th October 2023



David Pearson



Stephen Hogg



Amanda Ohs



Gavin Stanley



John Edward Brown



Keeley Pomeroy



Brett Gilmore

ANNEXURE A – EXPERT CONFERENCING ON HERITAGE

Participants: John Brown (JB), Keeley Pomeroy (KP), Brett Gilmore (BG), Amanda Ohs (AO), Dave Pearson (DP), Stephen Hogg (SH), and Gavin Stanley (GS).

Issue	Agreed Position	Disagreements or reservations, with reasons
Heritage Significance.	<p>JB, DP, AO agree that the building had significant heritage values, integrity and authenticity when originally scheduled being prior to the earthquakes.</p> <p>JP, DP, AO agree that the interior of the building is not scheduled.</p>	<p>DP, AO consider the building retains craftsmanship value despite the building condition. It also has historic and social significance and architectural significance and contextual significance. DP considers the building continues to meet five of the six heritage significance criteria (noting the uncertainty about potential archaeological value). DP and AO consider it retains sufficient integrity to justify scheduling in accordance with Policy 9.3.2.2.1 (b)(i).</p> <p>JB disagrees with the above and his assessment is that the condition of the building means that the above values have been reduced such that the building would not now meet the required tests for scheduling including moderate integrity based on the level of work required to return the building to use.</p>
Engineering feasibility of repair.	<p>SH and BG agree that the building is repairable but that the works will be invasive to the interior.</p> <p>SH and BG generally agree on the scope of work required for repair to the different Building Code ratings. For 67% this includes strengthening of the columns.</p>	<p>BG considers that the repair challenges, together with the assessed costs of the repairs, make it uneconomic to repair and justify demolition. SH disagrees with the reasons for demolition that BG has provided in his brief of evidence because he considers those matters can be mitigated.</p>

	<p>SH and BG agree that the ongoing unauthorized occupation of the building is a challenge.</p> <p>SH and BG agree that there are a number of options for re-use of the building and that retention of the façade only is an engineeringly feasible option.</p> <p>SH and BG agreed that roof repair would be new light weight roof and replacement membrane on top of existing concrete roof. Also that parts of the existing lightweight roof and existing membrane will need to be removed to facilitate repairs but this does not extend to the existing concrete roof.</p>	
Façade Retention	<p>JB, DP and AO agree that façade retention does not achieve ideal heritage outcomes, but DP and AO consider this is better than demolition of the entire building.</p>	<p>However, JB considers that the building would not merit inclusion on the schedule as a façade.</p>
QS methodology	<p>GS and KP agree that fluctuation indices are appropriate for updating costs from the previous 2017 estimates.</p> <p>GS and KP agree that the two different methods used by them are both recognized methods. However, GS understands that the CGPI method cannot be used for repair and refurbishment costs.</p> <p>GS and KP agree to exchange additional information on their calculations.</p>	<p>GS and KP disagree on the result of escalation. KP's assessment results in a 41% escalation GS estimates have 26% escalation.</p>

	<p>This includes assumptions re fire damage repair, decontamination, replacement of floors and doors and mold repair.</p> <p>GS and KP agree that after re-measure of the façade there is only a small difference between the numbers.</p> <p>GS and KP agree to exchange information of façade retention costs assumptions and estimates including steel framing of the façade.</p>	
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