

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

Statement of evidence of Peter Eggleton on behalf of Church
Property Trustees (Quantity Surveying)

Dated: 20 September 2023

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STATEMENT OF EVIDENCE OF PETER EGGLETON ON BEHALF OF CHURCH PROPERTY TRUSTEES

INTRODUCTION

- 1 My full name is Peter Ross Eggleton.
- 2 I am a director of Eggleton Group Limited, an independent Rangiora based firm specialising in construction consulting and quantity surveying. I have 50 years experience as a quantity surveyor. I am a Life Member of the New Zealand Institute of Quantity Surveyors. From 1982 to 2011 I worked for Rawlinsons Limited, a national quantity surveying practice with offices in Auckland, Wellington, Christchurch and Dunedin. I became a partner in 1985 and was the national managing director of Rawlinsons for 7 years. Rawlinsons Limited owned Rawlinsons Media Limited, the then editors and publishers of Rawlinsons Construction Handbook that was published annually.
- 3 I have been associated with Church Property Trustees through All Saints Church Community Hall relocation project, and structural strengthening proposals for various churches.
- 4 I have experience in working on Historic listed buildings, other church related buildings and numerous earthquake repair estimates including High Court Proceedings.

SCOPE OF EVIDENCE

- 5 My evidence will address the following:
 - 5.1 A rough order of cost to repair the building and comments on the evidence of Philip Griffiths.
- 6 In preparing this evidence I have:
 - 6.1 Reviewed the submission by Church Property Trustees; and
 - 6.2 Reviewed the evidence of Philip Griffiths for the Council.
- 7 I visited the building on Monday the 11th September 2023 and took various measurements and photographs.

CODE OF CONDUCT

- 8 While this is not an Environment Court hearing, I note that in preparing my evidence I have reviewed the Code of Conduct for Expert Witnesses contained in Part 9 of the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where I state that I am relying on the opinion or evidence of other witnesses. I have

not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

COSTS OF REPAIR AND STRENGTHENING

- 9 I have prepared a rough order of costings for the repairs and strengthening work as follows:

	\$
Chancel Arch	400,000
Gable walls - strengthening	146,000
Side walls and stonework	640,000
Parapets	150,000
Floor releveling	120,000
Roof connections - Holmes detail	425,000
Front entry step damage	3,000
Remediate woodwork, redecoration, floor coverings, water ingress issues, pigeon issues etc	1,200,000
Contractors margin/p and g - 30%	925,000
Professional fees and project management	900,000
Contingency - 20%	980,000
Total excluding GST	5,889,000

- 10 The above excludes work to recommission the pipe organ, heating, siteworks and provision for inflation.
- 11 I note the comments in **Mr Peter Carney's** evidence for Church Property Trustees in relation to a potential change in use. In such a scenario, the costs would be significantly higher due to the variable ground in Riccarton and the requirements for 100% NBS.

RESPONSE TO COUNCIL SECTION 42A REPORTS AND EVIDENCE

- 12 I have reviewed the evidence of Philip Griffiths dated 11 August 2023 and comment:
- 12.1 I agree that the gross ground floor area is 293 m2 but excluding any upper floors of the tower.
- 12.2 Mr Griffiths has not prepared a detailed repair estimate based on the Aurecon report for the strengthening option but rather a non-specific square metre rate for:
- (a) A repair and strengthening to 67% NBS of \$5,274,000 plus GST.
 - (b) A replacement like for like \$10,367,000 plus GST.
 - (c) Replacement replica of \$6,013,000 plus GST.
 - (d) A modern devotional building of \$1,465,000 plus GST.
- 12.3 In relation to the repair and strengthening estimate I noted from my visit to site that the building has suffered considerable damage from the earthquakes and dilapidation due to lack of maintenance. Therefore, I consider that the repair and strengthening is likely to be insufficient given the detailing and scope of repairs.

Peter Ross Eggleton
20 September 2023