

**BEFORE THE INDEPENDENT HEARINGS COMMISSIONER APPOINTED BY
THE CHRISTCHURCH CITY COUNCIL**

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER of an application for resource consent under section 88 of
the RMA by Cambridge 137 Limited for demolition of a
heritage building and construction of a hotel

APPLICANT Cambridge 137 Limited

**STATEMENT OF EVIDENCE OF GRANT ARMSTRONG ON BEHALF OF
CAMBRIDGE 137 LIMITED**

ARCHITECTURE

2 October 2024

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INTRODUCTION

- 1 My full name is Grant Robert Armstrong. I am a Principal and Director at Ignite Architecture Limited (**Ignite**). Ignite is a full-service design practice, with over 150 employees, specialising in master planning, architecture, and interior design. I have been in this position since 2014.
- 2 I am responsible for the strategic leadership of the practice. I also hold a specific leadership role as Principal in charge of the commercial sector nationally.
- 3 I have prepared this brief of evidence to support the application for resource consent by Cambridge 137 Limited to demolish the current Harley Chambers and to construct a new hotel in its place (**Application**). My evidence addresses the new hotel component of the Application and in particular the architectural design aspect.

Qualifications and experience

- 4 I am a Chartered Member of the Royal Institute of British Architects and a registered at the Architects Registration Board UK (registration number 071703G). I am also a member of the New Zealand Institute of Architects (membership number 28197).
- 5 I hold a Masters of Science with Distinction in Construction Economics and Management from University College London, a Post Graduate Diploma in Professional Practice from the University of Westminster, a Bachelor of Architecture with Honours from the University of Auckland, and a Bachelor of Architectural Studies also from the University of Auckland. I have over 25 years' experience with active practice, and I have been practicing in the New Zealand context since 2006. Over the 18 years I have practiced in New Zealand, I have been an architect at Ignite specialising in commercial, hospitality, and retail architecture with a strong focus on customer focused design.
- 6 I have worked as an architect on hotel and hospitality projects for 25 years in New Zealand, the United Kingdom, and Europe.

Code of conduct

- 7 While the resource consent application is not before the Environment Court, I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023.

Accordingly, I have complied with the Code in the preparation of this evidence, and will follow it when presenting evidence at the hearing.

- 8 Unless I state otherwise, this assessment is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
- 9 The data, information, facts and assumptions I have considered in forming my opinions are set out in my evidence. The reasons for the opinions expressed are also set out in my evidence.

Scope of Evidence

- 10 I was a co-author of the architectural statement prepared by Ignite Architects in support of the Application (Appendix 2 of the AEE filed in support of the Application).
- 11 My evidence addresses the following:
 - (a) Background to Ignite's involvement in the Application;
 - (b) An overview of the architectural statement supporting the Application, including:
 - (i) The site analysis undertaken at the outset of the design process;
 - (ii) The context (including the cultural, physical, and historic context) and the key design considerations;
 - (iii) The architectural response; and
 - (iv) The tower massing and sunlight and shading effects.
 - (c) A response to matters raised in submissions concerning architectural matters; and
 - (d) A response to matters raised in the section 42A report.
- 12 I have reviewed the following documents for the preparation of my evidence:
 - (a) A copy of the Application;
 - (b) The submissions lodged on the Application which address urban design/architectural issues;

- (c) A copy of the section 42A report prepared by Mr Scott Blair dated 24 September 2024 (**section 42A report**), including a copy of the Urban Design assessment prepared by Ms Ekin Sakin (Appendix E to the section 42A report); and
- (d) The draft of evidence prepared by Jonathan Cleese (Urban Design).

EXECUTIVE SUMMARY

- 13 The design of the building, as proposed in the Application, properly balances the functional and operational requirements of a hotel with the need to create human scale, cultural connection, and fit in with the historical context of its surrounding.
- 14 The design has been carefully considered to mimic the Harley Chambers building through the bottom three floors of the façade while also providing a modern and functional building.
- 15 The design also provides human scale by focussing the viewers' attention on the bottom three floors of the building and breaking up this view with visual interest in the façade. Further, an open plan bottom floor and large glass windows invite human connectivity between inside the building and out. This increases the sense of human scale for anyone outside the building.
- 16 I do not support the recommended setbacks Mr Blair proposes in his section 42A report. I consider the setbacks Mr Blair recommends cause unintended consequences. In particular, they introduce:
 - (a) Design complexity, especially in relation to structural support;
 - (b) Increased construction costs and complexity;
 - (c) Increased risks of weathertightness issues;
 - (d) Operational inefficiency for a hotel operation in relation to servicing rooms;
 - (e) Reduction in hotel capacity by approximately 12%; and
 - (f) Reduce the human connectivity between outside and inside the building.
- 17 Further, I do not consider the proposed setbacks are capable of delivering the human scale Mr Blair seeks to achieve through this

recommendation. The setbacks are focussed at the top of the building which is of limited relevance for a viewer's sense of human scale.

- 18 Therefore, in my opinion, the design proposed in the Application provides the best balance between form and function.

BACKGROUND AND ROLE

- 19 Ignite Architects were engaged by Cambridge 137 Limited for architectural services from the initial stages of this project. This included involvement in project initiation, concept designs, and the preliminary design stage. This is known as "project initiation".
- 20 Project initiation involves assessing the site and considers the feasibility of the various options from an architectural and design perspective. The purpose of this step is to help the client make informed choices about the right approach for the site. In this case, Ignite provided advice on the feasibility of construction of a building that was suitable for a hotel. As part of considering the feasibility of a building that could function as a hotel, we provided advice regarding the various functional requirements of the building.
- 21 The concept design stage involved developing initial visual representations of what the building could look like while the starting to build in the functional requirements of the building. In the case of hotels, it is important to maximise the number of guest rooms available. However, equally importantly is the layout and flow of the guestrooms to provide a function experience for the hotel visitor while ensuring staff of the hotel can efficiently and effectively service the hotel.
- 22 Preliminary design involved the development and refinement of the concept design and development of the research undertaken through the project initiation with a view to providing a design and architectural statement which could be lodged for resource consent.
- 23 In the following sections of my evidence, I provide an overview of the matters addressed within the architectural statement provided in support of the Application and attached in full at Appendix 2 of the Application.

SITE ANALYSIS

- 24 A full site analysis is set out in the Architectural Statement.

- 25 In summary, the site is prominently situated at the junction of Cambridge Terrace and Worcester Boulevard, making it a focal point in the urban fabric of central Christchurch. Cambridge Terrace is a key arterial road, ensuring high visibility and accessibility for the site.
- 26 Notable features of the site are:
- (a) The site is zoned Commercial Central City Business Zone in the operative Christchurch District Plan (**District Plan**);
 - (b) The immediate neighbouring buildings support a mixture of inner city civic, hospitality, and commercial activities. On the northern side the site is bordered by a contemporary commercial office building housing various professional services;
 - (c) Directly across Cambridge Terrace, to the east, is the Ōtākaro Avon River which provides an open recreational park amenity space that contrasts, but also complements, the surrounding density of the built environment; and
 - (d) The site has a level topography with its orientation primarily facing east-west. The neighbouring buildings offer limited protection from prevailing winds from the east, nor do they offer protection from the strongest winds from the north-west and the southwest.

URBAN DESIGN RESPONSE AND SITE CONTEXT

- 27 The following section of my evidence explains the factors outlined in the Architectural statement in support of the Application.

Cultural context

- 28 The site is located within the central city of Ōtautahi Christchurch and therefore the ancestral lands of Ngāi Tahu, and the contemporary takiwā of Ngāi Tūāhuriri, as mana whenua. It is located within an area which was once rich in natural resources. Māori would have utilised the abundance of resources available as this area formed part of a wider system of trails, rivers, and streams – in particular Otakaro Avon River which runs parallel to the eastern boundary the site.
- 29 The Ōtākaro Avon River and Ihutai Avon Heathcote Estuary are of vital importance to mana whenua who prized the abundant food and natural resources that could be harvested from the springs, waterways, wetlands, grasslands, and forests that flourished in the area. Ōtākaro,

which means the place of a game, is named after the children who played on the river's banks as the food was gathered.

Historical context

- 30 The proposed building sits within view of the Worcester Chambers, the Municipal Chambers, and the Canterbury Club. Further away, but still proximate, is Cathedral Square (with the Christchurch Cathedral) and the Arts Centre. All of these are historic buildings in Christchurch.
- 31 Further, the proposed building would replace Harley Chambers which itself is a historic building. However, Harley Chambers has recently been de-listed due to its significantly deteriorated condition and therefore diminished historic value following the Christchurch earthquake sequence.

Design elements which respond to the context of the building

- 32 The following elements of the design help to engage with cultural and historical context of the area:
- (a) **Ōtākaro river corridor:** The upper levels of the eastern façade of the proposed building present a well-proportioned, but respectful, glazed curtain wall to acknowledge and connect to the cultural primacy of the Ōtākaro river corridor.
 - (b) **The heritage podium:** the heritage podium of the proposed building creates a reference back to the Harley Chambers which came before. The façade in the proposed hotel has been designed to be the same height as Harley Chambers. The proposed building maintains a curve around the corner of Cambridge Terrace onto Worcester Boulevard reflective of how Harley Chambers links these two streets. The wider metal columns in the hotel's façade mimic the columns on the Harley Chamber façade. Finally, the hotel façade reflects the separation between the bottom third and top two thirds on the vertical axis of the Harley Chamber façade. All of these features help to link the two buildings to one another.
 - (c) **Connection to the outside:** The proposed design provides refined detail on the lower levels of the building which invite and engage guests and the public to the public amenity spaces within the hotel. The use of high-quality materials, depth in the façade, and carefully considered proportions establishes a connection with

the street. This is the part of the building where the human connection is most important. In contrast, the upper 8 levels adopt a more uniform curtain wall system, tying in with the grid pattern below.

- (d) **Relationship to Worcester Chambers:** Acknowledging the significance of the neighbouring historic building at 69 Worcester Boulevard, Worcester Chambers, the design opens up the western façade on the ground levels, rather than using the full footprint of the site. The design allows the eastern side of Worcester Chambers to be seen. This architectural gesture is a deliberate strategy to establish a visual connection and dialogue with the adjacent heritage structure. By exposing the red brick façade, the proposed building celebrates the unique architectural elements of the neighbouring Worcester Chambers, which have been hidden behind the existing Harley Chambers.

ARCHITECTURAL RESPONSE

- 33 Throughout the design of the building, Ignite considered the functional requirements of the hotel, established industry requirements, and expectations, as well as ensuring the building responds properly to the cultural, historical, and urban environment it is proposed to sit in.
- 34 I set out some of the key considerations which explain the design decisions which were made to balance these competing factors.

Functional design

- 35 The building proposed is suitable for a high quality four-star standard, city hotel. Hotels of this typology are characterised by a ground floor podium which provides public amenity, reception, and hospitality supported by back of house space. There is an upper-level guestroom tower connected by a central vertical circulation core which provides lifts and staircases and a central access corridor.
- 36 The overall architectural massing of the building is derived from a functional response to the requirements for a public podium and guestroom tower.
- 37 The proposal seeks to maximise the guest room count within the 42m height by providing 20 standard rooms per level over 10 upper levels for a total of 200 rooms. A hotel which provides 200 guestroom is

considered to be a 'medium to large' hotel in the New Zealand context. A hotel of this size enables a high degree of flexibility for future operators.

- 38 The guestroom tower floor layout is a double loaded corridor (meaning it has rooms flowing into it from both sides) with typical 'handed' rooms (being back-to-back each side of the corridor with shared bathroom service risers). This configuration enables a high degree of repetition in the construction, functional, and operational aspects of the hotel. This is best practice in the hotel industry as it allows a greater degree of usability for hotel visitors and efficiency for management and staff, as well as construction efficiencies.
- 39 The area per guestroom is generally 24sqm, which is industry standard for four-star hotel. The rooms generally have a proportion of 8m in length by 3m width, which is on the narrower side of industry standard, but still functionally acceptable to the hotel operator market. King, accessible, and split king rooms (typically 29sqm in area) are located opposite the services core, where the building grid has been widened from 3.025m to 3.66m.
- 40 20 guestroom per level is generally identified as the minimum number acceptable to hotel operators to ensure the efficient daily cleaning and servicing of rooms.
- 41 The public amenity areas are limited to ground floor with a reception lobby facing Worcester Boulevard. This layout directly connects the central lift lobby and service core to the hospitality lounge which will contain a cafe/restaurant/bar. This hospitality lounge will look out onto both Worcester Boulevard and Cambridge Terrace with full length glazing to the street boundaries. This maximises the internal enclosed dining space and the connection between outside and inside the building helping to create a sense of human scale in the building.
- 42 Back of house operational areas including kitchen and staff facilities and a guest fitness room. These services are physically separated from front of house spaces.
- 43 The building's primary access is through the southwest corner via two sets of doors on either side, one pedestrian entrance from the Worcester Boulevard footpath and the other from a coach scaled porte cochere vehicle drop off. This arrangement enables efficient staffing and security

for the hotel allowing it to utilise passive surveillance of visitors and guests.

- 44 A second (and separate) building entrance to the restaurant via Cambridge Terrace would be contrary to this functional design logic and was considered but discounted in the design stage (and is addressed further in Mr Clease's evidence from an urban design perspective).

Street Level / human connectivity

- 45 The street-level access was designed to focus on inclusiveness and fostering urban connectivity. The ground floor internal floor level has a 1m elevated sill and freeboard above footpath level in line with best practice engineered flood resilience design. Given the proximity of the river, protection against flooding is particularly important.
- 46 This elevation also references the original Harley Chambers sill line and connects to the neighbouring sill line of the Worcester Chambers Heritage building.
- 47 Visual connectivity is maintained by floor to ceiling glazing around the street perimeter. Enabling a typical person to comfortably interact from the street to activity inside the building, whilst ensuring the hotel guests inside have a sense of refuge and respite.
- 48 The design ensures that the lower three levels have a distinct and highly detailed façade treatment, in comparison to the rest of the tower. This provides a human-scale feel and visual interest to the bottom levels, which are the primary part of the building which will be seen by the public. This approach allows functionality of the building while retaining visual interest and focussing the viewer's eye on the lower three floors. This provides a sense of human scale.

Corner Treatment

- 49 The curved glass façade at the street corner of Worcester Boulevard and Cambridge Terrace adds a modern and inviting element to the building, welcoming guests inside. This design feature enhances the architectural interest of the building, contributing to the city's contemporary aesthetic.

Location and community interaction

- 50 The porte cloche provides a safe and efficient way for guests to be transported to the hotel while minimising the visual impact of this functional aspect of the building. This allows the building to engage directly with the environment and maintain the smooth frontage of Cambridge Terrace rather than being separated by an accessway.

Northern Façade Consideration

- 51 The northern façade of the hotel has been designed to establish a harmonious relationship with the neighbouring Lane Neave building, while also contributing to the overall architectural identity of the area. A grooved relief pattern is incorporated into the precast concrete panels of the northern façade, mimicking the panels on the Lane Neave building to create a sense of continuity between the two structures.

OTHER EFFECTS

- 52 The other effects considered during the design of the building, included the massing and sunlight effect, and the wind effects.
- 53 The Application presents a series of comparative shading studies. The comparison between the proposed building mass and the 'Massing Plan Change 14' (red building), presents the closest illustration of what would now be possible under in the District Plan baseline. This comparison demonstrates that the impact of shading is minimal, throughout the assessed daily and seasonal cycles of Summer and Winter Solstice, and Spring and Autumn Equinox.
- 54 The Application proposes the mitigation of wind effects for building users at street level through a canopy fronting Worcester Boulevard that wraps into the site on the western side to form a porte cochere and returns on the corner to meet Cambridge Terrace. This functional element reinforces the presentation of the main hotel entrance and integrates the entrance the podium architecture through shared materiality and a delicate visual presence.

RESPONSE TO SUBMISSIONS

- 55 I have reviewed the submissions from the public notification process that comment on matters relevant to my evidence, namely:

- (a) The scale of the building is too big for the site;¹
- (b) The building will have an adverse shading effect;² and
- (c) The hotel will channel east west 'wind flow'.³

56 The section 42A report writer, Mr Blair, addresses each of these concerns and concludes:

- (a) The scale of the building is appropriate and does not need to be reduced in height;⁴
- (b) Any adverse of shading are minor and acceptable,⁵ as are the adverse effects of the height infringement;⁶ and
- (c) Any adverse wind related effects will be minor and acceptable.⁷

57 I have reviewed the section 42A report in full and Mr Blair's reasoning for the conclusions expressed above. These are also matters which I addressed in my original architectural statement.

58 I agree with Mr Blair's assessment of the issues raised by the submitters. In my expert opinion, none of the issues raised would have a more than minor and acceptable adverse effect on the environment.

RESPONSE TO SECTION 42A REPORT

59 I have reviewed the aspects of the section 42A report that comment on matters relevant to my evidence. The key matters raised are the setbacks proposed by Mr Blair and the separate recommendation for setbacks and a second public entrance on Cambridge Terrace raised by Ekin Sakin, the Principle Urban Designer at the Christchurch City Council.

Setbacks

60 I disagree with Mr Blair's recommendations for the following setbacks:

¹ As summarised in the s 42A report dated 24 September 2024 at 27 and 28.
² As summarised in the s 42A report dated 24 September 2024 at 28.
³ As summarised in the s 42A report dated 24 September 2024 at 28.
⁴ s 42A report dated 24 September 2024 at 118.
⁵ s 42A report dated 24 September 2024 at 139, 141, 144, and 146.
⁶ s 42A report dated 24 September 2024 at 146.
⁷ s 42A report dated 24 September 2024 at 125.

- (a) A setback on the eastern side of the building of 1.2m from 28m above ground level (level 7 of the building), which Mr Blair suggests could be used as a balcony for the 7th floor rooms; and
- (b) A setback of 5m on the northern side of the building from 32m high (level 9 of the building), which Mr Blair precludes from being used as a balcony for the 9th floor due to privacy concerns.

- 61 Mr Blair's assessment relies on the urban design comments of Ms Sakin. However, Mr Blair's analysis and ultimate recommendations are inconsistent with Ms Sakin's advice (which I also do not agree with and address separately below).⁸
- 62 My opposition to the setbacks recommended by Mr Blair is primarily related to functional and operational considerations. However, I also oppose the aesthetics of the proposed setbacks and do not consider 'human scale' is achieved through the proposed changes. I address these in turn as follows, before specifically commenting on Ms Sakin's differing recommendations.

Functionality and operational requirements

- 63 A key policy consideration Mr Blair appears to rely upon to support his analysis is Policy 15.2.4.2.b⁹ of the District Plan:

Recognise the scale, form and design of the anticipated built form within a site and the immediately surrounding area and the functional and operational requirements of activities.

Emphasis added

- 64 I agree that the functional and operational requirements of activities should be a key factor of consideration and need to be carefully considered to prevent unintended consequences of the external form of the building.
- 65 However, I disagree with Mr Blair's application of the policy to this Application as it is unclear how Mr Blair has considered the functionality and operational requirements.

⁸ s 42A report dated 24 September 2024 at Appendix E.

⁹ Which appears to be mislabeled as Policy 2.4.2.4b at paragraph 112.

- 66 Mr Blair’s recommendation does not adequately take into account the effect on the operation and functionality of the hotel, nor does it take into account construction and structural challenges. Mr Blair suggests the 1.2 metre setback could be used as balconies for that floor¹⁰ and notes “With careful though the changes sought can be achieved”.¹¹ These factors are addressed below.

Structural consequences of setbacks

- 67 Introducing not one, but two setbacks introduces significant practical built complexities and costs at odds with the efficiency and legibility of the stacked repetition of the hotel tower typology. This design and build efficiency is discussed above at paragraph 78.
- 68 While the structural grid remains unchanged for the building generally, the setbacks would require the realignment of the structural grid along the eastern (Cambridge Terrace) side of the building. To achieve this, either a structural cantilever of the lower levels below the 28m setback would need to be installed or the building would need to be redesigned to transfer the structural loads at the 28m level. Both structural options would need to accommodate the additional complexity of the reaction of structural asymmetry reaction under seismic loads. To achieve sufficient structural strength the depth of the structural beams in this zone would increase. This would result in reduced services zone and potential reduction in ceiling heights to the guestrooms. These structural options, subject to further structural engineering design analysis, introduce design complexity and additional structural costs.
- 69 The setback of structural columns by 1.2m to provide the required structural support effects the layout on the first floor. Effectively it changes where the structural columns need to be which effects the flow and openness of the first floor. The openness of the first floor is critical to ensuring efficiency and human connectivity – which in turn effects human scale.

¹⁰ s 42A report dated 24 September 2024 at 109 and 112.

¹¹ s 42A report dated 24 September 2024 at 113.

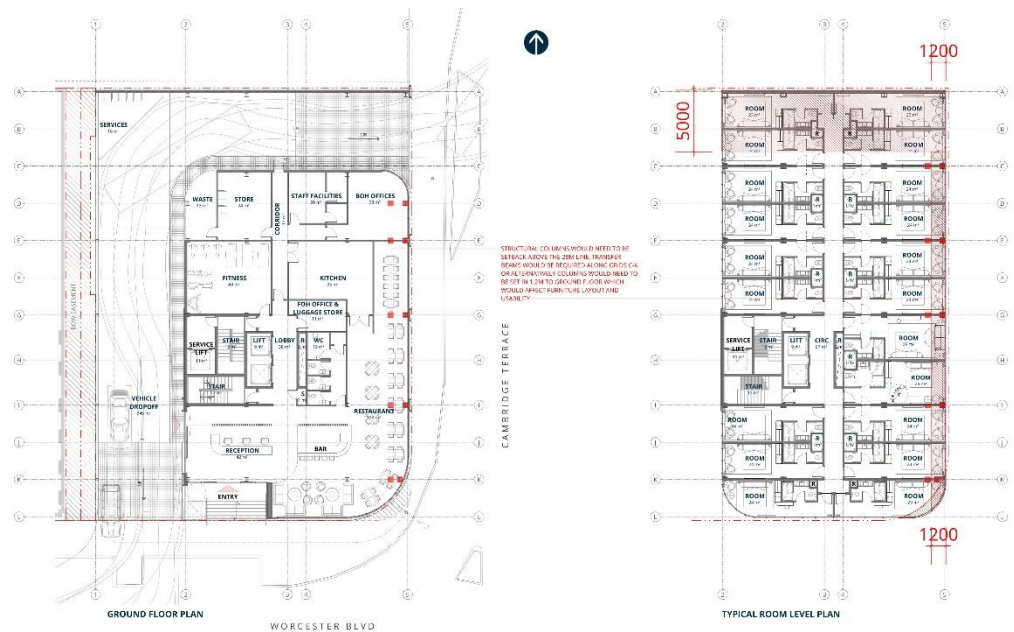


Figure 1 Typical Floor Plans with Setbacks

- 70 The setback of 1.2m would introduce complexity into the construction methodology and sequencing. The current proposed curtain wall design can be delivered via a spider crane off the floor structure and has no need for scaffolding beyond basic internal slab edge protection.
- 71 Delivery of the recommended eastern balcony would require scaffolding off the Cambridge Terrace footpath face to enable the contractor to construct the balcony waterproofing, flashing, tiling, and sliding joinery. The Cambridge Terrace footpath is where the container gantry and office accommodation are likely to be located for the project duration which, should scaffold be required above, would introduce a construction methodology clash. The scaffolding would require outriggers back into the road corridor shutting down a lane on Cambridge Terrace and preventing access to Worcester Boulevard. I understand that Cambridge Terrace is Central City Main Corridor (and is classified as Main Distributor) and it would be highly problematic for the city were the Council forced to shut down a lane for an extended duration.
- 72 Further, the 1.2m setback on the eastern façade of the building will have a direct impact on the technical requirements to reconcile the physical junction of two curving corners. In the current design, the bottom floor has a greater curve joining the eastern and southern façades than floors two and upwards. Introducing a setback would require the introduction of a third curve for the top floors of the building façade.

- 73 This 'intersecting double curve' geometry will require a bespoke curtainwall mullion design as it is non-standard detail not supported in any industry suppliers details. It would include a fully flashed vertical movement joint and saddle flashing. The resulting façade detail is visually unsatisfying and fundamentally conflicts with the sleek and simple curtain wall design. This junction would be designed out in normal architectural design development as it creates a façade weathertightness risk, increases cost, and is visually inconsistent.

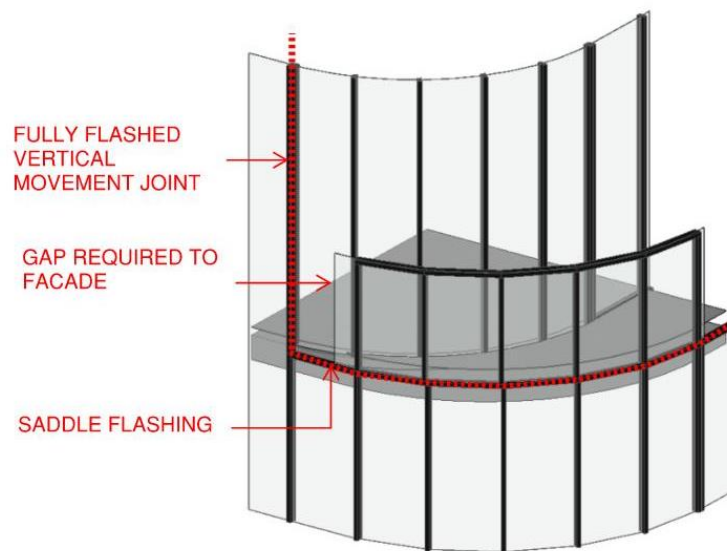


Figure 2 Intersecting Double Curve Curtain Wall Detail

- 74 The structural asymmetry and envelope issues identified above for the 1.2m setback generally apply also to the 5m setback to the northern façade. Additionally access to this roof for maintenance would require access hatches or doors, roof safety points and a separate gutter servicing strategy which all contribute to increased capital and operation cost.

Wind effects

- 75 The 1.2m setback would likely cause unintended wind effects.¹² Introduction of the setback would cause the unmitigated down draft

¹² It was not made clear in Mr Blair's example of the proposed hotel at 48 Peterborough Street what the proposed orientation of balconies would be. However, the proportions of the plan when viewed against the elongated north facing site suggest a west facing deck, well protected from the prevailing Christchurch easterly wind and therefore it is not a comparable example.

effects of the wind from the upper levels to be amplified. Wind modelling would be required to understand the exact effects of this design, but my experience suggests including this setback would require additional external mitigation for wind on the eastern façade above the balcony level to ensure occupant comfort. Additionally, the amplified effects of wind driven rain onto the balcony adds increased risk of weathertightness, and at a minimum, increased cost to introduce a tailored weathertightness design and built fabric to mitigate the risk.

- 76 While not proposed as occupied space, the 5m setback roof to the northern elevation is also exposed to the significant effects of downward driven rain. This will require tailored weathertightness and associated increased cost.

Functionality and operation of the hotel

- 77 The most obvious outcome of the recommended setbacks is the reduction in guestroom numbers. Four rooms will be lost for every floor the 5m setback is imposed upon (eight rooms in total). A further four rooms would be lost on every floor the 1.2m setback is imposed on as the resulting reduction in room size would bring the rooms on the eastern side below industry standard and would require combining rooms. The 1.2m setback would result in the loss of a further 16 rooms. Between the two setbacks a total of 24 rooms would be lost. This represents 12% of the operational capacity of the building.

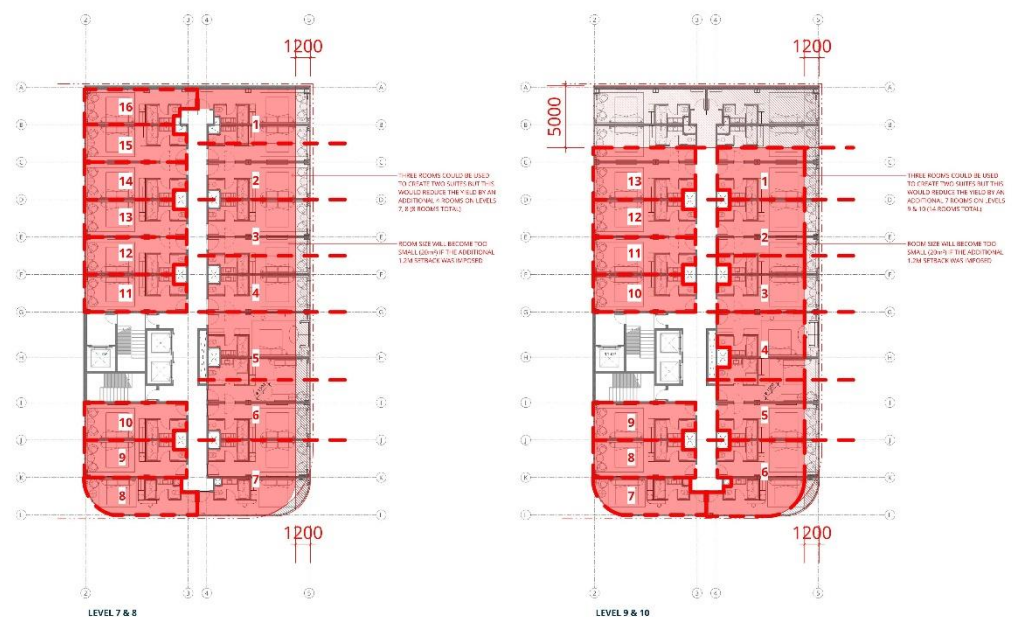


Figure 3 Typical Guestroom Layout with Setbacks

- 78 Beyond the base loss of rooms, the required reconfiguration to accommodate the setbacks would introduce significant inefficiencies.
- 79 First, the reconfiguration of rooms would affect the design of the plumbing services. The plumbing services are designed to be mirrored on each floor to ensure operational and construction efficiency. This type of efficiency minimises the risk of plumbing issues which may arise ensuring the functional needs of the building.
- 80 Second, hotels and hotel staff rely on a 20 rooms per floor and mirroring floor layouts to ensure efficiency of servicing the rooms. The proposed setbacks and resulting effect on the configuration on the rooms reduces the ability for the building to provide this operational functionality.

The utility of the balconies

- 81 Mr Blair suggests the 1.2m setback could be used as a balcony (although he does not recommend the 5m setback being used as a balcony for privacy reasons). The provision of balconies is highly unconventional for a standard city four-star hotel (balconies are more typical in resort hotel settings, especially in sub-tropical and tropical environments). Balcony spaces are rejected by hotel operators in this context as fundamentally not providing a return on investment as they result in:
- (a) Loss of internal space in the hotel rooms;
 - (b) Reduced guest security, privacy, and risk of adjacent overlooking, often mitigated through the introduction of 2m high visibility screens (which themselves reduce the internal room outlook amenity and value);
 - (c) Increased cost of construction;
 - (d) Additional operating costs through the operational cost of internal mechanical air conditioning system balancing to accommodate openable doors, cost of cleaning, maintenance, door hardware, and required space for opening the door;
 - (e) Additional weathertightness risk and mitigating façade detailing issues;

- (f) Increase the effect of wind and are uncomfortable to use when it is windy (in this case the balcony would be on the eastern side of the building which faces the prevailing wind); and
 - (g) Are grossly underutilised by guests.
- 82 Even in buildings where there is a pleasant outlook (such as the proposed hotel), balconies are typically rejected by four-star city hotel operators as they reduce the quality of the view from inside the room as the room is effectively setback from the edge of the balcony. This introduces a visual barrier to the view. Instead, large glass windows are typically favoured as they provide unimpeded views and human connection to those views. In the proposed building this provides connection to Cambridge Terrace and to Otakaro Avon River.

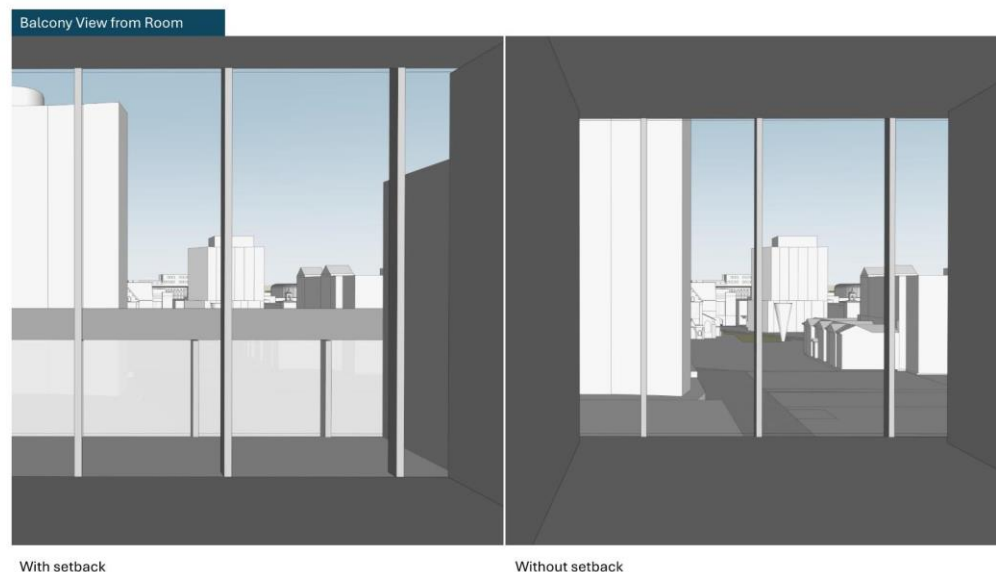


Figure 4 Balcony View from Room

Aesthetic and scale considerations

- 83 In addition to the functional and operational effects, the proposed setbacks have aesthetic effects in terms of the scale and look of the building.
- 84 Mr Blair engages with “scale” at the top of the building (which is rarely seen or noticed by the public) rather than at the ground level which is where the public predominantly engage with a building and notice its scale. Very large buildings maintain human scale if their lowest levels are designed to engage the public. Mr Cleese discusses this aspect in

his evidence and I rely on his expertise in this matter. However, I note that the comments Mr Clease makes in relation to the human scale and design of the building are entirely consistent with my knowledge and expertise and I agree with his assessment.

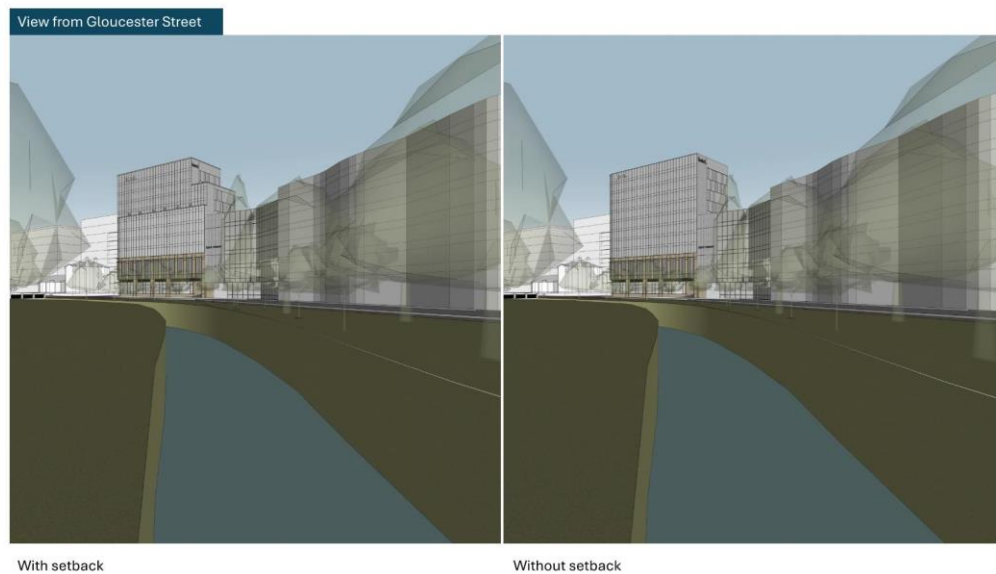


Figure 5 View from Gloucester Street



Figure 6 View from Worcester Boulevard (Bridge)



Figure 7 View from Oxford Terrace



Figure 8 View from Cambridge Terrace

- 85 When viewed from the Worcester Boulevard western approach, the notch to the tower resulting from the 5m setback on the northern façade of the building presents as a ‘missing piece’ with no architectural logic or reference. This is detrimental to the sleekness and sophistication of the

proposed tower architecture.



Figure 9 View from Worcester Street

- 86 When viewed from the Worcester Boulevard south elevation, the 1.2m setback presents an irregular architectural corner profile which detracts from the soft strength of the vertical curved corner of the proposed tower, and weakening the strongest element in the architectural hierarchy.



Figure 10 View from Cambridge Terrace South

Ms Sakin's recommendations

- 87 As noted above, Ms Sakin's recommendations differ from Mr Blair's in relation to both setbacks and the addition of a second guest entrance.

Ms Sakin's setbacks

- 88 My opposition to Ms Sakin's recommended setbacks broadly aligns with the comprehensive Urban Design evidence presented by Mr Clease. Of particular note architecturally, is the recommendation by Ms Sakin to shift the ground floor west into the porte cochere area by an unspecified distance (but I assume approx. 3m). This enables the western wall of the tower to also be extended west in order to compensate for the rooms lost by the tower above 28m being set back 4.2m from both the Worcester and Cambridge edges.
- 89 The impact of this proposal at ground floor is to limit the functionality of the porte cochere for full service coach drop off and compress the drive aisle and pedestrian movement area. Thus reduces the traffic safety for building users. The other significant effect of Ms Sakin's proposal is the hotel building's lower mass would be closer to the smaller scaled Worcester Chambers heritage building. Part of the design of the hotel was to create sufficient distance between the two buildings to showcase Worcester Chambers and make it more visual for pedestrians. This would be lost on Ms Sakin's design.
- 90 The functional aspects of the extent of the 4.2m setback proposed by Ms Sakin above 28m from both the Worcester Boulevard and Cambridge Terrace edges are not supported with regard their fundamental conflict with the hotel design premise of stacked floor plates, vertically aligned structure and services, and circulation cores. These would even further exacerbate the issues presented by Mr Blair's proposed setbacks that I have outlined above.

Addition of a second guest entrance

- 91 Ms Sakin also suggested the addition of a second guest entrance to the hotel on the Cambridge Terrace side. This suggestion was rejected by Mr Blair on the basis it effected the functional and operational requirements of the building.¹³
- 92 I concur with Mr Blair that a door to the restaurant directly from Cambridge Terrace would not meet the functional and operational

¹³ s 42A report dated 24 September 2024 at 114 and 115.

requirements of a four-star hotel. The addition of a second entrance would:

- (a) Eliminate the staff and security efficiency of having a single point of entry;
- (b) Expose the internal ground floor to the prevailing easterly wind, therefore requiring wind pressure mitigation to be installed through a wind lobby or revolving door; and
- (c) Require alterations to the footprint to enable a stair and landing from street level to internal ground floor level, which would impinge upon internal functional restaurant space.

93 I therefore agree that a second guest entrance to the building should not be included in the design as the negative effects to the function and operation of the building are not outweighed by any benefits to human connectivity.

CONCLUSION

94 I consider the design of the building as proposed appropriately balances the functional and operational requirements of a hotel with the need to create human scale, cultural connection, and fit in with the historical context of its surrounding.

95 The design has been carefully considered to mimic the Harley Chambers building through the bottom three floors of the façade while also providing a modern and functional building.

96 The design provides human scale by focussing the viewers' attention on the bottom three floors of the building and breaking up this view with visual interest in the façade. Further, an open plan bottom floor and large glass windows invites human connectivity between inside the building and out, increasing the sense of human scale for anyone outside the building.

97 Although I acknowledge what Mr Blair is trying to do through his recommended setbacks, I cannot support his recommendation. I do not consider the setbacks provide the human scale he is seeking to achieve. The setbacks are contained at the top of the building – a part which is of limited relevance for a viewer's connectivity and sense of human scale. Further, they introduce substantial unintended consequences for the

design, construction, and usability of the building which all negatively affect the functionality and operational efficiency of the design.

A handwritten signature in black ink, appearing to read 'Grant Armstrong', with a large, stylized initial 'G'.

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Grant Armstrong

2 October 2024