

## Report on a Publicly Notified Resource Consent Application

(Section 42A)

<b>Application Reference:</b>	<b>Land Use:</b>	RMA/2021/3921
<b>Applicant:</b>	Canterbury Jockey Club	
<b>Site address:</b>	165 Racecourse Road	
<b>Legal Description:</b>	Section 2 Survey Office Plan 534960	
<b>Proposal:</b>	Demolish the heritage listed Grand National Stand at Riccarton Racecourse	
<b>Zoning:</b>	Open Space Metropolitan Facilities zone	
<b>Overlays and map notations:</b>	The Grandstand is a Highly Significant (Group 1) heritage item (item #453) within heritage setting (#183) The site also contains The Tea House which is also a heritage item (item #452) within heritage setting (#183) Christchurch International Airport Protection Surfaces An Environmental Asset Waterway runs along the southwest boundary Protected trees – there are 48 Significant trees on the site	
<b>Activity status:</b>	Non-complying	
<b>Submissions:</b>	6 in support 5 in opposition (4 of these submitters seek to be heard) A full copy of the submissions is attached in Appendix 1	
<b>Date of Hearing:</b>	1 September 2022	
<b>Recommendation:</b>	Grant subject to conditions	

### Preamble

1. My name is Odette White. I am employed as a Senior Planner based in the Civic Offices of the Christchurch City Council. I have been employed as a Planner at the Council since 2009. I hold a Bachelor of Social Sciences degree in Geography and a Post Graduate Certificate in Resource Studies. I have 13 years of experience working in the planning and resource management field including 11 years' experience processing heritage consents following the 2011 Canterbury earthquakes, including numerous consents for the post-earthquake remediation and upgrade of various heritage buildings across the Christchurch District.

2. This report has been prepared with advice from the Council staff and external specialists detailed below. A copy of their reports has been attached in the appendices.

<b>Officer</b>	<b>Position</b>	<b>Appendix</b>
Gareth Wright	Heritage Advisor, CCC	2
Stephen Hogg	Technical Director, Buildings, Aurecon Group	3

3. This report reviews the application for resource consent and addresses the relevant information and issues raised. It should be emphasised that any conclusions reached or recommendations made in this report are not binding on the Commissioner. It should not be assumed that the Commissioner will reach the same conclusion or decision having considered all the evidence to be brought before him by the applicant and submitters.
4. Where a resource consent application has been publicly notified or is required to have a hearing, a Hearings Panel or Commissioner is required to make the decisions under sections 104A-104D, 105 and 106. In this case independent Commissioner, David Caldwell, has been appointed alone.

#### **Proposed activity**

5. Planz Consultants has applied for land use consent on behalf of the Canterbury Jockey Club Inc to demolish the heritage listed Grand National Stand at Riccarton Racecourse at 165 Racecourse Road, Riccarton Park.
6. The proposal is outlined in detail on pages 10 to 11 of the application but in brief, the main features include:
- The above ground parts of the building will be demolished first then soil investigations will be undertaken before the below ground foundations are excavated to a depth of approximately 2m.
  - Up to approximately 6800m<sup>3</sup> of below ground material may need to be removed from the site.
  - The remaining hole will be backfilled and an embankment formed and grassed over.
  - A Demolition Management Plan will be prepared and certified prior to any works commencing. This will include measures for managing safety, demolition traffic, noise and vibration, protection of the significant trees on site and the heritage listed Tea House, erosion and sediment control and soil contamination.
  - Salvage of heritage fabric, photographic recording and heritage interpretation are proposed and offered as conditions of consent. (These are discussed in further detail in a later section of this report).

#### **Background**

7. This application for resource consent was received on 24<sup>th</sup> November 2021 and was publicly notified on 18<sup>th</sup> May 2022. The application was delayed due to delays in the provision of technical reports that the application relies on and in obtaining expert advice. The submission period closed on 16<sup>th</sup> June 2022. A total of 11 submissions were received during this period – 6 in support and 5 in opposition. Refer to Appendix 1 for a copy of the submissions received.

## Description of the site and existing environment

8. The applicant's Assessment of Environmental Effects (AEE) includes a description of the site and its immediate surroundings in section 2.1 on pages 8-9 of the AEE submitted with the application. I consider that this description is accurate and it should be read in conjunction with this report.

## District Plan and National Environmental Standards – Relevant rules and activity status

### Christchurch District Plan

9. The site is zoned **Open Space Metropolitan Facilities zone** under the District Plan. The District Plan description for this zone is:

These spaces accommodate public and private major sports facilities, larger recreation facilities, marine recreation facilities, and motorised sports facilities on sites that provide:

- i. Sufficient land area to accommodate large scale buildings and structures, car and cycle parking areas and, where necessary, buffer areas to minimise reverse sensitivity;
  - ii. Sufficient area to facilitate marine recreation activities, recreational boating and associated facilities while maintaining and enhancing public access to the coastal marine area for recreation;
  - iii. Capacity for multifunctional use, co-location of complementary or compatible activities and for hosting city, regional, national and international events which provide entertainment to residents and visitors;
10. The Grandstand is listed as a **Highly Significant (Group 1)** heritage item in the District Plan. Group 1 items are those which:
1. Meet at least one of the heritage values in Appendix 9.3.7.1 at a highly significant level; and
  2. Are of high overall significance to the Christchurch District (and may also be of significance nationally or internationally), because it conveys important aspects of the Christchurch District's cultural and historical themes and activities, and thereby makes a strong contribution to the Christchurch District's sense of place and identity; and
  3. Have a high degree of authenticity (based on physical and documentary evidence); and
  4. Have a high degree of integrity (particularly whole or intact heritage fabric and heritage values).
11. For clarity it is only the exterior fabric that is protected (ie: exterior walls, roof, windows, exterior doors and foundations). Interior fabric of the building is not subject to any heritage protection under the District Plan.
12. The Heritage objectives and policies of the Plan generally seek that the contribution of historic heritage to Christchurch's character and identity is maintained in a way which enables and supports ongoing retention, use and adaptive re-use; and maintenance, repair, upgrade, restoration and reconstruction of historic heritage. They also seek to manage the effects of development of heritage items in a way that is sensitive to their heritage values, whilst recognising the need for works to be undertaken to accommodate their long-term retention, use and sensitive modernisation. Objective 9.3.2.1.1 acknowledges that in some situations demolition may be justified by reference to the matters in policy 9.3.2.2.8.
13. Key objectives and policies are listed within Appendix 4, and are discussed in detail in a later section of this report.

14. The history and heritage significance of the building is set out in the Heritage Statement of Significance in the District Plan, a copy of which is attached in Appendix 5.

15. The proposal requires resource consent under the following rules in the District Plan:

Activity status rule	Standard not met	Reason	Matters of control or discretion
9.3.4.1.5 NC1	Demolition <sup>1</sup> of a Highly Significant (Group 1) heritage item	The Grandstand is a Highly Significant listed heritage item and is proposed to be demolished in its entirety.	---

16. Overall the proposal must be considered as a **non-complying activity** under the District Plan.

### **National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES)**

17. These standards seek to ensure that land affected by contaminants in soil is appropriately identified and assessed before it is developed and if necessary the land is remediated or contaminants contained to make the land safe for human use.

18. The NES controls soil disturbance on land where an activity on the Hazardous Activities and Industries List (HAIL) is being carried out, has been carried out, or is more likely than not to have been carried out. The application site is identified as HAIL land as therefore the provisions of the NES apply.

19. The proposal requires consent under the NES as it breaches the following regulations:

- **Regulation 8(3)(c)** – the volume of soil disturbance will exceed 25m<sup>3</sup> per 500m<sup>2</sup>
- **Regulation 8(3)(d)(ii)** - the volume of soil to be removed from the site will exceed 5m<sup>3</sup> per 500m<sup>2</sup>

20. Pursuant to Regulations 10(4) and 11 the proposal is a discretionary activity under the NES as the activity is not otherwise provided for as a permitted, controlled, or restricted discretionary activity. Specifically, a Detailed Site Investigation (DSI) of the piece of land has not been able to be carried out due to the presence of the existing building over the ground to be disturbed.

### **Submissions**

21. Copies of all submissions have been provided to the Commissioner.

22. The reasons for the submissions in support are summarised as follows:

- The presence of the unusable stand is an impediment to the normal operation of the racecourse.
- The building is redundant / no longer needed.
- Little heritage or architectural value.
- The cost of upgrading would be a waste of money.
- The funds required to remediate the building are beyond the Club's resources.

23. The reasons for the submissions in opposition are summarised as follows:

- The heritage significance of the building.
- Much of the Luttrell Brothers work has been demolished.

<sup>1</sup> **Demolition** - in relation to a heritage item, means permanent destruction, in whole or of a substantial part, which results in the complete or significant loss of the heritage fabric and form .

- Environmental impact of the demolition – waste of materials.
  - Could be re-purposed.
  - Shortcomings in the application Assessment of Environmental Effects.
  - Applications for heritage grants have not been made.
24. A number of matters/requests raised by submitters are beyond the scope of this resource consent process under the RMA and cannot be addressed in the following assessment. This includes:
- Re-use of concrete from the building for prevention of coastal erosion.
  - Gifting or repurposing the building for the arts.
  - Allocation of Council funding to assist with restoration of the building.

<b>Resource Management Act 1991</b>
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25. When considering an application for resource consent and any submissions received, the consent authority must have regard to the matters listed in Sections 104B and 104D of the Resource Management Act 1991. Subject to Part II of the Act, which contains the Act's purpose and principles, including matters of national importance, the consent authority shall have regard to:
- a) *Any actual and potential effects on the environment of allowing the activity.*
  - b) *Any relevant provisions of a plan or proposed plan, and national environment standard*
  - c) *Any other matter the consent authority considers relevant and reasonably necessary to determine the application.*
26. It should be noted that other than giving pre-eminence to Part II, Section 104 gives no priority to other matters. They are all matters to have regard to and the consent authority must exercise its discretion as to the weight that it gives certain matters, depending on the circumstances of the case.
27. Under Sections 104B and 104D, when considering an application for resource consent for a non-complying activity, a consent authority may grant or refuse the resource consent, and (if granted) may impose conditions under section 108.
28. Under Section 104D, and despite any decision made for the purpose of Section 95A in relation to minor effects, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either the adverse effects of the activity on the environment will be minor, or that the application is for an activity that will not be contrary to the objectives and policies of the plan.
29. Even where one of the threshold tests in Section 104D is met, the consent authority still retains an overall discretion as to whether to grant the application. That discretion is to be exercised having regard to the criteria set out in Section 104.

<b>Actual and Potential Effects on the Environment (S.104 (1)(a))</b>
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30. As a non-complying the Council's assessment of this proposal is unrestricted and all actual and potential effects must be considered. Guidance as to the effects that require consideration is contained in the relevant objectives and policies, and any associated matters of discretion or control.

31. I have considered the relevant issues and it is my view that they fall broadly into the following categories:

- Heritage values
- Deconstruction and earthworks related effects - (protected trees, waterways, amenity, land stability, noise, vibration, traffic, erosion and sediment control)
- Human health

## **Heritage Values**

### The application

In summary the reasons set out in the application for the proposed demolition are in large part based on the extent of work that would be needed to repair and strengthen the building and that the costs of that are beyond the applicant's ability to fund and are thus unreasonable. Extensive engineering reporting provided by the applicant as further information is that the building is earthquake prone and likely to collapse in a moderate earthquake. The applicant's engineers advise that in addition to repairing earthquake damage, the building needs to be seismically upgraded to a minimum of 67% New Building Standard (NBS) and ideally 100% NBS.

The percentage NBS describes the seismic capacity of a building relative to New Building Standard. An earthquake prone building is defined as one that will have its ultimate capacity exceeded in a moderate earthquake and if it were to collapse, would do so in a way that is likely to cause injury or death to persons in or near the building. The threshold for an earthquake prone building is one that is less than 34% NBS. The applicant's engineering reports estimate the Grandstand is currently at less than 15% NBS and is therefore considered to be earthquake prone.

Cost estimates provided with the application are that a 67% seismic upgrade scheme would cost in the order of \$17.8 million. In a further information response the applicant advised that whilst they received a payout from their insurer, it was for all of the buildings at the racecourse and well less than half the costs of repair or rebuild of all the damaged buildings on site. Further that there are no funds available from the insurance proceeds for the repair or reinstatement of the Grand National Stand and that there are no realistic prospects for raising the necessary funds.

Aside from engineering and financial factors, the applicant also maintains that even if the Grandstand were remediated and able to be used it would not meet the current or future needs of the racecourse and has become redundant.

### Heritage advice

32. Gareth Wright, Council Heritage Advisor, has reviewed the application and submissions and provided comment on the heritage effects of the proposal. A full copy of Mr Wright's comments is attached in Appendix 3 and should be read alongside this report. In summary Mr Wright considers:

- The damaged sustained by the Grandstand as a consequence of the Canterbury Earthquake Sequence has not impacted the heritage values ascribed to it. If the building underwent the required seismic upgrade, its architectural and aesthetic values will be impacted and will be less intact than it was, but will maintain its heritage values at a level sufficient for the building to remain a highly significant heritage item on the District Plan.
- Acknowledges the limited availability and quantum of heritage grants.
- Notes the Club's contention that the building is redundant.

- Acknowledges the limited opportunity to find a viable alternative use for the building given its specific form, function and location.
- The costs of retaining the building are unreasonable.
- Demolition is accepted subject to conditions in line with the mitigation measures offered in the application. This includes requirements for the salvage of heritage fabric; photographic recording; and the incorporation of heritage interpretation in any new development on the site so that visitors may appreciate the history and story of the Grandstand.

Engineering advice

33. Stephen Hogg, Consultant Engineer, has reviewed the engineering reports provided by the applicant and visited the building. Mr Hogg was asked to specifically consider whether the engineering reports are reasonable/plausible in terms of the extent of work necessary to remediate and strengthen the building. Also whether it would be likely that an alternative scheme could be devised which would drastically reduce the extent of work (and therefore associated cost) that would be required to return the building to active use. A full copy of Mr Hogg's comments is attached in Appendix 4 and which should be read alongside this report. In summary Mr Hogg considers:

- Earthquake damage forms a small component of the overall scope of works that would be needed, with the majority being attributable to seismic strengthening/upgrade.
- Recommends that the building be strengthened to 67% NBS seismic loading rather than 34% in order to be suitable for crowd loading.
- An entirely new retrofitted seismic structure is required to achieve the necessary seismic capacity.
- The AECOM reports of damage, repair and strengthening concepts are plausible and reasonable.
- An alternative repair/strengthening scheme could not be devised that would drastically reduce the extent of work (and associated cost) to return the building to use.

Heritage New Zealand Pouhere Taonga

34. Whilst the building is not registered with Heritage New Zealand Pouhere Taonga (HNZPT), they were consulted anyway and provided the following comment:

*“Thank you for consulting Heritage New Zealand Pouhere Taonga (HNZPT) regarding the proposed demolition of the Public Grandstand at Riccarton Racecourse. The Grandstand is not included on the New Zealand Heritage List Rārangī Kōrero but is scheduled in the Christchurch District Plan as a highly significant item (number 453) and as part of a Heritage Setting (number 183). It also sits within the wider surroundings of the Tea House, which is listed as a Category 2 historic place.*

*HNZPT appreciate the investigative works carried out and the technical reports commissioned by the Jockey Club to explore repair strategies to strengthen the Grandstand. We acknowledge the building has sustained substantial earthquake damage and that the impact on its heritage fabric and values to repair the building will be invasive. We understand that the club have considered these aspects along with the associated costs, future demand to accommodate race spectators, limited adaptive reuse options and have concluded repairing the building to be an unviable option to pursue.*

*To mitigate the effects of demolishing this heritage building, we support the offered conditions:*

- 1. A comprehensive digital photographic record of the affected areas of the Grandstand and its setting must be made by the Consent Holder's Heritage Professional before, during, and after the completion of the works.*
- 2. A plaque, information board or other marker that the Consent Holder's Heritage Professional considers appropriate must be placed in a location clearly visible near the site of the Grandstand.*

*We note a condition has not been included to ensure the careful removal and reuse of certain materials and heritage features of the building (such as windows and doors) either in a replacement structure or*

*as remnant reminders of the Grandstand for other building projects, as per the heritage consultant's Heritage Impact Assessment. We would support a condition to this effect being included in the resource consent.*

*In terms of archaeology, we note this is a 1920's structure, so not an archaeological site as defined in the HNZPTA 2014. The AEE does acknowledge the property was occupied prior to 1900 and that any earthworks may affect subsurface archaeological remains. It also notes that an application for an archaeological authority will be made in due course once resource consent has been obtained.*

*We would like to commend the Jockey Club on their restoration works to the Tea House. We do not consider the demolition of the grandstand to have a significant impact on the Tea House setting."*

### Discussion

35. I accept the expert advice received. I acknowledge that the demolition will result in a total loss of the building's heritage values and that the mitigation offered by the applicant in terms of salvage of some materials, photographic recording and interpretation, whilst appropriate, does not offset the loss of the heritage item itself (nor is the applicant suggesting that it does). However, there are a number of extenuating circumstances in this case which lead me to conclude that the demolition is acceptable and which I discuss below.
36. Based on the engineering advice received, the work needed to remediate the building so that it could be re-used for its intended purpose is extensive and based on the information provided by the applicant very costly and beyond the Club's resources to fund. There is some criticism in the submissions that the Club has not actually lodged any applications for heritage grants. However Mr Wright advises that of the list of heritage grants available there are very few that the Club would be eligible for and even in a best case scenario would likely still leave the club with a significant funding gap. I did request details of the shortfall in insurance, but the applicant has advised that they are not in a position to release such details as they entered into a confidential settlement agreement with their insurer. But they have provided the following statement:
- "The Club is the registered proprietor of all the buildings at Riccarton Park Racecourse. It had a material damage insurance policy covering all the buildings on the site. The Club suffered loss by way of physical damage to various buildings on the site as a result of a number of different earthquakes including Kaikoura.
- The Club made a claim on its insurers in respect of a number of buildings including the Grand National Stand and entered into a confidential settlement agreement with its insurers. The Club is not in a position to be able to release details of that settlement agreement but it can confirm that the amount received from its insurers is well less than half the costs of repair or rebuild of all the damaged buildings on site.
- The settlement of the insurance was a cash sum for the Club to spend as it saw fit and did not require the repair or rebuild of any building. The Club has either already spent, or is committed to spending, all of the insurance proceeds on projects that are required as a priority to enable the racecourse to keep functioning in a competitive environment. There are no funds available from the insurance proceeds for the repair or reinstatement of the Grand National Stand, and no realistic ability to raise funds for that purpose."
37. I don't consider it necessary to have the Quantity Surveying estimates prepared by McKay Lang provided with the application peer reviewed. To seek further professional reporting on the application would add further cost for little gain in my view. Even if a peer review of the remediation costings found that some differences/savings could be made, given the engineering advice received from Mr Hogg that the



scheme put forward in the applicant's engineering reports is reasonable; that the building should be strengthened to 67% rather than 34%; and that it is unlikely an alternative scheme could be devised which would drastically reduce the extent of work, I consider it is unlikely that the costs could be substantially reduced to a point that would make it feasible. Furthermore it is commonplace that construction costs rise over time so the total cost by the time construction could commence would potentially be even higher than the \$17.8 million estimated in the application for the 67% scheme.

38. It is not known what potential future income could be gained from having the building remediated & returned to active use and whether this might help off-set the costs of retention or pay off a loan over time. However, apart from financial aspects, the Club maintain that the building is no longer fit for their needs. They cite a decline in on-course attendance at race meetings compared to when the Grandstand was first built and of the 28 race meetings held in a typical year at Riccarton Racecourse only one of these have historically required opening of the Grandstand. Post-earthquake, peak attendance during Cup week has still been able to be hosted without use of the Grandstand. A replacement building does not form part of the current application, but the Club state that any replacement grandstand on the site would be of a much smaller scale thus highlighting that the existing building is not suited to the future needs and in this way its retention is not a commercially viable prospect.
39. Adaptive re-use or repurposing of heritage buildings for a new more commercially viable use can be an alternative to demolition in some instances. Sale of a heritage site/building to a new owner who has funds to retain the item has sometimes been an option. Where a building has not been able to be retained on its original site, relocation to a new site has also occasionally been an alternative way of retaining some heritage value, albeit heritage professionals would likely say that is not a desirable heritage outcome as some heritage value is lost when an item is removed from its original location. Some of the submissions suggest that the building could be retrofitted and re-purposed for other uses. However, given the form, scale and location of the Grandstand in a prime trackside position within the racecourse, aswell as the very specific nature of the building and its use, I consider none of these are practical or viable options in this case. The planning framework also does not require that applicants must prove that they have exhausted every possible option that *might* enable a building's retention.
40. There is criticism in one of the submissions around shortcomings in the heritage assessment in the application. However the heritage significance of the building is not in dispute. It is acknowledged that the building is subject to the higher of the two levels of significance in the District Plan. The applicant's heritage professional, Mr Fulton, and Council's Heritage Advisor, Mr Wright, are also in agreement that even with the invasive strengthening works the building would retain sufficient heritage value to remain on the District Plan heritage schedule. I also agree with Mr Wright at para 3.9 of his comments, that heritage significance (or the loss thereof) is not the sole decisive factor in this case.
41. It is important to note that the District Plan does not seek that heritage buildings be protected and retained at all costs. Rather it expressly provides that in some instances demolition may be appropriate with reference to the matters in policy 9.3.2.2.8 which includes consideration of whether the costs to retain an item are unreasonable. In this case I consider the costs of remediating the Grandstand to a point where it could be re-used are unreasonable given the collection of factors described above and as set out by the applicant and in the expert advice. This includes the extensive engineering and seismic upgrade that would be required; the lack of affordable alternative remediation options; lack of funds and limited availability of grants; difficulty in finding an alternative re-use; sale of the building or site being impractical; and the building does not meet the Club's future needs. I discuss the other matters under 9.3.2.2.8 in detail in a later section of this report, suffice to say I do not consider any of them to be an impediment to the proposed demolition and that the unreasonable costs is the key relevant matter of policy 9.3.2.2.8 to the current application. For these reasons I consider this is an occasion when demolition is appropriate and thus the significant adverse effects upon heritage values of the Grandstand are acceptable.

42. With respect to the Tea House which is a separately listed heritage item in the District Plan within the same setting and listed with HNZPT as a Category 2 Historic Place, I accept HNZPT's advice that the demolition will not have a significant impact on the heritage values of the Tea House. Furthermore the Tea House is at least 40m away from the Grandstand and with a Temporary Protection Plan in place (discussed further below) any physical effects or risk of damage to the Tea House during demolition can be avoided.
43. I accept Mr Wright's recommendations re conditions for salvage, photographic recording and heritage interpretation and include such conditions at the end of this report.

### **Deconstruction and Earthworks**

44. Invariably there is potential for some adverse effects during the demolition and earthworks in terms of visual amenity, noise, vibration, demolition traffic, erosion and sediment control, the protected trees on site and the waterway along the southern boundary. The applicant proposes to submit a Demolition Management Plan (DMP) to Council for certification prior to the commencement of works that will avoid or mitigate these types of effects. This is common practice for large commercial projects and I appreciate the applicant needs the certainty that the demolition can go ahead before commencing the preparation of a detailed management plan as it can involve considerable further cost outlay and time. Importantly, the DMP would be required to be prepared by suitably qualified professionals and certified by Council Engineers and other relevant specialists prior to work commencing. Given this I consider that a DMP required by a condition of consent will provide appropriate mechanism for ensuring that any adverse effects of the demolition works and earthworks will be minor at most and temporary. I include some additional commentary on each category of potential effect below.

#### Visual Amenity

45. There will be some adverse visual effects on site during the demolition period, but this will not be prominently visible from surrounding streets or properties. Once complete, visual amenity within the site will be improved with the dilapidated fenced off building removed. The site will be tidier and provide a better experience for visitors to the site.

#### Land stability

46. There is no risk of land instability issues arising to any extent that would affect surrounding properties. This is because the site is flat, the location of works is well set back from any boundaries and neighbouring properties and the hole that will result from excavation of the foundations will be backfilled.

#### Noise & Vibration

47. The application does not propose to breach any District Plan noise or vibration rules. The relevant rules are included as advice notes to the applicant at the end of this report. Additionally the application also offers to include preparation of a noise and vibration management plan as part of a DMP condition, which I accept and have included in condition 2 and proposes limits on the use of machinery to between 7.30am – 5.00pm Monday to Saturday, and avoiding works on Sundays and public holidays. However the application also sought that the words '*except in cases of operational necessity*' be included. It is not clear what cases of necessity that might entail. To ensure that there is a level of Council oversight I recommend that this wording be extended to say '*except in cases of operational necessity where there has been prior approval of a Council Environmental Health Officer*'.

### Traffic

48. Construction traffic on the vehicle access will likely be noticeable for some neighbouring residents as demolition vehicles come and go. However the application proposes to limit truck movements to between 7.30am – 5.00pm Monday to Saturday, and avoiding works on Sundays and public holidays. I consider this is reasonable and in line with the hours of operation normally applied to construction activity in residential areas. However the application also sought that the words ‘*except in cases of operational necessity*’ be included. It is not clear what cases of necessity that might entail. To ensure that there is a level of Council oversight I recommend that this wording be extended to say ‘*except in cases of operational necessity where there has been prior approval of a Council Environmental Health Officer*’.
49. The DMP condition would also require a Traffic Management Plan to be prepared outlining how vehicle and pedestrian movements will be controlled to keep the public safe. I consider this provides appropriate oversight to ensure that any adverse effects of the demolition traffic on the safety and efficiency of the transport network will be avoided.

### Erosion and Sediment Control

50. An Erosion and Sediment Control Plan (ESCP) is a standard component of a DMP and included in recommended condition 2. The ESCP would be reviewed and certified by Council Engineers prior to works commencing to ensure that sediment and dust will be appropriately controlled.

### Protected Trees and Waterway

51. The nearest protected tree is approximately 12m away from the building and the waterway is approximately 140m away. The required setback for works from protected trees is 10m. Whilst it is not proposed to actually breach any protected tree rules or any rules relating to the waterway, I recommend that the DMP include provision of temporary protection plans for the significant trees on the site to ensure that harm to the trees or their root network is avoided particularly as a result of the earthworks to excavate the building foundations. The ESCP requirements and large separation distance from the waterway will ensure that adverse effects on the waterway are avoided.

### Waste of resources / Climate Change

52. As raised in some of the submissions, the demolition will result in a considerable amount of building materials going to waste/landfill. I accept that there is an environmental cost to this because buildings contain a significant amount of locked-in carbon, which is wasted when they are demolished. Rebuilding then creates further emissions in the making of materials for new buildings which contributes to climate change. Whilst the disposal of materials from the Grandstand is regrettable, at the present time, there are no rules in the District Plan restricting the demolition of buildings for climate change reasons. Nor do the heritage objective and policies relevant to demolition require consideration of climate change as a factor in deciding whether demolition is appropriate.

### **Human Health**

53. The application seeks that the potential for contaminated soils in the area to be excavated be dealt with via conditions of consent. This is because testing is not able to be carried out until the building has been removed. The application description states that once the building is cleared investigations into the presence of contaminants will be undertaken before any below ground excavations commence. I consider this to be an appropriate approach, however the contamination related conditions offered in the application don’t actually require that testing is to be undertaken. As such I recommend conditions

requiring that testing be undertaken and that the results of that testing be provided to Council before below ground excavations commence. I accept their offer of a condition requiring the provision of a Site Management Plan (SMP) for certification before works commence but with some additional wording to specify what that documentation needs to include and demonstrate in order to achieve certification. I also accept their offer of a condition requiring the removal of soils to an authorised facility and evidence of that disposal. The recommended conditions and required testing and certification of an SMP will ensure that the risk of human exposure to contaminants is appropriately managed and human health effects avoided in line with the NES.

### **Conclusion with respect to effects on the environment**

54. In summary, it is my opinion that the adverse effects will be significant as there will be a total loss of the building's heritage values. But I consider this to be acceptable in the context of the unreasonable costs of its retention; limited availability of grants; difficulty in finding an alternative re-use; sale of the building or site being impractical; and the building does not meet the Club's future needs.
55. Apart from heritage values, I consider all other effects range from minor to less than minor and that they can be appropriately managed through the recommended conditions of consent.

### **Relevant Objectives, Policies, and other Provisions of a Plan or a Proposed Plan (S.104 (1)(b))**

56. Regard must be had to the relevant objectives and policies in the Christchurch District Plan, a full copy of which is attached in Appendix 4.

#### Heritage

57. 9.3.2.1.1 Objective - Historic heritage
- a. *The overall contribution of historic heritage to the Christchurch District's character and identity is maintained through the protection and conservation of significant historic heritage across the Christchurch District in a way which:*
    - i. *enables and supports:*
      - A. *the ongoing retention, use and adaptive re-use; and*
      - B. *the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage; and*
    - ii. *recognises the condition of buildings, particularly those that have suffered earthquake damage, and the effect of engineering and financial factors on the ability to retain, restore, and continue using them; and*
    - iii. *acknowledges that in some situations demolition may be justified by reference to the matters in Policy 9.3.2.2.8.*
58. Whilst this objective seeks that heritage is maintained through protection and conservation, this is tempered by the specific recognition of engineering and financial factors on the ability to retain heritage buildings. It also expressly provides that in some situations demolition may be justified by reference to the matters in Policy 9.3.2.2.8. As discussed further below I consider the demolition to be appropriate under policy 9.3.2.2.8 on account of unreasonable costs for the extensive engineering work that would be required to return the building to use. As such I consider the proposal to be consistent with objective 9.3.2.1.1.
59. 9.3.2.2.3 Policy - Management of scheduled historic heritage
- a. *Manage the effects of subdivision, use and development on the heritage items, heritage settings and heritage areas scheduled in Appendix 9.3.7.2 and 9.3.7.3 in a way that:*
    - i. *provides for the ongoing use and adaptive reuse of scheduled historic heritage in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to*

*accommodate their long term retention, use and sensitive modernisation and the associated engineering and financial factors;*

- ii. recognises the need for a flexible approach to heritage management, with particular regard to enabling repairs, heritage investigative and temporary works, heritage upgrade works to meet building code requirements, restoration and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage; and*
  - iii. subject to i. and ii., protects their particular heritage values from inappropriate subdivision, use and development.*
- b. Undertake any work on heritage items and heritage settings scheduled in Appendix 9.3.7.2 in accordance with the following principles:*
- i. focus any changes to those parts of the heritage items or heritage settings, which have more potential to accommodate change (other than where works are undertaken as a result of damage), recognising that heritage settings and Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items;*
  - ii. conserve, and wherever possible enhance, the authenticity and integrity of heritage items and heritage settings, particularly in the case of Highly Significant (Group 1) heritage items and heritage settings;*
  - iii. identify, minimise and manage risks or threats to the structural integrity of the heritage item and the heritage values of the heritage item, including from natural hazards;*
  - iv. document the material changes to the heritage item and heritage setting;*
  - v. be reversible wherever practicable (other than where works are undertaken as a result of damage); and*
  - vi. distinguish between new work and existing heritage fabric in a manner that is sensitive to the heritage values.*

60. I accept and agree with the applicant's assessment of this policy at section 7.1.2 of the application in that most matters in this policy are not relevant to the proposed demolition. The offer of a photographic record of the demolition is consistent with 'b.iv'. I would also add that the proposed salvage of material and heritage interpretation is consistent with this policy.

61. 9.3.2.2.8 Policy - Demolition of heritage items

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 have regard to the following matters:*
  - i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;*
  - ii. whether the extent of the work required to retain and/or repair the heritage item is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised;*
  - iii. whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable;*
  - iv. the ability to retain the overall heritage values and significance of the heritage item through a reduced degree of demolition; and*
  - v. the level of significance of the heritage item.*

62. In respect to each of the matters under policy 9.3.2.2.8 above:

- i. Fencing could keep visitors to the site at a safe distance from the building which would remove the threat to life from the earthquake prone building.*
- ii. The expert heritage advice is that even if the necessary remediation were undertaken that the building would retain sufficient heritage value to still meet the threshold for listing and that its heritage values and integrity would not be significantly compromised by the work required to retain it.*
- iii. For the reasons discussed in the assessment of effects the costs to retain the building are considered to be unreasonable and as such I consider the proposal is supported by this sub-*

policy. Whilst matter 'iii' makes reference to costs "*particularly as a result of damage*", it is not limited only to costs associated with repairing 'damage'. So the fact that the majority of the costs in this case are attributable to strengthening works with a smaller proportion being due to repair of damage does not preclude the proposal from being supported by this sub-policy.

- iv. No specific engineering information was provided to demonstrate that a reduced degree of demolition is not possible or that it would not retain the overall heritage values of the building. However, I accept the reasons cited in the applicant's AEE as to why a reduced degree of demolition is not a viable or practical option, that being the engineering agreement to the necessity for strengthening to at least 67% NBS as well as the nature of the structure and its trackside position.
- v. The building is a Highly Significant (Group 1) heritage item in the District Plan which is the higher of the two categories of heritage listing in the Plan. To understand the rarity of the Grandstand I asked the applicant for information on how many other racecourse grandstands designed by the Luttrell Brothers are still in existence both in Christchurch and elsewhere in NZ. In response the applicant advised that the Luttrell Brothers did design other Grandstands around the country however the applicant could not find any evidence that any are still in existence. They also advised that there are other buildings associated with the Luttrell Brothers still in existence in Christchurch and elsewhere, including but not limited to:

- St James Anglican Church in Riccarton;
- Wood's Mill, Addington;
- St Mary Catholic Church and School in Hokitika;
- Backhouse Building in Wanganui;
- Riccarton Tea house, Riccarton Racecourse;
- New Zealand Express Company Building, Central Dunedin;
- Isaac Theatre Royal, Central Christchurch;
- Rose Historic Chapel, Central Christchurch.

However subsequent to this, Mr Wright has rightly pointed out that as per policy 9.3.2.2.1 the buildings in the District Plan schedule are there for their importance to the Christchurch District. As such the existence of Luttrell designed buildings elsewhere in New Zealand does not reduce the impact the proposed demolition would have upon heritage values in the Christchurch context.

63. Matters i-v under policy 9.3.2.2.8 do not form a hierarchy, nor does the policy require that all must be satisfied in order to be consistent with the policy. Whilst the proposal does not find support in matters i, ii, iv and v, I consider matter 'iii' regarding the unreasonable costs of retention to be particularly relevant in this case and strongly met. As such I consider the demolition to be appropriate and therefore consistent with policy 9.3.2.2.8.

#### Open Space

64. The relevant open space objectives and policies, which can be viewed in full in Appendix 2, are:

*18.2.1.1 Objective - Provision of open spaces and recreation facilities*

*18.2.1.3 Objective - Character, quality, heritage and amenity*

*18.2.2.1 Policy - The role of open space and recreation facilities*

*18.2.2.5 Policy - Environmental effects*

65. Of note objective 18.2.1.3.a.v, amongst other things seeks to minimise adverse effects on historic heritage values within and outside the open space. Whilst the proposal is clearly not minimising adverse effects on heritage values, for the reasons already discussed above, I consider the demolition of the heritage item is acceptable on this occasion. Furthermore it does not undermine the open space objectives overall and the site will still fulfill its purpose. If anything removal of the building will enable this part of the site to be better used for entertainment and recreation than it can be currently and in this way is in line with the purpose of the zone. For these reasons I consider the proposal is consistent with the Open Space objectives and policies.

#### Earthworks, Protected Trees, Waterways

66. I consider the proposal is also consistent with the objectives and policies in chapters 8, 9 and 6 relating to earthworks, protected trees and waterways respectively. As discussed in the assessment of effects the recommended conditions of consent and separation distances will ensure that any earthworks effects can be appropriately managed; the significant trees and amenity they provide maintained; and the waterway running along the south boundary suitably protected from any adverse impacts associated with the demolition works.

#### Conclusion

67. For the reasons above it is my conclusion that in an overall sense, the application is consistent with the relevant objectives and policies of the Plan.

#### **Non-complying Activity Threshold Test (S.104D)**

68. The application satisfies the threshold test contained in Section 104D of the Act, as whilst I find the effects will be significant, it is not contrary to the objectives and policies of the District Plan.

#### **Other relevant Statutory Documents (S.104 (1)(b))**

69. Statutory documents of relevance to this application include the National Environmental Standard for contaminated sites which is discussed in the assessment of effects above.
70. The District Plan has been recently reviewed and gives effect to the higher order planning documents. As such, there is no need to address them specifically in this report.

#### **Relevant Other Matters (S.104 (1)(c))**

#### **Precedent effect/Plan integrity**

71. Given the non-complying status of this application it is appropriate to have regard to the issue of precedent, as well as the effect of granting consent upon the integrity of the District Plan and public confidence in its consistent administration. Case Law has established however, through the High Court in *Rodney District Council v Gould*, that concerns relating to plan integrity and precedent effect are not mandatory considerations. The Court held that they are matters that decision makers *may have regard to*, depending on the facts of a particular case including:

1. Whether a proposal is contrary to the objectives and policies of the plan; and if so

2. Whether in the circumstances of a particular case a proposal can be seen as having some unusual quality.

In this case the proposal is not contrary to the objectives and policies, therefore I am satisfied that issues of precedent or plan integrity do not arise.

72. Notwithstanding the above, in my opinion there are a number of sufficiently unusual characteristics of this site and proposal which set this proposal aside from the generality of cases. These include:
- The Racecourse is a unique site and landuse.
  - The Grandstand could not reasonably be re-purposed for a viable alternative use.
  - Impractical to sell or relocate the building.
  - The high costs of repair and strengthening.

73. Given these factors, I consider that granting consent to this application is unlikely to give rise to any significant precedent effect which would challenge the integrity of the District Plan.

## **Part 2 of the Act**

74. The matters outlined previously are subject to Part 2 of the Act which outlines its purpose and principles.
75. The use, development and protection of resources is to be sustainably managed in a way that enables people and communities to provide for their social, economic and cultural wellbeing and their health and safety, while avoiding, remedying or mitigating any adverse effects of activities on the environment.
76. The Christchurch District Plan has recently been reviewed. Its provisions were prepared under the higher order planning documents and, through its preparation and the process of becoming operative, have been assessed against the matters contained within Part 2.
77. Taking guidance from recent case law<sup>2</sup>, the District Plan is considered to be the mechanism by which the purpose and principles of the Act are given effect to in the Christchurch District. It was competently prepared via an independent hearing and decision-making process in a manner that appropriately reflects the provisions of Part 2. Accordingly, no further assessment against Part 2 is considered necessary.

## **Conclusion**

78. After considering the actual and potential effects on the environment of allowing the application, it is my conclusion that there will be significant effects upon heritage values due to the total loss of the Grandstand. But in the circumstances, I consider this to be acceptable in the context of the unreasonable costs of its retention; limited availability of grants; difficulty in finding an alternative re-use; sale of the building is impractical; and the building does not meet the Club's future needs.
79. In my opinion this proposal is not contrary to the objectives and policies of the District Plan as the Plan acknowledges that in some situations demolition of heritage items may be justified with reference to policy 9.3.2.2.8 which includes unreasonable costs of retention as a relevant matter and which I consider to be the case with the current application.

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<sup>2</sup> *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316



80. I therefore consider that the proposal satisfies the threshold test of Section 104D. In this respect I consider Council has a discretion to exercise as to whether or not to grant consent.
81. I consider that the proposal is not inconsistent with Part 2 of the Resource Management Act 1991.
82. Having considered all of the relevant matters under Sections 104, 104B and 104D, it is my opinion that consent should be granted subject to conditions.

### Recommendation

83. I have assessed this application to demolish the heritage listed Grandstand at Riccarton Racecourse. Having considered all the matters relevant to this application, I recommend that this application be **granted** pursuant to Sections 104, 104B, 104D and 108 of the Resource Management Act 1991 subject to the following conditions:
1. Except where required to meet other conditions below, the development shall proceed in accordance with the information and plans submitted for the application and saved into Council records as RMA/2021/3921 Approved Consent Document.

#### Demolition Management Plan

2. All proposed works shall be carried out in accordance with an accepted Demolition Management Plan (DMP). The purpose of the DMP is to ensure that any potential effects arising from deconstruction activities on the site are effectively managed. The DMP shall be prepared by suitably qualified and experienced practitioners and shall include, but not be limited to the following:
  - a) Site description, topography, vegetation, soils and other reference information;
  - b) Details of proposed works including preparation of a deconstruction plan in accordance with the directions of a structural engineer to avoid collapse of weakened structures and ensure demolition occurs safely.
  - c) Roles and responsibilities, including contact details for the site manager appointed by the Consent Holder;
  - d) Site establishment;
  - e) Timing of works (including any staging required);
  - f) An Erosion and Soil Control Plan (ESCP), including drawings, specifications and locations of mitigation measures as necessary;
  - g) A Demolition Noise and Vibration Management Plan (DNVMP) demonstrating that noise and vibration nuisance will be minimised during demolition activities;
  - h) Storage of fuel and/or lubricants and any handling procedures;
  - i) Contingency plans (including use of spill kits);
  - j) Protocols for the discovery of archaeological material;
  - k) Construction traffic management measures, including measures to be adopted in accordance with the NZTA Code of Practice for Temporary Traffic Management; and demonstrating that vehicle and pedestrian movements will be controlled to keep the public safe;
  - l) Parking areas for construction staff;
  - m) Measures for identification and remediation of contaminated soil; and
  - n) Confirmation of approved disposal sites for waste;
  - o) Environmental compliance monitoring and reporting.
  - p) Temporary Protection Plans for the Tea House and Significant trees within the application site prepared by suitably qualified and experienced professionals demonstrating that they will be protected from damage during the course of works.
- The consent holder shall submit this DMP to the Council, Attention: Team Leader Compliance and Investigations for certification via email to [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz) at least 20 working days prior

to the commencement of construction work associated with this consent. This DMP is to be certified by the Team Leader or their nominee as meeting the requirements of Condition 2 prior to the commencement of any demolition or earthworks and, once certified, the DMP will thereafter form part of the Approved Consent Document.

*NOTE: The Team Leader (or their nominee) will either certify, or refuse to certify, the DMP within 10 working days of receipt. Should the Team Leader (or their nominee) refuse to certify the DMP, then they will provide a letter outlining why certification is refused based on the parameters contained in this condition.*

- Should the Team Leader (or their nominee) refuse to certify the DMP, the consent holder shall submit a revised DMP to the Resource Consents Manager for certification. The certification process shall follow the same procedure and requirements as outlined in condition 2.
- The DMP may be amended at any time by the Consent Holder. Any amendments to the DMP shall be submitted by the Consent Holder to the Council for certification. Any amendments to the DMP shall be:
  - a) for the purposes of improving the measures outlined in the DMP for achieving the DMP purpose (see condition 2), and;
  - b) consistent with the conditions of this resource consent.If the amended DMP is certified, then it becomes the certified DMP for the purposes of condition 16 and will thereafter form part of the Approved Consent Document.

3. The consent holder must notify Christchurch City Council no less than three working days prior to works commencing, (via email to [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)) of the earthworks start date and the name and contact details of the site supervisor. The consent holder shall at this time also provide confirmation of the installation of ESCP measures as per the plan referred to in Condition 2 above.

4. Run-off must be controlled to prevent muddy water flowing, or earth slipping, onto neighbouring properties, legal road (including kerb and channel), or into a river, stream, drain or wetland. Sediment, earth or debris must not fall or collect on land beyond the site or enter the Council's stormwater system. All muddy water must be treated, using at a minimum the erosion and sediment control measures detailed in the site specific Erosion and Sediment Control Plan, prior to discharge to the Council's stormwater system.

*Note: For the purpose of this condition muddy water is defined as water with a total suspended solid (TSS) content greater than 50mg/L.*

5. No earthworks shall commence until the ESCP has been implemented on site. The ESCP measures shall be maintained over the period of the deconstruction and earthworks phases, until the site is stabilised (i.e. no longer producing dust or water-borne sediment). The ESCP shall be improved if initial and/or standard measures are found to be inadequate. All disturbed surfaces shall be adequately topsoiled **and** vegetated or otherwise stabilised as soon as possible to limit sediment mobilisation.

6. Dust emissions shall be appropriately managed within the boundary of the property in compliance with the *Regional Air Plan*. Dust mitigation measures such as water carts, sprinklers or polymers shall be used on any exposed areas. The roads to and from the site, and the site entrance and exit, must remain tidy and free of dust and dirt at all times.

7. All loading and unloading of trucks with excavation or fill material shall be carried out within the subject site.

8. Any surplus or unsuitable material from the project works shall be removed from site and disposed at a facility authorised to receive such material.
9. Any backfilling in the area of the excavated foundations shall be with clean fill only.
10. All public roads and footpaths shall be kept clear of any tracked material from the demolition site.
11. Any public road, shared access, footpath, landscaped area or service structure that has been damaged, by the persons involved with the development or vehicles and machinery used in relation to the works under this consent, shall be reinstated as specified in the [Construction Standard Specifications](#) (CSS) at the expense of the consent holder and to the satisfaction of the Council.
12. Any change in ground levels shall not cause a ponding or drainage nuisance to neighbouring properties. All filled land shall be shaped to fall to the road boundary. Existing drainage paths from neighbouring properties shall be maintained.

#### **Noise**

13. The use of machinery in association with the demolition and earthworks shall be limited to between 7.30am – 6.00pm Monday to Saturday and truck movements limited to between 7.30am – 5.00pm Monday to Saturday. There shall be no works associated with the demolition on Sundays and public holidays except in cases of operational necessity where there has been prior approval of a Council Environmental Health Officer.

#### **Vibration**

14. The maximum permitted vibrations outlined in the German Standard DIN 4150-3:1999 “Structural Vibration – Part 3: Effects of Vibrations on Structures” shall be adhered to during all deconstruction and excavation works.

#### **NES – Contaminated soils**

15. Prior to any earthworks or below ground excavations of the foundations commencing, soil testing shall be undertaken by a Suitably Qualified and Experienced Practitioner (SQEP) to determine the level of any contamination in the area of ground to be disturbed. The results of that testing shall be provided to Council by way of email to [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz) along with the Site Management Plan required under condition 16.
16. At least 10 working days prior to any earthworks or below ground excavations of the foundations commencing, a Site Management Plan (SMP) prepared by a Suitably Qualified and Experienced Practitioner shall be provided to Council by way of email to [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz) for certification. No earthworks or excavation of foundations may commence until the SMP has been certified by Council. The SMP shall include as a minimum:
  - a. Risk assessment, analysis and recommendations for treatment that are consistent with the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health 2011.
  - b. Procedures and mitigation methods to ensure that contaminated soil is excavated, handled and disposed of appropriately.
  - c. The consideration of stormwater and dewatering discharges, and the requirements of the Council’s consents for these discharges.
  - d. Internal project monitoring methods to be undertaken by the SQEP, or Environmental Specialist under the supervision of a SQEP.
  - e. Procedures for sampling and record keeping.

- f. Reporting to the Council's Team Leader, Environmental Compliance, or nominee, within 21 days of the completion of the project (Email [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz)).
17. All earthworks and excavation of foundations shall be undertaken in accordance with the SMP certified under condition 16.
18. Any soils removed from the site during the course of the activity shall be disposed of to a facility authorised to accept the material. The consent holder shall provide evidence of soil disposal to an authorised facility such as weighbridge receipts or waste manifest submitted to the Christchurch City Council's Environmental Compliance Team, or nominee (Email [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz) ) within two months of the completion of works.
19. A copy of the relevant SMP required under Condition 16 shall be kept on site at all times.
20. The consent holder, and all persons exercising this consent, shall ensure that all personnel undertaking activities authorised by this consent are made aware of, and have access to, the contents of this consent document and the relevant SMP required under Condition 16 prior to the commencement of any earthworks or excavations.

### **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.

### **Advice notes:**

- i) If any dewatering is to occur separate consents may need to be obtained from Environment Canterbury.
- ii) It is the consent holder's responsibility to ensure that the activity, including where carried out by contractors on their behalf, complies with the below Christchurch District Plan standard - failure to do so may result in enforcement action and the need for additional land-use consent:
- Rule 6.1.6.1.1 P2 - All earthworks related construction activities shall meet relevant noise limits in Tables 2 and 3 of NZS 6803:1999 Acoustics - Construction Noise, when measured and assessed in accordance with that standard.
  - Rule 8.9.2.1 P1 Activity Standard f. - Earthworks involving mechanical equipment, other than in residential zones, shall not occur outside the hours of 07:00 and 22:00 except where compliant with NZS 6803:1999. Between the hours of 07:00 and 22:00 the noise standards in Chapter 6

Rule 6.1.5.2 apply except where NZS 6803.1999 is complied with, and the light spill standards in Chapter 6 Rule 6.3.6 apply.

- iii) Earthworks involving soil compaction methods which create vibration shall comply with German Standard DIN 4150 1999-02 (*Structural Vibration – Effects of Vibration on Structures*) and compliance shall be certified via a statement of professional opinion from a suitably qualified and experienced chartered or registered engineer. The statement of professional opinion is to be submitted to the Christchurch City Council via [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz) a minimum of five working days prior to any compacting activities commencing.

### **Scope of work**

- iv) This consent only covers earthworks involved in the demolition of the building. Any earthworks for redevelopment or a new building on the site will need to comply with the District Plan and NES or a further resource consent obtained.
- v) The applicant should not commence or should cease work on a given area if the works proposed in that area change from those in the approved consent document. Any variation should be discussed with the Christchurch City Council's Heritage Team Leader or nominee, who in consultation with Council's Resource Consents Unit will determine an appropriate consenting response. Five working days should be allowed for this process. Failure to discuss changes with the Council's Heritage Team or a Resource Consents Planner may constitute a breach of the conditions of this consent. Amended plans and information showing these changes, including any associated changes to the Temporary Protection Plan, may be required to be submitted to the Heritage Team Leader, Christchurch City Council (or nominee) for certification prior to work on that area commencing or resuming.

### **Submission of information**

- vi) Information being submitted in relation to conditions of this consent is to be sent by email to: [rcmon@ccc.govt.nz](mailto:rcmon@ccc.govt.nz). The current nominated Heritage team contact for this consent is Amanda Ohs, ph. 9418292 or email: [amanda.ohs@ccc.govt.nz](mailto:amanda.ohs@ccc.govt.nz), or [heritage@ccc.govt.nz](mailto:heritage@ccc.govt.nz). Alternatively please contact Gareth Wright ph. 941 8026 or email: [Gareth.wright@ccc.govt.nz](mailto:Gareth.wright@ccc.govt.nz), or Brendan Smyth, Heritage Team Leader, ph. 941 8934 or email: [brendan.smyth@ccc.govt.nz](mailto:brendan.smyth@ccc.govt.nz).

### **TPP**

- vii) A TPP sets out the risks to heritage fabric of the proposed works and how these risks will be managed to ensure no unwarranted damage occurs to heritage fabric proposed for retention. Detail should be included of how elements will be protected in situ and how elements proposed for removal are to be removed and stored for reinstatement. An example of a TPP is available from the Heritage team on request. Each plan needs to be customized to suit the heritage item, construction materials and scope of works.

### **Photographic Record**

- viii) The intention of the photographic record condition is to maintain a record of the works with a focus on the areas undergoing change rather than individual elements. The same camera positions should be used for all photo sets before, during and after the works to enable comparison. Photographs should be of printable quality, at least 1440 pixels by 960 pixels for a 4"x 6" print at a minimum resolution of 240 PPI. They should be labelled with the position on site or in relation to the site, date and photographer's name, and submitted as individual image files, with a plan showing photograph locations. Photos should be submitted to the Council's nominated Heritage

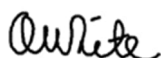
team contact electronically, either by email (noting that Council's email data transfer limit is 20MB per email), or via a file transfer website such as wetransfer.com or dropbox.com to rcmon@ccc.govt.nz.

## Monitoring

- ix) The Council will require payment of its administrative charges in relation to **monitoring of conditions**, as authorised by the provisions of section 36 of the Resource Management Act 1991. The current monitoring charges are:
- (a) A monitoring programme administration fee of \$102.00 to cover the cost of setting up the monitoring programme; and
  - (b) A monitoring fee of \$175.50 (*commercial*) for the first monitoring inspection to ensure compliance with the conditions of this consent; and
  - (c) Time charged at an hourly rate if more than one inspection, certification of conditions, or additional monitoring activities (including those relating to non-compliance with conditions), are required.

The monitoring programme administration fee and initial inspection fee will be charged to the applicant with the consent processing costs. Any additional monitoring time will be invoiced to the consent holder when the monitoring is carried out, at the hourly rate specified in the applicable Annual Plan Schedule of Fees and Charges.

- x) This resource consent has been processed under the Resource Management Act 1991 and relates to planning matters only. You will also need to comply with the requirements of the **Building Act 2004**. Please contact a Building Consent Officer (ph: 941 8999) for advice on the building consent process.
- xi) This site may be an archaeological site as defined and protected under the provisions of the Heritage New Zealand Pouhere Taonga Act 2014. Archaeological sites are defined in the HNZPTA as any place in New Zealand where there is physical evidence of pre-1900 occupation, regardless whether the site is known or not, recorded in the NZAA Site Recording Scheme or not, or listed with Heritage New Zealand or the local council. Authority from Heritage New Zealand is required for any work that affects or may affect an archaeological site. **Please contact the Heritage New Zealand regional archaeologist on 03 363 1880 or [archaeologistcw@heritage.org.nz](mailto:archaeologistcw@heritage.org.nz) before commencing work on the land.**



Odette White  
**SENIOR PLANNER**

### Reviewed by:

Mal Nash  
**TEAM LEADER PLANNING**

A handwritten signature in blue ink, consisting of several fluid, connected strokes.

10 August 2022

# Appendices

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# Appendix 1

Copy of submissions

## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	Richard McGregor Smith
Street number and name	8 Grahams Road, Ilam, Christchurch 8041 CHRISTCHURCH
I am submitting:	For myself
If submitting on behalf - what is your name	Richard McGregor Smith
If submitting on behalf - organisation name / relationship to submitter	
Email	smithnz@yahoo.com
Street number and name / PO Box	8 Grahams Road, Ilam, Christchurch 8041 CHRISTCHURCH
Suburb	CHRISTCHURCH
Town / City	CHRISTCHURCH
Postcode	8041
Phone (daytime)	+642102387152
Perferred method for correspondence	Email
I / We:	Support all or part of the application
The specific parts of the application that my / our submission relates to are:	entire
The reasons for my / our submission are:	Reason needs to be applied to what the best way forward is
The decision I / we would like the Council to make is:	grant the application in full
If a hearing is held:	Wish to speak in support of my/our submission

---

I / we will consider presenting a joint case with them at the hearing.	Yes
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Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

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**Office Use**

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Submission ID	46932
Submitted Date	11/06/2022 12:32:14
Submission Type	Online
Attachments	No
Notes	No

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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	[REDACTED]
Street number and name	[REDACTED]
I am submitting:	For myself
If submitting on behalf - what is your name	[REDACTED]
If submitting on behalf - organisation name / relationship to submitter	
Email	[REDACTED]
Street number and name / PO Box	[REDACTED]
Suburb	Upper Riccarton
Town / City	CHRISTCHURCH
Postcode	8041
Phone (daytime)	[REDACTED]
Perferred method for correspondence	Email
I / We:	Support all or part of the application
The specific parts of the application that my / our submission relates to are:	No historical or architectural value. Has no current use or future need. Upgrading would be a waste of money and will not see it used.

The reasons for my / our submission are: This building is an ugly concrete & out of date. Built at a time when racing had a much greater following. It has not been needed for Grand National Day or other high profile meetings. The existing newer stand is more than capable of providing indoor facilities for those attending. Membership is very low and the public now has access to what would had once been members only. So will sit deteriorating over time but could be used to store horse feed, like many tired old barns around the country. The Retirement Village expanding and housing being built on some of the Race way land is testimony to the reduced need/ use by the public on race days. The foot print left when demolished could be used for attracting more family orientated activities on site.

The decision I / we would like the Council to make is: I support the Council granting the request to demolish the building, use the concrete for land fill or to help prevent coast line from erosion from global warming sea rises.

If a hearing is held: Do not wish to speak in support of my/our submission

I / we request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

Yes

I / We request that my/our name and contact details are withheld under section 6 or 7 of LGOIMA.

Yes

Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

I am a very private person and wish to remain so.

### Office Use

Submission ID 46935

Submitted Date 13/06/2022 19:31:43

Submission Type Online

Attachments No

Notes No

## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	Steve Roberts
Street number and name	395 Main Nrth Road, Redwood
I am submitting:	For myself
If submitting on behalf - what is your name	Steve Roberts
If submitting on behalf - organisation name / relationship to submitter	
Email	steve-roberts1@outlook.com
Street number and name / PO Box	395 Main Nrth Road, Redwood
Suburb	Christchurch
Town / City	Christchurch
Postcode	8051
Phone (daytime)	033524279
Perferred method for correspondence	Email
I / We:	Support all or part of the application
The specific parts of the application that my / our submission relates to are:	
The reasons for my / our submission are:	

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The decision I / we  
would like the  
Council to make is:

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If a hearing is held:      Do not wish to speak in support of my/our submission

---

Reasons under  
section 6 or 7 of  
LGOIMA for  
withholding your  
name and contact  
details

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**Office Use**

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Submission ID              46939

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Submitted Date            16/06/2022 11:35:36

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Submission Type          Online

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Attachments                No

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Notes                         No

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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	The Trustees of the Christchurch Racecourse
Street number and name	165 Racecourse Road, Christchurch
I am submitting:	On behalf of an organisation or another person
If submitting on behalf - what is your name	Peter Cordner
If submitting on behalf - organisation name / relationship to submitter	Trustees of the Christchurch Racecourse of which I am the Chairman
Email	peter@cordner.co.nz
Street number and name / PO Box	PO Box 11137
Suburb	Sockburn
Town / City	Christchurch
Postcode	8443
Phone (daytime)	033665869
Perferred method for correspondence	Email
I / We:	Support all or part of the application
The specific parts of the application that my / our submission relates to are:	All of the application is supported
The reasons for my / our submission are:	



---

The decision I / we  
would like the  
Council to make is:

---

Reasons under  
section 6 or 7 of  
LGOIMA for  
withholding your  
name and contact  
details

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**Office Use**

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Submission ID            46941

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Submitted Date           20/06/2022 08:25:44

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Submission Type         Email : Received on time - accepted

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Attachments              Yes

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Notes                      No

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Resource Consents Unit

# Submission on an application for resource consent

Resource Management Act 1991 – Form 13

**Email to:** [resourceconsentssubmissions@ccc.govt.nz](mailto:resourceconsentssubmissions@ccc.govt.nz); or

**Deliver to:** Resource Consents Unit, Christchurch City Council, 53 Hereford Street, Christchurch; or

**Send to:** Resource Consents Unit, Christchurch City Council, PO Box 73013, Christchurch Mail Centre, Christchurch, 8154

**For enquiries phone:** (03) 941 8999

## 1. Submitter details

Full name of submitter: The Trustees of the Christchurch Racecourse  
 Street address: 165 Racecourse Road, Christchurch  
 Postal Address (if different): PO Box 11137 Sockburn, Christchurch  
 Contact phone number (daytime): 3665869 (Cordner) Postcode: 8443  
 Email: peter@cordner.co.nz

My address for service for receiving documents and communication about this application is:  By email  By post

## 2. Application details

RMA number (if not stated above): 2021/3921  
 Name of applicant: Canterbury Jockey Club  
 Application site address: 165 Racecourse Road, Christchurch  
 Proposed activity: Demolition of Grand National Stand

## 3. Submission details

I / We:  Support all or part of the application  
 Oppose all or part of the application  
 Am neutral towards the application

The specific parts of the application that my / our submission relates to are: *(give details, using additional pages if required)*

All of the Application is supported

The reasons for my / our submission are: *(use additional pages if required)*

The Trustees of the Christchurch Racecourse are concerned for the fortunes of the Canterbury Jockey Club's operation at Riccarton Racecourse and consider that the demolition of what is an unuseable building is in the interests of Thoroughbred Racing in Canterbury.

The decision I / we would like the Council to make is: *(give details including, if relevant, the parts of the application you wish to have amended and the general nature of any conditions sought. Use additional pages if required)*

To approve the Application

#### 4. Hearing of this application

If a hearing is held, I / we:

- Wish to speak** in support of my / our submission
- Do not wish to speak** in support of my / our submission
- If others make a similar submission I / we will consider presenting a joint case with them at the hearing
- Request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

*Please note that only submitters who indicate that they wish to speak at the hearing will be sent a copy of the planning report.*

*If you change your mind about whether you wish to speak at the hearing, please contact the Council by telephone on 941 8999 or by email at [resourceconsent submissions@ccc.govt.nz](mailto:resourceconsent submissions@ccc.govt.nz).*

#### 5. Signature (of submitter(s) or person authorised to sign on behalf of submitter(s))

Signature:

Date: 14th June 2022

Signature:

Date:

*Note: A signature is not required if you make your submission electronically*

#### Important information

1. The Council must receive your submission before the closing date and time for submissions on this application.
2. You must also send a copy of this submission to the applicant as soon as practicable, at the applicant's address for service.
3. If this application was limited notified the Council may adopt an earlier closing date for submissions once responses have been received from everyone who was notified.
4. If you are a trade competitor, your right to make a submission may be limited by the provisions in Part 11A of the RMA.
5. The Council may strike out a submission (or part of it) in the following situations:
  - It is frivolous or vexatious
  - It discloses no reasonable or relevant case
  - It would be an abuse of the hearing process to allow it to be taken further
  - It contains offensive language
  - It is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialist knowledge or skill to give expert advice on the matters.

#### Privacy information

The information requested on this form, including your contact details, is required by the Resource Management Act 1991 (RMA). The information will be held by the Council, and you may ask to check and correct any personal information that we hold about you. The RMA requires your submission, including your name and contact details, to be made available to the Council (including the Council decision-maker) and the applicant.

Your submission, including your name and contact details, may also be made available to other submitters and to the public on the Council's website, or on request. If requested, the Council may legally be required to make all submissions available to the public (which can include the media), including the name and contact details of the submitter, subject to the provisions of the Local Government Official Information and Meetings Act 1987 (LGOIMA). If you believe there are compelling reasons why your contact details should be kept confidential from other submitters or the public under LGOIMA, please contact the processing Planner for this application prior to making your submission.

- I / We request that my / our name and contact details are withheld under section 6 or 7 of LGOIMA for the following reason:  
*(attach additional pages if necessary)*

#### Office use only

Received at the ..... Office on ..... at ..... am / pm

## The Trustees of the Christchurch Racecourse

• FAX (03) 342 6114 • PHONE (03) 336 0000 •  
• P O Box 11137 • SOCKBURN • CHRISTCHURCH • 8443 •  
• E-MAIL [tim@riccartonpark.co.nz](mailto:tim@riccartonpark.co.nz) •

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On behalf of the Trustees of the Christchurch Racecourse I write in support of the submission made by the Canterbury Jockey Club to demolish the building known as the Grand National Stand (GNS) (formally the Public Grandstand)

The Trustees have the ownership of the land known as Riccarton Park Racecourse (a Racecourse Reserve) vested in them by the Riccarton Racecourse Act 2016 which superseded the Christchurch Racecourse Reserve Act 1878. The land is held by the Board of the trustees on trust for the purposes of racing.

The Trustees lease the entirety of the land to the Canterbury Jockey Club (CJC) to manage and conduct the sport of thoroughbred racing on the property. The CJC is responsible for the construction and management of all facilities on the property needed to conduct racing.

The CJC built the Grand National Stand (GNS) in 1920 for the use of patrons to partake in the sport of racing in the manner that they had to in that era. Over the ensuing century racing has evolved whereby patrons now participate in the sport in a greater variety of means such as Television, streaming, radio, cell phones, social outlets, and TAB's. The demand for massive grandstands no longer exists.

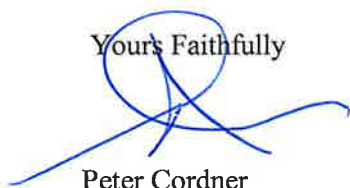
The Christchurch earthquakes damaged the GNS to the extent that a substantial amount of money is required to bring the building up to a necessary percentage of new building standards and then only to have it exist for negligible use.

The funds required are clearly beyond the resources of the CJC.

The CJC built the GNS to facilitate the demands of a previous era. It cannot be tied to that era to the detriment of being able to progress and develop racing over the next 100 years for the benefit of its racing stakeholders and the 650 people who annually derive some form of income from its operation.

As sad as it will be to see a monument to a previous age of racing disappear, benefits are able to be achieved by developing the site for a use which will enhance the racecourse for the future of the sport of thoroughbred racing with its long and proud history in Canterbury.

Yours Faithfully



Peter Cordner  
Chairman of the Trustees

## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

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Full name

[REDACTED]

---

Street number and name

[REDACTED]

---

I am submitting:

For myself

---

If submitting on behalf - what is your name

---

If submitting on behalf - organisation name / relationship to submitter

---

Email

[REDACTED]

---

Street number and name / PO Box

[REDACTED]

---

Suburb

Cashmre

---

Town / City

Christchurch

---

Postcode

8022

---

Phone (daytime)

[REDACTED]

---

Perferred method for correspondence

Email

---

I / We:

Support all or part of the application

---

The specific parts of the application that my / our submission relates to are:

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The reasons for my / our submission are:

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The decision I / we would like the Council to make is:

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If a hearing is held:

Do not wish to speak in support of my/our submission

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I / We request that my/our name and contact details are withheld under section 6 or 7 of LGOIMA.	Yes
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Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details	Protection
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**Office Use**

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Submission ID	46931
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Submitted Date	10/06/2022 17:28:50
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Submission Type	Online
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Attachments	No
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Notes	No
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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	George Fredrick Ritchie
Street number and name	99 Lakeside road Wanaka
I am submitting:	On behalf of an organisation or another person
If submitting on behalf - what is your name	Canterbury Jockey Club Inc
If submitting on behalf - organisation name / relationship to submitter	Life member of the Canterbury Jockey Club & Trustee of the Christchurch Racecourse Reserve .Christchurch resident from 1981 -2012
Email	gritchie@xtra.co.nz
Street number and name / PO Box	PO box 683
Suburb	
Town / City	Wanaka
Postcode	9343
Phone (daytime)	0212499666
Perferred method for correspondence	Email
I / We:	Support all or part of the application
The specific parts of the application that my / our submission relates to are:	Demolition of the Grand National Stand

The reasons for my / our submission are: The inability to utilise the stand for the benefit of the Public of Christchurch and New Zealand. The historic relationship the stand has had for the winter Grand National Carnival and the part it has played with the CCC in the extremely successful November cup week Carnival. A carnival that has not been replicated in NZ. With the recent development of the synthetic racing track at Riccarton Park the need for a like facility for the Public to enjoy year round racing. The Racecourse Reserve upon which the Grand National Stand is located provides not only racing amenities, but supports the public Riccarton Market and the historic Tea House pavilion. These facilities are enjoyed by the Christchurch Public who need a replacement rather than a deteriorating eyesore.

The decision I / we would like the Council to make is: It is important that the Council make this decision as soon as possible, as it is now 10+ years since the earthquakes and the Christchurch/NZ Public have been unable fully utilise the amenities at Riccarton Park (Canterbury Jockey Club) due to safety issues. It would be good news if the decision was made in time for this years November Cup Carnival.

If a hearing is held: Do not wish to speak in support of my/our submission

I / we will consider presenting a joint case with them at the hearing. Yes

I / we request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act. Yes

Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

#### Office Use

Submission ID	46933
Submitted Date	11/06/2022 17:04:48
Submission Type	Online
Attachments	No
Notes	No



## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	[REDACTED]
Street number and name	[REDACTED]
I am submitting:	For myself
If submitting on behalf - what is your name	
If submitting on behalf - organisation name / relationship to submitter	
Email	[REDACTED]
Street number and name / PO Box	
Suburb	
Town / City	Christchurch
Postcode	
Phone (daytime)	[REDACTED]
Perferred method for correspondence	Email
I / We:	Oppose all or part of the application
The specific parts of the application that my / our submission relates to are:	Waste of materials upgrading when we can retrofit and repurpose
The reasons for my / our submission are:	I believe it could go to the arts. Make covered for music and performances. Could make great atmospheric place and give reason to stay in this city
The decision I / we would like the Council to make is:	Give it to the arts, retrofit don't demolish. Way cheaper! Refuse reuse recycle should be applied to buildings
If a hearing is held:	Do not wish to speak in support of my/our submission

---

I / we will consider presenting a joint case with them at the hearing.	Yes
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I / We request that my/our name and contact details are withheld under section 6 or 7 of LGOIMA.	Yes
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Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details	Hacking
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**Office Use**

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Submission ID	46930
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Submitted Date	10/06/2022 15:33:07
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Submission Type	Online
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Attachments	No
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Notes	No
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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	David Hinman
Street number and name	66 Derby Street
I am submitting:	For myself
If submitting on behalf - what is your name	David Hinman
If submitting on behalf - organisation name / relationship to submitter	
Email	d.hinman@xtra.co.nz
Street number and name / PO Box	66 Derby Street
Suburb	St Albans
Town / City	Christchurch
Postcode	8014
Phone (daytime)	+64274314778
Perferred method for correspondence	Email
I / We:	Oppose all or part of the application
The specific parts of the application that my / our submission relates to are:	All - i.e the proposal to demolish the grandstand
The reasons for my / our submission are:	This is an important heritage listed building Retain and assist in restoring the building

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The decision I / we would like the Council to make is:

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If a hearing is held: Wish to speak in support of my/our submission

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I / we will consider presenting a joint case with them at the hearing. Yes

---

Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

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**Office Use**

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Submission ID 46937

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Submitted Date 15/06/2022 15:51:21

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Submission Type Online

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Attachments No

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Notes No

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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	[REDACTED]
Street number and name	[REDACTED]
I am submitting:	For myself
If submitting on behalf - what is your name	
If submitting on behalf - organisation name / relationship to submitter	
Email	[REDACTED]
Street number and name / PO Box	[REDACTED]
Suburb	[REDACTED]
Town / City	Christchurch
Postcode	8061
Phone (daytime)	[REDACTED]
Perferred method for correspondence	Email
I / We:	Oppose all or part of the application
The specific parts of the application that my / our submission relates to are:	The heritage AEE
The reasons for my / our submission are:	The AEE has not been undertaken by a heritage professional and does not meet industry standards or requirements of an AEE to meet heritage provisions within the RMA. There are serious flaws with the AEE, most notably is the absence of an assessment of the buildings current significance and an assessment of effects. The author has made no attempt to also undertake research on the building aside from relying on Council listing information as a secondary source, and the architectural consultant has not undertaken a condition assessment upon which to support their conclusions.

The decision I / we would like the Council to make is:	Oppose all of the application until a condition report and full AEE has been undertaken by a conservation architect,
--	--

If a hearing is held:	Wish to speak in support of my/our submission
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I / we will consider presenting a joint case with them at the hearing.	Yes
--	-----

I / We request that my/our name and contact details are withheld under section 6 or 7 of LGOIMA.	Yes
--	-----

Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details	I work as a heritage professional and it has potential to be detrimental to my business' reputation.
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#### Office Use

Submission ID	46928
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Submitted Date	10/06/2022 07:03:16
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Submission Type	Online
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Attachments	No
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Notes	No
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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name

[REDACTED]

Street number and name

[REDACTED]

I am submitting: For myself

If submitting on behalf - what is your name

If submitting on behalf - organisation name / relationship to submitter

Email

[REDACTED]

Street number and name / PO Box

[REDACTED]

Suburb

Town / City Rolleston

Postcode 7614

Phone (daytime)

[REDACTED]

Perferred method for correspondence Email

I / We: Oppose all or part of the application

The specific parts of the application that my / our submission relates to are:

The demolition of the Grand National Grandstand

The reasons for my / our submission are:

The decision I / we would like the Council to make is:

The Grandstand is a heritage listed building and should not be allowed to be demolished and instead repaired, we have lost too many heritage buildings in Christchurch and New Zealand, and it would be a shame to lose such a large and important building.

If a hearing is held: Do not wish to speak in support of my/our submission

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I / we request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

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Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

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**Office Use**

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Submission ID	46927
Submitted Date	09/06/2022 18:41:45
Submission Type	Online
Attachments	No
Notes	No

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## Submission on an application for resource consent

### Demolition of Grand National Grandstand,165 Racecourse Road

**Reference number:** RMA/2021/3921

**Applicant name:** Canterbury Jockey Club

**Site address:** 165 Racecourse Road

**Description of proposed activity:** Demolition of the heritage-listed Grand National Grandstand at Riccarton Racecourse

Full name	[REDACTED]
Street number and name	[REDACTED]
I am submitting:	On behalf of an organisation or another person
If submitting on behalf - what is your name	[REDACTED]
If submitting on behalf - organisation name / relationship to submitter	[REDACTED]
Email	[REDACTED]
Street number and name / PO Box	[REDACTED]
Suburb	Christchurch
Town / City	Christchurch
Postcode	8052
Phone (daytime)	[REDACTED]
Perferred method for correspondence	Email
I / We:	Oppose all or part of the application
The specific parts of the application that my / our submission relates to are:	Our submission applies to the whole application. We oppose demolition of this very important heritage building.
The reasons for my / our submission are:	1 GNS is a Highly Significant building on the Christchurch City Council Schedule of Heritage buildings; it is of the highest national significance - even although not appearing on the HNZPT List. 2 The heritage status of GNS does not rest solely

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on its architectural qualities (which are considerable) but encompass other aspects of the GNS, Riccarton Raceway and Riccarton stories; such factors are highly valued in CCC 'Our Heritage, Our Taonga 2019-29', the heritage strategy which now drives the city's heritage ethos. 3 Part of this story is about the architects themselves, the Luttrell brothers having been one of the nation's foremost Edwardian practices, highly skilled and innovative especially in the use of reinforced concrete and steel (witness King Edward Barracks, erected in 25 days). Some examples of their work remains (including Theatre Royal) but much has been demolished. It is imperative that no more is destroyed. 4 A significant claim to fame for the firm is the number and quality of grandstands designed and built by them (they were contractors, too). GNS is their most impressive work still standing locally. 5 The history of the raceway for nearly one hundred years is inseparable from that of the building, and of the adjacent Tea House, restoration of which won accolades from NZIA and Christchurch Civic Trust in 2009. This bond should continue. 6 Climate change, construction and demolition (C&D): the manufacture of the materials in GNS and construction of the building had not only a financial price, but also an historic (and ongoing) environmental price in terms of long-lasting CO2 emissions. 'The greenest building is the one standing'. Demolition would result in the destruction of the considerable embodied energy of the building and in further environmental ill-effects resulting from the demolition process itself. 7 The application by CJC does not attempt to minimise the importance of this building to Riccarton Park Racecourse; but much of the documentation provided with the application is about the negatives with very little in-depth thought about the positives resulting from retention (note 6 above and 8 below ). This negativity colours the comments about loss of heritage fabric and purported automatic loss of heritage value (refer 2,3,5 above). Examples abound where much loss of original fabric, replaced sympathetically with new materials has not effected the heritage standing of the building: Isaac Theatre Royal, Christchurch Town Hall. Overseas, this practice is common and widespread and has been so for decades. 8 Claimed costs of restoration and strengthening receive scant coverage in the documentation, yet the basis of the case for demolition is that retention is too expensive. If an innovative, adaptive re-use approach were taken by the applicant, GNS could become a National Centre of Horse Racing Heritage part of which might include boutique HRH apartments for which takers would be plentiful, and income from sales which would be strong; with a horse racing heritage museum of great interest to the racing community and beyond - and possibly much more! 9 'Further information - collated': in several pages of documentation of possible funding sources available to CJC, not one has been activated. It could rightly be inferred from this that there is little actual will to retain the building. 10 In a time of

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global warming crisis, of an absolute need to conserve the built and natural environment and all resources it is shameful that demolition of this iconic heritage building should be sought by CJC. We thoroughly recommend that applicant and adjudicator give our positive suggestions thoughtful consideration.

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The decision I / we would like the Council to make is: to decline the application for demolition and to work with the CJC and the community to ensure that the barriers (especially financial) to the club's retention, strengthening and re-vitalising of the GNS are removed as fully as possible.

---

If a hearing is held: Wish to speak in support of my/our submission

---

I / we request that the Council delegates its functions, powers, and duties to hear and decide the application to one or more hearings commissioners who are not members of the Council, under section 100A of the Resource Management Act.

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Reasons under section 6 or 7 of LGOIMA for withholding your name and contact details

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### Office Use

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Submission ID 46938

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Submitted Date 16/06/2022 09:27:26

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Submission Type Online

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Attachments No

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Notes No

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# Appendix 2

Heritage Advice (Gareth Wright, CCC)

**RMA/2021/3921: Demolition of the Riccarton Racecourse Public Grandstand (also known as the Grand National Grandstand), 165 Racecourse Road, Sockburn, Christchurch**

**Heritage Assessment:**

**1.0 Heritage Significance**

- 1.1 The Riccarton Racecourse Public Grandstand (the Grandstand) was built in 1923 to replace a timber stand that burnt down in 1919. It was designed by Luttrell Brothers, one of Edwardian New Zealand's foremost architectural practices. Until 1962 it served both as a members and public stand. The building underwent significant renovation in the 1980s.
- 1.2 The Grandstand has high social and historical significance for its association with the Canterbury Jockey Club, with the New Zealand Cup, and as a long-standing sporting and recreational facility. It has high cultural and spiritual significance for its association with the culture of horse-racing. It has high architectural and aesthetic significance for its design by Luttrell Brothers - regarded as New Zealand's specialist racecourse designers in the early twentieth century. It has high technological and craftsmanship significance as an early example of reinforced concrete construction. It has high contextual significance as a key part of the complex of buildings and open spaces that make up Riccarton Racecourse.
- 1.3 The Grandstand is a highly significant (Group 1) scheduled heritage item in the Christchurch District Plan. Group 1 scheduled heritage items are those considered of high significance to the District.

**2.0 Background**

- 2.1 The Grandstand sustained moderate damage in the Canterbury Earthquake Sequence of 2010 and 2011, which manifested as extensive hairline cracking. The stand remained in use until closed as a precautionary measure in 2018.
- 2.2 Post-earthquake structural investigation and analysis of the Grandstand was undertaken for Riccarton Racecourse and their insurer by consultancies AECOM and Kirk Roberts. They concluded that the building was considered earthquake-prone and required significant work to make it compliant.
- 2.3 As a consequence of this analysis, Riccarton Racecourse staff met Council Heritage Team representatives Gareth Wright and Amanda Ohs on site on 26 August 2020. At this meeting, Council was informed that demolition was reluctantly to be sought. The exterior of the Grandstand was viewed. In subsequent correspondence, the racecourse staff were informed of the requirements of a demolition consent.

**3.0 Application**

- 3.1 In light of detailed structural analysis following the Canterbury Earthquake Sequence, the Canterbury Jockey Club (the Club) has determined that the

Grandstand is uneconomic to seismically upgrade. Application has been therefore been made to fully demolish the building. In support of the application, the following key documentation has been provided:

- A consent application (Planz Consultants, November 2021) incorporating an Assessment of Environmental Effects. Appendices include
  - Heritage Impact Assessment (Fulton Ross Team Architects, November 2021).
  - Quantity Surveying Cost Estimates (McKay Lang, 18 November 2021)
- Seismic Upgrade – Impact assessment on existing building fabric (Kirk Roberts Consulting, 18 November 2021)
- Grand National Stand – Detailed Damage Evaluation (AECOM, 27 January 2015)
- Subsequent correspondence including:
  - A brief statement of heritage value (Fulton Ross Team Architects, 09 February 2022)
  - A brief contextual analysis of Luttrell Brothers grandstands and other buildings designed by the firm (Planz/Fulton Ross, 15 February 2022)
  - A statement of grant investigation and insurance, with an appendix listing grants investigated (Chapman Tripp on behalf of the Club, 06 April 2022)
  - Provision of an archaeological assessment (Underground Overground Archaeology, 27 May 2022)

3.2 AECOM consider that the Grandstand would be likely to collapse in a moderate earthquake due to several critical structural weaknesses. These include an inverted shear wall arrangement, the use of plain round rebar and low reinforcement ratios in concrete elements. These weaknesses are likely to lead to brittle shear failure of primary beams under cyclic loading. Kirk Roberts concur with this conclusion.

3.3 Kirk Roberts recommend that the Grandstand be upgraded to a minimum of 67% NBS, and ideally 100% NBS. The Kirk Roberts repair and seismic upgrade solution primarily involves transverse and longitudinal column and beam augmentation or replacement. This work is largely internal; the only external manifestation is alteration of the south elevation. On that elevation, the augmentation of the columns would narrow the bays, thereby necessitating the alteration of windows. The solution is able to be scaled to meet the required NBS; a higher NBS necessarily involves a greater degree of structural intervention – with additional bays narrowed.

3.4 The Fulton Ross Heritage Impact Assessment stated that the *proposed structural changes will have the effect of compromising the existing heritage values of the Grand National Stand* (p.8). Subsequently however, William Fulton stated that the *proposed structural changes diminish the Heritage value of the building but not to the point that the Heritage item would warrant being removed from the Heritage schedule.* (email: W. Fulton to T. Joll, 09 February 2022).

3.5 The MacKay Lang cost estimate (at November 2021) prices a 34% solution at \$15.2 million, and a 67% solution at \$17.8 million.

- 3.6 The Club acknowledges that it received an insurance settlement for all damaged buildings across the Riccarton Racecourse site. The Club asserts that the quantum of this settlement is confidential, but confirms that the amount received was *well less* than half the cost of repairing or rebuilding all of these buildings. The Club also states that as it was not a requirement of the settlement that the funds be distributed evenly across all of the damaged buildings, the funds have been spent (or are committed to being spent) on projects other than the Grandstand. The Club also demonstrates that it has investigated grant schemes, and confirms that where the opportunity exists to apply for grants, the sums available would be insufficient to make a substantive difference to the insurance shortfall (had an equitable proportion of the settlement been directed towards the Grandstand).
- 3.7 A comprehensive archaeological assessment of the site has been undertaken by Underground Overground for the Club. They considered it unlikely that archaeological remains would be encountered, and on that basis recommended that work proceed under an Accidental Discovery Protocol.
- 3.8 Heritage New Zealand Pouhere Taonga have been consulted. In their response (01 March 2022) they accept demolition as inevitable, support offered photographic and interpretation conditions, and propose a retrieval condition.
- 3.9 The proposal was notified on 18 May 2022. 11 submissions were received: six in support and five in opposition. Of those who support the application and who offer a reason for their support, one considers the presence of the unusable stand an impediment to the normal operation of the racecourse, and the other that it is redundant and of little heritage value. Of those which oppose the application, three primarily highlight the heritage significance of the building, one the environmental impact of the demolition, and one what they believe to be procedural shortcomings in the application (specifically in the Assessment of Environmental Effects). Those who make a heritage argument for retention of the building make a perfectly valid point. The procedural shortcomings of the application may or may not be the case. Both might be germane factors if heritage significance (or the loss thereof) were the decisive factor. I do not dispute the heritage significance of the Grandstand, and consider that it would still embody all ascribed heritage values if repaired in line with the applicant's methodology. Council District Plan policy however determines that heritage significance is not the sole arbiter of demolition. Financial considerations also carry (equal) weight, and in this case are, I believe, the decisive factor. This is set out below.

#### **4.0 Heritage and Financial Assessments**

- 4.1 District Plan Objective 9.3.2.1.1 (a) (iii) acknowledges that in some situations demolition [of a scheduled heritage item] may be justified by reference to the matters in Policy 9.3.2.2.8 (a). This policy requires that Council have regard to a number of factors when considering the appropriateness of a demolition of a scheduled heritage item. The most relevant of these in relation to the proposed demolition of the Grandstand are:
- whether the extent of the work required to retain and/or repair the heritage item is of such a scale that the heritage values of the heritage item would be significantly compromised;

- whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable.

4.2 The demolition of an intact heritage item is to be avoided as it results in the permanent loss of that item and the heritage values that it embodies. Where a damaged heritage item is proposed for demolition, it is necessary in the first place to determine if a reasonable repair strategy will maintain or reinstate its heritage values at a level sufficient for the item to remain scheduled. If such a strategy will either diminish an item's heritage values to the point where they no longer meet this threshold, or cannot restore those values to the required level, then the item's heritage values may be said to be significantly compromised. Demolition may then be considered to be an appropriate alternative course of action to repair.

4.3 To be scheduled as a heritage item on the Council Heritage Schedule, the heritage values that an item represents must meet the significance threshold set out in Policy 9.3.2.2.1. In the case of a Highly Significant heritage item, this means having a high degree of authenticity and a high degree of integrity. The ICOMOS New Zealand Charter 2010 (p.9) defines authenticity as the credibility or truthfulness of the surviving evidence and knowledge of the cultural heritage value of a place. The Charter (p.10) defines integrity as the wholeness or intactness of a place, including its meaning and sense of place, and all the tangible and intangible attributes and elements necessary to express its cultural heritage value.

4.4 The damage sustained by the Grandstand as a consequence of the Canterbury Earthquake Sequence has not impacted the heritage values ascribed to it. If the building undergoes the required seismic upgrade though, its architectural and aesthetic values will be impacted. Is that impact sufficient to prevent those values meeting the significance threshold? Proposed change to the interior is substantial but may be discounted in terms of impact on values because those spaces are utilitarian, have undergone considerable change over time, and were not a key factor in determining the overall significance of the building. These interior spaces are also not protected in the District Plan. Proposed change to the exterior is confined primarily to the south elevation, where up to half the distinctive windows will require modification, and the large ramps will be removed. In my opinion the primary functional relationship of the Grandstand however is with the race track on its north side, and neither the main (north) elevation nor the side (east and west) elevations are proposed for intrusive alteration. The Grandstand will still present largely as the Luttrells designed it. I would argue therefore that the alteration is insufficient to prevent the authenticity element of the significance threshold being met across all values. And although the upgraded Grandstand will be less intact than it was, I believe that it would still have more than sufficient integrity to express the building's values at a high level. So if the proposed repair and seismic upgrade is undertaken, I believe the Grandstand will definitively maintain its heritage values at a level sufficient for the building to remain a highly significant heritage item on the District Plan. I note that the applicant's heritage consultant reached a similar conclusion.

4.5 The other key factor in considering whether demolition is an appropriate course of action is whether the costs to retain the heritage item would be unreasonable. The



application states that the seismic upgrade is, as costed, uneconomic. As noted earlier, the Club states that even had the insurance settlement been equitably distributed across all damaged buildings on the racecourse site, it would have met less than half the cost of upgrading the Grandstand – which (as per the McKay Lang cost estimates) at 34% NBS would have meant a minimum of \$7.5 million, and at 64%NBS, \$9 million.

- 4.6 Regarding grants, of those three schemes which the Club has investigated and for which it is theoretically eligible, two (the Christchurch City Council Heritage Incentive Grant, and Lotteries Environment and Heritage Fund) would clearly be insufficient to make a substantive difference to the scale of the insurance shortfall. The third scheme – the Lotteries Significant Projects Fund – would potentially get the Club closer to making good the shortfall as it has awarded large sums of up to \$4.5M in recent years. In a very best case scenario however, such a grant would still leave the Club to find not less than \$3M or \$4.5M (depending on nominated %NBS). It is also unclear if (given its traditionally occasional use) the Grandstand would be considered to be of sufficient community benefit to be eligible. I am not aware of any alternate mainstream grant schemes which the Club has not investigated.
- 4.7 Additionally, the Club states that the Grandstand is functionally redundant – in that a facility of this type and scale is no longer required to accommodate race day crowds - and that there is limited opportunity to find a viable adaptive use for the structure given its very specific form, function and location. Given the substantial costs involved, the lack of obvious opportunity to access alternative funding sources, the redundancy of the structure and lack of any obvious viable alternative reuse, I accept that the costs of repair are unreasonable.

## **5.0 Other Considerations**

- 5.1 If consent is granted and demolition proceeds, the applicant indicates that in the longer term a new more modestly-scaled stand will be constructed on site. As mitigation they suggest that features and materials (such as doors and windows) from the Grandstand could be extracted for re-use in the new structure and potentially in other structures at the racecourse. This is supported; condition 7.1 addresses this.
- 5.2 In mitigation the applicant proposes to have the demolition of the Grandstand photographically recorded. A condition is offered. This is supported; see condition 7.2 below.
- 5.3 In mitigation the applicant proposes on-site interpretation telling the story of the Grandstand. A condition is offered. This is supported; see condition 7.3 below.

## **6.0 Conclusion**

The Riccarton Racecourse Public Grandstand sustained some damage in the Canterbury Earthquake Sequence and is considered to be earthquake-prone. As a consequence, the applicant (The Canterbury Jockey Club) is seeking consent for full demolition. The proposal will necessarily result in a complete and total loss

of heritage fabric, with a corresponding loss of associated heritage values and significance. On one hand I consider that a reasonable repair proposal would not compromise the integrity and authenticity of the structure such that it would be unable to represent ascribed heritage values to the degree required to maintain it on the district's heritage schedule. The effects of demolition on heritage values are therefore substantial. On the other hand, on the basis of evidence provided regarding viability, I believe that the costs of repairing the item are clearly unreasonable. Despite the deleterious effect of demolition on heritage values therefore, I regretfully accept that demolition is the only reasonable option. I recommend that consent be granted subject to the following conditions:

## **7.0 Conditions**

- 5.4 Prior to the letting of the contract for demolition, the consent holder will submit to the Council Heritage Team Leader or nominee for discussion and agreement, 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.
- 5.5 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 8.2 below.
- 5.6 In advance of the commencement of any new building or structure on the Grandstand site, the consent holder will submit to the Heritage Team Leader or nominee for discussion and certification, a scheme for interpreting the history of the former Grandstand in proximity to that site.

## **8.0 Advice Notes**

- 5.7 Information being submitted in relation to this consent is to be sent by email to rcmon@ccc.govt.nz. The current nominated Council Heritage Advisor for this consent is Gareth Wright (941 8026; gareth.wright@ccc.govt.nz). Alternatively contact Amanda Ohs (941 8292; amanda.ohs@ccc.govt.nz).
- 5.8 For reasons of comparison, photographs should be taken of and from the same locations on each occasion. Photographs should be labelled with location, date and photographer's name, and submitted as individual image files with a plan showing photograph locations. They can be submitted to the nominated Council Heritage Team contact on a memory stick, or electronically by either email (noting that Council's email data transfer limit is 20MB per email) or file sharing service such as wetransfer.com or dropbox.com to rcmon@ccc.govt.nz.

Gareth Wright  
Heritage Advisor  
22 June 2022

Reviewed by:  
Amanda Ohs  
Senior Heritage Advisor  
22 June 2022

# Appendix 3

Engineering Advice (Stephen Hogg, Aurecon)

2022-07-01

Odette White  
Senior Planner  
Christchurch City Council  
53 Hereford St  
Christchurch 8154

Dear Odette

**Riccarton Racecourse Grandstand Demolition – Technical Advice on Earthquake Damage, Repair and Strengthening reports**

You have requested that Aurecon provide technical advice on whether the AECOM reports are reasonable/plausible and that they have not drastically overblown or inflated the extent of damage and work needed to repair/seismically upgrade the building to a point where it could be re-used as a grandstand again.

**1 Scope of Review**

You have requested a short-written report that provides general comment on the following questions:

- Are the AECOM reports on the extent of damage & repair/strengthening concepts plausible and reasonable?
- Is it likely that an alternative repair/strengthening scheme could be devised that would drastically reduce the extent of work and associated cost to return the building to use?

To enable Aurecon to complete this task you have provided relevant reports for our review to assist us to form our opinions. The reports we have reviewed are as follows,

- RMA20213921 Intrusive\_Investi~n\_Report\_-\_Grand\_National\_REV1
- RMA20213921 Grand\_National\_Stand\_DDE\_DRAFT
- RMA20213921 Further Information – collated
- RMA20213921 Detailed Damage Evaluation
- RMA20213921 Damage Assessment Report
- RMA20213921 Conceptual Retrofit Scheme to 34NBS
- RMA20213921 Application - Plans for Processing – DRAFT
- RMA20213921 Appendix 2 Seismic Impact Assessment
- RMA20213921 Application - Plans for Processing – DRAFT
- 132039.00 Determination of the Questions 2.1(a) 2.1(b)Draft\_25 Sept 2017 (Holmes Strengthening Concept to 34% NBS)

## 2 Suitability to Provide Technical Advice

I am a chartered professional Engineer with 30 years' experience in structural design and construction of new structures, assessment of existing structures and building strengthening. I am resident and have been working in Christchurch since 2011 and am familiar with the structural assessment, repair and strengthening of earthquake damaged buildings. I consider I am appropriately experienced to understand and interpret the reports prepared by other consultants in relation to the earthquake damage observations and concept repair options for the Riccarton Racecourse Grandstand. I have relied on the accuracy of the structural analysis and building damage observations completed by AECOM when preparing this report. I have also visited the site to better understand the damage to the building and strengthening options available.

## 3 Site Visit Observations

We have visited the site on 29 June 2021. Our visit involved a walk through the main room areas building at each level observing exposed concrete surfaces to develop an understanding of the extent of observable cracking damage. We also walked out onto the upper bleacher level to observe the roof, timber flooring and rear concrete wall. Our observations did not identify any significant effect of foundation settlement or all the cracking damage as reported by AECOM as we did not explore all areas of the building. Our immediate observations did not give the impression of an extensively earthquake damaged building, however we consider this is a misleading initial observation when comparing the extensive damage observations recorded and photographed by AECOM.

## 4 Review of AECOM Reports

AECOM have provided extensive building damage observations and exhaustive structural analysis to evaluate the existing seismic capacity and determine the conceptual scope of strengthening works to achieve 34%NBS and 67% NBS retrofit strengthening capacities. The strength capacity of individual elements included within the AECOM structural analysis has relied on intrusive investigations to determine the strength of beams, columns, and walls as there was no existing information that describes how the building was originally constructed. These investigations and subsequent analysis have identified the existing structure has an undamaged seismic capacity in the order of 15% NBS as an Importance Level 3 building. Based on our review of the AECOM intrusive investigations reports and assessment of the analysis methodology used to evaluate the existing structure we consider the %NBS determined to be reliable.

In addition to the seismic assessment AECOM have evaluated the gravity and wind capacities of several important parts of the structure with the capacity limitations described below. These elements are rated compared to their required capacity based on the NZS1170 loading code which is used for design of in-service loads.

- Roof and supporting steel columns for gravity and wind loading – No wind uplift capacity except self-weight as a counterweight to uplift. Snow load is not evaluated in addition to gravity self-weight loading. This will be a worst-case gravity loading scenario.
- Upper Stand and Bleacher Stairs for gravity loading – Reported to achieve 90% code requirements but locally limited to 75% due to a building modification undertaken in 1981.
- Floor supporting beams – Reported as limited to 70% capacity for only 2.0KPa live loading. We note floors should be capable of 5%KPa as required for code compliance with live loading consistent with crowd loading. This equates to approximately 30% of the necessary capacity required for code compliance for in-use live loads.
- Lower stand framing – Reported as limited to 60% for 5 KPa live loading applied for in-use live loads.

## 5 Reply to CCC Questions

- Question 1 - Are the AECOM reports on the extent of damage & repair/strengthening concepts plausible and reasonable?

The primary damage to the building is cracking damage which in part appears to be pre-existing and has either been exacerbated or caused by the Canterbury earthquake sequence. The cracking damage is repairable and, in our opinion, forms a smaller component of the scope of the overall repair/strengthening concept.

The building repair will require all cracking damage to be repaired then for the major part of the scope the building will need to be strengthened to be suitable for use as an importance level 3 structure suitable for crowd loading. We are of the opinion that this can be no less than 67% NBS for seismic loading. All gravity, wind and snow loaded components should also meet 100% of the loading required by NZS1170 to be suitable and safe for in service use.

The building was designed and constructed circa 1920. This was prior to any code guidance for how reinforced concrete structures should be detailed to perform well in seismic events. A consequence is the reinforced concrete frames and walls are poorly detailed to resist seismic demands so cannot be relied on for any significant contribution to the overall existing seismic capacity of the structure. Because of this an entirely new retrofitted seismic structure in the longitudinal and transverse directions is required to provide the necessary seismic capacity to achieve a minimum of 34% NBS. Ideally this should be designed to achieve 67% NBS or higher to recognise a lower risk to life safety.

AECOM have developed concept strengthening schemes to meet 34% NBS and 67% NBS respectively. Both concepts use new retrofitted reinforced concrete frames in each direction to provide sufficient seismic capacity to meet each seismic demand threshold. The frames are positioned in each direction to limit the floor diaphragm demands and provide a reliable load path to the foundations. It would be expected that a more detailed evaluation of the floor diaphragms would result in further strengthening of load paths to the new frames which would increase the scope of retrofit strengthening.

We consider the AECOM reporting of damage & repair/strengthening concepts are plausible and reasonable. In addition to the structural seismic strengthening scope of work we would expect the extent of crack injection and concrete repair, repair and replacement of timber bleacher framing, gravity structure and wind load strengthening to be included with the overall scope and cost of strengthening works.

- Question 2 - Is it likely that an alternative repair/strengthening scheme could be devised that would drastically reduce the extent of work and associated cost to return the building to use?

An alternative strengthening concept design to 34%NBS dated 31 July 2017 has been prepared by Holmes Consulting LP. Holmes has used a similar philosophy by providing an alternate concept using a series of steel 'V' braced frames in the longitudinal and transverse directions located over new shear walls and foundations between ground floor and level 1. Holmes have used a similar philosophy to AECOM by providing a new retrofitted seismic resisting structure to achieve seismic capacity in each direction without reliance of strength contribution from the existing structure.

The Holmes concept to 34% NBS can be compared to the AECOM concept to 34% NBS. Both concepts use a similar philosophy to strengthen the building and, in our opinion, this is a correct approach and will be comparable for scope of work and cost.

The methodology for strengthening the Riccarton Grandstand requires a complete new retrofitted structure to resist seismic loads. Both AECOM and Holmes have provided concept strengthening schemes that provide the minimum scope of work required to achieve 34%NBS. In our opinion a minimum of 67% NBS or higher should be targeted in addition to upgrading the structure for gravity and wind loading.

We do not believe there is an alternative repair/strengthening scheme which could be devised that would drastically reduce the extent of work and associated cost to return the building to use.

Yours sincerely,



Stephen Hogg BE (Civil), CPEng, IntPE, MIPENZ.

**Technical Director**

**DDI Phone:** (03) 371 2042

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# Appendix 4

District Plan Objectives and Policies

## Heritage

### 9.3.2.1.1 Objective - Historic heritage

- a. The overall contribution of historic heritage to the Christchurch District's character and identity is maintained through the protection and conservation of significant historic heritage across the Christchurch District in a way which:
  - i. enables and supports:
    - A. the ongoing retention, use and adaptive re-use; and
    - B. the maintenance, repair, upgrade, restoration and reconstruction; of historic heritage; and
  - ii. recognises the condition of buildings, particularly those that have suffered earthquake damage, and the effect of engineering and financial factors on the ability to retain, restore, and continue using them; and
  - iii. acknowledges that in some situations demolition may be justified by reference to the matters in Policy 9.3.2.2.8.

### 9.3.2.2.1 Policy - Identification and assessment of historic heritage for scheduling in the District Plan

- a. Identify historic heritage throughout the Christchurch District which represents cultural and historic themes and activities of importance to the Christchurch District, and assess their heritage values for significance in accordance with the criteria set out in Appendix 9.3.7.1.
- b. Assess the identified historic heritage in order to determine whether each qualifies as 'Significant' or 'Highly Significant' according to the following:
  - i. to be categorised as meeting the level of 'Significant' (Group 2), the historic heritage shall:
    - A. meet at least one of the heritage values in Appendix 9.3.7.1 at a significant or highly significant level; and
    - B. be of significance to the Christchurch District (and may also be of significance nationally or internationally), because it conveys aspects of the Christchurch District's cultural and historical themes and activities, and thereby contributes to the Christchurch District's sense of place and identity; and
    - C. have a moderate degree of authenticity (based on physical and documentary evidence) to justify that it is of significance to the Christchurch District; and
    - D. have a moderate degree of integrity (based on how whole or intact it is) to clearly demonstrate that it is of significance to the Christchurch District.
  - ii. to be categorised as meeting the level of 'Highly Significant' (Group 1), the historic heritage shall:
    - A. meet at least one of the heritage values in Appendix 9.3.7.1 at a highly significant level; and
    - B. be of high overall significance to the Christchurch District (and may also be of significance nationally or internationally), because it conveys important aspects of the Christchurch District's cultural and historical themes and activities, and thereby makes a strong contribution to the Christchurch District's sense of place and identity; and
    - C. have a high degree of authenticity (based on physical and documentary evidence); and
    - D. have a high degree of integrity (particularly whole or intact heritage fabric and heritage values).
- c. Schedule significant historic heritage as heritage items and heritage settings where each of the following are met:
  - i. the thresholds for Significant (Group 2) or Highly Significant (Group 1) as outlined in Policy 9.3.2.2.1 b(i) or (ii) are met; and
  - ii. in the case of interior heritage fabric, it is specifically identified in the schedule;
    - unless
  - iii. 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
  - iv. 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.

### 9.3.2.2.3 Policy - Management of scheduled historic heritage

- a. Manage the effects of subdivision, use and development on the heritage items, heritage settings and heritage areas scheduled in Appendix 9.3.7.2 and 9.3.7.3 in a way that:
  - i. provides for the ongoing use and adaptive reuse of scheduled historic heritage in a manner that is sensitive to their heritage values while recognising the need for works to be undertaken to accommodate their long term retention, use and sensitive modernisation and the associated engineering and financial factors;
  - ii. recognises the need for a flexible approach to heritage management, with particular regard to enabling repairs, heritage investigative and temporary works, heritage upgrade works to meet building code requirements, restoration and reconstruction, in a manner which is sensitive to the heritage values of the scheduled historic heritage; and
  - iii. subject to i. and ii., protects their particular heritage values from inappropriate subdivision, use and development.
- b. Undertake any work on heritage items and heritage settings scheduled in Appendix 9.3.7.2 in accordance with the following principles:
  - i. focus any changes to those parts of the heritage items or heritage settings, which have more potential to accommodate change (other than where works are undertaken as a result of damage), recognising that heritage settings and Significant (Group 2) heritage items are potentially capable of accommodating a greater degree of change than Highly Significant (Group 1) heritage items;
  - ii. conserve, and wherever possible enhance, the authenticity and integrity of heritage items and heritage settings, particularly in the case of Highly Significant (Group 1) heritage items and heritage settings;
  - iii. identify, minimise and manage risks or threats to the structural integrity of the heritage item and the heritage values of the heritage item, including from natural hazards;
  - iv. document the material changes to the heritage item and heritage setting;
  - v. be reversible wherever practicable (other than where works are undertaken as a result of damage); and
  - vi. distinguish between new work and existing heritage fabric in a manner that is sensitive to the heritage values.

### 9.3.2.2.5 Policy - Ongoing use of heritage items and heritage settings

- a. Provide for the ongoing use and adaptive re-use of heritage items and heritage settings scheduled in Appendix 9.3.7.2 (in accordance with Policy 9.3.2.2.3), including the following:
  - i. repairs and maintenance;
  - ii. temporary activities;
  - iii. specific exemptions to zone and transport rules to provide for the establishment of a wider range of activities;
  - iv. alterations, restoration, reconstruction and heritage upgrade works to heritage items, including seismic, fire and access upgrades;
  - v. signs on heritage items and within heritage settings; and
  - vi. new buildings in heritage settings.

### 9.3.2.2.8 Policy - Demolition of heritage items

- a. When considering the appropriateness of the demolition of a heritage item scheduled in Appendix 9.3.7.2 have regard to the following matters:
  - i. whether there is a threat to life and/or property for which interim protection measures would not remove that threat;
  - ii. whether the extent of the work required to retain and/or repair the heritage item is of such a scale that the heritage values and integrity of the heritage item would be significantly compromised;
  - iii. whether the costs to retain the heritage item (particularly as a result of damage) would be unreasonable;
  - iv. the ability to retain the overall heritage values and significance of the heritage item through a reduced degree of demolition; and
  - v. the level of significance of the heritage item.

## Open Space

### 18.2.1.1 Objective - Provision of open spaces and recreation facilities

- a. A network of open spaces and recreation facilities that:
    - i. provides a diversity in the type and size of open spaces and recreation facilities to meet the current and future recreation, cultural, health and wellbeing needs of the community;
    - ii. contributes to the earthquake recovery of Christchurch and revitalised communities where people enjoy a high quality urban environment and enhanced opportunities for recreation;
    - iii. is accessible and distributed to meet the demands generated by population growth, urban intensification and areas of identified deficiency;
    - iv. provides users with a pleasant and safe environment;
    - v. enables temporary and multifunctional uses;
    - vi. maintains and enhances amenity values, connectivity and public access, where appropriate;
    - vii. recognises and provides for the historic and contemporary relationship of Ngāi Tahu with Christchurch District's land and water resources, and reflects their cultural values;
    - viii. recognises and provides for the district's indigenous biodiversity; and
    - ix. maintains and enhances public access to and along the coast.
-



### 18.2.1.3 Objective - Character, quality, heritage and amenity

- a. Activities, buildings and structures within open spaces are of a scale, form and design which:
  - i. maintain the predominance of open space, except for sites specifically dedicated to a more intense built development of recreation facilities, sports or community facilities;
  - ii. are compatible with the role and anticipated use of the open space, acknowledging that metropolitan facilities sites may contain large scale built development;
  - iii. in the case of Naval Point marine recreation area, support the existing function of the site and maintain public access to recreational boating activities and facilities;
  - iv. are integrated and consistent with the character of the surrounding area;
  - v. minimise adverse effects on adjoining land uses and the surrounding environment's ecological, landscape and natural values, historic heritage values and amenity values, both within and outside the open space;
  - vi. support the Garden City character of urban Christchurch and the heritage and natural setting of Banks Peninsula townships and settlements;
  - vii. recognise and provide for cultural heritage and the culture, traditions and relationship of Ngāi Tahu mana whenua with their ancestral lands, water, sites, wāhi tapu and other taonga; and
  - viii. protect the heritage values and visual landscape characteristics of Hagley Park and its primary function for outdoor active and passive recreation activities and sporting activities.
- b. Heritage open spaces are recognised, maintained and protected.

### 18.2.2.1 Policy - The role of open space and recreation facilities

- a. Provide, restore and enhance a network of private and public open spaces and recreation facilities that cater for a range of roles, functions and activities as identified in Table 18.2.2.1 below.
- b. Avoid activities that do not have a practical or functional need to be located within open space.
- c. Provide for the redevelopment of privately owned open spaces no longer required for recreation activities in accordance with the rules of the zone most compatible with the surrounding environment.
- d. Maintain and enhance, where appropriate, public access connections to walking and cycling track networks, and recognise and provide for collaborative projects by multiple parties.

b.	Open Space Metropolitan Facilities Zone	<p>These spaces accommodate public and private major sports facilities, larger recreation facilities, marine recreation facilities, and motorised sports facilities on sites that provide:</p> <ol style="list-style-type: none"> <li>i. Sufficient land area to accommodate large scale buildings and structures, car and cycle parking areas and, where necessary, buffer areas to minimise reverse sensitivity;</li> <li>ii. Sufficient area to facilitate marine recreation activities, recreational boating and associated facilities while maintaining and enhancing public access to the coastal marine area for recreation;</li> <li>iii. Capacity for multifunctional use, co-location of complementary or compatible activities and for hosting city, regional, national and international events which provide entertainment to residents and visitors;</li> <li>iv. At the Yaldhurst Recreation and Sports Facility, at 466-482 Yaldhurst Road, a multi-disciplinary sports hub of a nature and scale that are complementary to the remainder of the sports facilities network in the City, while ensuring that potentially adverse effects of development are appropriately mitigated, including effects of traffic on the operation of SH73 (Yaldhurst Road) and SH71 (Russley Road).</li> </ol>
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### 18.2.2.5 Policy - Environmental effects

- a. Ensure activities and the scale, layout, and design of open spaces and/or the facilities within them are appropriate to the locality and context, and any adverse effects on the amenity values of neighbours, Ngā Tahu cultural values, conservation activities and programmes, and the wider community are managed, through:
    - i. providing sufficient separation distances and limiting the height of buildings;
    - ii. limiting the floor area and site coverage;
    - iii. requiring landscaping and screening;
    - iv. mitigating adverse noise, glare, dust and traffic effects;
    - v. restricting the types, duration, hours of operation and frequency of activities;
    - vi. minimising disturbance of natural landforms, cultural landscapes identified in the District Plan, ecosystems or indigenous biodiversity, including fauna habitats;
    - vii. avoiding impacts on mahinga kai;
    - viii. requiring building setbacks from the banks of water bodies;
    - ix. encouraging the planting and maintenance of indigenous vegetation in the setback margins of water bodies; and
    - x. controlling the volume and depth of filling and excavation within the water body setbacks, and removal of vegetation.
  - b. Ensure the scale, layout, and design of facilities, buildings and structures is consistent with the role and function of the open space, and its anticipated level of spaciousness and character.
  - c. Minimise potential impacts of development within the open space zones on the operation of the Christchurch International Airport by avoiding development which could give rise to reverse sensitivity effects.
  - d. Protect the National Grid and identified electricity distribution lines by avoiding buildings, structures and sensitive activities in the open space zones within setback corridors.
- 

## Earthworks

### 8.2.4 Objective - Earthworks

- a. Earthworks facilitate subdivision, use and development, the provision of utilities, hazard mitigation and the recovery of the district.

#### 8.2.4.1 Policy - Water quality

- a. Ensure earthworks do not result in erosion, inundation or siltation, and do not have an adverse effect on surface water or groundwater quality.

#### 8.2.4.2 Policy - Repair of earthquake damaged land

- a. Facilitate recovery by enabling property owners to make repairs to earthquake damaged land for residential purposes, where the repairs will have acceptable adverse effects on people, property and the natural environment.
- b. Recognise the need for the repair of other earthquake damaged land as part of recovery.

#### 8.2.4.3 Policy - Benefits of earthworks

- a. Recognise that earthworks are necessary for subdivision, use and development, the provision of utilities, hazard mitigation and the recovery of the district.

#### 8.2.4.4 Policy - Amenity

- a. Ensure, once completed, earthworks do not result in any significant shading, visual impact, loss of privacy or other significant detractor from the amenity values enjoyed by those living or working in the locality.

### 8.2.5 Objective - Earthworks health and safety

- a. People and property are protected during, and subsequent to, earthworks.

#### 8.2.5.1 Policy - Land stability

- a. Avoid earthworks that will create a significant risk to people and property through subsidence, rockfall, cliff collapse, erosion, inundation, siltation or overland flows.
-

### 8.2.5.2 Policy - Nuisance

- a. Subject to [Policy 8.2.4.3](#), ensure that [earthworks](#) avoid more than minor adverse effects on the health and safety of people and their property, and do not generate continuous or persistent noise, vibration, dust or odour nuisance.

### 8.2.5.3 Policy - Vehicle movement

- a. Subject to [Policy 8.2.4.3](#), ensure that the transportation to and from a [site](#) of earth, construction or [filling](#) material is safe and minimises adverse transport network and local [amenity value](#) effects.

### 8.2.5.4 Policy - Earthworks design

- a. Ensure that [earthworks](#) over identified thresholds are designed to enable the anticipated land use.

### 8.2.5.5 Policy - Management of contaminated land

- a. Enable [earthworks](#) where necessary to appropriately manage land contamination.
- 

## Protected Trees

### 9.4.2.1.1 Objective - Trees

- a. Maintain and enhance the contribution of the [Christchurch District's](#) significant trees listed in [Appendix 9.4.7.1](#), and trees in [road corridors](#), parks, [reserves](#) and [public open space](#), to community amenity through:
    - i. landscape character and amenity;
    - ii. heritage and cultural values;
    - iii. purification of air and rainwater;
    - iv. releasing oxygen and storing carbon;
    - v. cooling of the built environment and waterways;
    - vi. stormwater and erosion management; and
    - vii. biodiversity protection and enhancement;
 while providing for the reasonable use and enjoyment of property and landowner responsibilities.
- 

### 9.4.2.2.3 Policy - Tree protection

- a. Protect from inappropriate physical works:
    - i. trees that are listed in [Appendix 9.4.7.1](#), particularly those trees identified as having exceptional values; and
    - ii. trees in [road corridors](#), parks, [reserves](#) and [public open space](#) where they provide [amenity value](#) and/or collectively contribute to the character and environmental quality of the [Christchurch District](#), to the extent consistent with maintaining the multiple functions of [road corridors](#), parks, [reserves](#) and [public open space](#).
- 

## Waterways

### 6.6.2.1 Objective - Protection of water bodies and their margins from inappropriate use and development

- a. Activities and development in [water body margins](#) are managed in a way that protects and/or enhances the following values and functions of the [water body](#) and its margins: flood management; water quality; riparian or aquatic ecosystems; the natural character and [amenity values](#) of the [water body](#); [historic heritage](#) or cultural values; and access where appropriate for [recreation activities](#), customary practices including mahinga kai, or maintenance.
-

# Appendix 5

Heritage Statement of Significance (District Plan)

**DISTRICT PLAN – LISTED HERITAGE PLACE  
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE  
*RICCARTON RACECOURSE AND SETTING –  
171 RACECOURSE ROAD, CHRISTCHURCH***

The Canterbury Jockey Club 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 thereafter leased to the Jockey Club. Consequently the course 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 and the course's Cup and Show Week each November are one of the city's premier events.

Riccarton Racecourse has two scheduled buildings that contribute to its historic character: the Tea House (1903) and the Public Grandstand (1920-23). Both were designed by Alfred and Sidney Luttrell, local architects who specialised in racecourse building design and gained many of their commissions through Sidney's involvement in numerous racing and jockey clubs. The Tea House was one of the Luttrells' first commissions after they arrived in New Zealand from Tasmania. While the Public Grandstand was the firm's most visible contribution to the course they also carried out a number of other projects at Riccarton over a 20-year period.

The successful restoration of the Tea House was recognised by the NZ Institute of Architects and the Christchurch Civic Trust in 2009. Both the Tea House and Public Grandstand remain in use today.



**DISTRICT PLAN – LISTED HERITAGE PLACE  
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE  
HERITAGE ITEM NUMBER 452  
*RICCARTON RACECOURSE TEA HOUSE AND SETTING – 171  
RACECOURSE ROAD, CHRISTCHURCH***



**PHOTOGRAPH: M.VAIR-PIOVA, 2014**

### **HISTORICAL AND SOCIAL SIGNIFICANCE**

*Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.*

The Tea House at Riccarton Racecourse has high historical and social significance for its association with the Canterbury Jockey Club and the early colonial origins of horse racing in Canterbury. The Canterbury Jockey Club has had the oldest continuous existence of any horse racing club in the country (est. 1854). It was holding race meetings at the Riccarton course by c1856. The Tea House, which was built in 1903 at a cost of £1,500, was part of a programme of improvements to mark the 1904 Golden Jubilee of the club. It was the first of a number of projects undertaken on the course by the Luttrell Brothers, who were racecourse specialist architects. Historically the Tea House was primarily used by women attending club meetings, as they were denied access to the Members' stands where alcohol was served. Women were however able to bet and a totalisator room was included within the design.

The Tea House remained in use as a function centre for some 70 years, before becoming outmoded and falling into a state of disrepair. It remained empty for more than a decade but in the late 1990s a committee was formed to save the building and a charitable trust established in 2003 oversaw its restoration and conservation. Repair work began in 2006 and the Tea House reopened in 2008. The building restoration project was commended by

both the NZ Institute of Architects and the Christchurch Civic Trust in 2009. The building now functions as a venue for hire.

## **CULTURAL AND SPIRITUAL SIGNIFICANCE**

*Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.*

The Tea House has high cultural significance for its association with the way of life of those colonists who introduced horse racing to Canterbury in the 1850s and then helped to develop the racing industry and establish New Zealand Cup Week as an integral part of the city's identity. It is also a reminder of the cultural mores which saw women and men segregated at such events according to socially acceptable conventions of the period. Its restoration in the late 2000s was acclaimed by the architectural profession and by the heritage community.

## **ARCHITECTURAL AND AESTHETIC SIGNIFICANCE**

*Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.*

The Tea House has high architectural and aesthetic significance as a rare Edwardian racecourse tea house. It was designed by Alfred and Sidney Luttrell, early 20<sup>th</sup> century Christchurch architects who specialised in the design of racecourse grandstands and associated buildings. The Luttrells also designed the Public Grandstand (1920-23) adjacent to the Tea House and were the architects of the Canterbury Jockey Club's former central-city office building in Oxford Terrace (1912, demolished). The Luttrell Brothers are renowned for introducing the Chicago skyscraper to New Zealand in the first decade of the 20<sup>th</sup> century and providing architectural services to the Catholic Diocese of Christchurch. As a number of their landmark buildings have been demolished since the 2010 and 2011 Canterbury earthquakes, the Tea House has further significance as a surviving example of the Luttrells' oeuvre, particularly from the first five years of their New Zealand practice.

The Tea House is a single-storey timber building with a wide, encircling veranda that faces north, towards the racetrack. The central portion of the building has a hipped roof, framed by side bays topped with turret roofs. The symmetry of Tea House's façade is reinforced by the gabled entry that projects forward of the veranda. Stylistically the building may be compared to a pavilion style design with its symmetry and wide connecting veranda. In 1907 the Luttrells called tenders for additions to the tearooms at Riccarton, which may have involved adding a ventilator to the eastern wing of the building to serve a training room for apprentice jockeys. Later unsympathetic additions and alterations were removed when the building was refurbished in the late 2000s. This is the only racecourse tea house listed by Heritage New Zealand. It is comparable to the Edwardian tea houses erected in the Rotorua (1903) and Te Aroha (1908) Domains but has rarity value because of its function to provide refreshments for racegoers.

## **TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE**

*Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.*

The Tea House has technological and craftsmanship significance for the potential it has to reveal information about Edwardian timber frame and weatherboard construction, materials, fixtures and fittings. It has craftsmanship detail relating to the decorative elements of the original veranda posts and entry canopy, although some of this has been replicated and reinstated during its restoration.

## **CONTEXTUAL SIGNIFICANCE**

*Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.*

The Tea House and its setting have high contextual significance within the environs of the Riccarton Park Raceway, particularly in relation to the Public Grandstand. Originally the Tea House was sited on a landscaped area surrounded by a moat. The moat created an island on which the Tea House sat and access to the building was via a bridge. The new landscaping has removed much of this but has left a depressed area in order to read the original setting. The contemporary landscaping around the Tea House, which was shown in a plan of the course published in October 1903, includes a moat and mature trees, many of which are listed. The racecourse has a considerable number of notable buildings, including the restored totalisator building, gates and stables. The immediate setting of the Tea House includes its landscaped garden setting, its moat, of which approximately two-thirds remains intact, and the Public Grandstand to the east.

## **ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE**

*Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.*

The Tea House and its setting 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. Although the Tea House was not erected until 1903, the Canterbury Jockey Club has operated on this site since c.1856.

## **ASSESSMENT STATEMENT**

The Tea House and its setting at Riccarton Park Raceway has high overall significance to Christchurch, including Banks Peninsula. The Tea House has high historical and social

significance for its association with the Canterbury Jockey Club and the Club's Golden Jubilee. The Tea House has high cultural significance for its association with the culture of the racing industry and the provision of amenities for female racegoers. The building has high architectural and aesthetic significance for its association with leading Canterbury architects, the Luttrell Brothers, who were nationally renowned for racecourse buildings. The rarity of this building type in New Zealand and the quality of the restoration also enhance its architectural significance. The Tea House has technological and craftsmanship significance for the potential it has to reveal information about Edwardian timber frame and weatherboard construction, materials, fixtures and fittings. The Tea House and its setting have high contextual significance on account of the landscaped grounds and in relation to other structures on the racecourse, especially the Public Grandstand of 1920-23. The Tea House and its setting 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.

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**REPORT DATED: 2 MARCH, 2015**

PLEASE NOTE THIS ASSESSMENT IS BASED ON INFORMATION AVAILABLE AT THE TIME OF WRITING. DUE TO THE ONGOING NATURE OF HERITAGE RESEARCH, FUTURE REASSESSMENT OF THIS HERITAGE ITEM MAY BE NECESSARY TO REFLECT ANY CHANGES IN KNOWLEDGE AND UNDERSTANDING OF ITS HERITAGE SIGNIFICANCE.

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**DISTRICT PLAN – LISTED HERITAGE PLACE  
HERITAGE ASSESSMENT – STATEMENT OF SIGNIFICANCE  
HERITAGE ITEM NUMBER 453  
*RICCARTON RACECOURSE PUBLIC GRANDSTAND AND  
SETTING – 171 RACECOURSE ROAD, CHRISTCHURCH***



**PHOTOGRAPH: M.VAIR-PIOVA, 2014**

### **HISTORICAL AND SOCIAL SIGNIFICANCE**

*Historical and social values that demonstrate or are associated with: a particular person, group, organisation, institution, event, phase or activity; the continuity and/or change of a phase or activity; social, historical, traditional, economic, political or other patterns.*

The Public Grandstand at the Riccarton Racecourse has high historical and social significance for its association with the Canterbury Jockey Club (est. 1854) and its use as a sporting and recreational facility since 1923. The grandstand was designed by the Luttrell Brothers, one of New Zealand's foremost Edwardian architectural practices. The Canterbury Jockey Club's first race meeting was held in Hagley Park in Easter 1855 but by January 1857 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, which served the course until the mid-1950s.

By 1903 there were four stands at the racecourse, one of which, a timber stand, burnt down in 1919 and was replaced with the Public Grandstand. The Luttrell Brothers were members of the Canterbury Jockey Club and acted as both designers and contractors for the project. The cost of the grandstand was between £70,000 and £80,000 and it functioned as a

combined public and members' stand until a new members' stand was built in 1962 (demolished 2012). Since 1867 the course has been the home of the New Zealand Cup. The Public Grandstand, also known as the Grand National Stand, has social significance particularly in relation to the Cup Week held in November each year.

### **CULTURAL AND SPIRITUAL SIGNIFICANCE**

*Cultural and spiritual values that demonstrate or are associated with the distinctive characteristics of a way of life, philosophy, tradition, religion, or other belief, including: the symbolic or commemorative value of the place; significance to Tangata Whenua; and/or associations with an identifiable group and esteemed by this group for its cultural values.*

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, which is an integral part of the city's identity.

### **ARCHITECTURAL AND AESTHETIC SIGNIFICANCE**

*Architectural and aesthetic values that demonstrate or are associated with: a particular style, period or designer, design values, form, scale, colour, texture and material of the place.*

The Public Grandstand has high architectural significance or 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 1902 and 1932 they were the New Zealand specialists in the design of racecourse grandstands. As well as the Riccarton grandstand and a number of other buildings for the Canterbury Jockey Club, they designed grandstands at Addington (1912-17), Trentham (1919-25), Hastings (1913-14), Greymouth (1923), and Motukarara (1926) racecourses.

The Public Grandstand is a reinforced concrete structure with two tiers of seating and a rear elevation four storeys in height. The seating is protected by roofs carried on partly cantilevered steel trusses. The rear elevation of the building is dominated by concrete piers, mullioned windows and is accessed via prominent ramps. The structure is largely unornamented, its aesthetic qualities resting on the bold functional forms and structural details. An elevator shaft was added to the rear of the building in the 1980s when the Public Grandstand 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.

### **TECHNOLOGICAL AND CRAFTSMANSHIP SIGNIFICANCE**

*Technological and craftsmanship values that demonstrate or are associated with: the nature and use of materials, finishes and/or technological or constructional methods which were innovative, or of notable quality for the period.*

The Public Grandstand 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. The Luttrell Brothers were leaders in the early 20<sup>th</sup> use of concrete construction in New Zealand and also demonstrated their

engineering skills in structures such as the King Edward Barracks drill shed (1904-5 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 Public Grandstand.

## **CONTEXTUAL SIGNIFICANCE**

*Contextual values that demonstrate or are associated with: a relationship to the environment (constructed and natural), a landscape, setting, group, precinct or streetscape; a degree of consistency in terms of type, scale, form, materials, texture, colour, style and/or detail; recognised landmarks and landscape which are recognised and contribute to the unique identity of the environment.*

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

## **ARCHAEOLOGICAL AND SCIENTIFIC SIGNIFICANCE**

*Archaeological or scientific values that demonstrate or are associated with: the potential to provide information through physical or scientific evidence an understanding about social historical, cultural, spiritual, technological or other values of past events, activities, structures or people.*

The Public Grandstand 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. Although the grandstand was not erected until 1920-23, the Canterbury Jockey Club has operated on this site since c.1856.

## **ASSESSMENT STATEMENT**

The Public Grandstand 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 20<sup>th</sup> century use of reinforced concrete and steel truss construction, of which the Luttrells 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.

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