

PC9 Built Heritage Oral Submission

Jean Dorrell & David Whyte

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Note: Appendix and text in italics taken as read.

1. Of the properties recommended for removal by Ms Caddigan in her Statement of Evidence *dated 24 August 2023*, she found 23 of them to be typical examples of its type with no documented heritage qualities of significance, *specifically*¹:

This includes (but is not exhaustive): the place is a typical (rather than notable or representative) example of its type; a historical or architectural association cannot be demonstrated or is of unproven or uncertain significance; the historical pattern is characteristic of that found across Hamilton in the applicable development period.

2. Of those 23, there were 11 where WSP had ranked at least one heritage quality as “high”. This includes 9 which were ranked high for “rarity”. To have properties ranked as high rarity, then deemed to be typical suggests that WSP may have inflated the values and a further review is needed of **all** the other proposed Built Heritage sites in the WSP report.

3. Ms Caddigan’s evidence also recommended 10 properties be removed with the primary reason being that they had been highly modified, *specifically*:

The place has modifications to the extent that it does not represent the heritage qualities for which it was scheduled;

4. In the WSP report, six of these “highly modified” properties were ranked as moderate integrity with one ranked as High integrity. Where properties were deemed to be so modified as to not represent the heritage qualities, an accurate integrity rating should have been low or none.

5. This raises two concerns which need to be addressed:

- a. From this sample reviewed by Ms Caddigan, it suggests that **the WSP report has overstated at least some of the heritage values**. (This is separate to the question of whether “moderate” should be included which I will leave to the experts.)

- b. **The properties which did not have submissions made for or against them, also need to be reviewed using the same criteria as Ms Caddigan used**, to ensure buildings with weak (or no) documented heritage values are not scheduled as built heritage simply because no one made a submission on that property. This could result in the preservation of false history.

- i. For example, Ms Caddigan recommended the removal of 3 Oxford Street due to it being typical with no documented heritage qualities of significance. 9 and 17 Oxford Street have the same values in the WSP report as 3 Oxford Street has. Based on our very detailed research of the history of Oxford Street as part of HHA process, the two other Oxford Street properties will have exactly the same heritage value as 3 Oxford, and also the same lack of documentation of the history. The fact that no submission was made against (or for) inclusion of those two properties, does not mean that they should just be included by default.

¹ Footnote 7 in Ms Caddigan’s Statement of Evidence dated 24 August 2023

Appendix A: Summary from Ms Caddigan's Report 24 August 2023

| Address | Primary reason for removal | WSP high values |
|---------------------------------------|----------------------------|-----------------------------|
| 2 Clifton Road, Hamilton Central | No heritage qualities | Rarity Group |
| 2 Liverpool Street, Hamilton Central | No heritage qualities | Rarity Integrity |
| 3 Oxford Street, Fairfield | No heritage qualities | None |
| 6 Claudelands Road, Hamilton East | No heritage qualities | Style/design/type Rarity |
| 7 King Street, Frankton | No heritage qualities | Style/design/type Rarity |
| 8 Marama Street, Frankton | No heritage qualities | Integrity Group |
| 9 Fowlers Ave, Frankton | No heritage qualities | Style/design/type Rarity |
| 11 Frances Street, Hamilton East | No heritage qualities | Rarity |
| 11 Wye Street, Frankton | No heritage qualities | Style/design/type Rarity |
| 16 Marama Street, Frankton | No heritage qualities | Integrity Group |
| 17 Beale Street, Hamilton East | No heritage qualities | None |
| 28 Thackeray Street, Hamilton Central | No heritage qualities | None |
| 36 Angelsea Street, Hamilton Central | No heritage qualities | Rarity |
| 47 Norton Road, Frankton | No heritage qualities | None |
| 53 Claude Street, Fairfield | No heritage qualities | Style/design/type Rarity |
| 94 Albert Street, Hamilton East | No heritage qualities | None |
| 94 Lake Road, Frankton | No heritage qualities | None |
| 131 Albert Street, Hamilton East | No heritage qualities | None |
| 164 Ulster Street, Whitiara | No heritage qualities | None |
| 243 River Road, Claudelands | No heritage qualities | None |
| 1188 Victoria Street, Whitiara | No heritage qualities | None |

| Address | Primary reason for removal | WSP values of note |
|------------------------------------|----------------------------|---|
| 3 Hardley Street, Whitiara | Modified | Moderate integrity |
| 7 Caro Street, Hamilton Central; | Modified | High designer Moderate integrity |
| 7 Radnor Street, Hamilton Central | Modified | Low integrity |
| 13 Cardrona Road, Beerescourt; | Modified | High Style/design, High Rarity High Group High Setting Moderate integrity |
| 118 Albert Street, Hamilton East | Modified | Moderate integrity |
| 158 Ulster Street, Whitiara | Modified | Moderate integrity High various others |
| 170 Pembroke Street, Hamilton Lake | Modified | Moderate integrity |
| 233 River Road, Claudelands | Modified | High integrity High various other |
| 913 River Road, Queenwood | Modified | Unknown integrity! High on various (Roger Walker house) |
| 1335 Victoria Street; Beerescourt | Modified | High Rarity Low integrity |