

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:* **Church Property Trustees**  
(Submitter 825)

Summary statement of Peter Eggleton (Quantity Surveying) on  
behalf of Church Property Trustees

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Dated: 17 April 2024

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## **SUMMARY STATEMENT OF PETER EGGLETON ON BEHALF OF CHURCH PROPERTY TRUSTEES**

### **INTRODUCTION**

- 1 My full name is Peter Ross Eggleton. I am a director of Eggleton Group Limited, an independent Rangiora based firm specialising in construction consulting and quantity surveying.
- 2 I prepared evidence in relation to the submission made by Church Property Trustees (*CPT*) 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 by Mr Philip Griffiths for Christchurch City Council (*Council*).

### **SUMMARY OF EVIDENCE**

- 4 My evidence provides a rough order of cost to repair the St James Church and comments on the evidence of Philip Griffiths for the Council.
- 5 I visited the building on Monday the 11<sup>th</sup> September 2023 and took various measurements and photographs.
- 6 My total cost estimate for repair and strengthening work is **\$5,889,000 excluding GST**. Paragraph 9 of my *EiC* sets out the line items included in my estimate that result in this total. I note that my estimate excludes work to recommission the pipe organ, heating, siteworks and provision for inflation.
- 7 If the building was required to be strengthened to 100% NBS due to a change in use, the costs would be significantly higher due to the variable ground in Riccarton and the additional strengthening requirements.
- 8 Paragraph 12 of my *EiC* responded to Mr Griffiths primary evidence, concluding that his repair and strengthening estimate was likely to be insufficient given the detailing and scope of repairs. This is due to the considerable earthquake damage to the building and dilapidation due to lack of maintenance.
- 9 I have reviewed Mr Griffiths' rebuttal evidence insofar as it addresses my evidence. His main comment is that I have applied a 30% percentage for Contractors margin/p and g, whereas he considers 22% appropriate. I remain of the view that 30% is

appropriate. However, even with Mr Griffiths' 22% applied, my overall figure would change to \$5,594,000. His overall figure is \$5,274,000. The reasons for the different may be the amount of temporary works that the client may impose. Regardless, the figures are all within a reasonable tolerance.

- 10 In addition, I maintain my position that the risks as stated in **Mr Peter Carney's** engineering evidence for CPT in relation to the foundations and requirements for a change in use may result in significant cost increases.

**Peter Ross Eggleton**

**17 April 2024**