

Before an Independent Hearings Panel
Appointed by Christchurch City Council

under: the Resource Management Act 1991

in the matter of: proposed Plan Change 14 to the Christchurch District
Plan

and: **Carter Group Limited**
(Submitter 824)

Summary Statement of David Hill (architecture) on behalf of
Carter Group Limited

Dated: 16 April 2024

Reference: Jo Appleyard (jo.appleyard@chapmantripp.com)
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SUMMARY STATEMENT OF DAVID HILL ON BEHALF OF CARTER GROUP LIMITED

INTRODUCTION

- 1 My full name is David Norman Hill. I am a Director of Wilson and Hill Architects Limited.
- 2 I prepared evidence in relation to the submission made by Carter Group Limited (*Carter Group*) on Plan Change 14 to the Christchurch District Plan (*PC14*) dated 20 September 2023 (*EiC*). My qualifications, experience and confirmation I will comply with the Code of Conduct for Expert Witnesses (Part 9, Environment Court Practice Note 2023) are set out in my EiC and I do not repeat those here.
- 3 This statement is intended to provide a brief summary of my evidence. This includes updates where relevant in light of the rebuttal evidence filed for Christchurch City Council (*Council*).

SUMMARY OF EVIDENCE

- 4 The building is currently in an advanced state of deterioration. It suffered significant damage that compromised its weather tightness in the 2011 earthquakes. This earthquake damage has not been repaired and the building has remained unoccupied since then. The building has suffered significant damage from water ingress and from people squatting in it.
- 5 Over the years prior to the earthquake, a lot of its original features had been removed or altered, this has progressively changed the character & integrity of the building.
- 6 The building is in such a deteriorated state it will have to be rebuilt. The amount of original building fabric that could be reused is minimal which would result in the built result being a 'replica' of the original building. It would be a reconstruction not a restoration.
- 7 The building in its current location and its heritage setting, compromises the development of this site.
- 8 I have read the evidence of Tim Holmes and disagree with the statement that the '*While there are elements of the Blue Cottage that require replacement, this may equate to 25% of the weatherboards (for example) and certainly not an amount of the building which as a whole equates to a rebuild*'. The existing building fabric is so deteriorated very little of the original building fabric will be able to be reused. It will be a reconstruction not a restoration.

- 9 I have read the evidence of Clara Caponi and disagree with the statement *'...the cottage retains much of its original fabric and finishes'*. My evidence contains a list of the building features that have been removed or altered over its lifetime. It is my opinion that the removal / alteration of these features has significantly changed the cultural heritage value of this building.
- 10 I have read the evidence of Tim Holmes and disagree with his statements *'Therefore works would need to be carried out to make good damage to the building fabric and defective service installations, but upgrades to current building code are not required'* and *'In particular, the installation of insulation, double glazing and a compliant heating system, while desirable, is not strictly required and would equate to betterment as far as the minimum works required to bring the Blue Cottage back to its previous use.'*
- 11 The scope of work in my evidence is based on what would be required to return the building to its previous use as a functional residential building or an education building that are restored and fitted out to a level the market would expect. The scope of work would comply with the NZ Building Code as required for its use and Healthy Home standards so it can be rented out as a residence.
- 12 Installing insulation and heating in this building are readily achievable, and are items I am sure will be a requirement in obtaining a building consent for the reconstruction works required. Also, without them, the building would be not meet market expectations and would struggle to attract people to occupy it. The scope of works Mr Holmes is recommending would result in a 'Deans Cottage' type building (as an example), which is not capable of any real practical use.
- 13 The cost of the work required to achieve this aligns with the costings in Tom Chatterton's evidence.

David Norman Hill

16 April 2024