

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

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*under:* the Resource Management Act 1991

*in the matter of:* proposed Plan Change 13 to the Christchurch District  
Plan

*and:* **Daresbury Limited**  
(Submitter 874)

Summary statement of Jonathan Clease (planning) on behalf of  
Daresbury Limited

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Dated: 17 June 2025

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## **SUMMARY STATEMENT OF JONATHAN CLEASE ON BEHALF OF DARESBUY LIMITED**

### **INTRODUCTION**

- 1 My full name is Jonathan Guy Clease. I am a Director in the planning and resource management consulting firm Planz Consultants Limited.
- 2 I provided a statement of evidence in relation to the relief sought by Daresbury Limited (*Daresbury*) on proposed Plan Change 14 to the Christchurch District Plan (*PC14*) dated 20 September 2023. I provided a brief statement of evidence on proposed Plan Change 13 (*PC13*) dated 6 June 2025 (*EiC*) that drew heavily on my earlier *PC14* evidence. My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses (Part 9, Environment Court Practice Note 2023) are set out in my *EiC* and I do not repeat those here.
- 3 This statement is intended to provide a brief summary of my evidence (both *PC13* and *PC14* iterations).

### **LISTING OF DARESBUY HOUSE<sup>1</sup>**

- 4 The District Plan heritage provisions are a focused response to heritage management in a post-earthquake context. As such, the heritage objective<sup>2</sup>, the policy on listing<sup>3</sup>, and the policy on demolition<sup>4</sup> all reflect the need to take into account damage and the reasonableness of the costs associated with repair and restoration.
- 5 There remain a number of earthquake damaged heritage buildings in the City and therefore in my view the recognition of such in the policy framework remains valid.
- 6 At the heart of the debate on Daresbury is the test of whether the costs of repair are unreasonable.
- 7 As a triple brick, multi-storey building that has experienced significant structural damage to the ground floor structure, the scope of works to rectify that damage is extensive. There is broad agreement between the engineering evidence of Mr Gilmore for Daresbury and the review of that engineering evidence by Mr Hogg for Council as to the scope of works.
- 8 There is likewise broad agreement as to the consequences of those works on the remaining heritage significance of the building between Mr Pearson for Daresbury and Ms Ohs and Mr Fulton for Council –

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<sup>1</sup> 9 Harakeke Street, Fendalton

<sup>2</sup> Objective 9.3.2.1.1(a)(ii)-(iii)

<sup>3</sup> Policy 9.3.2.2.1(c)(I)-(ii)

<sup>4</sup> Policy 9.3.2.2.8(a)(iii)

namely that the resultant outcome is largely a replica, that replicas are not generally considered to be an acceptable heritage outcome, that allowance of the significant earthquake damage necessarily tempers what would normally be an unacceptable outcome, that the heritage value of the resultant building is diminished, but that sufficient heritage value would still remain to warrant listing purely in terms of heritage values.

- 9 Identification of heritage value is the start, not the end, of a s32 assessment of costs, benefits, efficiency and effectiveness. To pass a s32 test the tool of listing needs to be assessed against the policy outcomes that the listing tool implements. This necessarily requires a robust consideration of the policy framework for both listing and demolition.
- 10 The tests for listing are set out in Policy 9.3.2.2.1(c)(i) and (ii). To be listed, a building must first contain sufficient heritage value to warrant listing, UNLESS, any of the tests in clause (ii) are met, namely:
- (i) The physical condition of the heritage item, and any restoration, reconstruction, maintenance, repair, or upgrade work would result in the heritage values and integrity of the heritage item being compromised to the extent that it would no longer retain its heritage significance; and/or*
  - (ii) There are engineering and financial factors related to the physical condition of the heritage item that would make it unreasonable or inappropriate to schedule the heritage item.*
- 11 Ms Ohs draws on the evidence of Mr Fulton and assesses the first of the listing tests, namely whether or not the building (once repaired) will retain sufficient heritage value to warrant listing<sup>5</sup>. She likewise draws on the engineering evidence of Mr Hogg that a repair solution (albeit extensive) is available, to pass the second listing test<sup>6</sup>.
- 12 She then defers to Ms Richmond to assess the third and final listing test of whether or not there are financial factors that would make it unreasonable or inappropriate to list.
- 13 The required repairs and engineering scope of works has been assessed by a Quantity Surveyor for Daresbury, and reviewed by a Quantity Surveyor for Council<sup>7</sup>. Whilst there is some difference in their anticipated repair costs, these differences are within a relatively narrow range (approximately 5% of the overall repair cost), being Mr Harrison's figure of \$9.7m incl. GST for Daresbury and Mr Stanley's

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<sup>5</sup> Ms Ohs s42A, para.127

<sup>6</sup> Ibid, para.128

<sup>7</sup> Mr Shalders has provided an updated summary of his PC14 evidence to reflect cost and value changes over the last 2 years. The numbers quoted in my summary reflect this updated information rather than the numbers referenced in my EiC which relied on the PC14 evidence of 2023.

figure of \$9.2m incl. GST for Council. The cost of a new build is also assessed by Mr Stanley as being between \$7.2m-\$11.2m excl. GST, depending on specification.

- 14 To test reasonableness, Ms Richmond in essence simply compares the repair cost with the new build cost and considers that as they fall within a similar ballpark that the costs are reasonable and the third listing test is passed<sup>8</sup>.
- 15 In my view this is the wrong comparison to determine reasonableness<sup>9</sup>. I instead examine the cost of the repair compared to the value of the repaired building. I secondly compare the overall cost of the repairs + land value with the property's value were it to be on-sold. In my view these are the key considerations that any homeowner makes when considering whether or not to embark on a substantial building project.
- 16 Such an assessment must necessarily rely on valuation evidence. Council has neither obtained its own valuation evidence or peer reviewed that provided by Mr Shalders.
- 17 Mr Shalders values the repaired building as having a value of \$4.075m incl. gst (excluding land). This compares with a repair cost of \$9.2m (Mr Stanley) or \$9.7m (Mr Harrison). There is therefore a clear gap of \$5.1m- \$5.6m between the cost of repair and the value of the repaired building.
- 18 The end cost of the resultant project is estimated by Mr Shalders to be in the order of \$18m<sup>10</sup>. Mr Shalders identifies that the most expensive home ever sold in the history of Christchurch is \$9.1m.
- 19 In my view, having to embark on a building project where the cost of repairs is nearly twice what the resultant building is worth, and where to recoup costs the overall property would need to be sold for twice the price of the most expensive residential house ever sold in Christchurch, is clearly unreasonable.
- 20 As such the threshold for not listing is clearly established. To retain the listing does not align with the heritage policy framework and as such is not an efficient or effective tool in delivering heritage outcomes which were carefully drafted as a contextual response to the realities of a major earthquake.

**Jonathan Cleese**

**17 June 2025**

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<sup>8</sup> Ms Richmond S42A, para.8.1.66

<sup>9</sup> The days of 'Downton Abbey' with servants quarters in the attic are well past, with even high-end dwellings not coming close to the size and layout of Daresbury

<sup>10</sup> I note that the land value component of this estimate assumes no heritage listing. If the listing were to be retained then the land value element would be reduced to reflect the more limited subdivision potential of the site.