and:	Carter Group Limited
in the matter of:	proposed Plan Change 14 to the Christchurch District Plan
under:	the Resource Management Act 1991

(Submitter 824)

Statement of evidence of William Fulton (heritage) on behalf of Carter Group Limited

Dated: 20 September 2023

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



STATEMENT OF EVIDENCE OF WILLIAM FULTON ON BEHALF OF CARTER GROUP LIMITED

INTRODUCTION

- 1 My full name is William Henry Fulton. I am a Director of Team Architects Christchurch and a Director of Team Architects Limited, a consortium of eight architectural practices across New Zealand.
- 2 I hold a Bachelor of Architecture (Hons) from the Victoria University of Wellington, a Batchelor of Building Science from Victoria University of Wellington and a Post Graduate Diploma in Landscape Architecture from Lincoln University. I am a member of the International Council on Monuments and Sites (*ICOMOS NZ*) and a member of Heritage New Zealand. I am a member of the New Zealand Institute of Architects (*NZIA*). I am a member of the Christchurch City Council Urban Design Panel and the Akaroa Design Panel.
- 3 I have over 20 years of professional expertise in architecture and Heritage conservation. Prior to the 2010/2011 Christchurch earthquake sequence I was involved in many heritage projects in Christchurch including the Christchurch Music Centre, the Riccarton Racecourse Tea House and the Huntley Homestead in Yaldhurst.
- 4 Most recently I have been appointed to the panel of Heritage Professionals administered by the Christchurch City Council. I have been the Heritage Architect for many projects including the restoration of New Regent Street. I am currently the Conservation Architect and one of the Heritage Professionals working on the Christchurch Cathedral restoration project.

CODE OF CONDUCT

5 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

6 My evidence addresses the condition of the Blue Cottage at Carter Group Limited's (*Carter Group*) property at 32 Armagh Street (*Site*) from a heritage architecture perspective.

- 7 In preparing my evidence, I have reviewed:
 - 7.1 Carter Group's submission (excluding appendices);
 - 7.2 Relevant parts of the evidence of Amanda Ohs, Tim Holmes and Clara Caponi for the Council; and
 - 7.3 The Property Inspection Report by Kyle Brookland for Carter Group.
- 8 I also undertook a site visit (interior and exterior) of the Blue Cottage on 11 September 2023.

SUMMARY OF EVIDENCE

9 The building is in poor condition largely due to a lack of maintenance but also because it has not been used for a number of years and exposed to intruders and vandalism. Two large trees to the southern boundary are also negatively impacting on the state of the building.

BUILDING CONDITION

- 10 The poor condition of the building is partly a result of damage due to moisture ingress. This is mainly a result of the failing rain-water system due to leaf and vegetation build up. The internal valley, between the East-west roof gables, has a build-up of vegetation that means rainwater is entering the building above the internal Hallway. All roof and rainwater goods need to be cleared of debris and connected directly to the stormwater system.
- 11 There are areas of rotten weatherboard especially where spouting and rainwater heads are not functioning allowing water to locally spill onto walls and cause rot. The rainwater system needs to be repaired and replaced for it to function properly.
- 12 A section of the west wall is missing where a chimney has been removed. This will need to be reinstated or boarded over to make the wall weather tight.
- 13 The remaining weatherboards and external timber trims appear sound, with some signs of borer but most surfaces have been covered with graffiti. The underlying paint is wearing off, back to bare timber in some places. The external cladding and external trims need to be stripped back and repainted, with any rotten or borer damaged boards replaced.

- 14 The two trees to the southern boundary are having a negative impact on the condition of the building in terms of leaf and branch drop as well as raising surrounding ground levels. In my opinion they need to be removed to avoid further risk to the building.
- 15 The ground level and leaf litter have risen over time and are impacting the original stone foundations and the ability for the sub floor foundation to ventilate adequately. Ground levels to the south elevation need to be lowered to allow more air flow to the sub floor cavity. I did not access this sub floor space but have seen photos which suggest a lack of ventilation and moisture damage from above.
- 16 The external timber joinery has been vandalised and boarded up with plywood sheets. Much of the glazing has been broken and will need to be replaced. The windows will need to be further assessed to determine what is required to make them function again.
- 17 On the interior the failing valley flashing between east-west gables has allowed rainwater to enter and damage the ceiling and walls of the hallway.
- 18 While I did not access the ceiling space, recent photos indicate the presence of mould to roof framing and sarking. This is probably a direct consequence of the water ingress resulting from the failed valley flashing.
- 19 The wall linings are a mix of lathe and plaster and sheet linings. There is isolated cracking in the lathe and plaster which will need to be repaired or replaced with new bracing elements.
- 20 The rainwater ingress has negatively affected the carpet which along with damage and soiling caused by intruders will need to be replaced.
- 21 There is a hole in the floor just inside one room. This area may have been an access panel to the sub floor but has extensive borer damage. Once the carpet is removed a survey of the floorboards will need to be undertaken.
- 22 The internal fittings and fixtures have been partially removed from their position and items like timber mantles, door leaves, arches and wardrobes are strewn around the interior spaces. These fittings and fixtures will need to be removed, repaired and reinstated. The accumulated rubbish and debris left by intruders will need to be removed.
- 23 I have referred to the Property inspection Report by Informed Property Inspections dated 25 August 2023. This report documents the current condition room by room. While I generally agree with its observations relating to the buildings current condition, the report recommends full replacement of elements in most instances.

I would advocate for a repair strategy that took a Conservation approach and took into consideration the Heritage significance of the building.

COUNCIL EVIDENCE

- 24 I have refered to the Council evidence where they relate to the condition and repair of the building.
- 25 I have read the evidence from Amanda Ohs and agree with statements relating to the condition and repair of the building especially her observation that, 'Due to the nature of the material, timber buildings deteriorate and require elements to be repaired and replaced over time – this is an accepted part of heritage conservation practice.'
- 26 I have read the evidence of Tim Holmes and largely agree with his findings especially his comment that the building is capable of repair.
- 27 I have read the evidence of Clara Caponi. I am limited to commenting on her findings regarding the buildings current condition. I agree with her general comments regarding the lack of maintenance and the negative impact the two large trees are having on the condition of the building.

William Fulton

20 September 2023