

Before Hearing Commissioners
at Christchurch

under: the Resource Management Act 1991

in the matter of: application RMA/2021/3921 for consents to demolish
the heritage-listed Grand National Stand at Riccarton
Racecourse

and: **Canterbury Jockey Club**
Applicant

Evidence of William Fulton (heritage architect)

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EVIDENCE OF WILLIAM FULTON

INTRODUCTION

- 1 My full name is William Henry Fulton. I am a Director of Fulton Ross Team Architects and a Director of Team Architects Limited, a consortium of eight architectural practices across New Zealand.
- 2 I hold a Bachelor of Architecture (Hons) from the Victoria University of Wellington, a Bachelor of Building Science from Victoria University of Wellington and a Post Graduate Diploma in Landscape Architecture from Lincoln University. I am a member of the International Council on Monuments and Sites (ICOMOS NZ) and a member of Heritage New Zealand. I am a member of the New Zealand Institute of Architects (NZIA). I am a member of the Christchurch City Council Urban Design Panel and the Akaroa Design Panel.
- 3 I have over 20 years of professional expertise in architecture and Heritage conservation. Prior to the 2010/2011 Christchurch earthquake sequence I was involved in many heritage projects in Christchurch including the Christchurch Music Centre, the Riccarton Racecourse Tea House and the Huntley Homestead in Yaldhurst.
- 4 Most recently I have been appointed to the panel of Heritage Professionals administered by the Christchurch City Council. I have been the Heritage Architect for many projects including the restoration of New Regent Street.
- 5 I am familiar with the Canterbury Jockey Club's (CJC) application to demolish the heritage-listed Grand National Stand (GNS) at Riccarton Racecourse (the *Application*). I am authorised to give evidence on behalf of CJC.

CODE OF CONDUCT

- 6 Although this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2014. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE

- 7 In preparing my evidence, I have reviewed:

- 7.1 The Application;
 - 7.2 Responses to Council's further information requests;
 - 7.3 Submissions on the Application;
 - 7.4 The comprehensive archaeological assessment of the site prepared by Underground Overground Archaeology;
 - 7.5 The Officer's Report and associated appendices; and
 - 7.6 The evidence of other witnesses for CJC.
- 8 This evidence is divided as follows:
- 8.1 The history of the CJC;
 - 8.2 An outline of the heritage values of the GNS, including:
 - (a) Historical and social significance;
 - (b) Cultural and spiritual significance;
 - (c) Architectural and aesthetic significance;
 - (d) Technical and craftsmanship significance;
 - (e) Contextual significance;
 - (f) Archaeological significance; and
 - 8.3 Consideration from a heritage perspective of the structural upgrade options for the GNS;
 - 8.4 Consideration of the CJC's future vision for the site;
 - 8.5 Responses to submissions; and
 - 8.6 Responses to the Officer's Report and associated appendices.

THE CANTERBURY JOCKEY CLUB: HISTORY

- 9 The CJC was established in 1854 and held its first meeting in Hagley Park at Easter of the following year. The Riccarton Racecourse was reserved as a public recreation ground by the Canterbury Provincial Council in 1858 and therefore leased the land to the CJC.
- 10 Consequently, the racecourse became a magnet for horse owners and breeders, as can be seen in the history of Chokebore Lodge in Racecourse Road, for example. Riccarton Racecourse became the

home of the New Zealand Cup in 1867. The racecourse's Cup and Show Week each November are one of the city's premier events.

- 11 Over its long history the CJC have invested in buildings that form part of the wider Riccarton Park Racecourse. The CJC employed architects to design buildings that were both useful, aesthetically pleasing and that lasted. These are the buildings that eventually acquired heritage value.
- 12 Also within the Heritage setting of the GNS (#183) is one other scheduled highly significant building: the Tea House (#452) that, as with the GNS, was designed by Alfred and Sidney Luttrell in 1903.
- 13 The Tea House was one of the Luttrell Brothers first commissions after they arrived in New Zealand from Tasmania.
- 14 The Tea House Building was in a dis-used state in 2000. The CJC along with local and Council support took up the challenge of restoring the building. I assisted CJC in this project acting as their architect.
- 15 The successful restoration of the Tea House was recognised with awards by the NZ Institute of Architects and the Christchurch Civic Trust in 2009.
- 16 The care that the CJC takes in maintaining the grounds and facilities at the Riccarton Park Raceway is testament to their attitude to preserving their history for the enjoyment of their visitors.

HERITAGE VALUES OF THE GNS

- 17 The information in this section has been sourced from the Christchurch District Plan's Statement of Significance for the GNS:

Historical and social significance

- 18 The GNS at the Riccarton Racecourse has high historical and social significance. The significance is because of its association with the CJC (est. 1854) and its use as a sporting and recreational facility since 1923. The GNS was designed by the Luttrell Brothers, one of New Zealand's foremost Edwardian architectural practices.
- 19 The CJC's first race meeting was held in Hagley Park in Easter 1855. But by January 1957, the club was holding its third meet at its new course in Upper Riccarton. The development of the racecourse provided an impetus for growth in the area and was the prime reason this suburb developed ahead of other areas that were closer to the city. In 1877 a railway extension was added from Sockburn to Riccarton, which served the course until the mid-1950s.

20 By 1903 there were four stands at the Riccarton Racecourse. One, a timber stand, burnt down in 1919. That timber stand was replaced with the GNS in 1923. The Luttrell Brothers were members of the CJC and acted as both designers and contractors for the project.

21 The cost of the GNS was between £70,000 and £80,000. The grandstand functioned as a combined public and members' stand until a new members' stand was built in 1962 (demolished in 2012). Since 1867 the racecourse has been the home of the New Zealand Cup. The GNS, has social significance particularly in relation to the Cup Week held in November each year.

Cultural and spiritual significance

22 The GNS has high cultural significance for its association with the culture of horse racing locally and nationally. The GNS also has high cultural significance for its association with the New Zealand Cup Week, which is an integral part of the city's identity.

Architectural and aesthetic significance

23 The GNS has high architectural significance for its design and construction by the Luttrell Brothers. Brothers Alfred (1865-1924) and Sidney (1872-1932) Luttrell established one of New Zealand's foremost Edwardian architectural practices after settling in Christchurch in c.1901. Between 1901 and 1932 they were the New Zealand specialists in the design of racecourse grandstands.

24 As well as the GNS and a number of other buildings for the CJC, they designed grandstands at Addington (1912-1917). They also designed racecourses at Trentham (1919-1925), Hastings (1913-1914), Greymouth (1923), and Motukarara (1926).

25 In terms of the structure itself:

25.1 The GNS is a reinforced concrete structure with two tiers of seating and a rear elevation four stories in height. The seating is protected by roofs carried on partly cantilevered steel trusses.

25.2 The rear elevation of the building is dominated by concrete piers, mullioned windows and is accessed via prominent ramps.

25.3 The structure is largely unornamented, its aesthetic qualities resting on the bold functioning forms and structural details.

26 There has also been some redevelopment of the GNS since its initial construction. An elevator shaft was added to the rear of the building in the 1980s when the GNS was redeveloped, with two floors being renovated to further their use as a venue for functions and

community activities. The ground floor has also been redeveloped and brought up to modern standards in recent times.

Technical and craftsmanship significance

- 27 The GNS has high technological and craftsmanship significance due to its early 20th century reinforced concrete construction. The shingle for the construction of the stand was reportedly taken from the centre of the racecourse.
- 28 The Luttrell Brothers were leaders in the early 20th century use of concrete construction in New Zealand. Their engineering skills were also demonstrated in structures such as the King Edward Barracks drill shed (1904-1905 – now demolished). Sidney Luttrell became a director, later managing director, of the Golden Bay Cement Company in 1920 in order to guarantee a supply of concrete for projects such as the GNS.

Contextual significance

- 29 The GNS and its setting have high contextual significance as part of the complex of buildings and open spaces that constitute the Riccarton Racecourse.
- 30 The setting consists of a large roughly rectangular block, situated to the south of the racetrack that contains the main buildings of the racecourse. A large number of listed notable trees are a feature of the racecourse setting. The GNS has landmark significance within the precinct due to its size, bold appearance and steel and reinforced concrete construction.
- 31 The Riccarton Racecourse was one of the prime reasons for the early development of the suburb. It remains an important venue and focus for the area.

Archaeological and scientific significance

- 32 The GNS and its setting have archaeological significance because of the potential to provide archaeological evidence relating to past building construction methods and materials, and to human activity on the site, including that which occurred before 1900.
- 33 Although the grandstand was not erected until 1920-1923, the CJC has operated this site since c.1856. Of most relevance in this information is the Christchurch City Council's Assessment Statement which provides:

"The [Grand National Stand] and its setting at Riccarton Park Raceway has high overall significance to Christchurch, including Banks Peninsula. It has high historical and social significance for its association with the Canterbury Jockey Club and the sporting and recreational identity of Canterbury. The Public Grandstand has high cultural significance for its association with the culture of horse racing locally and nationally as well as its association with New Zealand Cup Week, The Public Grandstand has high architectural significance for its design by the Luttrell Brothers, who

were acknowledged specialists in grandstand construction. The building has high technological and craftsmanship significance for its early (20th century) use of reinforced concrete and steel truss construction, of which the Luttrell's were leading exponents. The Public Grandstand has high contextual significance within the racecourse as the largest and most prominent building and for its relationship to other building and structures, including the 1903 Luttrell-designed Tea House. As the site of horse racing and the Canterbury Jockey Club since c.1856, the setting of the Public Grandstand has archaeological significance because of the potential to provide archaeological evidence relating to past building construction methods and materials, and to human activity on the site, including that which occurred before 1900."

- 34 I agree with the findings of this assessment by the Christchurch City Council Heritage Team.

THE GRAND NATIONAL STAND: STRUCTURAL UPGRADE

- 35 I visited the site most recently on 2 June 2021, having previously walked through the building after the 2011 earthquakes.
- 36 The building has been empty since the 2010/2011 earthquakes. The evidence of **Mr George** sets out the current seismic state of the building and describes Kirk Roberts' proposals to seismically upgrade the building to various percentages of the New Building Standard (*NBS*). The evidence notes that the current structure is earthquake prone. The current %NBS is recorded as being well below 34%.
- 37 The proposed upgrade work involves significant changes to the existing structure in order to achieve an acceptable NBS (which Kirk Roberts considers should be at least 67% or as close to 100% NBS as possible). The south façade will have much of the concrete frame replaced, some with panels infilled. The concrete floor will have large sections removed and replaced to improve the connection between floor and wall elements. Most of the interior fabric will need to be stripped out in order to achieve the upgrades. The hooded windows to the south will need to be modified to allow for new column dimensions. **Mr George's** evidence also highlights concern with the state of steel work and timber elements in terms of their structural capacity and comments on the need to replace the large ramped structures to the south.
- 38 In summary, the GNS will need to undergo considerable change to its original heritage fabric as a result of the proposed structural upgrade. I understand from the evidence of **Mr George** that this is the case even if the 34% NBS option is chosen. The proposed structural changes will have an impact on the existing heritage values of the GNS.

Alternative uses

- 39 Adaptive reuse is a viable mechanism for ensuring the future viability of at-risk heritage structures. Re-purposed buildings can

often increase the value and revenue potential of heritage buildings which in turn can help off-set the cost of strengthening and upgrade works.

- 40 In the case of the GNS, however, the structure and its position and function as a trackside viewing platform means that there are very limited options for how the GNS could be re-purposed. In my view, the structure is essentially a grandstand and in any future scenario it could only be used for this purpose.

Mitigation measures

- 41 I now comment on measures that could be taken to mitigate the loss of the GNS if it were to be demolished.
- 42 There are materials within the existing structure that may be able to be carefully removed for reuse. This could be either in a possible future replacement structure or as remnant reminders of the GNS for other building projects. This could include the internal doors, and external timber windows, for example. I understand the CJC intend to retain and eventually reuse parts of the GNS that have heritage value, should this be possible and that this is now incorporated as an agreed draft condition of consent¹.
- 43 I consider it is important to photographically record the building prior to any deconstruction works began for the purpose of awareness and education of the historic heritage values of the site. And while it is by no means an adequate replacement, some form of onsite interpretation telling the story of the GNS would be an important reminder of this significant building. I understand this is being offered as a condition of consent by the CJC and is also recommended by Ms White in her s.42A report².

Archaeological assessment

- 44 Archaeological matters have been considered in an Assessment provided by Underground Overground.

Replacement proposal

- 45 I understand that should the CJC be successful in its application to demolish the GNS, then the area that was once occupied by the building will be grassed into an embankment until a final replacement option is decided and authorised.
- 46 I understand the CJC is continuing to develop possible replacement options for the GNS should the application to demolish be granted. From my experience with the CJC and the restoration of the Tea House, I am confident that any replacement will be appropriately

¹ Condition 41 of the s.42A report.

² Condition 42 of the s.42A report.

considered in the wider context of the Riccarton Racecourse. I understand from **Mr Joll's** evidence that any replacement building would also require a separate resource consent.

RESPONSE TO SUBMITTERS

- 47 I acknowledge that the GNS has significant Heritage value and agree with many of the comments submitters made to that effect.
- 48 My specific comments are as follows:
- 48.1 Jeremy Haberfield-Short:
- (a) My assessment draws on the information provided by the Christchurch City Council Heritage team. This provides a concise summary of the significance of the GNS which I have read, understand, and agree with.
 - (b) I was asked to provide an assessment of the impact of the proposed structural works rather than a condition assessment of the architectural components of the building.
- 49 Christchurch Civic Trust and Historic Places Canterbury:
- 49.1 I agree with the Christchurch Civic Trust and Heritage Places Canterbury assessment regarding the Heritage significance of the GNS.
- 49.2 I do not agree that the GNS could be reasonably adapted to house a museum or a boutique hotel.
- 49.3 I agree with their assessment that many Luttrell Brothers buildings have been destroyed.

RESPONSE TO S 42A REPORT AND APPENDICES

- 50 I generally agree with the Council's heritage report. Specifically, I agree that:
- 50.1 If the building was upgraded/restored, this would impact the architectural and aesthetic values, but would not diminish them to a level that the GNS would no longer be a highly significant heritage item in the District Plan;
 - 50.2 There is limited availability and quantum of heritage grants;
 - 50.3 There is limited opportunity to reuse; and
 - 50.4 The costs of upgrading/restoring are unreasonable.

51 I agree with the comments provided by Heritage NZ. In particular, I agree with Heritage NZ's:

51.1 Support of the offered conditions;

51.2 View that the works required will be invasive; and

51.3 Commendations to the CJC on their restoration of the Tea House.

52 I believe the following conditions of consent are appropriate:

Heritage

21. Prior to the letting of the contract for demolition, the consent holder shall submit to the Council Heritage Team Leader or nominee for certification, a list of those features and materials from the Grandstand that have been identified for removal and potential reuse in future redevelopment across the wider racecourse site. The purpose of this documentation is to demonstrate that the salvage of heritage features and materials is maximised wherever practicable.
22. A digital photographic record of the heritage item and heritage setting is to be lodged with Council's Heritage Team within three months of the completion of works. In order to adequately record changes to heritage fabric, photographs must be taken before commencement, at regular intervals during, and after completion of works. Photographs must be of printable quality, at least 1440 pixels by 960 pixels for a 4"x 6" print at a minimum resolution of 240 PPI. Also see Advice Note below.
23. Prior to the commencement of any new building or structure in the location of the Grandstand or within heritage setting #183, the consent holder shall submit to the Heritage Team Leader or nominee for certification, a scheme for interpreting the history of the former Grandstand in proximity to its original location.

CONCLUSION

- 53 The GNS is a highly significant heritage structure. Its heritage values cover a range of attributes from historical to contextual. The GNS has been an important part of the Riccarton Racecourse from 1923 to 2010.
- 54 Unfortunately, due to earthquake damage, the GNS has been sitting empty for over a decade now, while repair strategies and its future have been considered. The CJC are now in the unenviable position of having to consider the demolition of what has been a valued part of their amenities.
- 55 I recognise the substantial damage the GNS has sustained, as a result of the Canterbury earthquakes, and the seismic upgrades required. I acknowledge the impact the proposed structural upgrade will have on the CJC's ability to retain, restore and reuse the building. I also acknowledge the reluctant decision that has been made by the CJC to apply to demolish the heritage listed building.

Dated: 17 August 2022

William Fulton