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 Tom Chatterton (Quantity Surveying) on behalf of Carter Group Limited

Dated: 16 April 2024

Reference: Jo Appleyard (jo.appleyard@chapmantripp.com)

Annabel Hawkins (Annabel.hawkinsr@chapmantripp.com)





SUMMARY STATEMENT OF TOM CHATTERTON ON BEHALF OF CARTER GROUP LIMITED

INTRODUCTION

- 1 My full name is Thomas Graham Chatterton. I am a Quantity Surveyor and Director of Rider Levett Bucknall.
- 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.
- 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

- We provided a Rough Order of Cost dated September 2023 for the Blue Cottage at 325 Gloucester Street, Christchurch.
- This estimate was based on the scope of works provided by Wilson & Hill Architects supplemented by site visits.
- 6 Rates have been used from other recent Christchurch projects.
- 7 Contingency allowances have been based on allowances for an existing building project appropriate for a project with the number of unknowns such as this.
- The estimate is a conservative, yet realistic estimate for the development works likely to be required to bring the building up to a functional and useable state that meets the market's expectations. Specifically taking into account construction methodologies that heritage listing demands, as well as considering replacement and strengthening of framing yet to be verified.
- The Rough Order of Costs stated it to be a "Worst case scenario". It should be noted that the number of provisional allowances included in the estimate could in reality grow beyond these allowances and therefore it is not a worst case scenario. References in my evidence to "Worst case scenario" should therefore be replaced with "estimated to a conservative, yet likely and realistic estimate approach to the scope of works and allowances made".
- We have since updated the rough order of costs in April 2024 (refer to report at **Appendix 1**) to include the areas based on Gavin Stanley's measurements of the GFA, Roof plan and external wall

area provided in his evidence. I have also updated the requirement for lead based paint removal, as a provisional allowance. Again, this estimate was based on the scope of works provided by Wilson & Hill Architects.

- After initial discussions with Gavin Stanley, we believe we are aligned in both measure, methodology and rates, it is just scope which differentiates the estimates. I believe if we were both to have the same scope of works we would align our costing quickly.
- We have also done a high-level range of estimates for a new build of the same size and shape using Linea Weatherboards and low medium cost fittings (refer to report at **Appendix 2**). This has been further verified by Brooksfield housing developers.
- 13 The revised rough order of costs is not a complete cost of the development project. It specifically excludes:
 - 13.1 GST;
 - 13.2 Carter Group management Costs;
 - 13.3 Development Contributions;
 - 13.4 Legal Fees;
 - 13.5 Finance Costs;
 - 13.6 Escalation; and
 - 13.7 Works outside of the 20 x 15m site boundaries.
- 14 Therefore, when considering the total cost of the development these items need to be specifically considered in the feasibility of any proposed project.
- 15 In summary, I estimate:
 - 15.1 a rough order of costs for building **repair** of \$1.4m excluding GST (being \$1.61m including GST). This being estimated on a conservative, yet likely and realistic basis, accounting for the scope of works and allowances made by Mr Hill and Mr Brookland.
- 15.2 **Replacement** costs of **\$533K** (excluding GST) for an equivalent building.

Tom Chatterton

16 April 2024