

Canterbury Jockey Club Inc

Demolition of the Heritage listed Grand
National Stand at Riccarton Racecourse



Riccarton Racecourse, 165 Racecourse
Road, Christchurch

Resource Consent Application to the
Christchurch Council



Planz Consultants

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APPLICATION FOR RESOURCE CONSENT
SECTION 88 OF THE RESOURCE MANAGEMENT ACT 1991

To: the Christchurch City Council

1. **Canterbury Jockey Club Inc** applies for **land use consent** for the following activity:

Demolish the heritage listed Grand National Stand at Riccarton Racecourse

The proposal is more fully described in the attached AEE and plans which form part of this application.

2. The site at which the proposed activity is to occur is as follows:

Address: Riccarton Racecourse, 165 Racecourse Road, Christchurch

Legal Description: Section 2 Survey Office Plan 534960

Area: 82.3566 hectares

3. The name of the owners and occupiers of the land to which the application relates are:

The Trustees of The Christchurch Racecourse

4. Listed Land Use Register: Environment Canterbury's Listed Land Use Register (LLUR) has identified this site as being contaminated or potentially contaminated from current or previous land use activity included on the Hazardous Substances and Industries List (HAIL). The provisions of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:SC) may need to be complied with.

An assessment of the proposal against the provisions of the NES:SC are contained in 6.3.

5. The Grand National Stand was constructed in 1923 and therefore does not require an Archaeological Authority from Heritage New Zealand Pouhere Taonga for works to, or removal of, the structure down to ground-level. The site has been used as a racecourse since 1857 and therefore an Authority is likely to be required for works that disturb the ground, including the removal of foundation footings. This will be applied for following a decision on this application.
6. In accordance with the Fourth Schedule of the Resource Management Act 1991 (as amended 3 March 2015), an assessment of the environment effects in the detail that corresponds with the scale and significance of the effects that the proposed activity may have on the environment is attached.
7. No other information is required to be included in this application by the District Plan, the Resource Management Act 1991, or any regulations made under that Act.

The required deposit will be paid upon receipt of the invoice.



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Resource Management Act 1991

Fourth Schedule

Assessment of Effects on the Environment

1 Introduction

Canterbury Jockey Club Inc (the Jockey Club) applies for resource consent (land use) to demolish the heritage listed Grand National Stand (the Grandstand) at Riccarton Racecourse. The Grandstand is a protected Heritage item, scheduled in the Christchurch City Council as a Highly Significant heritage item (item #453) and part of a Heritage setting (#183). The cleared area will be leveled and grassed until a final decision is made on any potential replacement building or landscaping.

Resource consent is also required as a discretionary activity in accordance with the National Environmental Standards for Assessing and Managing Contaminants in Soil to Protect Human Health (NES:CS).

The Record of Title for the site is attached in **Appendix 1**.

1.1 Background

The Riccarton Park Racecourse is owned by the Trustees of the Christchurch Racecourse who lease it to the Jockey Club. The Jockey Club is an Incorporated Society not for profit racing club affiliated to New Zealand Thoroughbred Racing.

The Jockey Club was established in 1854 and the first race meeting was held in Hagley Park in Easter 1855. The Riccarton racecourse was reserved as a public recreation ground by the Canterbury Provincial Council in 1858 and thereafter leased to the Jockey Club. By 1903 there were four stands at the racecourse, one of which, a timber stand, burnt down in 1919 and was replaced by the Grandstand.

The Grandstand was designed by the Luttrell Brothers, one of New Zealand's foremost Edwardian architectural practices. It was constructed in the early 1920s and was used as a sporting and recreational facility between 1923 and 2010. It functioned as a combined public and members' stand until a new members' stand was built in 1962 (demolished 2012).

The Grandstand incurred substantial damage during the Canterbury Earthquake sequence of 2010-2011 and has subsequently been the subject of detailed structural inspections and analyses. As outlined in the Seismic Impact Assessment, prepared by Kirk Roberts and contained in **Appendix 2**, the Grandstand is considered to be 'Earthquake Prone' when considered in the context of the New Zealand Building Act 2004. As an earthquake prone building, the Grandstand has been fenced off and is not usable.

The Jockey Club have commissioned several technical reports to inform potential repair strategies for the Grandstand. Having considered the invasive nature of works required to repair the building, the associated impact on heritage fabric and values, the associated costs of

undertaking the work, the lack of substantive heritage grant funding available, and the lack of need for the Grandstand to accommodate typical raceday spectators, the unenviable decision has been made to seek resource consent to demolish the building.

The Jockey Club has also undertaken extensive and costly repair and restoration works to the separate heritage scheduled 'Tea House' which is located to the west of the Grandstand'. In addition to being scheduled in the Christchurch City Council as a Highly Significant Heritage Item (HID # 543), 'The Tea House' is also listed by Heritage New Zealand Pouhere Taonga as a Category 2 Historic Place (List No: 5330). These works were the recipient of a 2009 Canterbury Architecture Award and a Christchurch Civic Trust award.

2 Site Description

2.1 Application Site and Surrounds

The wider application site is known as Riccarton Park Racecourse and is home to the Canterbury Jockey Club. The site is legally described as Section 2 Survey Office Plan 534960 and occupies an area of 82.3566 hectares. The site is generally flat. The main racecourse buildings and access roads and carparking are clustered towards the southern boundary. The racetrack, which has a circumference of 2,400m, is located centrally on the site. The site contains 48 significant individual trees which are scheduled in the District Plan. These are also clustered towards the southern boundary.

Riccarton Racecourse has two heritage buildings scheduled in the District Plan: The Tea House (1903) and the Public Grandstand (1920-23).

An aerial photo of the site and surrounds is contained in **Figure 1**.

The Club host over 20 race-days each season at the site, with highlights including the New Zealand Cup Meeting in November, Grand National in August, and the Autumn Racing Carnival.

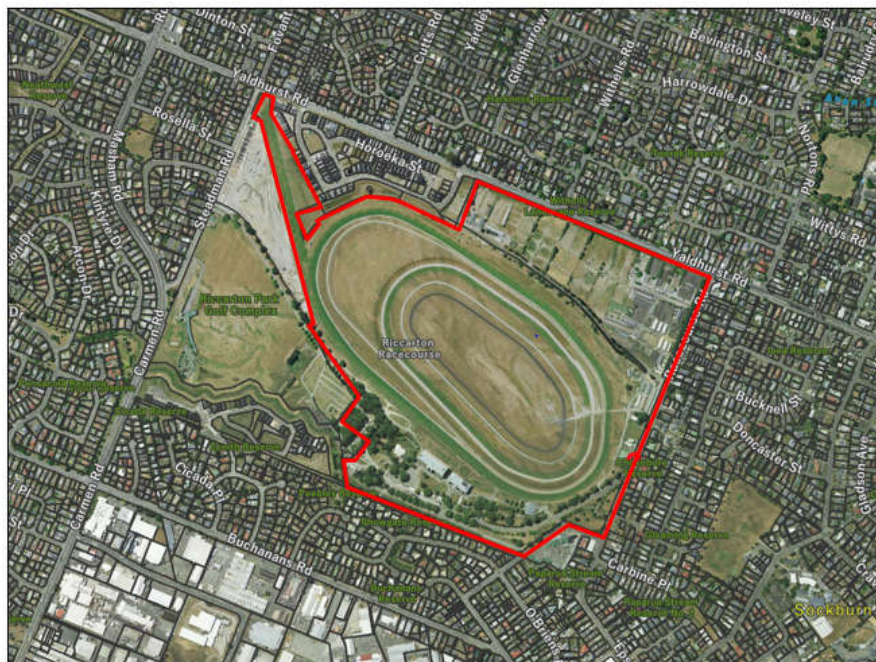


Figure 1: Aerial photo identifying the application site (Source: Canterbury Maps).

As noted above, the Grandstand is a protected heritage item, scheduled in the Christchurch City Council as a Highly Significant heritage item (item #453) and part of a Heritage setting (#183). It is not registered under the Heritage New Zealand Pouhere Taonga Act 2014.

The history and heritage significance of the building are described in a heritage assessment undertaken by Mr William Fulton of Fulton Ross Team Architects, (attached as **Appendix 3**). In summary, the Grandstand is a four-storey racing grandstand building with two levels of terraced seating facing the racecourse. The structure is comprised of concrete walls at each end and concrete frames to the interior supporting concrete floors, and the stands are constructed of steel beams, steel columns and timber flooring.

An elevator shaft was added to the rear of the building in the 1980s when the Grandstand was redeveloped, with two floors being renovated to further their use as a venue for functions and community activities.

The following information is sourced from the Christchurch City Council (HID # 543, Heritage assessment and statement of Significance).

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.

As noted earlier, the Grandstand incurred substantial damage during the Canterbury Earthquake sequence of 2010-2011. The Grandstand is considered to be 'earthquake Prone' and cannot be used.

The site is bounded to the east by Racecourse Road, with the northern boundary of the site partially bounded by State Highway 73. In the last decade land that previously formed part of the racecourse has been developed by Ngāi Tahu Property into the 'Karamū' subdivision, with build-out of residential sections largely complete. Riccarton Park Golf Complex and a new retirement complex occupy the adjoining land to the west. Low density residential housing occupies the adjoining land to the south and is the dominant housing typology in the surrounding area.

3 Proposal Description

As noted above, the Jockey Club applies for resource consent to demolish the heritage listed Grandstand at Riccarton Racecourse. The cleared site of the Grandstand will be re-grassed to a simple embankment until a decision is made on a replacement option.

To remove the existing foundations, excavation to a depth of 2m is anticipated. Conservatively, it is also anticipated that up to 6,800m³ of belowground material may need to be removed as part of the proposed works.

Demolition activities will be managed to ensure any environmental effects on surrounding properties and the environment are avoided or mitigated. Management methods will be detailed in a Demolition Management Plan to be prepared by the selected contractors, and certified by the Council, prior to any work commencing. These will include management measures for site safety, traffic management, noise and vibration management, protection of significant trees, erosion and sediment control, and the management of any soil contamination (if applicable). The Management Plan will also specify the steps necessary to ensure the adjacent Tea House and setting are adequately protected whilst demolition is undertaken. Separate conditions are discussed in more detail below regarding the salvage of heritage fabric where appropriate and the provision of a photographic record whilst the works occur.

4 Statutory Requirements

4.1 Part 2 of the RMA

Part 2 of the RMA sets out the purpose and principles of the Act, being “to promote the sustainable management of natural and physical resources” which is defined to mean:

“managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic and cultural wellbeing and for their health and safety while –

(a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

(b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and

(c) Avoiding, remedying or mitigating any adverse effects of activities on the environment.”

This assessment is informed by reference to the matters set out in sections 6, 7 and 8 of the Act.

The application of Part 2 in the context of considering resource consent applications has been impacted by case law arising from the *R J Davidson Family Trust v Marlborough District Council* case. The Court of Appeal decision on Davidson¹ found that the High Court erred when it determined the Environment Court was “not able or required to consider Part 2 of the Resource Management Act 1991” when undertaking its decision-making role in accordance with section 104 of the RMA. The decision means that when considering resource consent applications, decision-makers “must have regard to the provision of Part 2 when it is appropriate to do so”: [47].

Section 6 of the RMA provides for the protection of historic heritage and of the relationship of Māori and their cultural and traditions with ancestral lands, from inappropriate subdivision use

¹ *R J Davidson Family Trust v Marlborough District Council* [2018] NZCA 316

and development, as matters of national importance. Significantly, clause (f) states:

(f) the protection of historic heritage from inappropriate subdivision, use, and development.

Section 7 requires particular regard to be had to 'other matters.' Of relevance to this application are:

(b) the efficient use and development of natural and physical resources;

(c) the maintenance and enhancement of amenity values; and

(f) maintenance and enhancement of the quality of the environment;

Section 8 requires the principles of the Treaty of Waitangi to be taken into account.

An assessment of the proposal against Part 2 is provided in Section 8 below.

In summary, it is considered that the demolition of the Grandstand is not "inappropriate" and would better achieve the purpose of the Act than retaining the building. The below assessment regarding 'inappropriate' is informed by the District Plan heritage policy framework which has been developed to reflect the post-earthquake environment and was developed to give effect to Part 2. Given the recent timing of the District Plan review, there does not appear to be any omissions or significant shortcoming in the District Plan policy framework and therefore in line with Court direction further reference back to Part 2 is not considered to be necessary when determining this application.

4.2 Section 104 RMA

Section 104 of the RMA provides the statutory requirements for the assessment of the application and sets out those matters that the Council must have regard to when considering the application. Subject to Part 2 of the RMA, it is considered that the relevant matters for the assessment of this application include:

Any actual or potential effects on the environment of allowing the activity;

The relevant objectives, policies, rules and other provisions of the District Plan; and

Any other matter that the Council considers relevant and reasonably necessary to determine the application.

Section 104(2) allows the Council when forming an opinion in relation to any actual or potential effects on the environment of allowing the activity to disregard an adverse effect of the activity on the environment if the District Plan permits an activity with those effects. In this instance there is no relevant permitted baseline given that there is no permitted pathway for the demolition of heritage items.

Section 104D sets out particular restrictions for non-complying activities, a consent authority may grant a resource consent for a non-complying activity only if it is satisfied that either—

(a) the adverse effects of the activity on the environment (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or

(b) the application is for an activity that will not be contrary to the objectives and policies of—

-
- (i) *the relevant plan, if there is a plan but no proposed plan in respect of the activity; or*
 - (ii) *the relevant proposed plan, if there is a proposed plan but no relevant plan in respect of the activity; or*
 - (iii) *both the relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity*

An assessment of the proposal against Section 104D, is provided in Section 9 below.

Under Section 104B of the RMA the Council may grant or refuse an application for a non-complying activity, and if it grants the application, may impose appropriate conditions in accordance with section 108.

5 Christchurch District Plan Assessment

5.1 Zoning

The entire site is zoned Open Space Metropolitan Facilities Zone.

5.2 Christchurch District Plan Overlays and Notations

- Heritage Items - Heritage Item H452 (Riccarton Racecourse Tea House)
 - Heritage Item H453 (Riccarton Racecourse Public Grandstand)
- Heritage Setting H183
- Significant Individual Trees - The site contains 48 scheduled significant trees
- Christchurch International Airport Protection Surfaces (which given the nature of the proposed works are not triggered by the application)
- Environmental Asset Waterway (located parallel to the site's southern boundary, some distance from the Grandstand).

5.3 Key Definitions

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.

Temporary activities and buildings

in relation to Chapter 6 General Rules and Procedures, means activities and their ancillary buildings that are intended to have a limited duration and incidence (one-off, infrequent, transitional or with a defined end date, as opposed to regular and ongoing) and:

- a. *are not part of a permanent activity that occurs on the site; and*
- b. *create no, or only negligible, lasting alteration or disturbance to any site, building or vegetation.*

It includes:

- c. *public artworks, recreation activities and entertainment activities; and*

d. the provision of car parking areas ancillary to a temporary activity, whether sealed or unsealed, provided in accordance with an approved Traffic Management Plan, except as otherwise specified in Sub-chapter 6.4 Temporary earthquake recovery activities.

It excludes:

e. temporary utilities, which must comply with the relevant provisions in Chapter 11 Utilities and Energy.

5.4 Scope of Compliance Assessment

The District Plan rule interpretation set out below is that of the author and is not in substitution of the Council’s own assessment of the proposal, nor is it a restriction on the matters resource consent is being sought for. Resource consent is applied for the proposal as described in the “Proposal Description” set out above in Section 3 of this AEE, including all attached plans and other technical information submitted in support of the application. Resource consent is applied for the rule infringements described in this application, and any other resource consents necessary, whether specifically identified or not, to allow the proposal to be established, maintained and operated.

As such, if the Council is of the view that resource consent is required for alternative or additional matters to those identified in this Assessment of Effects on the Environment (AEE), it has the discretion to grant consent to those matters as well as or in lieu of those identified in this AEE. Furthermore, should Council be of the view that the activity status of any of the matters requiring consent is different to that described in this AEE, or that some or all of the matters requiring consent should be bundled or unbundled in a way that results in a different outcome to that expressed in this AEE, the Council has the ability under section 104(5) of the RMA to process the application regardless of the type of activity that the application was expressed to be for.

5.5 Compliance Assessment

The following table assesses the proposal against the relevant provisions in the Christchurch District Plan and identifies non-compliance matters:

Rules	Assessment	Rule Status
Chapter 8 Earthworks		
<p>Rule 8.9.2.1 P1 Earthworks</p> <p>Based on an approximate site area of 82.3 hectares, approximately 41,150m³ of earthworks could be undertaken to a maximum depth of 0.6m.</p> <p>Earthworks shall not occur within 5 metres of a heritage item or above the volumes contained in Table 9 within a heritage setting listed in Appendix 9.3.7.2.</p>	<p>The proposed earthworks will not exceed the volumes contained in Rule 8.9.2.1 Table 9. The depth of excavation exceeds 0.6m (being 2m). However, the works will require building consent and will occur within the footprint of the building, therefore exemption 8.9.3.a.iv applies.</p> <p>Once demolition has been completed, earthworks will be required to remove existing foundations and services and prepare the site for grassing. However, the heritage item will obviously be removed prior to earthworks occurring and therefore this rule is not considered to be triggered.</p>	Complies

Rules	Assessment	Rule Status
Chapter 9 Natural and Cultural Heritage		
9.3 Historic Heritage		
Rule 9.3.4.1.5 NC1 Non-complying activities Demolition of a Highly Significant (Group 1) heritage item.	The Grandstand is a Highly Significant listed heritage item and the proposal seeks to demolish it.	Non-complying
Chapter 9 Natural and Cultural Heritage		
9.4 Significant and other trees		
Rule 9.4.4.1.3 RD5 Any works within the dripline of a significant tree listed in Appendix 9.4.7.1 that involves, amongst other things, the disturbance of land (including earthworks)	The proposed earthworks will sit outside the dripline of all significant trees.	Complies

5.6 Activity Status

Overall, the proposal falls to be considered as a **Non-complying Activity** under the Christchurch District Plan.

6 Assessment of Effects on the Environment

6.1 Heritage Effects

Section 6 of the Resource Management Act specifies matters of national importance. Relevantly, it states that: *“in achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance...*

(f) the protection of historic heritage from inappropriate subdivision, use, and development”.

Section 6 does not in itself require that all heritage buildings be preserved, and the degree of protection offered to them will depend on the relative qualities of the particular building or place as reflected in the District Plan. The Grandstand is scheduled as a Highly Significant scheduled heritage item in the District Plan.

The assessment on heritage effects therefore rests on a determination as to whether the proposed demolition and replacement of the building is ‘inappropriate’ (as informed by the Objectives and Policies of the Christchurch District Plan which are assessed below in Section 7). Such a determination involves consideration of:

- The heritage values of the building;
- The current building condition;
- The extent of works necessary to bring it up to an appropriate standard;
- The level of intrusiveness of repair works and the associated effects of such works on heritage values;
- The costs of such works;

-
- The availability of grants or alternative funding sources;
 - The rate of return/ economic viability of the required investment;
 - Alternatives such as repurposing;
 - The effectiveness of mitigation measures.

As discussed in further detail in Section 7 below, at an objective and policy level the District Plan “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”. Demolition is therefore contemplated, subject to the merits of a case-by-case assessment against the bullet-pointed matters set out above.

A heritage assessment prepared by William Fulton is attached as **Appendix 3**. The heritage assessment summarises the history of the building, the work of the building’s architect, and the building’s current condition.

It is undisputed that the building does contain heritage value, with these values reflected in the fact that the building is listed as a Highly Significant heritage item in the District Plan. Demolition of the building cannot therefore be justified by mere convenience, and is not a matter to be undertaken lightly. The applicant has therefore undertaken a robust assessment of the options available for the repair, strengthening, and reuse of the Grandstand.

The process of considering reuse and retention options has been undertaken as follows:

- 1) Detailed damage evaluations were undertaken by AECOM, which included intrusive investigations and quantitative seismic analysis;
- 2) A seismic impact assessment has been undertaken by Kirk Roberts to determine conceptual structural upgrades required to achieve 34%, 67% and 100% NBS, and the impact they will have on the existing building fabric of the Grand National Stand;
- 3) The cost estimates for the various repair and strengthening options have been costed by a quantity surveying firm, McKay Lang Ltd, with the cost estimates set out in **Appendix 4**. They have also provided a letter outlining the increase in anticipated costs that have arisen since January 2021 due to significant restrictions in the supply of building materials and the implications of these for the cost estimates.
- 4) The Jockey Club has considered whether there are any potential reuse scenarios;
- 5) The Jockey Club has and continues to explore whether grants are available to bridge the financial gap. It has not yet been able to obtain any funding. In any case, it is highly unlikely any grant would be enough to cover any meaningful proportion of the estimated cost of the required repairs structural upgrades;
- 6) The findings of the above reports are then considered in the Heritage Impact Assessment attached as **Appendix 3**.

6.1.1 Engineering Assessment

As noted in the seismic impact assessment contained in **Appendix 2**, the New Zealand Society for Earthquake Engineering (NZSEE) states the aim of structural performance improvement should be to achieve as near as reasonably practicable to 100% NBS but strongly recommends

that a minimum of 67% NBS is attained. The building is estimated to be <15%NBS and therefore is considered to be “earthquake prone”.

The seismic impact assessment notes that the Grandstand has little inherent lateral capacity in its superstructure to use as the basis for a seismic upgrade in either the longitudinal or transverse directions. The engineers “*strongly recommend that the building is upgraded to a minimum of 67% NBS and would suggest a target of 100% NBS is more appropriate*”.

The seismic impact assessment identifies, in Section 4.3, that the Grandstand would require substantial structural upgrading. The assessment also notes that in addition to the seismic upgrade works that would be required for the building to achieve either 34% NBS and 67% NBS, the building would also require earthquake repair works and general maintenance. Generally, all walls need to be repaired for cracking and repainted both internally and externally. Further details of these works is contained in Section 5 of the engineering report contained in **Appendix 2**.

In summary, the building is currently at less than 15% NBS and therefore needs significant structural strengthening works in order to be used. In considering the impact on heritage fabric and heritage values of the works required to achieve a minimum of 67% NBS, the Heritage Professional has noted:

The proposed upgrade work involves significant changes to the existing structure in order to achieve an acceptable NBS (which Kirk Roberts considers should be at least 67% or as close to 100% NBS as possible). The south façade will have much of the concrete frame replaced with some panels infilled. The concrete floor will have large sections removed and replaced to improve the connection between floor and wall elements. Most of the interior fabric will need to be stripped out in order to achieve the upgrades. The hooded windows to the south will need to be modified to allow for new column dimensions. The structural report also highlights concern with the state of steel work and timber elements in terms of their structural capacity and it comments on the need to replace the large ramped structures to the south.

In summary the GNS will need to undergo significant change to its original heritage fabric as a result of the proposed structural upgrade options. We understand from the Kirk Roberts report that this is the case even if the 34% option is chosen. The proposed structural changes will have the effect of compromising the existing Heritage values of GNS.

In essence, the engineering report confirms that extensive and intrusive works would be necessary in order to bring the building up to code and to re-establish its use as a grandstand. The Heritage Assessment further identifies that these works would result in significant change to the original heritage fabric of the Grandstand.

6.1.2 Quantity Surveying Assessment and grant availability

The quantity surveying assessment concluded that the costs of repairing and strengthening the existing building to 34% or 67% NBS are \$15.2m and \$17.8m respectively (noting that these costs include increased material costs, as outlined in **Appendix 4**, but do not include professional fees or consenting fees).

The Jockey Club have explored, and continue to explore, whether heritage grant funding is available to help fund the substantial repair costs. As set out above, it has not yet been able to obtain any funding and it is considered very unlikely it will to the amount required for the structural upgrades.

6.1.3 Functional need for a grandstand and consideration of reuse options

The racecourse holds some 28 race meetings in a typical year. The Jockey Club have advised that only one of these would historically have required the opening of the entire Grandstand. All others can be conducted within the boundaries of the Club Grandstand with the addition of temporary infrastructure such as a mini and maxi marquee.

The Jockey Club has also advised that:

The racing industry has developed and changed significantly since the construction of then [Grandstand] in the 1920's. In those halcyon days attendance at race meetings was the only way to participate other than through the wireless and SP bookmakers. The evolution of the TAB in 1951, extended radio coverage and on to Trackside television has increased the sports off-course participation appeal whilst at the same time reducing its on-course attendance appeal. Other than major Carnival racedays when large crowds are attracted attendance is in the main members, owners, sponsors and enthusiasts. People do not need to travel to attend the races they can do so in their own lounge, hospitality outlets and even on their cellphones. Clubs have changed their focus from maintaining massive infrastructure for large attendance and instead provide facilities for the core requirements with the ability to expand through temporary infrastructure for their major race-days. This is a modern worldwide trend with the practice now to design a racecourse for its 3rd or 4th biggest event with ability to expand with temporary infrastructure. The racing industry itself is reflecting this with a consolidation into fewer racecourses nationwide with an investment policy into key racecourse for the bulk of race-meetings and a retention of tourist type racecourses that attract big attendances at holiday time.

Peak attendance occurs during Cup Week, which has been successfully held since the earthquake sequence (and with the Grandstand fenced off), with peak cup day crowds successfully accommodated within the members Stand, temporary marquees, and informal grassed viewing areas.

The Grandstand is therefore simply not needed for accommodating race meeting crowds. Whilst future development plans have yet to be developed, it is anticipated that in the short-to-medium term the Grandstand site will be reformed as a simple grassed embankment with a flat top that is capable of accommodating temporary marquees, in a manner similar to Hagley Oval Cricket Ground. Long-term plan for a replacement grandstand facility will be at a much smaller scale, again conceptually similar in size to the Hagley Oval pavilion.

Such development must be commercially realistic in order for it to proceed, and unfortunately retention of the Grandstand is not commercially possible, as reflected in the significant financing gap between repair costs and funds available, and the building even if repaired is simply not needed for meeting modern spectator needs.

As noted in the attached Heritage Assessment, adaptive reuse is often a viable mechanism for ensuring the future viability of at-risk heritage items. In the case of the Grandstand however, the structure and its position and function as a trackside viewing grandstand means that there are very limited options for repurposing.

In considering potential alternative uses, the Heritage Assessment notes:

the structure and its position and function as a trackside viewing grandstand means that there are very limited options for how the GNS could be repurposed. In my view, the structure is essentially a grandstand and in any future scenario it would need to remain a grandstand.

It is considered that there are no plausible future alternative uses for the building.

6.1.4 Heritage Assessment

The heritage assessment contained in **Appendix 3**, describes the building's history and significance. The assessment recognises that retention and reuse is a preferable heritage outcome to demolition. Having considered the technical reports produced, the Applicant's Heritage Professional, Mr Fulton concludes:

the [Grandstand] is a highly significant Heritage structure with heritage values covering a range of attributes from historical to contextual. The [Grandstand] has been an important part of the Riccarton racecourse from 1923 to 2010. Unfortunately, due to earthquake damage, the [Grandstand] has been sitting empty for the last decade, as repair strategies and its future have been considered. Given the information that I have been provided, [the Jockey Club] are now in the unenviable position of having to consider the demolition of what has been a valued part of their amenities.

I recognize the substantial damage the GNS has sustained as a result of the Canterbury earthquakes. I acknowledge the detrimental effect the proposed structural upgrade will have on the JJC's ability to retain, restore and reuse the building.

I also acknowledge the reluctant decision that has been made by the [Jockey Club] to apply to demolish this Heritage listed building

To mitigate the effects of the loss of the building, to the greatest extent practicable, the Jockey Club will work with the Heritage Professional and seek to adopt the mitigation measures they have suggested, which include:

There are materials within the existing structure that may be able to be carefully removed for reuse, either in a replacement structure or as remnant reminders of the [Grandstand] for other building projects. This could include the internal doors, and external timber windows.

It would be important to photographically record the building prior to any deconstruction works began. And while it is no means considered an adequate replacement, some form of on site interpretation telling the story of the GNS would be an important reminder of this significant building.

The Jockey Club is committed to implementing the recommended mitigation and proposes conditions of consent to that effect.

Demolition of heritage buildings is never undertaken lightly, and the Jockey Club has demonstrated their desire to ensure the appropriate protection and enhancement of heritage items on their site, where it can be practically achieved, through the extensive works they have recently undertaken to the Tea House. As noted above, these works were the recipient of several heritage awards.

The Jockey Club has already invested considerable resources towards first fully exploring retention options, and then secondly ensuring other heritage items on the site are protected.

6.1.5 Planning Conclusions on Heritage Matters

As noted earlier, Section 6 of the RMA requires decision makers to protect historic heritage from “..... *inappropriate subdivision, use and development*”, not development per se. The assessment then turns on what is ‘inappropriate’, with reference to the objectives and policies of the District Plan (discussed in more detail below), and the wider sustainable management outcomes sought in section 5 of the RMA.

Demolition of heritage buildings should only be considered in circumstances where practical alternatives have been explored and retention is either not financially possible or where the works necessary to ensure retention are so intrusive as to significantly diminish heritage values. Buildings must be kept safe for the public and neighbouring landowners and put to economically viable uses for owners. An ongoing, financially plausible use is fundamental to ensuring the long-term protection and retention of heritage buildings, for the benefits this brings to both the individual building owner and to the wider community.

The submitted documentation confirms the current state of the building, the lack of need for a grandstand of this size for race meetings, and the lack of plausible options for conversion to different activities (such as residential or office use). Furthermore, the works necessary to enable the ongoing use of the Grandstand are both extensive and so expensive as to not be financially plausible without some significant form of financial subsidy. These factors can be balanced against the building’s heritage value. Noting this, it is considered that the future environment scenario is not a choice of demolition and replacement versus repair and reuse, but rather demolition and replacement versus ongoing vacancy and dilapidation.

In summary, demolition of the Grandstand is considered to be appropriate for the following reasons:

- 1) The Grandstand is earthquake prone and as such it cannot be occupied without significant repair and strengthening works and has therefore remained unused since the Canterbury earthquakes.
- 2) The upgrade work necessary to achieve an acceptable NBS of at least 67% would involve significant changes to the existing structure that the Heritage Professional has advised would be a significant change to the existing heritage fabric.
- 3) No adaptive reuse options are available.
- 4) The cost analysis has identified the cost to retain the building with strengthening to 67% NBS, to address earthquake damage, are substantial, with the cost estimated at \$16.19 million. This is not commercially tenable given the limited number of times per year that the Club hosts events that would require the use of the stand.
- 5) There are no heritage grant funds available that are sufficient to enable a meaningful bridging of the significant financial gap.

- 6) The District Plan recognises the condition of heritage items, 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.

6.2 Demolition Effects

A Demolition Management Plan (DMP) will be submitted to Council for certification that it provides suitable measures to avoid or mitigate the effects of demolition activities. The DMP will provide details on the proposed demolition methodology and management measures that will be employed. The plan will be finalised prior to work commencing to ensure that it captures any additional management measures required, including those incorporated in any conditions of consent.

The following management measures are proposed to be included in the Demolition and Construction Management Plans (as relevant to each plan):

- Preparation of a de-construction plan, and undertaking demolition in accordance with the directions of a structural engineer to avoid collapse of weakened structures, and ensure demolition occurs safely.
- Sampling of potentially contaminated soils, and undertaking works in accordance with the directions of a contaminated land specialist.
- Confirmation of approved disposal sites for waste, including contaminated soils.
- Preparing and implementing a Demolition Noise and Vibration Management Plan (DNVMP) outlining how noise and vibration nuisance will be mitigated during demolition activities.
- Controlling noise by restricting use of machinery to between 7.30am – 6.00pm, and truck movements between 7.30am – 5.00pm Monday to Saturday, and avoiding works on Sundays and public holidays except in cases of operational necessity.
- Controlling dust by way of applying water to working faces during demolition, ceasing activities during high winds, and dampening truckloads of demolition material.
- Installing sediment control such as fencing, bunds to prevent sediment entering the stormwater system, and ensuring trucks are clean of material to ensure debris are not carted onto roads.

The final DMP will also accommodate any specific requirements for archaeological site management to align with the requirements of any archaeological authority, and measures to ensure the recovery of heritage building materials/features.

Overall, any adverse amenity effects associated with the demolition will be temporary, and avoided or mitigated as far as practicable by the proposed management measure.

6.3 National Environmental Standard relating to soil contamination

As a result of HAIL activities being identified at the site, the NES:SC must be considered when disturbance activities are being carried out in those areas identified. Based on the expected level of soil disturbance/removal and the types of potential contaminants present, the soil disturbance activity would require resource consent.

As the area to be excavated is currently covered with an existing building, subsurface investigation is currently not possible. In the absence of an investigation (i.e. DSI), the consent

therefore needs to progress down the **discretionary** activity pathway (pursuant to clause 11 of the NES:SC).

Given the unknown nature of the excavated material, it is proposed that an investigation of the material be carried out once the building has been demolished and access to the underlying soils is provided. The investigation will be carried out to assess potential impacts to human health and to assist in determining an appropriate mediation option and/or an appropriate offsite disposal location for the surplus soils generated.

To appropriately manage the potential effects to human health from the area beneath the existing Grandstand, five conditions of consent are offered by the applicant. These are outlined as conditions 7-11 in Section 11 below.

6.4 Positive effects

Positive effects are relevant under s.104 to the consideration of resource consent applications. Overall, the positive effects of the proposed development are summarised as follows:

- Removes an earthquake prone, and therefore unusable and unsafe building that has ongoing costs associated with retaining but provides no economic return;
- The reduction in ongoing costs associated with retaining the Grandstand, will ensure additional funds are available to maintain the adjacent listed Tea House.

7 Objectives and Policies

7.1 Historic Heritage

Objective 9.3.2.1.1 Historic heritage recognises:

- 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.*

7.1.1 Assessment:

The Grandstand is a significant part of the built landscape of Riccarton Racecourse, it has however suffered substantial damage as a result of the Canterbury earthquakes, and has not been used for more than a decade. The proposed demolition works recognise the current condition of the building, and the effect of engineering, financial and safety factors on the ability to retain and use the Grandstand in the future. In particular, it is noted that the Grandstand is earthquake prone. The upgrade work necessary to achieve an acceptable NBS (of at least 67%

NBS) would also involve significant changes to the existing structure that the Heritage Professional has advised would significantly change the original heritage fabric, and therefore the existing heritage values.

It is considered that the current situation is one where demolition is justified, as further discussed in the assessment of the proposal, against the matters in Policy 9.3.2.2.8, below. The proposal is therefore considered to be consistent with this Objective.

Policy 9.3.2.2.3 – Management of scheduled historic heritage seeks to manage the effects of subdivision, use and development on heritage items and setting 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.*

It also requires that any work on heritage items and heritage settings is 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.*

7.1.2 Comment

The proposal seeks to demolish a listed heritage item, it is therefore considered that most matters outlined in this policy are not relevant.

It is however noted that the photographic record that would be undertaken of the demolition, as detailed in the offered condition of consent, this record would document the demolition of the Grandstand and the associated changes to the heritage setting.

In considering adaptive reuse, the attached Heritage Assessment notes that “*the structure and its position and function as a trackside viewing grandstand means that there are very limited options for how the [Grandstand] could be repurposed. In my view, the structure is essentially a grandstand and in any future scenario it would need to remain a grandstand*”.

Policy 9.3.2.2.5 Ongoing use of heritage items and heritage settings provides for:

- a. *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.*

7.1.3 Comment

The proposal seeks to demolish a listed heritage item, it is therefore considered that this policy is not relevant.

Policy 9.3.2.2.8 – Demolition of heritage items notes:

- b. *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.*

7.1.4 Comment

As noted earlier, the Grandstand is scheduled in the Christchurch City Council as a Highly Significant (item #453). The building is not however registered with Pouhere Taonga Heritage New Zealand. The building is earthquake prone and is fenced off to remove the threat the building could pose in the event it collapsed. The building is therefore not able to be used and as such has remained fenced off for more than a decade.

In considering 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, the attached Heritage Assessment notes:

“The proposed upgrade work involves significant changes to the existing structure in order to achieve an acceptable NBS (which Kirk Roberts considers should be at least 67% or as close to 100% NBS as possible). The south façade will have much of the concrete frame replaced with some panels infilled. The concrete floor will have large sections removed and replaced to improve the connection between floor and wall elements. Most of the interior fabric will need to be stripped out in order to achieve the upgrades. The hooded windows to the south will need to be modified to allow for new column dimensions. The structural report also highlights concern with the state of steel work and timber elements in terms of their structural capacity and it comments on the need to replace the large ramped structures to the south.

In summary the GNS will need to undergo significant change to its original heritage fabric as a result of the proposed structural upgrade options. We understand from the Kirk Roberts report that this is the case even if the 34% option is chosen. The proposed structural changes will have the effect of compromising the existing Heritage values of [Grandstand].”

The cost analysis has identified the cost to retain the building with strengthening to 67% NBS, to address earthquake damage, are substantial, with the cost estimated at \$16.19 million. This is unreasonable, and not commercially tenable given the limited number of times per year that the Club hosts events that would require the use of the stand.

Even strengthening the building to 34% NBS would be substantial and not commercially tenable, with the cost estimated at \$15.2 million.

The damage sustained and the extent of works required to bring the structure up to the recommended minimum of 67%NBS; combined with the nature of the structure and its position and function as a trackside viewing grandstand means that a reduced degree of deconstruction is not a viable consideration.

For the reasons outlined above, it is considered that the proposal is consistent with this policy.

7.2 Significant Tree Policy Framework

Objective 9.4.2.1.1 Trees - seeks to maintain and enhance the contribution of the District’s significant trees and trees in road corridors, parks, and public open spaces to community amenity while providing for the reasonable use and enjoyment of property and landowner responsibilities.

Policy 9.4.2.2.3 Tree Protection – seeks under clause a.i. to protect from inappropriate works trees that are listed in Appendix 9.4.7.1, particularly where those trees are identified as having exceptional values.

7.2.1 Assessment

The tree policies taken as a package seek to recognise the value of trees to the community, whilst balancing such value with the recognition that works at times do need to be undertaken in proximity to such trees.

For significant trees on private land, the policies seek to protect such trees from inappropriate development, with particular emphasis on trees with identified exceptional values. The

application is consistent with this direction as the proposed works protect the ‘significant trees’ on the application site.

7.3 Open Space Metropolitan Facilities

Complementing the District Plan’s specific heritage provisions, **Objective 18.2.1.3** sets out further direction for the management of heritage outcomes in the Open Space zones. In particular, it seeks to minimise adverse effects on historic heritage values and amenity values, both within and outside the open space.

7.3.1 Comment

For the reasons outlined in Section 7.1 above, it is considered that the current situation is one where demolition is justified.

8 Part 2 of the Act

8.1.1 Section 6 ‘Matters of national importance’

As noted above, Section 6 of the RMA specifies matters of national importance. Relevantly, it states that: *“in achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance....*

(f) the protection of historic heritage from inappropriate subdivision, use, and development”.

For the reasons outlined in 6.1.5, the demolition of the Grandstand is considered to be appropriate.

8.1.2 Section 7 ‘Other matters’

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

- (a) The ethic of stewardship;
- (b) The efficient use and development of natural and physical resources;
- (c) The maintenance and enhancement of amenity values;
- (f) Maintenance and enhancement of the quality of the environment;
- (g) Any finite characteristics of natural and physical resources.

With regard to Section 7(a), the ethic of stewardship, as exercised by the Council, extends to the identification of heritage items in the Plan, and the encouragement of their retention. The Plan itself does not however require protection in all instances.

In terms of a property owner, the principle of stewardship does not impose an obligation to maintain a heritage item for community benefit in any / all circumstances. The evidence set out above demonstrates that genuine efforts have been made to investigate whether the retention of the Grandstand is viable. The building is presently not able to be used and cannot be repurposed.

Sections 7(b) and 7(g) matters are to a large extent intertwined as they relate to this proposal. Section 7(b) introduces the principle of efficient use. It is considered that this must involve aspects of economic enablement given the anticipated commercial environment provided by the Plan (through the zoning) for the site. That is not to say that the heritage values to the community, as represented by the Grandstand, are not an efficient use of the site, but more that where these are degraded and the productive uses associated with these physical resources undermined, then the principle of Section 7(b) would be better met through redevelopment.

Owing to the nature of the building, further adaptive re-use is not feasible. Retention would therefore result in the continued degradation of the Grandstand. If such a future is the inevitable outcome for the Grandstand, it is difficult to conclude that a drawn-out decline is in any way less offensive to Section 7(g) than its more imminent demolition. Section 7(b) can be better achieved through the reuse of the site of the Grandstand to provide a facility to accommodate functions and raceday attendance that has the potential to meet the social and economic needs of the community whilst concurrently retaining the site's historical association within the wider Riccarton Racecourse.

In terms of Sections 7(c) and 7(f), it is acknowledged that the character of the immediate area will change markedly from its current appearance. The Grandstand is not however readily visible from any adjoining property. If the continued decline of the physical resources of the Grandstand is an inevitable outcome of the building's retention, it is considered that such an outcome less successfully achieves the maintenance of amenity values, or the quality of the environment, than the alternative which is the replacement of the current derelict building with a grassed area.

8.2 Section 5 and balancing conclusion

That the Grandstand contains heritage values and is a landmark building on the application site is undisputed. Against these values is the lack of any plausible repurposing of the building and its underutilisation even if restored, with the ongoing economic burden of retention needing to be met by the landowner alone.

If the continued retention of the Grandstand inevitably leads to its continued degradation as an empty monument, it is considered that the sustainable management in the sense of providing for the cultural, social, and economic well-being of the community would not be provided for. A drawn-out deterioration of the building, where all other avenues for retention appear to be exhausted, would result in a decline in the significant heritage values currently held for the building. A judgment therefore has to be made as to whether the purpose of the Act would be better achieved by the retention of the Grandstand in its current and deteriorating condition or its demolition.

For the reasons set out above, it is considered that the demolition of the Grandstand is not "inappropriate" and would better achieve the purpose of the Act than retaining the building.

9 Section 104D(1)(b) Threshold Test

Section 104D of the Act directs that 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 (other than any effect to which section 104(3)(a)(ii) applies) will be minor; or the application is for an activity that will not be contrary to the objectives and policies of both the

relevant plan and the relevant proposed plan, if there is both a plan and a proposed plan in respect of the activity (section 104D(1)(b)(iii)).

It is understood that when considering whether the adverse effects will be minor, there is no statutory authority to consider the positive effects that might accrue from the proposal. Rather it is the adverse effects, as proposed to be remedied and/or mitigated, and taken as a whole, that are to be no more than minor. In this instance, for the reasons outlined in Section 6 above, the effects are considered to be no more than minor.

When assessing the second aspect of the threshold or gateway test, it is understood that the term contrary means that a proposal must be “not repugnant” to the relevant plan objectives and policies rather than simply not being in accordance or inconsistent with them. This is a high threshold, and in order to be considered ‘contrary’ as in ‘repugnant’ the application must demonstrate a significant level of inconsistency with the policy framework. As noted in Section 7 above, the proposal is considered to be consistent with the policy framework. The proposal is therefore able to pass both limbs of the section 104D threshold test s; and as such, is able to be considered for approval pursuant to section 104 of the Act.

10 Consultation/Notification

Under the provisions of the amended RMA there is now no presumption in favour of notification (section 95A). The requirement for the Council to be “satisfied” that the effects “will be minor” before proceeding on a non-notified basis has been removed. Instead, public notification is only required if the Council “decides” that the activity:

... will have or is likely to have adverse effects on the environment that are more than minor.

The adverse effects of the proposal have been discussed above and have been found to be no more than minor.

The below table sets out the matters that are required to be considered under s95A and s95B. This consideration, in tandem with the above assessment of effects, has found that adverse effects on other parties are less than minor and that the application can be processed on a **non-notified basis**.

S95A Public Notification	
Step 1: Does the application fall within the criteria for mandatory public notification under s95A(3)?	No
Step 2: Does the application fall within the criteria for precluding public notification under s95A(5)?	No.
Step 3: Does the application fall within the criteria for public notification under s95A(8) & s95D?	N/A
Step 4: Are there special circumstances that would warrant public notification under s95A(9)?	No, the application is for the demolition of a heritage item, where there is a consenting pathway for the rule breaches identified in this application.
S95B Limited Notification	
Step 1: Are there certain affected groups and affected persons who must be notified under s95B(2)-(3)?	No persons will be affected in any way greater than the general public in terms of effects on heritage values of the Grandstand and its setting, or the effects

	of the scale of the temporary demolition works.
Step 2: Does the application fall within the criteria for precluding limited notification under s95B(6)?	No
Step 3: Does the application fall within the criteria for other affected persons to be notified under s95B(7)-(8) and s95E?	No, adverse effects are considered to be no more than minor. With respect to non-statutory heritage interest groups, whilst potentially interested in this project these groups are not “affected parties or potentially affected parties” in themselves from a RMA perspective
Are there special circumstances that would warrant limited notification under s95B(10)?	As set out above, no special circumstances apply.

11 Offered Conditions

The condition framework is offered as part of this application and forms the basis against which the subsequent assessment of effects was undertaken.

General

1. Except where modified by the conditions below, the work must proceed in general accordance with the information submitted with the application dated November 2021 (Planz AEE and Appendices 1 – 4). The ‘Approved Consent Documentation’ is entered into the Council’s records as RMA/2021/XXX - XXXX pages (TRIM Reference 21/XXXXXX) and the ‘Approved Plans’ (XXXXXXXXXX) are now stamped RMA/2021/X plans 1 to XX (TRIM Reference 21/XXXXXX).
2. Certified works under this consent must be undertaken in accordance with the certified information, plans and methodologies.

Heritage

3. 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. The record must be lodged with the Christchurch City Council’s Heritage Team for their records within three months of the completion of the reinstatement. The intention of the digital photographic condition is to secure a reasonable record of the works and the progress of the works with a focus on the areas undergoing change rather than individual elements. The same digital device positions should be used for all image sets before, during and after the works to enable comparison. They must be labelled with the location, date and photographer’s name, and submitted with a plan showing photograph locations. Images must be at least 1440 pixels by 960 pixels to enable for a 4"x 6" photographic print at a minimum resolution of 240 PPI. Images can be taken with a good quality camera, phone or tablet. Images should be submitted to the Council’s 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.
4. 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.

Demolition

5. Prior to demolition of any of the existing buildings commencing, the consent holder shall provide to Council a Demolition Management Plan (DMP) for certification that it provides suitable measures to avoid or mitigate the effects of demolition activities. The DMP shall include:
 - Preparation of a de-construction plan, and undertaking demolition in accordance with the directions of a structural engineer to avoid collapse of weakened structures, and ensure demolition occurs safely.
 - Confirmation of approved disposal sites for waste, including contaminated soils.
 - Preparing and implementing a Site Specific Safety Management Plan to ensure hazards are managed.
 - Preparing and implementing a Traffic Management Plan (TMP) outlining how vehicle and pedestrian movements will be controlled to keep the public safe.
 - Preparing and implementing a Demolition Noise and Vibration Management Plan (DNVMP) outlining how noise and vibration nuisance will be mitigated during demolition activities.
 - Controlling noise by restricting use of machinery to between 7.30am – 6.00pm, and truck movements between 7.30am – 5.00pm Monday to Saturday, and avoiding works on Sundays and public holidays except in cases of operational necessity.
 - Controlling dust by way of applying water to working faces during demolition, ceasing activities during high winds, and dampening truckloads of demolition material.
 - Installing sediment control such as fencing, bunds to prevent sediment entering the stormwater system, and ensuring trucks are clean of material to ensure debris are not carted onto roads.
6. The Demolition Management Plan certified by the Council under condition 5 above, shall be implemented for the duration of the demolition activity occurring on the site.

Contaminated Soil

7. The Council shall be notified at least ten working days prior to the commencement of earthworks. The notification shall be emailed to rcmon@ccc.govt.nz
8. A Site Management Plan (SMP) shall be prepared by a Suitably Qualified and Experienced Practitioner and provided to Christchurch City Council for approval by way of e-mail to rcmon@ccc.govt.nz no later than 10 working days prior to the commencement of the development works.
9. In the event of contamination discovery e.g. visible staining, odours and/or other conditions that indicate soil contamination, then work must cease until a Suitably Qualified and Experienced Practitioner (SQEP) has assessed the matter and advised of the appropriate remediation and/or disposal

options for these soils. Any measures to remediate or manage the discovered contamination may require a resource consent under the NES.

10. All contaminated soils removed from the site will not be suitable to be disposed of at a cleanfill facility and must be disposed of at a facility whose waste acceptance criteria permit the disposal.
11. The consent holder shall submit evidence (i.e. weighbridge receipts or waste manifest) of the disposal of surplus soils from the site to an authorised facility to the Council, Attention: Team Leader Environmental Health by way of email to rcmon@ccc.govt.nz, no later than 20 working days following this disposal.

12 Conclusion

The Canterbury Jockey Club seeks land use consent to demolish the heritage listed Grandstand.

Resource consent is also sought as a discretionary activity in accordance with the NES:CS.

The Grandstand incurred substantial damage during the Canterbury Earthquake sequence of 2010-2011 and has subsequently been the subject of detailed structural inspections and analyses. The Grandstand is considered to be 'Earthquake Prone' when considered in the context of the New Zealand Building Act 2004.

Demolition of heritage buildings is never undertaken lightly, and the reuse of heritage buildings can be an important opportunity to add character and value to a wider development. The applicant has therefore explored options for the retention and strengthening of the Grandstand, noting that repurposing is not a viable option given the function of the building as a trackside viewing grandstand.

The proposed demolition works recognise the current condition of the building, and the effect of engineering, financial and safety factors on the ability to retain and use the Grandstand in the future.

The application is considered to be consistent with the objectives and policies of the District Plans.

It is therefore considered that the proposal is in keeping with the intent of the District Plan and is consistent with the requirements of Part 2 of the RMA.

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HERITAGE IMPACT ASSESSMENT

RICCARTON RACECOURSE GRAND NATIONAL STAND



November 2021

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INTRODUCTION

Fulton Ross Team Architects Limited have been asked by The Canterbury Jockey Club to report on the Heritage values of the Grand National Stand (GNS) at the Riccarton Racecourse. In the past, we have worked with the Canterbury Jockey Club when it undertook the restoration of the Teahouse at the Riccarton Racecourse from 2006-2008.

The GNS is a protected Heritage structure listed by the Christchurch City Council as a Highly Significant (item #453) and part of a Heritage setting (#183) which includes the restored Teahouse building.

HERITAGE VALUES

The following information setting out the cultural heritage significance is sourced from the Christchurch City Council (HID # 453, Heritage assessment and statement of Significance).

Note that this source refers to the listed item as the 'Public Grandstand'. For the benefit of consistency, we have referred to the structure as the 'Grand National Stand' as it is known as today.

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 Grand National Stand 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 Grand National Stand. 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 Grand National Stand 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 Grand National Stand 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 Grand National Stand is a reinforced concrete structure with two tiers of seating and a rear elevation four stories in height. The seating is protected by roofs carried on partly cantilevered steel trusses. 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 Grand National Stand 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 Grand National Stand 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 20th 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 Grand National Stand.

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 Grand National Stand 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 racetrack 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 Grand National Stand 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. Of most relevance in this information is the Christchurch City Council's Assessment Statement which provides:

"The [Grand National Stand] and its setting at Riccarton Park Raceway has high overall significance to Christchurch, including Banks Peninsula. It has high historical and social significance for its association with the Canterbury Jockey Club and the sporting and recreational identity of Canterbury. The Public Grandstand has high cultural significance for its association with the culture of horse racing locally and nationally as well as its association with New Zealand Cup Week, The Public Grandstand has high architectural significance for its design by the Luttrell Brothers, who were acknowledged specialists in grandstand construction. The building has high technological and craftsmanship significance for its early (20th century) use of reinforced concrete and steel truss construction, of which the Luttrell's were leading exponents. The Public Grandstand has high contextual significance within the

racecourse as the largest and most prominent building and for its relationship to other building and structures, including the 1903 Luttrell-designed Tea House. As the site of horse racing and the Canterbury Jockey Club since c.1856, the setting of the Public Grandstand has archaeological significance because of the potential to provide archaeological evidence relating to past building construction methods and materials, and to human activity on the site, including that which occurred before 1900."

We are in agreement with the findings of the Christchurch City Council Heritage Team

THE CANTERBURY JOCKEY CLUB; HISTORY

The Canterbury Jockey Club (CJC) was established in 1854 and held its first meeting in Hagley Park at Easter of the following year. The Riccarton racecourse was reserved as a public recreation ground by the Canterbury Provincial Council in 1858 and thereafter leased to the CJC. 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.

Over its long History the CJC have invested in buildings that form part of the wider Riccarton Park Racecourse. They employed Architects to design buildings that were both useful, aesthetically pleasing and that lasted. These are the buildings that eventually acquired heritage value.

Also within Heritage setting (#183) is one other scheduled highly significant building, the Tea House (1903) that was also designed by Alfred and Sidney Luttrell (#452).

The Tea House was one of the Luttrell Brothers first commissions after they arrived in New Zealand from Tasmania.

The Tea House building was in a dis-used state in 2000, and the CJC along with local and Council support took up the challenge of restoring of the building. We assisted CJC in this project acting as their Architect

The successful restoration of the Tea House was recognised with awards by the NZ Institute of Architects and the Christchurch Civic Trust in 2009.

The care the CJC takes in maintaining the grounds and facilities at the Riccarton Park Raceway is testament to their attitude to preserving their history for the enjoyment of their visitors.

THE GRAND NATIONAL STAND: STRUCTURAL UPGRADE

We visited the site most recently on 2nd June 2021, having previously walked through the building after the 2011 Earthquakes. The building has been empty since the 2010/2011 earthquakes. The accompanying Structural report (Kirk Roberts June 2021) sets out the current seismic state of the building and describes their proposals to seismically upgrade the building to various levels of NBS. They note that the current structure is earthquake prone and likely to collapse in a moderate earthquake. The current NBS is noted well below 33%.

The proposed upgrade work involves significant changes to the existing structure in order to achieve an acceptable NBS (which Kirk Roberts considers should be at least 67% or as close to 100% NBS as possible). The south façade will have much of the concrete frame replaced with some panels infilled. The concrete floor will have large sections removed and replaced to improve the connection between floor and wall elements. Most of the interior fabric will need to be stripped out in order to achieve the upgrades. The hooded windows to the south will need to be modified to allow for new column dimensions. The structural report also highlights concern with the state of steel work and timber elements in terms of their structural capacity and it comments on the need to replace the large ramped structures to the south.

In summary the GNS will need to undergo significant change to its original heritage fabric as a result of the proposed structural upgrade options. We understand from the Kirk Roberts report that this is the case even if the 34% option is chosen. The proposed structural changes will have the effect of compromising the existing Heritage values of GNS.

COSTINGS

I understand CJC have obtained QS costings for each of these options, I do not comment on these here.

ALTERNATIVE USES

Adaptive reuse is a viable mechanism for ensuring the future viability of at-risk heritage structures. Re-purposed buildings can often increase the value and revenue potential which in turn can help offset the cost of strengthening and upgrade works. In the case of the GNS however the structure and its position and function as a trackside viewing platform means that there are very limited options for how the GNS could be repurposed. In my view, the structure is essentially a grandstand and in any future scenario it would need to retain this facility.

MITIGATION MEASURES

I have been asked to comment on measures that could be taken to mitigate the loss of the GNS if it were to be demolished. There are materials within the existing structure that may be able to be carefully removed for reuse, either in a possible future replacement structure or as remnant reminders of the GNS for other building projects. This could include the internal doors, and external timber windows.

It would be important to photographically record the building prior to any deconstruction works began for the purposes of awareness and education of the historic heritage values of the site. And while it is no means considered an adequate replacement, some form of on site interpretation telling the story of the GNS would be an important reminder of this significant building.

REPLACEMENT PROPOSAL

I understand that should CJC be successful in their application to demolish the GNS, then the area that was once occupied by the building will be grassed into an embankment until a final replacement option is decided and authorised.

At my most recent visit to the site, I briefly sighted a draft concept to replace the GNS with a new viewing area on a raised earth embankment and single-story hospitality enclosure. The new proposal does not seem to be intended to replace the scale of the GNS but rather is a subtle reminder that this site is intended as providing an outlook over the racecourse. The draft concept had a visual relationship with the Tea-House, in terms of scale and openness, compared to the visual dominance the existing GNS has and its relationship with the adjacent members stand.

I understand CJC is continuing to develop possible replacement options for the GNS should the application to demolish be granted. From our experience with the CJC and the restoration of the Tea House, we are confident that any replacement will be appropriately considered in the wider context of the Racecourse.

CONCLUSION

In conclusion, the GNS is a highly significant heritage structure with heritage values covering a range of attributes from historical to contextual. The GNS has been an important part of the Riccarton racecourse from 1923 to 2010. Unfortunately, due to earthquake damage, the GNS has been sitting empty for the last decade, as repair strategies and its future have been considered. Given the information that I have been provided, CJC are now in the unenviable position of having to consider the demolition of what has been a valued part of their amenities.

I recognize the substantial damage the GNS has sustained as a result of the Canterbury earthquakes. I acknowledge the detrimental effect the proposed structural upgrade will have on the CJC's ability to retain, restore and reuse the building.

I also acknowledge the reluctant decision that has been made by the CJC to apply to demolish this Heritage listed building.