

**BEFORE AN INDEPENDENT HEARINGS PANEL  
IN CHRISTCHURCH**

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

**UNDER** the Resource Management Act 1991 (the **RMA**)

**AND**

**IN THE MATTER OF** of the hearing of submissions on Plan Change 14  
(Housing and Business Choice) to the Christchurch  
District Plan

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**STATEMENT OF REBUTTAL EVIDENCE OF CHESSA STEVENS ON BEHALF  
OF CHRISTCHURCH CITY COUNCIL**

**QUALIFYING MATTER: HERITAGE  
HERITAGE SITE: ST JAMES' CHURCH**

**Dated: 9 October 2023**

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## EXECUTIVE SUMMARY

1. This rebuttal evidence responds to submitter evidence seeking the removal of St James' Church (item number 465) and its Setting (number 220) at 65 Riccarton Road from Appendix 9.3.7.2 Schedule of Significant Historic Heritage (**Schedule**).
2. The issues addressed in this rebuttal evidence are set out in paragraph 9 below.
3. Having considered submitters' evidence I maintain my position that St James' Church and its setting should not be removed from the Schedule.

## INTRODUCTION

4. My full name is **Francesca Louise Stevens**. I practice under my abbreviated name, Chessa Stevens. I am Principal Conservation Architect and National Built Heritage Lead at WSP New Zealand Ltd.
5. I prepared a statement of primary evidence on behalf of Christchurch City Council (**Council**) dated 11 August 2023. My primary evidence addressed 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.
6. I have the qualifications and experience set out at paragraphs 18-20 of my primary evidence dated 11 August 2023.
7. I repeat the confirmation given in my primary evidence that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

## SCOPE OF REBUTTAL EVIDENCE

8. In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters, as that evidence relates to my primary evidence including evidence of the following witnesses:
  - (a) Mr Jonathan Cleese for CPT; and
  - (b) Mr Peter Carney for CPT.

9. In this evidence I respond to the following issues in relation to St James' Church:
  - (a) tangible and intangible heritage values;
  - (b) repair options;
  - (c) the use and reuse options; and
  - (d) earthquake strengthening options.

#### **EVIDENCE OF JONATHAN CLEAVE**

10. At paragraph 27 of his evidence, Mr Cleave states that the heritage value of the building must be less than it was prior to the damage; and, similarly at paragraph 40.2, he states that “*heritage values are degraded as a result of damage to fabric*”.
11. As explained in the analysis provided in my primary evidence (at paragraphs 50 and 51), heritage values encompass both the tangible and intangible, many of which continue to exist regardless of the building’s condition. Furthermore, the devastating loss of built heritage in Christchurch that followed the Canterbury Earthquakes means that surviving buildings are typically much rarer than they were prior to the Earthquakes, adding to their overall heritage value.
12. At paragraph 41 of his evidence, Mr Cleave states that “*there is negligible prospect of the buildings being repaired and therefore ongoing listing simply subjects the owners to three unpalatable choices*” being to leave the building derelict, apply for Resource Consent for a non-complying activity, or sell the property in a damaged state. I do not agree that these are the only choices available to CPT with regards to St James’ Church.
13. At paragraph 35 of his evidence, Mr Cleave makes several statements that I will address separately:
  - (a) *CPT have offered St James Church to other faith communities and no interest has been forthcoming.*

Other faith-based communities are not the only parties that might be interested in taking over the building. Further, it is not clear what is meant by “offered” – whether this was gratis or payment was required.

- (b) *Alternative non-faith uses are possible, however a 'change of use' is likely to trigger the need for the necessary building code upgrades...*

I do not consider that this reason provides sufficient justification for removing St James' Church from the Schedule. For the reasons discussed below, I consider that there are a number of options available for strengthening the building to ensure it meets building code in a way that also protects its heritage values.

- (c) *... the resultant costs [of alternative non-faith uses] mean that uses such as an office or retail/ café do not deliver a rate of return that would make alternatives plausible.*

As discussed at paragraphs 87 to 109 of my primary evidence, there are a variety of potential adaptive reuses for St James'. Mr Clease has not provided any evidence that these uses would not deliver a rate of return that would make alternatives plausible.

14. Other options for St James' Church 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. I note that funding for this may be available through the Department of Internal Affairs Lottery Environment and Heritage fund (as stated at paragraph 83 of my primary evidence).

15. 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 do not disagree. However, 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.

## EVIDENCE OF PETER CARNEY

### Introduction

16. In his evidence, Peter Carney outlines the amendments/additions to the strengthening scheme prepared by Aurecon that he believes are required to achieve a seismic capacity of 67% of the New Building Standard (**NBS**) for a building of Importance Level (IL) 2 (paragraph 10). At paragraph 11, he states:

*“The primary addition I recommend to the Aurecon strengthening scheme involves work to connect perimeter walls into the existing roof structure and, where required, strengthen that roof structure to resist anticipated loads”.*

17. I note that the drawings included with Mr Carney’s evidence are taken from Aurecon’s *Strength and Repair Assessment and Re-Strengthening Drawings* (as identified at paragraph 8 of Mr Carney’s evidence) which are dated 28/07/11 and 13/04/12, and were not originally lodged as part of the submission documentation package. These differ from the drawings included in Aurecon’s *Concept Issue of the Consent Documentation for Remediation of St. James Church*, that have a later date of 5/11/12, which I reviewed in my primary evidence.
18. It is not within my area of expertise to comment on whether or not the additional measures proposed by Mr Carney are required for Aurecon’s 67% NBS scheme to actually achieve 67% NBS for an IL2 building. On this matter I refer to the evidence of Ms Clara Caponi. However, it appears to me that the Concept Issue of the Consent Documentation for Remediation takes into account many of the measures that Mr Carney has proposed.
19. The above observations notwithstanding, I have evaluated whether or not, in my opinion, St James’ Church and Setting would continue to meet the criteria for scheduling as a “highly significant” item – or, as a minimum, a “significant” item - if the interventions proposed by Mr Carney, including those proposed by Aurecon in the drawings dated 13/04/12, were implemented.

### Roof diaphragm

20. Mr Carney’s proposed strengthening scheme requires the ceiling/roof diaphragm over the nave to be strengthened by either applying a layer of

plywood. This would require either: removing the roof and installing it over the roof sarking and reinstalling the roof, or removing the ceiling, applying the plywood, and reinstalling the ceiling. In both cases, the installation process would be invasive, and some historic fabric would be lost during the process. However, at completion, the diaphragm would not be visible, and the overall impact on architectural, aesthetic, technological and craftsmanship values of the building would be minimal.

21. Both options would require:
  - (a) The addition of new purlins to the roof cavity. These would not require any historic fabric to be removed that was not being removed already, and would not be visible on completion. Therefore, these interventions would have no impact on the values of the building.
  - (b) The addition of fabricated brackets below the ceiling to continuously tie every second line of purlins across each truss. These brackets would be visible, but would be relatively small, and could be designed sympathetically. Therefore, this intervention would have a negligible impact on the architectural, aesthetic, technological and craftsmanship values of the building.
  - (c) The addition of M16 stainless steel rods at rafter locations penetrating through the west wall and the chancel wall, which would be visible on the exterior. These are addressed under the respective sections below.

### **Chancel arch and wall**

22. The two roof diaphragm options proposed by Mr Carney would require M16 stainless steel rods to be installed at rafter locations penetrating through to the exterior. These would be visible along the top of the chancel wall on the exterior. However, this wall is not a prominent feature of the building, owing to its position between the nave and the chancel, and being partially obscured by the tower on the north side.
23. At SK-02-02, Mr Carney states that tying the chancel arch to each underpurlin with through-anchors and fabricated brackets could be used as an alternative to applying an engineered cementitious composite. This intervention would likely be visible. However, neither option would result in a

notable reduction in architectural, aesthetic, technological and craftsmanship values of the building.

24. At S-03-01 and -02 Mr Carney identifies works required that will impact the east gable wall that are associated with strengthening the chancel roof by tying the “*gable end wall and internal arch to roof framing*”. Mr Carney refers to the same sketch options (SSK-001 and SSK-002) as for the roof diaphragm required over the nave. It is assumed that these works would require M16 stainless steel rods be installed at rafter locations penetrating through to the western side of the chancel arch wall. Because the roof level of the chancel is lower than that of the nave, these would likely be visible on the interior face of the chancel arch wall.
25. At S-04-01, Mr Carney proposes 250 x 250 concrete tie beams at the base and top of the wall, formed and poured prior to post-tensioning steel tie rods within the wall. Installation of the rods and concrete tie beams would be invasive, but would be invisible at completion. The *Concept Issue of the Consent Documentation for Remediation* states that using concealed steel strands drilled through the centre of the chancel wall to is not considered viable if the building is to be strengthened to 67% NBS. Therefore, exposed tensioned rods will need to be installed on both faces of the wall, or steel support beams would be required as an alternative.
26. The strengthening options presented in the *Concept Issue of the Consent Documentation for Remediation*, which are discussed at paragraphs 60 to 66 of my primary evidence, are highly invasive and would be visible at completion. In my opinion, Mr Carney’s proposed strengthening solution, which would result in only the ends of M16 bolts being visible on the nave side of the chancel wall, would have a lesser impact on the heritage values of St James’ Church than the three options proposed in the *Concept Issue of the Consent Documentation for Remediation*.

### **West gable wall**

27. The two roof diaphragm options proposed by Mr Carney would require M16 stainless steel rods to be installed at rafter locations penetrating through to the exterior. These would be visible along the top of the west gable wall on the exterior.



28. Further works affecting the west gable wall are discussed in paragraph 31 below.

### **East gable wall**

29. At S-03-01 and -02 Mr Carney identifies works required that will impact the east gable wall that are associated with strengthening the chancel roof by tying the “*gable end wall and internal arch to roof framing*”. Mr Carney refers to the same sketch options (SSK-001 and SSK-002) as for the roof diaphragm required over the nave. Therefore, it is assumed that these works would require M16 stainless steel rods be installed at rafter locations penetrating through to the exterior of the east gable wall. A similar requirement to tie these walls together is identified in the *Concept Issue of the Consent Documentation for Remediation*. Therefore, I believe that the impact on the building’s heritage values would be no greater under Mr Carney’s proposed strengthening scheme than it would be under the scheme proposed in the *Concept Issue of the Consent Documentation for Remediation*.

### **Other works**

30. At S-03-01, Mr Carney states that the roof eaves must be exposed to “*improve either roof sarking-to-wall or ceiling-to-wall diaphragm connections*”. It may be assumed that this work could take place as part of installing the roof diaphragm over the nave, and therefore would not add any further fabric removal or risk of fabric damage to the scheme. Further, this work would be invisible at completion, thereby having no notable impact on the building’s architectural, aesthetic, or craftsmanship values.
31. The Aurecon *Re-Strengthening Drawings* added to by Mr Carney propose other repair and strengthening works including:
- (a) injection grouting to cracks in line with the eaves on the east and west gable walls;
  - (b) crack stitching and grout injection to stonework below windows on each face;
  - (c) installation of masonry screws at 500crs each way through masonry walls installed from the interior and covered with plaster;

- (d) installation of fabricated steel brackets each side of truss bottom chords, bolted together through truss chords and fixed to vertical hold downs each side grouted into perimeter walls;
  - (e) pinning loose Oamaru corner stones using stainless steel rods drilled and epoxied into place;
  - (f) repointing of joints in the Oamaru stonework around the windows; and
  - (g) pinning of stone finials to gable-ends.
32. These works are similar to those proposed in the *Concept Issue of the Consent Documentation for Remediation* and can be carried out in such a way that the works are largely, if not entirely, concealed once they have been completed.

#### **Summary of impact of Mr Carney's proposed strengthening scheme**

33. It is my view that the strengthening scheme presented by Mr Carney, which combines Aurecon's *Strength and Repair Assessment and Re-Strengthening Drawings* dated 28/07/11 and 13/04/12 with his proposed additions, 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 *Concept Issue of the Consent Documentation for Remediation* assessed in my primary evidence (summarised in paragraph 74).
34. I therefore remain of the opinion 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.

#### **Strengthening requirements and change of use**

35. At paragraphs 19 and 20, Mr Carney raises the question of whether the Council would accept a 67% NBS strengthening scheme if the use of the building were to change.
36. Section 115 of the Building Act sets out the code compliance requirements for change of use. Notably this includes (with my emphasis added):

- (a) *in a case where the change involves the incorporation in the building of 1 or more household units ... will comply, **as nearly as is reasonably practicable**, with the building code in all respects; and*
- (b) *in any other case, unless the territorial authority gives the owner written notice that the territorial authority is satisfied, on reasonable grounds, that the building, in its new use,—*
  - (i) *will comply, **as nearly as is reasonably practicable**, with every provision of the building code that relates to the following:*
    - A. *means of escape from fire, protection of other property, sanitary facilities, structural performance, and fire-rating performance:*
    - B. *access and facilities for persons with disabilities (if this is a requirement under section 118); and*
  - (ii) *will,—*
    - A. *if it complied with the other provisions of the building code immediately before the change of use, continue to comply with those provisions; or*
    - B. *if it did not comply with the other provisions of the building code immediately before the change of use, continue to comply at least to the same extent as it did then comply.*

37. Section 4 of the Building Act states (with my emphasis added) that:

*(2) In achieving the purpose of this Act, **a person to whom this section applies must take into account** the following principles that are relevant to the performance of functions or duties imposed, or the exercise of powers conferred, on that person by this Act:*

*(f) **the need to facilitate the preservation of buildings of significant cultural, historical or heritage value.***

38. It is my understanding that the Council has discretion to decide to what extent it is prepared to accept strengthening of the building beyond 34% NBS, regardless of whether or not its use is changed, on the basis of what is

reasonably practicable in order to meet its responsibilities to facilitate the preservation of buildings of significant cultural, historical or heritage value.

9 October 2023

**Chessa Stevens**

WSP Principal Conservation Architect and National Built Heritage Lead