

BEFORE THE HEARINGS PANEL

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 hearing submissions on Plan
Change 13 (Heritage) to the
Christchurch District Plan

**SUMMARY OF EVIDENCE OF SUZANNE AMANDA RICHMOND
ON BEHALF OF CHRISTCHURCH CITY COUNCIL**

HERITAGE ITEMS (SITES)

17 June 2025

INTRODUCTION

1. My name is **Suzanne Richmond**. I am a Heritage Advisor specialising in planning in the Heritage Team at **Christchurch City Council**. I have the qualifications and experience set out in my evidence-in-chief dated 28 May 2025. 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 the submitters' evidence.
2. I will cover the following in my summary:
 - (a) Plan Change 14 recent decisions
 - (b) Summary of evidence
 - (c) Correction to evidence
 - (d) Proposed schedule amendment – removal of demolished 187 Fitzgerald Avenue
 - (e) Response to submitter evidence – Daresbury Limited
 - (f) Response to submitter evidence – Ceres New Zealand, and
 - (g) Response to submitter evidence – Otto Snoep.

PC14 RECENT DECISIONS

3. Since preparing my primary evidence, the PC14 decision on Council's alternative recommendations was received from the Minister Responsible for RMA Reform on 5 June 2025.¹ On Matter 17, the Minister declined the inclusion of a matter of discretion to protect the Papanui War Memorial Avenues trees heritage item² from the effects of adjoining intensification.
4. As Council's PC14 decisions on NPS-UD³ are now operative in policy 3 areas, and one⁴ of the new heritage items proposed in PC13 is a site affecting capacity in a policy 3 residential zone⁵ and five are located in policy 3 non-residential zones⁶, I have made an assessment in relation to

¹ [CB-COR1290-Letter-to-Christchurch-City-Council-re-IHP-recommendations.pdf](#)

² Notified as a new item in PC13 and PC14.

³ National Policy Statement on Urban Development 2020 (updated May 2022).

⁴ Protection of the dwelling and setting at 35 Rata Street (zoned HRZ) has a potential impact on residential capacity. The other heritage item Papanui War Memorial Avenues street trees adjoins some HRZ properties but is confined to the road reserve and does not impact on residential capacity.

⁵ For location and zoning of 35 Rata Street - see list of new items in Appendix G, evidence of Amanda Ohs, [5.7 APP G Amanda Ohs - Table of new items and interiors \(PC13 webpage\)](#) and see [Heritage aerial maps for new items](#) – 35 Rata Street (aerial map #838, item #1433 ([PC13 webpage](#)), and PC14 decision zone maps: [Mapping of Council Policy 3 decision \(PC14 webpage\)](#).

⁶ New heritage items zoned CCZ are: 28 Bealey Avenue, 167 Hereford Street, 129 High Street, 159 Manchester Street and 152 Oxford Terrace. See [Heritage aerial maps for new items](#) (refer aerial map

qualifying matters against s77J and s77P at paragraph 5.1.10 to 5.1.17 of my primary evidence.

SUMMARY OF EVIDENCE

Issue 1 – Protection of heritage items

5. I adopt the advice of Amanda Ohs in relation to scheduling of new items, having considered a number of submissions in support and some against, including for baches at Taylors Mistake Bay⁷ and the Papanui War Memorial Avenues. As a result of submissions on Papanui War Memorial Avenues, I recommend some minor changes to the rules which I believe improve the interface between the heritage and street tree rules.
6. I also recommend a correction to the extent of the notified Sydenham Cemetery heritage item, supported in the evidence of Amanda Ohs. Sydenham Cemetery received support for scheduling in submissions and no specific opposing submissions.
7. I provided evidence for PC14 (paragraph 8.1.16) regarding the scheduling of Spreydon Lodge, which is relied on in the PC13 evidence of Marcus Langman (paragraph 45), and I continue to hold this view.

Issue 2 – Removal of protection of heritage items

8. My recommendations to continue to schedule and amend protection for Daresbury heritage setting and Antonio Hall heritage item are supported by the other Council experts. I address Daresbury again below.

Issue 3 – Changes to protection

9. Based on the technical evidence of Amanda Ohs, I support reductions of the heritage settings of the dwelling at 27 Glandovey Road and Riccarton Racecourse Tea House, and deletion of the demolished Public Grandstand heritage item. Further to my discussion of these submissions at paragraph 8.1.74 and 8.1.75, I would like to clarify that the recommendations Amanda Ohs is making in PC13 on these two sites are consistent with the IHP recommendations made on both sites in PC14⁸. Decisions on submissions

numbers in schedule) ([PC13 webpage](#)), and PC14 [Mapping of Council Policy 3 decision](#) ([PC14 webpage](#)).

⁷ The addresses for operative and proposed baches are all Taylors Mistake Bay, so this includes those at Boulder Bay.

⁸ [IHP-Recommendations-Report-Part-5-29-July-2024.pdf](#), para 87(d).

for these sites were not made in PC14 due to the sites being outside NPS-UD Policy 3 areas.

Issue 4 and 5 – Changes to provisions

10. My evidence considers a number of submissions both in support and opposing changes to the heritage rules framework. Based on my years of experience working at Council with the district plan heritage provisions,⁹ heritage owners and resource consent applicants, and my daily observation of the implementation of PC13 in the two years since notification in March 2023, I am comfortable that the notified changes have been working successfully to promote good heritage outcomes, with no resulting increase in resource consent numbers associated with the minor strengthening of rules and greater use of permitted standards. I consider that the changes proposed in evidence by Marcus Langman on the Council submissions will improve the clarity and accuracy of these provisions.
11. I am proposing a further change to the first part of the demolition policy in relation to heritage items¹⁰, to establish a policy position which ensures that the activity status hierarchy in the rules between the *operative* activity status for demolition of heritage items and *proposed* activity status for buildings in Residential Heritage Areas is articulated in the policy so the policy in turn gives effect to the objective. Equivalent changes to the policy to apply it to RHAs have been addressed by Glenda Dixon in her evidence.
12. I have proposed a minor change to the notified wording of the heritage setting definition at paragraph 8.1.125 to further clarify that the heritage setting does not form part of the scheduled heritage item which is the feature which meets the scheduling criteria.
13. I have also recommended a change to the wording of the permitted cemeteries rule at paragraph 6.1.20 to 6.1.28, noting that there were no submissions on this rule. This is to correctly reflect the intention of the notified rule as described in the s32 report - to permit all monumental works, which is more enabling than the notified wording of the rule.

⁹ Under the Christchurch City Plan, Banks Peninsula District Plan, and Christchurch District Plan including Christchurch District Plan as amended by Plan Changes 13 and 14.

¹⁰ Discussed at paragraph 8.1.136 to 8.1.138 of my primary evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

Issue 6 – Other submissions

14. I make some further recommendations on submissions on a range of general heritage-related matters.

CORRECTION TO EVIDENCE

15. I would like to make a correction to my primary evidence in the Out of Scope Submissions section at paragraph 7.1.11. This paragraph is out of order and should follow paragraph 7.1.7 as it relates to the further submission by Ceres New Zealand.

PROPOSED SCHEDULE AMENDMENT – REMOVAL OF 187 FITZGERALD AVENUE

16. Resource consent RMA/2023/325 was granted on 3 October 2023 for demolition of the scheduled heritage building at 187 Fitzgerald Avenue. As this was subsequent to notification of PC13 in March 2023, the deletion of this heritage item (#641) and heritage setting (#376) was not included in the notified proposal. There were no submissions on this site and so there was no scope to recommend removal from the schedule in my PC13 s42A reporting. As this building has recently been demolished and a new development is currently underway on the site, I recommend that the heritage item and setting protection is removed so that resource consent is not required for future works within the heritage setting.

RESPONSE TO SUBMITTER'S EVIDENCE – DARESURY LIMITED

17. I have reviewed the submitter's evidence of Jonathan Clease, Planner for Daresbury Limited¹¹, who relies on his PC14 evidence, and have noted the letters he has attached as Appendix 6¹² and Appendix 8¹³ which contain similar content summarising the submitter's legal submissions seeking the de-scheduling of Daresbury.
18. The discussion on Daresbury in my primary evidence¹⁴ summarises my opinions on the evidence of Council and submitter experts, and includes consideration of Chapman Tripp's letter to Council. I remain of the view, based on my own assessment and relying on the evidence of Council

¹¹ [Jonathan Clease, for Daresbury Limited](#)

¹² Chapman Tripp letter to Council, 12 November 2024.

¹³ Chapman Tripp letter to the Minister Responsible for RMA Reform, 17 January 2025.

¹⁴ Daresbury discussion at paragraph 8.1.62 to 8.1.71 of my primary evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

experts, that Daresbury can be retained as a Highly Significant item on the heritage schedule in accordance with scheduling policy 9.3.2.2.1. I concur with Mr Fulton's primary evidence for PC14 at paragraphs 68 and 69 (attached to his PC13 evidence – see link in the footnote)¹⁵ which neatly sums up my view, so I repeat this in part here:

Daresbury is of such significance, both locally and nationally, that it is reasonable to do what is feasibly required to strengthen and restore this building. ...The cost of repair of Heritage buildings of the nature [of] Daresbury is significant but is proportional to the scale of the project and the heritage value placed on the building. While I am not an expert in the detailed costs, I believe they should be compared to projects like Ōtahuna Lodge or Mona Vale, rather than domestic projects of similar scale but lesser Heritage value.

RESPONSE TO SUBMITTER'S EVIDENCE – CERES NEW ZEALAND

19. Mr Tim Joll, Planner for Ceres New Zealand¹⁶:

- Claims that the threshold test for non-complying activities in s104D is impossibly high for significantly damaged buildings;
- Points to other examples of site specific rules for the Christ Church Cathedral and the Taylors Mistake baches, and
- Recommends that a significantly damaged buildings schedule and associated more permissive rules framework would better meet the purpose of the Act.

20. As discussed in the section of my evidence on provisions for significantly damaged buildings¹⁷ and the demolition policy¹⁸, I disagree that not having a customised rules framework for specified significantly damaged buildings makes it substantively harder for owners to deconstruct these buildings.

21. Heritage objective 9.3.2.1.1 and demolition policy 9.3.2.2.8 (as amended by PC13) are *targeted* at the most significantly damaged buildings *and* other buildings which are in poor or unsafe condition. These *are* the buildings that

¹⁵ [William Fulton PC13 evidence - APP A statement of evidence PC14](#)

¹⁶ Evidence of [Tim Joll, for Ceres New Zealand](#), discussion at paragraph 25-40 and matters of discretion Appendix 1.

¹⁷ Paragraph 8.1.100 - 8.1.120 of my primary evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

¹⁸ Paragraph 8.1.130 - 8.1.138 of my primary evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

may be able to meet clause a.iii. of the objective: "...in some situations demolition may be justified by reference to the matters in Policy 9.3.2.2.8". The matters in the demolition policy consider complex engineering and financial feasibility scenarios which might preclude retention of such buildings including significantly damaged buildings. Intact buildings which do not fit into these categories generally do not, in my experience, meet these tests.

22. Demolition applications processed by Council show that it is possible for proposals for demolition of significantly damaged buildings (also buildings in poor condition or unsafe) to be assessed as minor or not contrary to the operative objectives and policies. Riccarton Racecourse Public Grandstand (application prepared by Mr Joll)¹⁹ is the only full demolition application lodged for an earthquake damaged Highly Significant scheduled heritage item since the Canterbury earthquakes. The decision records that the primary drivers for demolition were the scale of the costs of upgrading the structure and the significant constraints on reuse. The proposed demolition was assessed by the commissioner as being consistent with objectives and policies. In this case a Highly Significant item met the threshold test for non-complying activities without damage being the most important or only factor.
23. Three of the resource consents granted for demolition of Significant scheduled heritage buildings notified for deletion in PC13²⁰ were granted on a non-notified basis, essentially because after taking into account their condition and required repair methodologies under the demolition policy, there was not an identified repair option that would retain the integrity and heritage significance of the heritage building.
24. I am not generally in favour of site-specific rules, as while they may seek to provide clarity for certain sites, in my view in doing so they risk unfair outcomes for other sites, and can make the overall rules framework more complex. I did not prepare evidence for the Christchurch Replacement District Plan hearings in 2016 on the customised rules for the Christ Church Cathedral, which I understand came into the Plan in response to the owner's submission. In relation to the proposed permitted rule for the Taylors Mistake Bay baches, this only applies in the narrow circumstance

¹⁹ 165 Racecourse Road, RMA/2021/3921 publicly notified decision by Commissioner David Caldwell, granted 18 October 2022.

²⁰ 19 Kotare Street, 300 Hereford Street and 38 Phillips Street.

where a bach's licence to occupy is cancelled, and I consider there are very unusual site specific factors which justify the permitted rule in that case.

25. In response to the matters of discretion Mr Joll proposes for significantly damaged buildings,²¹ I consider that engineering, costs and threat to life/property²² are provided for in the notified demolition policy. Salvage and interpretation²³ are standard conditions of demolition resource consents along with photographic recording. Consideration of whether consent has been granted for a replacement building²⁴, may provide some mitigation in broader urban design terms, however when assessing impact of demolition on heritage values a replacement building does not mitigate the loss of a heritage item.

26. I agree that the assessment matter Mr Joll proposes relating to whether a s124 Building Act notice for dangerous or insanitary buildings has been issued in relation to the site²⁵ is a relevant matter to consider in demolition applications²⁶, and I would add that, whether the building is entered on the national Register of Earthquake Prone Buildings (EPB Register²⁷) is also relevant. However, I consider these are both engineering factors which can be contemplated in (amended clause number) a.ii.B. of the demolition policy and the objective in relation to the condition of buildings (a.ii)., and are appropriately provided for already, under the operative consent status for the building.

27. I consider that the various complex factors relating to the feasibility of retaining or demolishing significantly damaged and other heritage items in poor or unsafe condition, are either directly related to the condition and heritage values of the building itself, or are wider (less directly related but equally valid) considerations which might be site or owner specific²⁸. In my view these are more appropriately assessed via a discretionary or non-

²¹ Evidence of [Tim Joll, for Ceres New Zealand](#), Appendix 1. These matters are similar to those for demolition of Christ Church Cathedral in 9.3.6.2.

²² Evidence of [Tim Joll, for Ceres New Zealand](#), Appendix 1 – his 9.3.6.7 a) and b).

²³ Evidence of [Tim Joll, for Ceres New Zealand](#), Appendix 1 – his 9.3.6.7 e) and f).

²⁴ Evidence of [Tim Joll, for Ceres New Zealand](#), Appendix 1 – his 9.3.6.7 c).

²⁵ Evidence of [Tim Joll, for Ceres New Zealand](#), Appendix 1 – his 9.3.6.7 matter d).

²⁶ I am aware that s124 notice under the Building Act for dangerous or insanitary buildings can be issued for parts of buildings or complexes, as in the case of Antonio Hall, and that it may be possible to address the notice through a combination of repair and partial demolition of the building or complex. A s124 notice attached to a site does not necessarily mandate full demolition.

²⁷ [Register of earthquake-prone buildings \(EPB Register\)](#).

²⁸ Examples of these wider factors which I have termed “non-heritage factors” for want of a more descriptive term, are at paragraph 8.1.110 of my evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

complying activity status, with associated policy guidance, rather than seeking to derive an exhaustive list of matters of discretion for a restricted discretionary activity.

28. Mr Joll²⁹ considers that the addition to the demolition policy of the wording: “is to be avoided wherever possible, particularly in the case of Highly Significant heritage items” represents a significant policy shift that should have required a s32AA assessment. As discussed in my evidence³⁰ the amendment does not seek to *change* the policy approach, but to better articulate a policy position which gives effect to the objective and is already implemented in rules for *operative* activity statuses and the *existing* list of factors in the policy. I disagree that the words “wherever possible” are subjective, as these words are placed to directly acknowledge the list of existing considerations which follow in the policy to inform a conclusion as to whether it is possible to avoid demolition, or demolition is justified.
29. In my view the proposed demolition provisions are the most appropriate way to achieve the purpose of the Act.

RESPONSE TO SUBMITTER’S EVIDENCE – OTTO SNOEP

30. And finally, I respond to submitter evidence from Mr Snoep³¹ on the Taylors Mistake Bay baches.
31. In relation to Mr Snoep’s discussion on existing use rights on page 10(xi) of his submission, I note that district plan heritage protection and associated rules as amended by PC13 mean that, where a licence to occupy remains in place, resource consent is required for removal of the bach and for alteration in cases where existing use rights do not apply. Aside from regulatory consenting requirements, heritage protection is also an education tool for working with owners to support changes which maintain the integrity and authenticity of heritage items and retain heritage significance. As noted in the statements of significance for the baches³², the baches have often been altered and adapted to suit the changing needs of owners, and this forms part of their significance. Amanda Ohs has

²⁹ Evidence of [Tim Joll, for Ceres New Zealand](#), paragraph 33 and 34.

³⁰ Paragraph 8.1.136 – 8.1.138 of my primary evidence: [4.0 S42A PC13 Section 42A Report Heritage Items Suzanne Richmond](#)

³¹ [PC13 evidence Otto Snoep](#)

³² For baches proposed in PC13 see: [Statements of Significance - New Items – PC13 webpage](#), Provisions section). For baches protected in the operative district plan statements of significance are linked from the “Significant” link in the schedule entry: [Christchurch District Plan - Appendix 9.3.7.2 - Ctrl/F search for “Taylors \[Mistake Bay\]”](#).

responded in her summary statement to Mr Snoep's comments on the s32 analysis in relation to the statements of significance.

32. Contrary to Mr Snoep's assertions on page 19 (16.17), I consider that the heritage scheduling of the baches is not inconsistent with Chapter 18 Open Space policies and rules in the district plan, and the Open Space Coastal zone rules in 18.9 provide for the existing baches at Taylors Mistake Bay.

CONCLUSION

33. Other than where I have stated above, I continue to hold the views expressed in my primary evidence.

Dated: 17 June 2025
Suzanne Richmond