

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)

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

Dated: 20 September 2023

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STATEMENT OF EVIDENCE OF DAVID HILL ON BEHALF OF CARTER GROUP LIMITED

INTRODUCTION

- 1 My full name is David Norman Hill.
- 2 I am a Director of Wilson and Hill Architects Limited, which I founded with Christopher Wilson in 1995.
- 3 I hold a Bachelor of Architecture (Hons) from Victoria University School of Architecture and have been a Registered Architect since 1991. I am a past Chairman of the Canterbury Branch of the New Zealand Institute of Architects and a Fellow of the New Zealand Institute of Architects.
- 4 I have broad experience in successfully designing and delivering a range of building types. I have designed a number of award-winning projects, including the Forte Health building, Sumner & Taylors Mistake Surf Lifesaving Clubs and the Rakaia Apartments. I have recently completed the restoration of the heritage listed Lawrie Wilson Building at 210 Tuam Street.
- 5 I was born in Christchurch and have spent most of my life in this city. I am familiar with the sites to which the Carter Group Limited (*Carter Group*) submission relates, in particular the property at 32 Armagh Street.

CODE OF CONDUCT

- 6 Although this is not an Environment Court hearing, 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.

SCOPE OF EVIDENCE

- 7 My evidence addresses the current condition of the Blue Cottage at the Armagh Street property and the spatial/development implications of several aspects of proposed Plan Change 14 in relation to the property.
- 8 In preparing my evidence I have reviewed:
 - 8.1 Carter Group's submission insofar as it relates to the Armagh Street property;

8.2 The evidence of **Mr Brookland** and **Mr Fulton** prepared on behalf of Carter Group; and

8.3 The evidence of Ms Caponi on behalf of the Council.

BLUE COTTAGE

- 9 The building is currently in an advanced state of deterioration. It suffered significant damage that compromised its weather tightness in the 2011 earthquakes that has not been repaired and has remained unoccupied since then.
- 10 The building has suffered significant damage from water ingress and from people squatting in it. Its kitchen and bathroom have been vandalised and it has suffered some damage from a fire set in one of the rooms. I have included photos of the existing state of the building as an appendix to this evidence.
- 11 Over the years prior to the earthquake, a lot of its original features had been removed or altered including (but not limited to):
- 11.1 the original slate roof has been replaced with corrugated iron;
 - 11.2 the original bullnose veranda sheltering the entry has been removed and an accessible ramp installed;
 - 11.3 two of the original chimneys have been removed and the third one that collapsed during the earthquake has not been replaced;
 - 11.4 two of the three original fireplaces have been replaced with more modern fireplaces;
 - 11.5 a number of the original doors, ceiling cornices and other interior trim has been removed;
 - 11.6 ceilings have been lowered;
 - 11.7 some of the original timber sash windows have been replaced with more modern windows; and
 - 11.8 lean-tos have been added on the western side.
- 12 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. One would be a struggle to call it a restoration.
- 13 The reused original building elements would be limited to items such as a few windows, some doors, some skirtings and cornices and some exterior trim such as the timber gable brackets.

- 14 The ground levels on the Gloucester St side would need to be lowered to expose the sub floor foundation vents / foundation walls and the floor relevelled.
- 15 To comply with current building codes:
 - 15.1 compliant insulation would have to be installed to the roof, walls and floor;
 - 15.2 polythene will need to be fitted over the ground beneath the house (to meet healthy home standards);
 - 15.3 existing & new timber framed windows will need to be double glazed;
 - 15.4 a new kitchen, bathroom & laundry facilities will need to be installed;
 - 15.5 a compliant heating system (eg heat pumps), a ventilation system and a hot water heating system will need to be fitted;
 - 15.6 it is likely to require rewiring, replumbing and new sewer and stormwater drainage.
- 16 There will also be structural requirements to be met, with the level required dependent on what the building will be used for. The structural requirements are likely to be higher for an education use, being a use that would also require accessible access (a ramp) and an accessible WC to be constructed.
- 17 The building is deteriorated to a such an extent that it would have to be totally rebuilt. The original building elements that still exist and are in a state that can be reused, are minimal. To rebuild in this manner will result in a 'replica' of the original of very limited heritage value and would be an expensive exercise.
- 18 I have read the evidence of Tim Holmes and disagree with his comment that the building is 'eminently capable of repair'. As stated above, the work required on this building will be beyond the scope of a 'repair', it will be a rebuild with very little of the original heritage fabric being in a state that will allow it to be reused.
- 19 I have read the evidence of Clara Caponi and disagree with her comment that 'the cottage retains much of the original fabric and finishes'. The original features noted above that have been removed or altered are relatively significant.

DEVELOPMENT OF ARMAGH STREET SITE

- 20 As the building is sited in the centre of the site's Gloucester Street frontage, and its heritage setting extends the full width of this frontage, any development potential for this portion of the site is

completely compromised. For example, there is no opportunity for a building to be developed directly on the Montreal / Gloucester Street corner that would define the corner and the street edges.

- 21 Without the building and its heritage setting, the Gloucester Street frontage of the site could be developed for any number of different uses. With its street frontage to the south, this part of the site is ideal for residential or mixed use as it allows for private, sunny outdoor living areas to be built to north. Gloucester Street is the ideal street for situating the vehicle entry/ exit for a development for this whole site. A vehicle entry / exit in this location provides access onto a relatively quiet two-way street that then provides easy access to the north and south one way systems.
- 22 If the building was to be rebuilt, relocating it to the western boundary with a much smaller heritage setting would be an option. This would allow space for a development on the Gloucester / Montreal St corner and space for a vehicle entry / exit serving the site. However, a full rebuild as described above would still be required.
- 23 The northwest corner of the site, with its ideal orientation for sun and its distance from the busy Montreal / Armagh St corner, is the best part of the site for residential / mixed use development. The two large protected trees will limit the portion of this part of the site that can be built on and will shade any buildings that are built close to them. Currently, the two trees reduce development flexibility and opportunity for the site.

HERITAGE INTERFACE

- 24 Heritage buildings can and should cohabit with buildings built at different times. The buildings that make a city each tell their own story of the economic conditions at the time they were built, what the original owner's aspirations were and what society's aspirations were.
- 25 Having a heritage building immediately adjacent to a new contemporary building creates a contrast between them and from this often they both appear stronger individually. An example of this in Christchurch is in Tuam Street with the 1910 Lawrie Wilson building sitting alongside the 2015 Ecan Office Building. Numerous examples exist in our older residential suburbs, where well designed residential buildings sit well alongside older heritage residential buildings.

26 I do not see the need for separate controls for heritage interfaces, particularly given, as I understand it, there already exist rules in the District Plan which currently manage the relationship between new development and heritage items/areas.

David Hill

20 September 2023

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THE BLUE COTTAGE – ARMAGH STREET

PHOTOS OF EXISTING



West Elevation (1st gable end where chimney collapsed in earthquake)



East Elevation



West Elevation (2nd gable end)



Gloucester St face



Cladding deterioration



Hallway



Entry door



Fireplace that replaced one of the original



Original fireplace



Fire damage to floor



Kitchen



Laundry



Bathroom