

**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

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

17 June 2025

SUMMARY STATEMENT

1. My name is **Dr Ann McEwan**. I am an architectural historian and the principal of Heritage Consultancy Services. HCS specialises in built heritage identification and assessment for district plan reviews and plan changes. I have also prepared numerous Heritage Impact Assessments in support of resource consent applications for scheduled heritage items and areas.
2. I have prepared evidence on behalf of the Christchurch City Council to assist the Panel in matters relating to the Residential Heritage Areas and a number of potential scheduled heritage items. I reaffirm that I am complying with the Environment Court's Code of Conduct for Expert Witnesses in presenting this summary of my evidence and responding to submitters' evidence.
3. My evidence describes my identification and assessment of nine Residential Heritage Areas in Christchurch City and Lyttelton. I outline the background to and methodology I applied to the proposed RHAs. I provide my view on submissions in respect to six of the proposed RHAs and also discuss a number of potential RHAs, which I assessed but did not recommend for scheduling. Finally I address a number of individual heritage items about which the Council asked me to comment.
4. My evidence notes that the RMA and the RPS anticipate and provide for the identification and protection of heritage areas, which should proceed from such areas' importance to Canterbury's 'distinctive character and sense of identity' (RPS Objective 13.2.1). I also explain the distinction between heritage and amenity (character) values and identify the importance of the post-earthquake context for the identification of PC13's RHAs.
5. For clarity, although the Heaton Street RHA was withdrawn by the Council, my reference to it at paragraph 55 of my SoE remains valid, I believe, to the extent that the RHA I identified included only part of the total length of Heaton Street because the eastern section no longer possessed sufficient authenticity and integrity. I could have referenced the Macmillan Avenue RHA to make the same point. I also acknowledge that I incorrectly referred to a 'Dr Anderson', instead of 'Dr Adamson' at paragraph 61 of my SoE.
6. The Council resolved, on 4 June 2025, to remove a further 24 properties from the Lyttelton RHA. I identified that these could be deleted without a notable impact on the heritage values of the RHA as a whole.

7. Since I prepared my SoE I have reviewed information provided to me by the Council in respect of post-notification consents issued for works to be undertaken within a number of the RHAs. This information resulted in minor changes to the record forms for 9 Carrington Street and 2 Macmillan Avenue but did not cause me to change the rating of any of the properties concerned.

Dr Bruce Harding's evidence on the Macmillan Ave RHA

8. There is nothing in Dr Harding's evidence that alters my identification and assessment of the RHA.
9. Dr Harding discusses 'heritage character areas' and raises concerns with character (amenity) planning provisions in Cashmere that are not heritage issues arising from PC13. In response to Dr Harding's statement I can confirm that the Macmillan Avenue RHA is indeed predicated on John Macmillan Brown's 1908 subdivision and that it constitutes a portion of Macmillan Avenue, the full extent of which is fully encompassed by Character Area 3 (see Christchurch District Plan planning maps & Appendix 9.3.7.9.7). This character area also includes parts of Hackthorne Road and Dyers Pass Road. In my SoE (para 95) I refer to PC14's proposed Cashmere Residential Character Area; I am now aware that Character Area 3 in the Operative District Plan is solely relevant in this matter (see also SoE para 99).

John Brown's evidence on the CPT North St Albans RHA

10. There is nothing in John Brown's evidence in respect to the CPT North St Albans Subdivision (1923) that alters my identification and assessment of the RHA.
11. I agree with Mr Brown that historic heritage and amenity (character) should not be conflated. My heritage report for each RHA describes how the area meets the criteria for historic heritage as they are specified in Appendix 9.3.7.1 of the Operative District Plan. Consistent with his view on the appropriateness of a 'site-by-site analysis' for RHAs (para 24) I note that this work was carried out, as can be seen in the site records for all properties located within each RHA. I remain of the opinion that 'strong evidence' has in fact been provided by the Council in support of all the RHAs that are proposed for scheduling as part of PC13 (see Brown SoE, paras 40 & 41).
12. I remain of the opinion that both Malvern Park and Rugby Park are integral to the historic narrative and heritage values of the RHA and that removing

individual houses from the RHA as a whole would undermine its historic authenticity and integrity.

13. Recreational use of part of the CPT property that was subdivided in 1923 predates the residential development of the area by over 40 years and, as the RHA report describes, the twin parks (Malvern and Rugby) 'created a more desirable recreation space within [the CPT's] overall land holdings, rather than surveying a number of smaller pocket parks each time they undertook a subdivision' (RHA report, top of page 4).¹ I therefore do not agree with Mr Brown's contention, at para 27.6, that 'the contextual association of the recreational / open space is too broad, as to lack specific relevance to the 1923 subdivision'. Furthermore, I do not consider that the absence of an overt association between Rugby Park and the CPT after 1926 can be characterised, as it appears to have been by Mr Brown, as evidence that the park is not integral to the heritage values of the RHA. That the land comprising the RHA was once held by the CPT cannot be disputed given the land tenure history of the area and I do not consider that the broader community use of Malvern and Rugby Parks since the mid-1920s is evidence in and of itself of there being no connection between the recreational amenity provided by the parks and the people who lived and live in the RHA.
14. I cannot comment about what Mr Brown would consider a 'compelling rationale' for the RHA as a whole or its inclusion of Rugby Park, in particular, but note that he acknowledges that 'the general RHA methodology adopted by Council aligns with the Canterbury Regional Policy Statement' (paras 11 and 24). As acknowledged in the RHA report (bottom of page 1), the bipartite park is zoned Open Space Metropolitan Facilities and Open Space Community Parks; inclusion of the RHA within the District Plan will make no change to these underlying zonings.
15. In preparing my SoE I reviewed the houses at 6 and 12 Malvern Street and remain of the view that they merit a 'Defining' rating on the basis that they 'establish the historic heritage values of the Heritage Area ... [and] retain a level of authenticity and integrity sufficient to demonstrate these values' (the definition of the "defining" rating - emphasis added). [Mr Brown sometimes mistakenly refers to 10 and 12 Malvern Street in the main body of his Statement of Evidence].

¹ [St Albans CPT subdivision RHA December 2021](#).

Mr Joll's evidence

16. There is nothing arising from Mr Joll's evidence that alters my opinion. However, in reviewing Mr Joll's evidence I identified an error I made in preparing a combined record form for Rugby and Malvern Parks. To remedy that oversight, given that each park has a different owner and separate legal description, I have now prepared two separate record forms, which are appended to this summary statement.

Conclusion

17. Nothing has altered my substantive view on matters pertaining to the proposed RHAs or specified individual items, either recommended for scheduling or not, since I prepared my Statement of Evidence. Furthermore I consider that the reports and individual record forms for properties within each RHA are as accurate as they can be at this time.

Dr Ann McEwan

Dated 17 June 2025

Appendices: Individual Site Record Forms [2] for Rugby Park and Malvern Park.

CHRISTCHURCH DISTRICT PLAN
CPT NORTH ST ALBANS SUBDIVISION (1923) RESIDENTIAL HERITAGE AREA
INDIVIDUAL SITE RECORD FORM

ITEM NAME Rugby Park
ADDRESS 178 Innes Road
Christchurch

PHOTO



CHRISTCHURCH DISTRICT PLAN STATUS

N/A

HNZPT LIST ENTRY STATUS

N/A

ARCHITECT/DESIGNER

Unknown

DATE OF CONSTRUCTION

Various

STYLE

Sports park / Utilitarian

PHYSICAL DESCRIPTION

Sports park, administration buildings and training facilities; memorial gates. Malvern Scout Den at northern corner of site.

CONTEXT/SETTING/LANDSCAPE FEATURES

The park is bordered by Innes Road, Malvern Street and Rutland Street; Malvern Park forms the eastern boundary of the park. CRU memorial gates overlook the intersection of Rutland and Malvern Streets.

MATERIALS/STRUCTURE

Grass, trees, stone, timber, concrete, corrugated steel.

ALTERATIONS

Jubilee gates erected (1929). Scout den erected (1950). Grandstand opposite Gosset Street extended (c.1960). L-shaped building at corner of Malvern and Rutland Streets erected; carpark off Rutland Street developed (c.2015).

RATING

Defining

REASON FOR RATING

Sports park developed in tandem with CPT housing subdivision.

HISTORICAL AND SOCIAL SIGNIFICANCE

The houses in this area represent the residential development of a bungalow suburb during the interwar period. The subdivision was carried out by the Anglican Church Property Trustees and was marketed with reference to the nearby tramline and the ease with which new residents would be able to access the central city from their homes. The CPT gifted the eastern half of what is now Malvern Park to the Christchurch City Council in 1922; initially the council had first right of refusal to buy the western portion. After the council decided that the purchase price was too high, the Canterbury Rugby Union purchased the western parcel from the CPT in 1926; it was officially opened as Rugby Park on 26 July 1929. The Malvern Scout Den was opened in the presence of County Commissioner Sir Joseph Ward on 4 November 1950.

CULTURAL AND SPIRITUAL SIGNIFICANCE

The area's cultural values are associated with the way of life of its residents since the later 1920s.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

The California Bungalow style housing in the area illustrates the 'triumph' of the bungalow over the villa for middle class housing in the early 20th century.

CONTEXTUAL SIGNIFICANCE

The residential environment of the HA is enhanced by its grassed berms and street trees and complemented by its historic and physical relationship with a popular suburban park. Houses are built to address the street and typically retain a high level of authenticity and integrity.

ARCHAEOLOGICAL SIGNIFICANCE

The area's potential archaeological values likely relate to its later 19th and early 20th century agricultural uses and residential activity since the mid-1920s.

TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE

The houses exhibit craftsmanship values typical of the period in which they were built.

REFERENCES

John Wilson et al *Christchurch Contextual Historical Overview* (June 2005)

NZ Federation of University Women Canterbury Branch *St Albans from Swamp to Suburbs – An Informal History* Christchurch, 1989.

<http://christchurchcitylibraries.com/Heritage/PlaceNames/>

<https://www.kahurumanu.co.nz/atlas>

<https://teara.govt.nz/en/suburbs>

REPORT COMPLETED

13 June 2022 / revised 12 June 2025

AUTHOR

Dr Ann McEwan, Heritage Consultancy Services

CHRISTCHURCH DISTRICT PLAN
CPT NORTH ST ALBANS SUBDIVISION (1923) RESIDENTIAL HERITAGE AREA
INDIVIDUAL SITE RECORD FORM

ITEM NAME Malvern Park
ADDRESS 180 Innes Road
Christchurch

PHOTO



CHRISTCHURCH DISTRICT PLAN STATUS

N/A

HNZPT LIST ENTRY STATUS

N/A

ARCHITECT/DESIGNER

Unknown

DATE OF CONSTRUCTION

Various

STYLE

Passive recreation reserve / Utilitarian

PHYSICAL DESCRIPTION

Recreation reserve; service building at northern end of western boundary.

CONTEXT/SETTING/LANDSCAPE FEATURES

The park is bordered by Innes Road, Roosevelt Avenue, and Malvern Street; Rugby Park forms the western boundary. Trees planted around the perimeter; mix of bollard and wire and hedging along road boundaries.

MATERIALS/STRUCTURE

Grass, trees, shrubs, timber, concrete and steel.

ALTERATIONS

Trees planted (c.1950). Replacement service building erected (later 2000s).

RATING

Defining

REASON FOR RATING

Recreation reserve developed in tandem with CPT housing subdivision.

HISTORICAL AND SOCIAL SIGNIFICANCE

The houses in this area represent the residential development of a bungalow suburb during the interwar period. The subdivision was carried out by the Anglican Church Property Trustees and was marketed with reference to the nearby tramline and the ease with which new residents would be able to access the central city from their homes. The CPT gifted the eastern half of what is now Malvern Park to the Christchurch City Council in 1922.

CULTURAL AND SPIRITUAL SIGNIFICANCE

The area's cultural values are associated with the way of life of its residents since the later 1920s.

ARCHITECTURAL AND AESTHETIC SIGNIFICANCE

The California Bungalow style housing in the area illustrates the 'triumph' of the bungalow over the villa for middle class housing in the early 20th century.

CONTEXTUAL SIGNIFICANCE

The residential environment of the HA is enhanced by its grassed berms and street trees and complemented by its historic and physical relationship with a popular suburban park. Houses are built to address the street and typically retain a high level of authenticity and integrity.

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The area's potential archaeological values likely relate to its later 19th and early 20th century agricultural uses and residential activity since the mid-1920s.

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The houses exhibit craftsmanship values typical of the period in which they were built.

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