

**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 HERITAGE EXPERTS

21st September 2023

INTRODUCTION

1. This joint witness statement relates to expert conferencing on the topic of Heritage.
2. The expert conferencing was held on 21st September 2023, facilitated by Paul Thomas via a video-conference.
3. Attendees at the conference were:
 - (a) Amanda Ohs and Ann McEwan, for Christchurch City Council.
Amanda Ohs is the author of a statement of evidence dated 11 August 2023 on listed heritage items. Ann McEwan is the author of a statement of evidence dated 11 August 2023 on Residential Heritage Areas.
 - (b) John Brown is the author of two statements of evidence being firstly for Cambridge 137 Ltd relating to 137 Cambridge Terrace, and secondly for Kainga Ora – Homes and Communities on Residential Heritage Areas.
 - (c) Gareth Wright who is the author of evidence on a heritage matters not covered in the conferencing was also an observer of the conferencing and did not participate.

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 Heritage issues relevant to Plan Change 14, noting that a separate conferencing is to be held on Conservation Architecture, Heritage Engineering and Quantity Surveying.
7. Conferencing covered all matters on a preliminary agenda which had been discussed by the experts in advance of the conferencing.
8. All attendees reviewed relevant evidence in advance of the conferencing.

9. **Annexure A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

Date: 22nd September 2023



John Edward Brown



Dr Ann McEwan



Amanda Ohs

ANNEXURE A – EXPERT CONFERENCING ON HERITAGE

Participants: John Brown (JB), Amanda Ohs (AO) and Dr Ann McEwan (AM).

Issue	Agreed Position	Disagreements or reservations, with reasons
<p>Listing of 137 Cambridge terrace</p>	<p>JB agreed that prior to the Canterbury earthquakes the building met the tests for Inclusion on the schedule as a significant heritage item.</p> <p>Agreed that AO would also attend the related conference next week.</p>	<p>The principal disagreement is whether the building in its current state justifies scheduling.</p> <p>JB considers the damage to the building from earthquake, vandalism and fire has reduced the integrity and technology heritage values of the building.</p> <p>JB considers that the building cannot meet the tests of Policy 9.3.2.2.1 now or after repair and upgrade.</p> <p>AO's assessment is that it still justifies scheduling based on its heritage values including contextual significance as a City landmark, the architectural value of the façade and intangible values.</p> <p>AO considers that repair and upgrade would not compromise the heritage values such that it should be removed from the schedule with reference to Policy 9.3.2.2.1(c) iii.</p> <p>AO's assessment relies on other expert evidence that will be subject to further conferencing with a wider range of experts on 27 September.</p>
<p>Heritage Area Assessment Methodology</p>	<p>JB and AM agree that the assessment criteria for the proposed heritage areas are correct and reflect the requirements of the Regional Policy Statement.</p>	<p>However, JB considers that peer review of the assessments is required. Particularly in regard to fact checking and geographical extent of each heritage area.</p>

	<p>JB and AM agree that the methodology applied is appropriate and heritage areas proposed are justified.</p> <p>JB and AM agree that heritage areas do not require a two tier 'Significant' and 'Highly Significant' system that is applied to scheduling buildings. However, JB considers that level of information in the assessments would assist when determining consent applications.</p>	<p>AM advised that AO had peer reviewed her work on this and that there was an iterative process applied.</p> <p>JB considers that refinements are justified and that there are potential inconsistencies or lack of clarity in some cases in evaluations of defining and contributing buildings. This concern is limited to specific details in specific reports. He considers this important because it feeds down into application of the plan rules.</p> <p>AM considers that there is always room for different experts to have different judgements on value but that, overall, the assessments are robust and consistent.</p> <p>Notwithstanding the above there is close alignment between the experts with differences relating to matters of detail.</p>
<p>Should issued Certificates of Compliance for demolitions be taken into account in establishing heritage areas?</p>	<p>This matter is raised in JB's evidence for Kainga Ora because they hold CoCs for demolition of dwellings at the Piko/Shand RHA. JB and AM agree that from a heritage expert perspective the existence of demolition CoCs should not be a consideration in evaluation of heritage value. However, it is also agreed that this is also a matter for consideration by planning experts.</p>	
<p>The term Residential Heritage Areas</p>	<p>AM and JB agree that the naming of heritage areas eg Heaton Street Residential Heritage Area, was descriptive rather than introducing a new kind or 'sub-species of heritage area.</p>	<p>JB considers there is potential for confusion applying the term Residential Heritage Areas in terms of existing Plan policy referring to just Heritage Areas.</p>

Terminology Between Heritage Areas and Character Areas.

JB considers that the assessment reports for the two types of area should avoid both using the term 'contributing' site. This is to avoid confusion between the two types of area. He recommends that character area assessments change contributing to supporting to adopt a different term to heritage areas.

AM does not consider this is justified but this is a matter that the panel may wish to consider.