

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991 (RMA)

AND

IN THE MATTER of Proposed Plan Change 9 to the Operative Hamilton
City District Plan

**STATEMENT OF VENTAKA RAMANA BABU PURCHURI ON BEHALF OF
SNR LIMITED**

10 November 2023

Introduction

- 1 My name is Ventaka Ramana Babu Purchuri and I am a director of SNR Limited (**SNR**).
- 2 SNR is the registered owner of the property at 36 Hendon Road, Fairview Downs, Hamilton (**Property**).

Further Submission

- 3 SNR made a further submission on Niall Barker's submissions to Hamilton City Council's Plan Change 9. Mr Barker (**Submitter**) requests that part of Fairview Downs (including the Property) is listed as a Historic Heritage Area under PC9.
- 4 In its further submission, SNR sought that the proposed Fairview Downs HHA being introduced by the Submitter was rejected.
- 5 I do not consider that Fairview Downs demonstrates any characteristics that warrants heritage protection.

Further Heritage Assessments

- 6 Mr Knott's evidence states that the Fairview Downs area is of "low" heritage significance.¹ Mr Knott concludes that the historic significance of the area has been diluted due to the difference in frontages among the lots, including the construction of medium and tall timber fences, and the diversity of houses within the area.² I agree with Mr Knott's assessment.

Section 42A Report

- 7 The s 42A author has not recommended that Fairview Downs is scheduled as an HHA.³ I support this recommendation.

Further Evidence

- 8 Ms Kellaway's rebuttal evidence disagrees with the conclusion reached by Mr Knott in relation to diversity of houses and timber fencing.⁴ I do not agree with Ms Kellaway's comments for the following reasons:

¹ Supplementary Statement of Evidence of Richard John Knott in Response to Panel Direction 8 (Historic Heritage Areas), 22 September 2023 at [52].

² At [52].

³ Section 42A Report Update Statement for Historic Heritage Areas – Va Mauala 20 October 2023 at [21].

⁴ Statement of Rebuttal Evidence of Laura Liane Kellaway on behalf of Niall Baker, 6 October 2023 at [21].

Diversity in houses

- (a) I believe that diversity in housing structures lowers the heritage integrity of an area. As outlined in my original further submission, there is no consistent street layout on Hendon Road that makes a positive contribution to the heritage significance or quality of the area to justify it being part of a new HHA. Lot layouts, dwelling design and frontages of properties vary considerably along Hendon Road. This includes angled buildings, limited number of varied setbacks and garages in front yards which take away from the lot consistency and layout in the area.
- (b) The Submitter is also proposing that up to 420 houses should be included in the proposed Fairview Downs HHA boundaries.⁵ This would make it one of, if not, the largest HHA in Hamilton. Dr McEwan stated in her rebuttal evidence, filed in the first hearing, that in her experience, having such a large number of houses is not typical of HHAs, and raises concerns about whether such proposed areas have boundaries that are robust and defensible.⁶

Medium and tall timber fences

- (a) Ms Kellaway disagrees with Mr Knott's finding that the historic significance of Fairview Downs is diluted by the construction of medium and tall height timber fences along the frontage of lots.⁷
- (b) I agree with Mr Knott's assessment that the presence of "medium and tall height timber fences" is a leading factor in determining that Fairview Downs has been assessed as having a "low" overall heritage value.⁸

⁵ Statement of Rebuttal Evidence of Laura Liane Kellaway on behalf of Niall Baker, 6 October 2023, Appendix 1.

⁶ Rebuttal Statement of Evidence of Dr Ann McEwan to Submitter #199, 12 May 2023 at [19].

⁷ Statement of Rebuttal Evidence of Laura Liane Kellaway on behalf of Niall Baker, 6 October 2023 at [13].

⁸ Supplementary Statement of Evidence of Richard John Knott in Response to Panel Direction 8 (Historic Heritage Areas), 22 September 2023 at [52].

- (c) Timber fencing comes back to an architectural argument. Ms Kellaway has also linked fences to architecture.⁹ I agree with Mr Knott's comments that the fences in Fairview Downs are disruptive and come in a variation of sizes. The fences are a leading factor in determining that Fairview Downs is assessed as 'low' because the heritage integrity is affected. As you can see with my Property below:



- (d) My fence is a standard combination medium and tall white timber fence, and does not contribute to or add to the architectural quality of my house, but adds to evidence of the variety of fences in the area.
- (e) Presumably the disruption caused by a fence is considered of somewhat of importance as 19 out of 29 HHAs (65% of the scheduled HHAs) require a resource consent to build/alter fences.¹⁰ Presumably this is because fences in other HHAs are not just standard fences, but fences that hold some degree of an architectural quality (and are not just a tall timber fence).

⁹ Statement of Rebuttal Evidence of Laura Liane Kellaway on behalf of Niall Baker, 6 October 2023 at [21].

¹⁰ Rule 19.3.2 (h). I note that the rule does not specify the actual activity only "Fences and/or walls located forward of the front building line of the dwelling". I have assumed that it means to alter an existing fence or build a new fence.

- (f) Ms Kellaway has identified that approximately 174 out of 420 properties in the proposed Fairview Downs boundary have medium or tall fences.¹¹ The evidence that has been submitted speaks to the variation of fences within the area.

Conclusion

- 9 In my view, no evidence has been provided by the Submitter that unequivocally demonstrates the presence of an HHA in Fairview Downs to meet the threshold of 'moderate'.
- 10 I support the recommendation by the s 42A author that Fairview Downs should not be scheduled as a new HHA. I ask that the Panel upholds this recommendation.

Dated: 10 November 2023

Ventaka Ramana Babu Purchuri

Director of SNR Limited

¹¹ Statement of Rebuttal Evidence of Laura Liane Kellaway on behalf of Niall Baker, 6 October 2023, Appendix 1.