

**BEFORE INDEPENDENT HEARING COMMISSIONERS  
IN CHRISTCHURCH**

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

**IN THE MATTER** of the Resource Management Act 1991

**AND**

**IN THE MATTER** of the hearing of submissions on Plan Change 13 (Update of  
Historic Heritage Provisions) to the Christchurch District Plan

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**STATEMENT OF PRIMARY EVIDENCE OF DR ANN ELIZABETH MCEWAN  
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

Dated: 28 May 2025

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## **EXECUTIVE SUMMARY**

1. My full name is Dr Ann Elizabeth McEwan. I am an independent heritage consultant trading as Heritage Consultancy Services. Since June 2021 I have been engaged by Christchurch City Council (the Council) to assist with the preparation of Plan Change 13 as it relates to Residential Heritage Areas (RHAs).
2. I have prepared this statement of evidence on behalf of the Council in respect of submissions made about RHAs to Plan Change 13 (PC13) to the Christchurch District Plan (the District Plan).
3. My primary evidence before this hearing concerns the identification and assessment of RHAs in Christchurch and Lyttelton. This work was predicated on a study of residential Heritage Conservation Areas that was undertaken by consultancy firm Harrison Grierson in 2009-10; I was a member of the study team at that time.
4. The points raised in my evidence chiefly concern the boundaries of the proposed RHAs, the inclusion and rating of individual properties within them, and the potential for further RHAs to be scheduled. The evidence I presented to the Plan Change 14 IHP has been appended to this report.

## **INTRODUCTION**

5. My name is Dr Ann Elizabeth McEwan and I am a heritage consultant with over 35 years' experience in the field. I hold a PhD in art and architectural history from the University of Canterbury, am an experienced peer reviewer and expert witness, and a full member of ICOMOS New Zealand.
6. Since I established Heritage Consultancy Services in 2006 I have undertaken the review of the built heritage schedules for the Kaipara, Thames-Coromandel, Waikato, Nelson, Waimakariri, Selwyn, Timaru and Gore district plans. Using the heritage area methodology first developed for Christchurch City Council in 2009-10, potential heritage areas were identified and assessed in all of these districts. Only some districts were found to have heritage areas that merited scheduling according to the criteria; principally Thames-Coromandel, Waikato, Nelson and Timaru. Existing and proposed planning provisions in each district, as well as budgetary and time constraints, mean that the four-tier categorisation used in Christchurch was not implemented in any of these jurisdictions. More recently I have also worked for Waitaki District Council and identified two

heritage areas there. Over the years I have worked for Christchurch City Council on a number of heritage projects, including assessing all of the currently proposed Residential Heritage Areas in the city.

7. I am the author of the 'Heritage Issues' chapter in *Planning Practice in New Zealand*, edited by Caroline Miller and Lee Beattie (LexisNexis, 2017/2022), which was given the John Mawson Award of Merit by the NZ Planning Institute in 2018. In 2015-16 and 2021 I was engaged as a Professional Teaching Fellow in the School of Architecture and Planning at the University of Auckland. I have served on the Auckland, Hamilton and Waipa councils' Heritage Advisory Panels in the past.
8. In preparing this evidence I have:
  - (a) Read the submissions provided to me by the Council and referred to the corresponding RHA reports where necessary.
  - (b) Reflected on the evidence I provided to the IHP for Plan Change 14 and the evidence of some experts party to that process. I confirm at this time that the evidence I prepared for PC14 is unchanged, except where scheduled items or areas have been demolished or withdrawn by the Council.
  - (c) Undertaken further field work on 18-20 June 2023 in order to view or review areas of the city raised in submission.
  - (d) Prepared 'Potential RHA review criteria template' reports, where necessary, to record my recommendation not to schedule streets nominated in submissions as potential RHAs.
  - (e) Revised individual record forms and RHA reports, where necessary, in response to submissions.
  - (f) Reviewed all RHA reports and individual record forms prior to finalising this statement of evidence in an effort to ensure that my contribution to PC13 is as accurate as possible in respect to the current state of each area and the properties within.
9. I am authorised to provide this evidence on behalf of the Council.

## **Qualifications and experience**

10. I hold the qualifications of a PhD in Art and Architectural History from the University of Canterbury (2001).
11. I first worked for Christchurch City Council in the summer of 1995-96 when I was tasked with preparing assessment reports for scheduled items. I lectured in art and architectural history and heritage at the University of Waikato from 1996 until 2005 and thereafter established Heritage Consultancy Services.
12. I provide independent heritage consultancy services throughout New Zealand and appeared as an expert witness at the Christchurch Replacement Plan hearings in 2015. Previously, in 2009-10, I was part of an interdisciplinary team that undertook the identification and assessment of residential Heritage Conservation Areas for Christchurch City Council. This work formed a reference point for the more recent RHA project undertaken by Heritage Consultancy Services but was not determinative of it in light of the destruction caused by the Canterbury Earthquakes of 2010-11.
13. I am a full member of ICOMOS NZ, PHANZA (Professional Historians Association of New Zealand Aotearoa), and DOCOMOMO NZ.

## **Code of conduct**

14. While this is a Council hearing, I have read the Code of Conduct for Expert Witnesses (contained in the 2023 Practice Note) and agree to comply with it. Except where I state I rely on the evidence of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from my expressed opinions.

## **Scope of evidence**

15. My statement of evidence addresses the following matters:
  - (a) RHA background & methodology;
  - (b) Response to PC 14 IHP Recommendations in respect to the heritage significance of the proposed RHAs
  - (c) Chester Street East / Dawson Street RHA;
  - (d) CPT North St Albans Subdivision (1923) RHA;

- (e) Inner-city West RHA;
  - (f) Lyttelton RHA;
  - (g) Macmillan Avenue RHA;
  - (h) Shelley/Forbes Streets RHA;
  - (i) Requested additional RHAs: Mary Street & Rayburn Avenue; Papanui War Memorial Streets, Beverley Street, Scott Street, Riccarton, Phillipstown, Dover Street, Woodville Street, Cashmere View Street.
  - (j) Selected individual items with respect to scheduling.
16. I address each of these points in my evidence below.

## **RHA BACKGROUND & METHODOLOGY**

17. Under the Resource Management Act (RMA) historic heritage resources include areas as well as individual buildings and structures.<sup>1</sup> In New Zealand recognised and protected heritage areas encompass town centre commercial, residential and mixed use building typologies. When scheduled on a district plan such areas typically contain a mix of individually scheduled items and un-scheduled properties. In the case of railway house and state house heritage areas, for example, there may be no scheduled items present because it is in the collective values of the street or subdivision that heritage significance lies. Unlike individual heritage items or historic places, territorial authority scheduled heritage areas are rarely ranked and HNZPT's historic areas never are.<sup>2</sup>
18. Throughout New Zealand local authorities identify heritage areas and provide for their protection by scheduling them on their district plans. Some, such as the Grahamstown Heritage Area in Thames and Queenstown's Courthouse Heritage Precinct are of long standing [1993 & 1995 respectively], whereas others have been introduced in more recent district plan reviews.<sup>3</sup> Under the HNZPT Act 2014, HNZPT lists historic areas for

<sup>1</sup> RMA Section 2 Interpretation. See also the Canterbury Regional Policy Statement, Chapter 13, Policy 13.3.1.

<sup>2</sup> The Operative Queenstown Lakes District Plan is an outlier in this respect because it does categorise the district's heritage precincts (areas). In the Proposed District Plan (11 April 2025), however, heritage precincts are not categorised.

<sup>3</sup> Timaru District Council's Caroline Bay Historic Heritage Area was included in the Proposed District Plan notified in September 2022 and a number of residential heritage areas were added to the 2024 Wellington City District Plan, including those of Armour Avenue, Ascot Street, Doctor's Common, Elizabeth Street and Moir Street.

information and advocacy purposes; local authorities must have regard to these listings.

19. The methodology for the identification and assessment of Residential Heritage Areas was formulated in 2009 for Christchurch City Council by an interdisciplinary team, of which I was a member, led by Harrison Grierson Consultants. Residential Heritage Conservation Areas, as they were then called, were defined thus in the consultants' report:
20. *Collectively an HCA contains a range of features, buildings and places and must:*
  - *Incorporate a collection of elements that together addresses the interconnectedness of people, place and activities.*
  - *Contribute to the overall heritage values, identity and amenity of the city.*
  - *Have a coherent heritage fabric which meets recognised criteria for heritage assessment.*
  - *Demonstrate authenticity and have integrity, applying to both tangible heritage values- physical and readily understood – and intangible values – less readily understood and less visible underlying aspects such as stories and views that contribute to the HCA.<sup>4</sup>*
  - *Contain a majority of sites/buildings that are of Primary or Contributory importance to the HCA.*
  - *Have been predominantly developed more than 30 years ago [at the time of assessment].*
  - *Fulfil one or more of the following CCC heritage assessment criteria.*
21. The definition of HCAs also stated that 'Small and/or fragmented areas with poorly defined boundaries, and therefore lacking defensibility were excluded [from the study] as potential individual HCAs'.<sup>5</sup>
22. Best practice assessment of heritage areas commonly involves a categorisation (rating) of individual properties; this process serves to substantiate the presence of significant heritage values and establish the basis for a planning regime addressing the relative importance of a single property to the heritage values of the area as a whole. Typically the categorisation of properties will give rise to a hierarchy of planning rules, with individually scheduled items subject to the highest level of protection and activity status and the rules pertaining to those properties assessed as being neutral or intrusive being focused on the potential of new development to maintain and enhance heritage values.

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<sup>4</sup> Authenticity and integrity are both defined in the ICOMOS New Zealand Charter. [https://icomos.org.nz/wp-content/uploads/2020/12/NZ\\_Charter.pdf](https://icomos.org.nz/wp-content/uploads/2020/12/NZ_Charter.pdf)

<sup>5</sup> Harrison Grierson 'Christchurch Proposed Residential Heritage Conservation Areas' report for CCC, March 2010, p. 4.

23. While some councils, such as Wellington City Council, simply categorise properties within an area as contributory or non-contributory to overarching heritage values, the Council decided in 2009 to use four rating categories (Defining, Contributory, Neutral & Intrusive) to provide a more nuanced description of properties within a heritage area; this in turn supports a better understanding of the values of the heritage area as a whole. Heritage area identification and assessment is an iterative process whereby an overarching theme or historic narrative, such as military housing or foundational development in a particular suburb, is considered in light of a property by property analysis whereby the physical evidence of a theme or narrative is substantiated. Above all the heritage area as a whole must meet the assessment criteria for significant heritage value and, using the Council's four-tier methodology, it is to be expected that a majority of 'Defining' and 'Contributory' properties will be present within an RHA in order for it to be defensible.<sup>6</sup>
24. Historic research is fundamental to the identification and assessment of heritage areas and the establishment of a robust and defensible boundary for them. Historic survey plans, aerial photographs, and local histories are key research sources, in addition to the HNZPT List and reports of community efforts, both past and present, to recognise and promote the heritage values of an area.
25. While the regional and national significance of an RHA may make an important contribution to its heritage values, it is the importance of the area to the people of Christchurch City that is fundamental to the recommendation to schedule a heritage area on the Council's district plan in order to facilitate its protection from 'inappropriate subdivision, use and development'.<sup>7</sup>
26. Under the RMA there is no requirement to determine a level of local, regional and/or national significance of heritage resources in order to establish whether a resource merits scheduling on a district plan. Similarly the Canterbury RPS states that heritage 'identification and protection of significant historic heritage items, places and areas' should proceed from 'their particular values that contribute to Canterbury's distinctive character and sense of identity'.<sup>8</sup> In practice the direction provided by the RMA and

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<sup>6</sup> See Christchurch District Plan Appendix 9.3.7.1 'Criteria for the assessment of significance of heritage values'.

<sup>7</sup> RMA s6(f).

<sup>8</sup> Canterbury RPS Objective 13.2.1.



RPS focuses best practice heritage research efforts towards city and district research sources and analysis and then applies those findings to the assessment criteria adopted by the relevant territorial authority.

Consequently the Council's district plan Policy 9.3.2.2.2, as it has been amended by PC13, clearly states that heritage areas will be identified, assessed and scheduled on the basis of their significance to Christchurch District.

27. Although early survey and subdivision plans typically establish a historic pattern of development that provides the basis for the extent of a heritage area, field work is also required to assess the physical resource at the time of potential scheduling. If there has been a substantial loss of notable buildings and structures from a locale being assessed as a heritage area then it may be of historic interest but will not possess a sufficient level of authenticity and integrity to demonstrate significant heritage value. In a similar vein, a cluster of well-preserved villas or bungalows could contribute to the charming appearance of a street or suburb but not meet the threshold for scheduling as a heritage area because they lack a significant level of historic, architectural and contextual heritage values. It may then transpire that such clusters are identified as character areas for their amenity value under RMA s7(c).
28. Sidelined due to the impacts of the Canterbury Earthquakes, the 2009-10 Heritage Conservation Areas project established a matrix for identifying highly significant and representative residential heritage areas across the city. It also devised a ranking methodology with which to identify the extent to which each property within an area created, maintained or undermined the heritage values of the area as a whole.
29. Of the twelve residential Heritage Conservation Areas identified in 2009 for Christchurch City Council, I found that seven had retained sufficient heritage values to warrant scheduling as RHAs. More recently the Council withdrew the Heaton Street and Piko/Shand State House RHAs from the remit of PC13. I identified three new areas (Chester Street East/Dawson Street, the Church Property Trustees' North St Albans Subdivision of 1923 and Shelley & Forbes Streets in Sydenham) as part of the current RHA project, based on new research and a consideration of the city's surviving heritage resources in the post-earthquake context. Given that the Lyttelton Heritage Conservation Area could not be progressed before the Canterbury

Earthquakes, my assessment of the Lyttleton RHA is new although its values were identified in 2009.

30. Although not progressed in Christchurch via a plan change at the time, I was able to 'road test' the 2009-10 Heritage Conservation Areas report template and property categorisation in my work on the Thames-Coromandel District Plan in 2011-12. More recently I have used the same methodology as part of the review of the heritage schedule in the Timaru District Plan (2020). In both cases recommended heritage areas were incorporated into the district plan without challenge. In the case of TCDC this included two residential heritage areas and two other areas that encompassed a large number of residential properties.
31. In principle and in practice I have found the Council's heritage area approach to be robust and defensible. By contrast Hamilton City Council's recent Plan Change 9, with which I was involved as an expert witness for a large number of submitters, resulted in a large number of proposed residential heritage areas being rejected by the hearings panel on the basis that the methodology was insufficiently robust to substantiate significant heritage values that merited protection under RMA s6f. Based on my work as a peer reviewer and assessor for Heritage New Zealand Pouhere Taonga I also consider that the RHA methodology is comparable with HNZPT's historic area list entry process.<sup>9</sup>
32. With regard to the categorisation of properties within each RHA the distinction drawn between Defining, Contributory, Neutral and Intrusive sites is intended to have two outcomes; first; to establish whether a potential area accommodates a sufficient number of Defining and Contributory elements to embody significant heritage values and, secondly, to provide the basis for a nuanced planning response to facilitate the ongoing protection of heritage values from inappropriate subdivision, use and development. The definitions for each categorisation or rating, which are included in each RHA report, rely on the key words 'establish', 'support', 'neither establish, support nor detract' and 'detract' to identify and explain the contribution each site makes to the heritage values of the area as a whole.

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<sup>9</sup> Peer review of Tongaporutu River Baches Historic Area registration report (2010) & Nelson Boulder Bank Baches Heritage Assessment in respect of the Nelson Boulder Bank Historic Area (2013).

33. Ranking of sites within the RHA is a qualitative process, underpinned by the 'Criteria for the assessment of significance of heritage values' contained within the District Plan (Appendix 9.7.3.1) and elaborated upon in the individual site record form for each property within the RHA. Defining properties are typically those that remain as close as is reasonably possible to the design and construction of the house when it was first built, allowing for changes, such as electricity connections, that were needed to make a colonial cottage fit for modern usage, for example. Contributory dwellings are typically houses that date to the year or period fundamental to the historic values of a heritage area, such as 1957 in the case of Wayside Avenue, but which have been noticeably modified by alterations and/or additions to cladding and fenestration or the enclosing of open porches. The location of garages is also often a key factor in the determination of a Contributory rather than Defining categorisation, particularly in those heritage areas in which the layout of houses within the streetscape is fundamental to architectural and contextual heritage values.
34. Neutral dwellings may be new houses that are in sympathy with the overarching heritage values of the area or historic houses that have been greatly modified. Intrusive elements within a residential heritage area can be multi-unit developments, vacant sites caused by the demolition of historic homes, or non-residential uses, where these do not contribute to the heritage values of the area as a whole. In the case of Lyttelton the topography of the town often means that vacant sites are less intrusive than they would be within the Christchurch heritage areas, consequently many have been given a Neutral rating.
35. In all cases I applied the four tiers of categorisation on a case-by-case basis to the specific heritage area under consideration. This approach is comparable, in my opinion, to the weightings that could be given to the various features of an individual scheduled heritage item, whereby a façade demonstrating all of its original Victorian construction, fenestration, and detailing would be categorised as Defining and a 1980s aluminium and glass conservatory addition to a secondary elevation would likely be ranked as Intrusive.
36. Within each record form the information provided is sufficiently specific, in my opinion, to establish the reason for the rating of each property. The majority of defining properties have been researched to the extent that

historic ownership information has allowed for insights into the identity of early residents and hence the history and heritage values of the area.

37. By contrast, the historic heritage areas identified by Hamilton City Council as part of Plan Change 9 are only supported by high level heritage statements in which generic historic information is provided. HCC did not rate individual properties within any of the 32 HHAs that were notified; consequently resource consent applicants have to traverse the planning provisions for the city's HHAs without any direction from council as to how their property contributes, or does not, to the heritage values of the heritage area.
38. To date I have provided Heritage Impact Assessments for 14 Hamilton property owners who are now subject to the HHA provisions of PC9 and in only five cases do I consider that defensible heritage values were present. The remaining nine properties, along with another two assessments I've recently been commissioned to undertake, are in parts of the city that, arguably, demonstrate some amenity qualities but do not embody significant heritage value. Unfortunately for affected property owners HCC's decision to delete any character areas from the district plan as a result of PC9 has left the council with a 'heritage or nothing' scenario that I believe has had the result of placing an undue burden on property owners in many parts of the city. The resulting conflation of heritage values and amenity or character qualities in a large number of the 17 residential HHAs that have been accepted by the hearing panel for PC9 is neither robust nor defensible in my opinion; a position echoed by the evidence presented by Kāinga Ora's heritage expert Mr John Brown to the PC9 and to the Council's PC14 hearings.

## **RESPONSE TO SUBMISSIONS**

39. I note that submissions # 824 (Carter Group Property Limited) and # 823 (Catholic Diocese of Christchurch) request that the definitions of Defining, Contributory, Neutral and Intrusive buildings and/or sites be deleted on the basis that they are 'vague' and provide 'little certainty' as to what would or would not constitute a property subject to one of the four ratings. I recommend the relevant submission points are rejected on the basis that without definitions the ratings would be vague, because they would offer no direction to owners or the Council as to the justification for an RHA, and create uncertainty around the implementation of the planning framework.

40. As part of the RHA work programme I reviewed 34 potential RHAs prior to notification of Plan Changes 13 and 14 and found that the methodology for RHA identification and assessment provided a rigorous benchmark against which nominated RHAs could be measured. I also found that the 'Potential RHA review criteria template' devised by Council staff to record my review of potential RHAs was fit for purpose and gave rise to concise documents for areas that did not meet the threshold for significant heritage value and thus scheduling. In the case of both the 'Residential Heritage Area Record Form' and the 'Potential RHA review criteria template' I believe that both place the appropriate emphasis on heritage significance, authenticity and integrity and give effect to the 'Criteria for the assessment of significance of heritage values'.
41. Several submissions to PC13 referred to the general intent and/or methodology used in the proposed scheduling of RHAs. Submission # 1028 (Rob Seddon-Smith) requested that a 'clear definition' of the heritage character of each area be provided by Council. This is the purpose of the RHA report for each area, wherein the contribution of each individual property to the subject RHA is also provided. I therefore consider that Council has already addressed the action requested by this submitter.
42. Submission # 1030 (Paul Mollard) opposed the identification and scheduling of all RHAs in Christchurch and questioned the existence of 'any unique or distinguishing features' in the RHAs that have been put forward in PC13. I consider that the assessment reports for each RHA identify the significant heritage values of each area, which therefore merit protection under RMA s6(f). Furthermore I can assure the panel that I was not subject to any advocacy from local residents, as is implied in the submission, to recommend scheduling of RHAs. I do not consider that this submission should be accepted, on the grounds that significant historic heritage resources deserve protection under the Act and according to the Canterbury Regional Policy Statement and Christchurch District Plan.
43. General support for the RHAs was offered in submissions # 145 (Te Mana Ora Community and Public Health), # 404 (Lawrence Kiesanowski) and # 428 (Sarah Wylie). I consider that these submissions should be accepted and the RHAs should therefore be retained within the Council's Schedule of Heritage Areas at Appendix 9.3.7.3.

44. There were no submissions in respect to the Englefield Avonville, RNZAF Station Wigram Staff Housing, or Wayside Avenue 'Parade of Homes' RHAs and therefore there is no commentary about them below.
45. The preparation of this SoE also entailed reviewing the heritage reports and individual records for the nine RHAs that are still in contention. Drawing upon Google Streetview photographs, LINZ and Canterbury Maps aerial views, council records and real estate advertisements, I have revised the rating of a number of properties within the RHAs and, where necessary, revised the area reports accordingly. I believe that my assessments are now as up to date as they can be at this time. Properties that I recommend being given a revised rating are listed in Appendix 2.

#### **RESPONSE TO PC14 IHP RECOMMENDATIONS IN RESPECT TO THE HERITAGE SIGNIFICANCE OF THE PROPOSED RHAS**

46. The IHP disagreed with the Council's position put forward at the PC14 hearing that 'the areas to which RHA would be applied constitute 'historic heritage' in the first instance' (para 376). Citing statements made by planning witnesses for Carter Group and Kāinga Ora, the IHP came to the conclusion that the Council had conflated heritage and amenity (character) values 'without a significant foundation' (para 378). In my opinion this finding ignored the substantive evidence put forward by the heritage area reports and appended individual site record forms. In particular the heritage reports identified the heritage values embodied in each RHA according to the heritage assessment criteria in the ODP.
47. Furthermore I consider that the IHP position, as recorded in its Recommendations Report dated 29 July 2024, provided no explanation as to how each specific RHA report, which included my site-by-site analysis, failed to meet the threshold for scheduling. The IHP report (at para 381) notes that Kāinga Ora's heritage expert John Brown 'concluded that the criteria for assessment were generally appropriate'. In my opinion Mr Brown highlighted some aspects of the RHA assessment process and practice that he would have done differently, especially in respect to the Council putting forward only residential heritage areas at this time and not identifying 'Highly Significant' or 'Significant' heritage areas, in a similar way that individual heritage items are categorised. Mr Brown also identified what he felt was some confusion around the council's mapping of heritage and character areas. As I have only been involved in the former I cannot

comment on the approach taken to character areas but I maintain my view that the RHAs have been identified, assessed and mapped in a manner that is robust, defensible and in accordance with best practice.

48. I do not agree with Mr Brown's opinion that greater clarity would be achieved if the RHA reports included a statement as to whether the area has local, regional and/or national significance because I believe this would be at odds with both the RPS and DP, which are directed at protecting historic heritage resources that are significant to the people of Canterbury and Christchurch. I would also note that having a requirement to assess a heritage item or area in one council area against a local/regional/national framework would not only be an extremely time-consuming exercise but is also more appropriately the domain of a national heritage agency or entity such as Heritage New Zealand Pouhere Taonga, Engineering New Zealand or the Rail Heritage Trust of New Zealand.
49. In my experience heritage items and areas can meet the criteria for scheduling on a district plan whether they exhibit local, regional and/or national dimensions of significance. Furthermore the focus upon the identification and protection of heritage resources that are significant to the people of a particular city or district council area allows for assessments of significance that are relative to the specific nature of the historic built environment. In the case of Christchurch, as well as Selwyn and Waimakariri districts, the impact of the 2010 and 2011 earthquakes is such that the significance of buildings and areas is sometimes amplified by their survival where other items and areas have been lost. A case in point is the heritage area at The Spur and Clifton Bay, which was identified in 2009-10 as having significant heritage value for its architectural quality and association with an early 20<sup>th</sup> century subdivision undertaken by nationally renowned architect Samuel Hurst Seager. A review of the area in 2022 established that the extent of earthquake damage to houses in the area was so great that it no longer possessed sufficient authenticity and integrity to merit scheduling.
50. It is my opinion that the heritage expert evidence cited by the IHP, being mine and that of John Brown appearing for Kāinga Ora, did in fact establish the merits of RHAs as a mechanism by which to give effect to the RMA, the Canterbury Regional Policy Statement and the Christchurch District Plan.

51. Where I do agree with the IHP, and other parties to PC14, is in their conclusion that the conflation of heritage and amenity or character values should be avoided. For that reason a large number of potential RHAs, including Cashmere View Street, which is discussed below, have not been recommended for scheduling because while they may demonstrate some amenity values, especially in respect to street trees and a consistency of housing types and styles, the threshold for significant heritage value has not, in my opinion, been met.

#### **CHESTER STREET EAST / DAWSON STREET RHA**

52. A number of submissions were made in respect of the proposed Chester Street East / Dawson Street RHA. In several submissions, reference was made to a September 2022 decision by the Council to extend the RHA to take in the whole length of Chester Street East. I am informed that decision was rescinded at a Council meeting held on 1 March 2023. I was not aware of that recommendation when I supplied a boundary review report to the Council in October 2022, which confirmed the mapped extent of the RHA. The following comments are made on the basis of the RHA that I identified, assessed and mapped for the Council.
53. Submission # 1001 (Kerstin Rupp) requested that the Council's September 2022 decision to extend the RHA the full length of Chester Street East be adopted. The submitter considers that my recommended RHA would create a divide in the community that would undermine its sense of identity and character. While I acknowledge the community feeling evidenced by this and other similar submissions, I have assessed the RHA on the basis of the presence, or not, of significant historic heritage values embodied in the built environment. For that reason, and after careful consideration, I do not consider the eastern portion of Chester Street East merits scheduling as an RHA.
54. Submission #s 1002 (Keith Paterson & Helen Verity), 1022 (Bosco & Helen Peters), and 1024 (Marius and Roanna Purcaru) all requested that the RHA be extended the full length of Chester Street East. The submitters also requested that an enlarged RHA include the property bounded by Kilmore Street and Fitzgerald Avenue that is the former Ward's Brewery site. Heritage setting 374 encompasses both the scheduled historic heritage items on this site (heritage items 204 & 1295) as well as the building at 173 Chester Street East, which is the subject of submission # 22 (see below).



55. In the absence of a direct connection between the brewery and the residential development of Chester Street East I do not consider that extension of the RHA is either warranted or necessary to protect the heritage values of either the RHA or the former Ward's Brewery site. Furthermore I consider that the residential development on Chester Street East to the east of 147 Chester Street East (on the north side) and Chesterfields Park (on the south side) lacks sufficient authenticity and integrity to merit inclusion in the RHA. A similar approach to mapping the RHA can be seen, for example, in the Heaton Street RHA. The submitters refer, mistakenly in my opinion, to the use of a 'percentage-of-historic-dwelling calculation system' by me and suggest that recent demolitions in the street are somehow the result of the exclusion of the eastern end of the street from the RHA. I refute this assertion and confirm that I did not consider the eastern sector merited inclusion in the RHA before any demolitions to which the submitters refer. Furthermore I do not consider that there is a relationship between the Chester Street RHA and the Englefield Avonville RHA other than one of physical proximity. I therefore recommend that these submissions are rejected.
56. Submission # 1002 further requested that the RHA be extended to include the section of Kilmore Street bounded by Dawson Street in the east and Barbadoes Street in the west. This proposal appears to involve nine properties, including the scheduled heritage item overlooking the intersection of Kilmore and Barbadoes Streets (HID # 316). The submitters consider that such an amendment would add 'properties with significant historical, architectural and contextual values' to the RHA and also create a buffer to better protect the 'Defining' buildings lining Chester Street East. The submitters have provided some commentary about the potential heritage values of the Kilmore Street properties and acknowledge that an assessment of the properties at 203-250 Kilmore Street would be needed before it could be incorporated into the RHA.
57. I undertook a site visit on Monday 19 June 2023 and while I observed some villa and bungalow style dwellings I do not consider that the section of street in question retains sufficient authenticity and integrity to merit scheduling. For that reason I recommend that this submission point be rejected.
58. Notwithstanding the recommendation above, I did observe on the same site visit that the cottages at 341, 345 and 347 Barbadoes Street warranted consideration as an extension to the RHA. Having established that they

predate 1877, were erected as early rental accommodation, and would likely be rated as Defining (# 347) and Contributory (#s 341 and 345) features in the RHA, I am of the opinion that the Chester Street East RHA should be extended to encompass these three properties.

59. Submission # 1007 (Ian & Karen Shaw) also requested that the RHA be extended the full length of Chester Street East and amended to include the Kilmore Street properties that border the RHA, being directly to the north of 129, 131 and 133 Chester Street East. While this submission is narrower than that provided by Submission # 1002 it appears to have the same intent and I have therefore considered it within the context of the more holistic submission discussed above. For the reason stated above I do not believe this submission should be accepted.
60. Submissions #s 57 (Debbie Smith), 1013 (Simon Adamson & Judith Hudson), 1014 (Susan Parle), 1015 (Mary Crowe, see also # 281), and 1052 (Bradley Nicolson for the Oxford Terrace Baptist Church) all requested that the RHA be extended the full length of Chester Street East.
61. Dr Anderson and M/s Hudson acknowledged that 'the Eastern quarter of Chester St East lacks the same density of historic structures' but contend that the RHA should, with particular reference to 173 Chester Street East, encompass the full street to maintain the integrity of the community. Whilst understandable I believe that the identification of RHAs needs to be robust and defensible and that an extension to the east of the RHA would be inconsistent with the approach taken across the city. In my opinion the view stated in this submission, and others, that Chesterfields Park should be at the heart and not the edge of the RHA is a misunderstanding of the RHA methodology. While this submission, and others, clearly demonstrate the cultural importance of the street as a whole to members of the community the properties I have excluded from the RHA do not demonstrate sufficient authenticity and integrity to warrant inclusion in the RHA.
62. M/s Parle and M/s Crowe sought the extension to protect the 'character' of the street. Given that the RHAs are identified in order to protect significant heritage values and not to manage the maintenance of character features I do not consider that these submissions challenge the boundaries of the RHA.
63. No further information was supplied by Mr Bradley to support his request.

64. Submission # 1016 (Waipapa Papanui-Innes-Central Community Board) supported the RHAs in general and requested that the full length of Chester Street East be included in the RHA, partly in order to create a continuity of zoning between the Chester Street East and Englefield Avonville RHAs. This submission has not made me revise my opinion that the east end of Chester Street East does not merit inclusion in the RHA.
65. Submission # 22 (Peter Beck) also requested that the RHA be extended the full length of Chester Street East, in keeping with the cited Council decision. In making that request the submitter mistakenly suggests that I applied a 'percentage-of-historic-dwelling calculation system' when determining the boundaries of the RHA. What was taken into account were the low numbers of potential 'Defining' and 'Contributory' buildings in the eastern sector and the low level of authenticity and integrity at this end of the street.
66. Although the property at 173 Chester Street East may be in multiple unit titles it is nevertheless located on a single land parcel, which is the basic building block, so to speak, of the RHAs. I acknowledge that the building located at 173 Chester Street East evokes the form and historic relationship of the site with the scheduled heritage items to the east but do not agree with the submitter's characterisation of the assessment process undertaken in this case. Reconstruction does indeed compromise heritage values and in the case of 173 Chester Street East historic photographs demonstrate the way in which the building has changed and been redeveloped since it was erected as a warehouse for Ward's Brewery. I therefore stand by my assessment of the building at 173 Chester Street East as 'Neutral' within the context of my boundary review report and the mapped extent of the RHA. Furthermore I note that 173 Chester Street East is included in heritage setting 374, as discussed above.
67. Submission # 842 (Fire & Emergency NZ) requested that the FENZ property on the north side of Chester Street East be excluded from the RHA. The submitter is opposed to the partial inclusion of their large property in the RHA and provided a revised map of the RHA according to their submission. To create such a break in the continuity of the RHA would, in my opinion, be inconsistent with the approach taken to other RHAs and create the potential for a significant negative impact upon the contextual heritage values of the section of the RHA bounded by Madras Street in the west and Barbadoes Street in the east.

68. As notified, the boundary placement within the FENZ property was intended to recognise the historic development pattern of the Chester Street East frontage and allow for the management of future development on the site in sympathy with the heritage values of the area, which are strongly supported by local residents. The submitter notes that future development plans for that portion of the property within the notified RHA boundary are likely to involve 'single storey buildings and [be] similar to the built form which surrounds the site'. It does not therefore appear that the RHA will impede the submitter's use of the site.
69. On the basis of the submission and a site visit I made to Chester Street East on Monday, 19 June 2023, I now recommend that the RHA boundary line across the FENZ property be reduced to an approximately five-metre strip along the southern frontage of the site. This would be largely in line with the current security gate and the south elevation of the substation and would potentially create a setback for any future development on the FENZ property. To the east of the substation the boundary would follow the fence that is in situ, which visually creates a treed and grassed reserve space adjacent to the road boundary. Setback strips flanking the substation will, in my opinion, provide appropriate protection for the contextual values of the FENZ property within the RHA while not restricting necessary development within the larger site. A revised map of the RHA showing the detail for the recommended boundary is appended to this statement.

#### **CPT NORTH ST ALBANS SUBDIVISION (1923) RHA**

70. Submissions # 1003 and # 135 (Melissa Macfarlane) included consideration of the CPT (Church Property Trustees) North St Albans Subdivision (1923) RHA. The submission asked that the RHA be deleted and the area retained instead as a residential character area.
71. Based on the historic heritage values identified and described in the RHA report I consider that the area demonstrates significant historic heritage values and therefore merits scheduling as an RHA. I undertook a site by site assessment in order to identify the extent of the RHA, confirm its high level of authenticity and integrity, and determine a rating for each property within it. I consider that the 'burden of proof' for all of the city's RHAs has been set at a high bar and is consistent with the level required for individual scheduled items. I therefore recommend that this submission point be rejected.

72. The submission also requests that the dwelling at 48 Malvern Street be re-rated as a 'Neutral' building within the RHA; it is currently a 'Defining' building. I have reviewed my assessment of the house in light of the submission and Council building records and consider that it retains sufficient authenticity and integrity, at this time, to be rated as a 'Defining' building. John Chatfield's occupation was given as 'builder' in the electoral roll of 1928, by which time he and his wife Annie were resident at 48 Malvern Street. I believe that the Chatfields' owner/occupation, and the fact that the property once extended through to Roosevelt Avenue, explains the larger scale of the house in comparison with some of its contemporary neighbours within the RHA.
73. The addition to the front of the house, which dates to c.1960, is sympathetic in style and materials and I do not consider that the alterations and additions made to the rear and interior of the dwelling in c.1994 represent a substantial change to the building. Notwithstanding my original rating of the property as 'Defining', alterations and additions that are currently being undertaken (see RMA2023965) lead me to recommend a revised categorisation of 48 Malvern Street to 'Contributory'.
74. The further submission put forward by the Canterbury Rugby Football Union (CRFU) concerns the inclusion of Malvern Park and two houses (6 & 12 Malvern Street) that are owned by the CRFU in the RHA. No heritage information has been presented in the further submission that alters my opinion that the heritage area merits protection, the subject houses are appropriately included in this area, and that their exclusion from it would compromise the integrity of the area as a whole.
75. With respect to the park as a whole, its development history is integral to the history and heritage significance of the RHA. The park is comparable to the inclusion of the Rutland Street Church in the RHA as another non-residential use that is contemporary with the subdivision undertaken by the Anglican Church Property Trustees. The park's inclusion in the heritage area is also consistent with that of the Presbyterian Church precinct in the Macmillan Avenue RHA and the air force buildings in the RNZAF Station Wigram Staff Housing RHA. The inclusion of Elmwood Park in the Heaton Street RHA and the shops and open spaces in the Piko/Shand RHA further demonstrated a similar and consistent approach to RHA identification, assessment and mapping, notwithstanding that both areas were withdrawn from PC 13 by the Council in December last year.

76. The CRFU's further submission supports a number of submission points raised by Kainga Ora and Carter Group Ltd but provides no substantive evidence that calls into question the heritage significance of the CPT North St Albans Subdivision (1923) RHA. For that reason I recommend the further submission is rejected.

#### **INNER-CITY WEST RHA**

77. Submission # 699 (Christ's College) is largely concerned with planning matters outside the scope of my expertise and engagement. In respect to the Inner-City West RHA the submitter objects to a number of properties owned by the College being included within the boundaries of the RHA. The submitter notes that they hold a Certificate of Compliance that will allow them to demolish all non-scheduled buildings on the sites in question within the statutory timeframe (until 6 October 2027).
78. Notwithstanding the potential for the submitter to demolish all of the buildings on their holdings to the east of Rolleston Avenue, with the exception of two individually scheduled heritage items, I can confirm that the properties in question make a significant contribution to the heritage values of the area and exclusion of these properties from the RHA would be inconsistent with the heritage methodology and criteria applied by the Council. The RHA derives part of its heritage significance from its proximity of a number of the city's major cultural and educational facilities, including Christ's College's primary campus. Furthermore the College began acquiring residential property on the east side of Rolleston Avenue after World War I and thus the school is directly associated with the heritage values of the RHA.
79. Although the submission is largely concerned with planning matters, I note that the implied portrayal of the RHA as featuring 'small detached Victorian dwellings' (submission page 5) is not accurate and fails to take account of the variety of residential typologies throughout the RHA, which can therefore accommodate future development of a varied nature on currently vacant sites such as that at 21 Gloucester Street. I therefore recommend that this submission be rejected.
80. Submission # 1061 (Elizabeth Harris & John Harris) requested that the Cashel Street portion of the RHA, including the submitters' property at 31 Cashel Street, be deleted on the grounds that scheduling individual items alone is sufficient to protect the city's heritage values and that the buildings

along the north side of Cashel Street between Rolleston Avenue and Montreal Street do not have significant heritage value.

81. I do not agree with the submitters' position, which is contrary to the RMA definition of historic heritage resources, and can confirm that I established the boundary for the RHA on the basis of the presence of significant historic, architectural and contextual heritage values.<sup>10</sup> In the absence of information from the submitters that might challenge the evidential basis for the RHA I do not consider that the boundary should be adjusted to remove the Cashel Street properties from the area. Furthermore I note that I have rated the property at 31 Cashel Street as a 'Defining' element within the RHA and that the submitters provided no information that would cause me to revise my assessment of this site. As the submitters state, the building at 31 Cashel Street is not a scheduled heritage item, and nor is it proposed to be; I therefore consider its inclusion within the RHA is proportionate to the heritage values of the property.
82. Submission # 1075 (Diana Shand) supports all of the proposed RHAs, including the Inner-City West RHA, and requests that it be extended to include Cranmer Square, which is already a scheduled heritage item (Heritage item # 157). While I concur with the submitter that residential use of buildings within the RHA helps to maintain and enhance heritage values, I do not consider that incorporating Cranmer Square into the RHA would be appropriate or serve any useful purpose. Where a park has been included within the boundaries of an RHA, as in Heaton Street for example, this is because the park is integral, rather than coincidental, to the heritage values of the area. I do not consider that Cranmer Square is integral to the heritage values of the Inner-City West RHA, even though there is a close physical association between the two.
83. The submitter (at submission point # 1075.5) also requests that commercial use in the wider area be confined to Oxford Terrace and that residential uses be encouraged in Cambridge Terrace, with an extension of the Medium Density Zone on the east side of Montreal Street, from 59 Gloucester Street in the north to 75 Cambridge Terrace in the south. While the submitter refers to the maintenance of heritage values as one rationale for this action, I do not believe that the block thus described in the submission embodies collective heritage value or will have a demonstrable

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<sup>10</sup> See RMA Part 1 Interpretation and application, 2 (1) historic heritage.

impact on the heritage values of the RHA. I defer to other council experts in regard to the planning implications of the zoning for this area.

84. Submission # 824 (Carter Group Property Limited) questions the heritage values of the RHA but provided no substantive information to reconsider what is described as the 'questionable merit' of unspecified sites within the RHA. At paragraph 13 of the submission the submitter refers to 'errors' but does not elaborate further on what these might be.
85. The submission goes on to request the deletion of all RHAs, although no discussion is provided about any RHA other than the Inner-City West RHA. Failing the acceptance of that submission point, the submitter seeks the deletion of the Inner-City West RHA. As the submission raises no substantive points in relation to the heritage values of any of the RHAs I remain of the opinion that the RHAs have been carefully assessed and robustly mapped; I therefore recommend that this submission be rejected.
86. Having previously reviewed the RHA map in response to the submission about the former CGHS site I subsequently reconsidered the status of the YMCA site, which is bordered by Hereford and Cashel Streets and Rolleston Avenue at the south-west corner of the RHA. Now that the 'Defining' house at 7 Cashel Street has been removed and a new building erected on the Rolleston Avenue frontage of the property I have recommended to the Council that this lot be removed from the RHA. These changes to the site all post-date my preparation of the Inner-City West RHA report and I believe they are appropriate and consistent with the response taken to the former CGHS site in the circumstances. I have, however, advised the Council that both the former CGHS and YMCA sites should be subject to interface provisions because they are located in a part of the city with very high heritage values and their proximity to Cranmer Square, the Inner-City West RHA, the Arts Centre and the Christ's College, Museum and Botanic Gardens precinct means that, in my opinion, there are grounds for a precautionary approach enabling council to exercise some degree of discretion as to design, bulk, height etc.

#### **LYTTELTON RHA**

87. Submission # 1078 (Julie Villard) requested that the Lyttelton RHA be amended so that it only included those properties rated as 'Defining' and 'Contributory'. Such an approach would be inconsistent with the RHA methodology adopted by the Council and could lead to the loss of heritage



values by, potentially, allowing for inappropriate subdivision, use and development in the RHA. As it is the collective values of the area that have been identified and assessed as having heritage significance a planning approach that fails to place some restrictions over 'Neutral' and 'Intrusive' sites within an RHA cannot, in my opinion, facilitate the protection of the area's heritage values in accordance with RMA s6(f).

88. My identification and assessment of the Lyttelton RHA was underpinned by the Heritage New Zealand Pouhere Taonga 'Lyttelton Township Historic Area' registration report of 2009 and Dr John Wilson's 'Banks Peninsula Contextual Historical Overview and Thematic Framework' (CCC, June 2014). The RHA can therefore be described as giving effect to the HNZPT historic area in the context of the Council's own historic understanding of the importance of Lyttelton as a port town. I recommend that this submission be rejected.
89. Submission # 289 (Cody Cooper) sought the entire removal of the Lyttelton RHA and requested instead that the Council 'pick a specific street or smaller area to designate as heritage'. The submitter does not nominate a street or smaller area for identification as an RHA and such an approach would be contrary to the HNZPT Historic Area and the assessment of significant heritage values across the RHA as proposed. I recommend that this submission be rejected.
90. In April 2025 the Council accepted a staff recommendation, and subsequently issued a public notice in relation to PC13, to reduce the extent of the Lyttelton RHA by removing from it a number of properties in the western sector of the area as notified. I reviewed the properties in question and consider that most, but not all, could be excluded without substantially compromising the values of the area as a whole.
91. In reviewing the individual record forms for each RHA as part of the preparation I undertook for this hearing, I reconsidered the properties in Bridle Path that were not excluded by the council in April of this year. With respect to the remaining 15 properties in the lower part of Bridle Path I am now of the opinion that they can be excluded from the RHA without notably undermining the heritage values of the area as a whole. Only one house out of the 15 has a Defining rating [# 22 Bridle Path] and the remainder are either modified later 19<sup>th</sup> or early 20<sup>th</sup> century houses or were built in the 1970s or c.1990. Although the Bridle Path has considerable historic

importance as an ara [track] linking Lyttelton with Christchurch I am now of the view that the dwellings lining this roadway do not make an essential or significant contribution to the heritage area. I therefore recommend that all houses in Bridle Path previously identified as part of the RHA be excluded from it.

92. Consistent with the reconsideration of the Bridle Path properties, I also have reviewed and now recommend the exclusion of 2, 9, 13, 15, 17A, 17B, 19, 21 and 23 Dudley Road from the heritage area. Of the eight houses located at these addresses, barring 2 Dudley Road that is a vacant lot, only one was rated Contributory; the remainder were rated Neutral. These properties are on the periphery of the RHA and can be excluded without notable effect on the areas heritage values. The single Contributory dwelling [#19] is a modified vernacular cottage. All of the other houses are late 20<sup>th</sup> or early 20<sup>th</sup> century dwellings; hence their Neutral rating.

#### **MACMILLAN AVENUE RHA**

93. Submission # 1027 (Daniel Rutherford) requested the removal of the property at 20 Macmillan Avenue from the Macmillan Avenue RHA. I assessed the former Shaw house on this site as being a 'Defining' building within the RHA, which was mapped to closely follow John Macmillan Brown's 1908 Cashmere subdivision.
94. The inclusion of 20 Macmillan Avenue in the RHA maintains the integrity of the historic subdivision that underpins the historic, architectural and contextual heritage values of the area. The house has not been scheduled as an individual heritage item and therefore the heritage values relate to the area as a whole and do not rely, for example, on past or current ownership by highly significant local people. That said the c. 40 year occupancy by noted home economist Janet Shaw does contribute to the historic values of the RHA.
95. Removal of the property from the RHA could mean that it would be incorporated into the proposed Cashmere Residential Character Area, which would therefore still entail a level of Council oversight in consenting matters. The submitter does not appear to have considered this possibility.
96. I have reviewed the building documentation that Council holds in relation to this property but was not able to visit the site because the owners would not consent to such action. On the basis of the submission and Council files I

have not changed my opinion that the property at 20 Macmillan Avenue should be included in the RHA. Nor do I believe that having two land parcels commonly held provides a heritage rationale for their joint inclusion or exclusion from an RHA. For that reason I maintain my position that 20 Macmillan Avenue should be included in the RHA but that 20A Macmillan Avenue should not.

97. The submitter referred to a possible boundary adjustment with 20A Macmillan Avenue in the future. 20A is also owned by the owner of 20 Macmillan Avenue but has not been included in the RHA. Such a boundary adjustment, if it was deemed to be appropriate under the Act and in accordance with the planning provisions for RHAs, need not have a negative impact on the heritage values of the RHA. That said, as only a future possibility and within the context of RMA s6(f)'s requirement to protect historic heritage resources from inappropriate subdivision, I consider the submitter has not provided heritage grounds for the exclusion of 20 Macmillan Avenue from the RHA. The fact that a single owner holds both land parcels at 20 and 20A Macmillan Avenue is not relevant to the defensible boundary I believe has been mapped for the RHA.
98. Submission # 1079 (Dr Bruce Harding) requests clarity as to the rationale for the extent of the Macmillan Avenue RHA and asks that information about key people and properties within the RHA are indicated on Council maps etc. To that end the RHA report identifies the extent of the RHA, describes its heritage values, and provides individual records for all properties within the RHA. It is not usual practice to delineate 'iconic citizens' within a district plan, save for, by implication, when those properties associated with such people that are scheduled as significant historic heritage resources. It would be expected, however, that the RHA reports be linked to the district e-plan and thus become part of the city's historic record.
99. Whereas in the past SAM 17 and 17a encompassed Hackthorne Road, Dyers Pass Road and Macmillan Avenue, the proposed Macmillan Avenue RHA and the Cashmere Residential Character Area will now supersede the earlier planning framework. It would appear that the submitter is not aware of this, judging from his submission. The proposed character area includes the west end of Macmillan Avenue, within which is located the last home of Professor Macmillan Brown ('Holmbank', 35 Macmillan Avenue). It is

unclear from the submission whether the submitter wished to nominate 35 Macmillan Avenue to be scheduled as an individual heritage item.

100. In response to the submitter's commentary regarding the RHA report, I note that the report's function was not to record a history of the wider area but rather describe and substantiate the history and heritage values of the RHA. Nevertheless the information provided by the submitter is appreciated and I have reviewed the RHA report in light of his notes and made some minor revisions to it as a result.

#### **SHELLEY/FORBES STREETS RHA**

101. Submission # 1005 (Kate Askew) requested that the dwelling at 10 Shelley Street within the Shelley/Forbes Streets RHA be reclassified as a 'Defining' feature in the area. As proposed, the house was given a 'Contributory' rating on the grounds that, although likely dating to the 1890s, it has been modified considerably.
102. The submitter, who also supports the RHA in general and the inclusion of her home at 11 Shelley Street in particular, states that the house at # 10 is currently being renovated. Following a site visit to Shelley Street on Monday 19 June 2023, I can confirm the 'Contributory' categorisation of this dwelling because the changes made to the house, including its plaster stucco cladding, veranda and replacement fenestration, all remain in situ. Furthermore, the categorisation of such a dwelling as 'Contributory' is consistent with the approach taken across the RHAs identified in PC13.
103. Submission # 1040 (Neil McNulty) opposes the inclusion of Forbes Street in the Shelley/Forbes Streets RHA on the grounds that there is 'little genuine heritage fabric left in this street'. As indicated in the RHA report for this area I do not agree with the submitter and consider that the RHA report provides a robust justification for the inclusion of properties in Forbes Street, including the submitter's own dwelling, in the RHA. Consequently I recommend that this submission be rejected.

#### **REQUESTED ADDITIONAL RHAS**

104. Mary Street & Rayburn Avenue
- a) Submission # 37 (Susanne Trim) includes a comment that Mary Street and Rayburn Avenue in Papanui 'probably show off that mid 20th century suburban architecture more appropriately' than the Heaton

Street RHA. Putting to one side that the formerly proposed Heaton Street RHA is typified by early 20<sup>th</sup> century Arts and Crafts style houses, I have reviewed both streets in the light of this submission.

- b) Mary Street dates to c.1890 and runs from the Main North Road in the north-west to Grants Road in the south-east. Intersecting streets divide Mary Street into four blocks. While there are some bungalows along the street, and one square-plan villa towards the north-west end, there has also been considerable redevelopment; consequently I have been unable to identify the architecture to which the submitter referred.
- c) Rayburn Avenue was originally called Ingmire Street and was formed in early 1913. The street runs from Grants Road in the north-west to Paparoa Street in the south-east and is intersected by Dormer and Perry Streets. Rayburn Avenue features street trees and a combination of bungalows and modern housing stock.
- d) The question as to the potential heritage value of Dormer, Rayburn and Perry Streets will be discussed in the next section. In response to submission # 37 I can find no evidence to suggest that either Mary Street or Rayburn Avenue are in any way comparable to the heritage values demonstrated by the Heaton Street RHA. I therefore recommend that this submission is rejected.

105. Papanui War Memorial Streets

- a) A number of submissions concerned identifying streets in Papanui as RHAs. In this regard it is noted that the Papanui War Memorial Avenues (Alpha, Claremont, Condell, Dormer, Gambia, Halton, Hartley, Kenwyn, Lansbury, Norfolk, Perry, Scotson, St James, Tillman, Tomes, and Windermere) have been proposed for scheduling (HID # 1459) in PC13. I believe that this is appropriate heritage recognition and protection for this suite of Papanui streets.
- b) Submission # 1004 (Sally Dixon) identified Windermere Road and St James Avenue as having 'character'. Given that the submitter also referred to the 'history and heritage of this family area', I have considered the submission. I assessed St James Avenue in December 2021 and recommended that the Council 'review management status of memorial trees and consider whether Rev TN Griffin Memorial Gates (1931) should be scheduled as a heritage item'. I consider that the

Council's decision to schedule the memorial streets was the appropriate response to my recommendation. My consideration of the potential heritage values of Windermere Road follows below.

- c) Submission # 1041 (Ruth Morrison) requested that Paparoa Street, Dormer Street, Rayburn Avenue and Perry Street be kept as 'heritage areas' and refers to a Council decision in 2016 to that effect. It is assumed that the submitter is referencing a former character area overlay, given that the RHAs are being introduced to the district plan for the first time. In addition to St James Avenue, I also assessed Paparoa Street/Tomes Road in March 2022 as a potential RHA and concluded that the 'two streets do not meet the criteria for scheduling as an RHA. While they are near one another and retain some period housing, they lack a common historic development narrative and sufficient authenticity'. Following additional field work undertaken on 18 and 19 June 2023 I have now prepared 'Potential RHA Review Criteria Template' reports for Dormer Street, Rayburn Avenue, and Perry Street and recommend that the submission be rejected on the basis that none meet the threshold for scheduling as RHAs. This recommendation also encompasses submission # 329 (Dominic Mahoney), in as much as that submission requested that Perry Street be not zoned for high-density residential development on the basis of its 'historical heritage nature'.
- d) Submission # 709 (PK Tucker & CS Winefield) also requested that Windermere Road, its houses, trees and memorial plaques, be identified and scheduled as an RHA. As indicated above, Papanui's war memorial avenues, including their trees and plaques have been proposed for scheduling. This then leaves the houses to be considered for either RHA or character identification. The latter falls outside the scope of my expertise and engagement, but in regard to the former I can confirm that I have reviewed the information provided by the submitters and visited Windermere Road on Sunday 18 June 2023. Large areas on either side of the road remained undeveloped in the early 1940s and the 20<sup>th</sup> century history of Windermere Road principally arises from the educational and care home functions that originated with Catholic and Presbyterian church activity on sites extending through to Condell Avenue. Today the presence of Te Ara Hou Ōtautahi and the Bellevue Care Centre represents historic continuity but I do not consider that the houses in the street embody significant heritage values. I have

prepared a 'Potential RHA Review Criteria Template' to this effect and recommend that the submission be rejected on that basis.

- e) Submissions # 152 (Dylan Lange for Papanui Heritage Group) sought character recognition for Papanui's residential streets and did not specify any proposed for RHA status. As such the submission falls outside my engagement by Council.
- f) Submission # 206 (Emma Wheeler) also identified Windermere Road and St James Avenue and requested that they are not zoned for intensification. This falls outside my engagement and it is noted that the war memorial heritage value of the two streets has been recognised by Council.
- g) Submission # 765 (Margaret Howley) opposed intensification of the war memorial streets in Papanui in order to protect the heritage values of the memorial trees. As previously noted the memorial avenues have been proposed as a scheduled item and they fall outside my engagement by Council to identify and assess RHAs.

106. Beverley Street

- a) Submission # 1008 (Mark Winter) requested that Beverley Street in St Albans be recognised by Council for its heritage and character status. I assessed this street in March 2022 and provided the Council with the following recommendation: 'Beverley Street, while it does possess character and amenity values, does not meet the criteria for scheduling as an RHA. Some houses within the street may merit consideration for scheduling as individual heritage items. Houses at 12 (Julia Green house, 1928, designed by Cecil Wood), 28 and 34 Beverley Street are especially notable examples of the Georgian Colonial Revival style, although 34 (Ivan Wood house, 1930, designed by Helmore & Cotterill) has been considerably enlarged. It is also interesting to note the apartment building and the duplex on the north side of the roadway (Nos. 11 & 23).'
- b) I also noted in the 'Potential RHA Review Criteria Template' for Beverley Street that 'Houses retain a good level of authenticity but the street lacks the heritage narrative needed to establish a benchmark for defining and contributory features.' I have reviewed my earlier

assessment of this street and stand by my conclusion that it does not meet the threshold for scheduling as an RHA.

- c) Submission # 1091 (Rosie Linterman) also requested that Beverley Street be recognised as a residential character street, notwithstanding that a reference was made in the submission to a 'residential heritage area'.

107. Scott Street, Sydenham

- a) Submission # 1088 (Anton Casutt) requested that Scott Street in Sydenham be scheduled as an RHA or as a character area. The street runs from Brougham Street in the north to Browning/Burns Streets in the south and is intersected on the west side by Deyell Crescent. Originally known as Scott's Road, the street dates to the mid-1870s and is characterised by small, single-storey artisans' cottages.
- b) Putting to one side its potential recognition as a character area, which is outside my area of expertise and engagement, I visited the street on 20 June 2023 and undertook historic research to determine whether it would meet the threshold for scheduling as an RHA. Consequently I have prepared a 'Potential RHA Review Criteria Template' report for the street, which I do not believe meets the criteria and significance threshold for scheduling as an RHA, in large part due to the degree to which the original artisans' cottages have been modified and/or redeveloped. I therefore recommend that this submission is rejected.

108. Riccarton

- a) Submission # 1090 (Waipuna Halswell Hornby Riccarton Community Board) identifies, in general terms, residential character and/or heritage areas in Hornby, Hornby South, Sockburn, Hei Hei, Islington and Broomfield. These areas were largely developed in the latter half of the 20<sup>th</sup> century and are more likely to exhibit residential character than embody significant historic heritage values at this time, given the paucity of evidence required to make a determination of heritage significance. A review using Canterbury Maps and Google Streetview has not identified any potential RHAs in these suburbs and I defer to others in regard to potential character areas in these parts of the city.
- b) The same submission also identifies an issue in regard to significant 'heritage settings' but it is not entirely clear what is meant by this, given



that all individual heritage items and the proposed RHAs have been mapped and 'Contextual' heritage values (see Christchurch District Plan Appendix 9.3.7.1) have been addressed in all statements of significance for items and areas. That said it appears that the submitter is proposing that the suburb of Riccarton is identified as a 'heritage setting' on the basis that it forms the backdrop to a number and range of significant natural, cultural and historic heritage resources.

- c) In light of this submission I can confirm that the settings of heritage items and areas are 'seen as significant' and, in the case of Riccarton Bush and House, for example, multiple heritage values can be present and identified within a single heritage site. It is not best practice however to connect disparate heritage items by applying a 'heritage setting' overlay to a suburb, or part thereof. The lack of clear boundaries and the fragmented nature of the suburb as a whole undermine the argument for a 'Riccarton Heritage Setting RHA' in my opinion, whilst the submitter's discussion about buffers for heritage items and areas falls outside the scope of my engagement by Council. I recommend this submission is rejected, in as much as it touches upon heritage matters.

109. Phillipstown

- a) Submissions # 1063 & # 734 (Marie Byrne) requested a new RHA encompassing, it appears, an area bounded by Cashel Street, Ferry Road, Bordesley Street and Nursery Road. It is assumed that the submitter intended to delineate the frame of a proposed RHA of workers' cottages, which would therefore also include Oliviers and Mathesons Roads, Leyden Street, Cross and Inglis Streets and the east end of St Asaph Street. This delineation would thus cover the middle third of the suburb, which extends from Fitzgerald Avenue in the west to Aldwins Road in the east, and is bounded by Cashel Street and Ferry Road in the north and south respectively.
- b) Based on my desk-top study and fieldwork undertaken on Tuesday, 20 June 2023, I consider that the extent of modification and redevelopment is too great to consider the area as an RHA. The size of blocks within the nominated area has lent itself to considerable intensification from the mid-20<sup>th</sup> century to the present day. While small cottages and villas have survived there are also a considerable number of flats and townhouses. During my fieldwork I found that the streets mentioned

above were of a highly variable nature, in terms of the age and style of residential buildings, and that none presented themselves as potential RHAs. That is not to say that the area lacks historic fabric and interest, but rather that the review criteria for a potential RHA could not be met. I therefore recommend that this submission be rejected and have prepared a 'Potential RHA Review Criteria Template' report to support my position on the matter.

- c) During the course of my assessment of a potential RHA in Phillipstown the Ryan Street Residential Character Area came to my attention. While the street appears to be outside the area identified by the submitter, I am of the opinion that it would meet the threshold for scheduling as an RHA and that such an action might be considered to accept, in part, the submission made by Ms Byrne. To that end I have prepared a potential RHA template report for the street, which has been presented to the Council.

110. Dover Street, St Albans

- d) Submission # 1016 (Waipapa Papanui-Innes-Central Community Board) requested consideration of the 'workers' cottages' in St Albans' Dover Street as an RHA. I visited Dover Street on Sunday, 18 June 2023 but found that the street lacks sufficient authenticity and integrity, in whole and in part, to warrant consideration as an RHA. While some small cottages are still extant in the street there has also been considerable redevelopment over the last fifty years. I therefore recommend that this submission be rejected and have prepared a 'Potential RHA Review Criteria Template' report to support my position on the matter.

111. Woodville Street, Edgware

- a) Submission #775 (also 1095, Margaret Stewart) requested that Woodville Street be protected as a character and/or heritage area. I prepared a potential RHA review report for Woodville, Cleveland (north) and Geraldine Streets in October 2022 and concluded that they lacked overall coherence and a distinctive and significant development history. I also noted in my report that: 'While small clusters of older (1910s) houses remain in all three streets, both individual housing modification and site redevelopment have undermined the authenticity and integrity of the houses and the streetscape as a whole.' The report is appended

to my evidence and I recommend this aspect of the submission by Ms Stewart be rejected on the basis of my findings.

112. Cashmere View Street

- a) Submission #741 (Susan Bye for Lower Cashmere Residents Association) to PC 13 and PC14 requested that Cashmere View Street be made a heritage area. Although submission # 581 (Joanne Nikolaou) was primarily concerned with a request to make the Cashmere View Somerfield Area a 'Suburban Character Area' I have also had regard to it in reference to submission #741 because it contained reference to heritage values in Cashmere View Street.
- b) I assessed Cashmere View Street in September 2023 using the Potential RHA review criteria template (Appendix 3). My recommendation at that time, which still stands, was as follows:
- c) *Cashmere View Street was formed in 1926 by William Silas Angas, a Christchurch tailor. Angas had acquired the four constituent lots of this Somerfield residential subdivision in December 1925 from members of the Thomson family. The street, named as Cashmere View Road in the 1930 Wises' Post Office Directory, is not included in the Christchurch Libraries' Index of Street Names. After transferring land for the purpose of a road and recreation ground to the city council, Angas sold individual lots in the street through the later 1920s; the resultant houses are typical interwar bungalows. There were seven houses occupied by the time the 1930 Wise's directory was printed; 20 by 1936. Angas died in 1959, at which time he had been living in River Road, Richmond.*
- d) *Cashmere View Street does not embody significant heritage values but may possess character qualities. The street is not recommended for scheduling as an RHA.*
- e) On the basis of the assessment referenced above, I recommend that the submission is rejected.

**INDIVIDUAL HERITAGE ITEMS**

113. As referenced in the Statement of Evidence supplied by Ms Ohs, I can confirm that I have previously reviewed proposals to schedule 111 Hackthorne Road, the 20<sup>th</sup> Battalion and 20<sup>th</sup> Regiment War Memorial in

Janes Deans Close, the Burnside stable (former quarry stables), and the former Teddington (Allandale) lockup.

114. As outlined in my PC14 evidence (Appendix 4A), I did not consider that the dwelling at 111 Hackthorne Road or the war memorial in Jane Deans Close merited scheduling. I did, however, support scheduling of the former Burnside stables in Bamfords Road, Allandale, and the former lockup in Teddington.
115. With respect to scheduled item # 463, the former Holy Name Seminary at 265 Riccarton Road, I peer reviewed the most recent iteration of the statement of significance in May of this year. I support the removal of the former Kincaid house from the scheduled item in view of its substantive destruction by fire and the consequent reduction of rating for the item from 'highly significant' (Group 1) to 'significant' (Group 2) on the basis of the level of heritage values present on the site as it now exists.

## **CONCLUSION**

116. In considering the submissions made to PC13 in regard to the proposed RHAs I consider that each of the nine areas that are now proposed for scheduling have been robustly assessed and that the boundaries for each, subject to the recommended exclusions or additions itemised in Appendix 2, are defensible.
117. I have considered all of the information provided by submitters, where it concerns the identification and assessment of RHAs, and consider that none of the submissions have persuaded me to delete the proposed RHAs or to recommend new ones for addition to the District Plan; with the possible exception of Ryan Street in Phillipstown.
118. On the basis of some submissions I have reviewed and made minor revisions to some of the RHA reports and individual record forms for properties within the RHA. In preparing this Statement of Evidence I have also reviewed, and revised where necessary, the individual heritage record for every property located in each RHA to make them as accurate as possible at this time.

Dr Ann McEwan