

Before an Independent Hearings Panel  
Appointed by Christchurch City Council

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*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 Kyle Brookland (building condition  
assessment) on behalf of Carter Group Limited

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Dated: 16 April 2024

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## **SUMMARY STATEMENT OF KYLE BROOKLAND ON BEHALF OF CARTER GROUP LIMITED**

### **INTRODUCTION**

- 1 My full name is Kyle Brookland. I am the owner and director of Informed Property Inspections 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 I undertook an inspection of the building on 25 August 2023 and prepared a Building Inspection Report which is attached as Appendix 1 to my evidence in chief. This report and the photographs included in it demonstrated that the building was in a significant state of disrepair with significant watertightness, moisture, and hygiene issues.
- 5 In response to Mr Holmes' rebuttal evidence paragraphs 19 to 21:
  - 5.1 I carried out the inspection in accordance with NZS 4306:2005 Residential property inspection. The main reason for the inspection being undertaken to the NZS 4306:2005 standard was because of the scope that I was given to undertake the inspection. My scope was that the final permitted use of the building would be for residential or educational purposes and NZS 4306:2005 is therefore the most appropriate standard to apply.
  - 5.2 The inspection has set guidelines which highlight direct line of sight only – non-invasive measures were also undertaken as any destructive testing requires separate approval prior.
- 6 In response to Mr Holmes' paragraph 23 that there exist biological cleaning companies in Christchurch that could clean heritage building fabric and bring it back to use, I note that:
  - 6.1 While possible, in my experience, this is very expensive; and
  - 6.2 I understand that such services have not been included in the costings provided by Mr Chatterton.

- 7 Despite Ms Caponi's rebuttal evidence, I remain of the view that the works required to return this property to a safe operational standard involves an almost complete replacement of all of the building components. In forming this view, I note that I have been involved with several restoration projects over the years and in my experience once the damages are identified correctly it becomes more practical to replace components in their entirety, rather than repair or restore them.
- 8 For example, when weatherboards are removed, damage to the framing is often observed or non-complaint framing is found which increases the scope of the required works. Another example I have encountered is where builders will elect not to work on contaminated buildings (even once cleaned) or insist on replacement.
- 9 In summary, I stand by the conclusion in my building report that *'the works required to return this property to a safe operational standard involves an almost complete replacement of all of the build components and it would likely be more cost effective to replace he structure with a modern equivalent'*.

**Kyle Brookland**

**16 April 2024**