

1. INTRODUCTION

- 1.1 My full name is John Edward Brown and I am providing Expert Evidence on behalf of Kāinga Ora in relation to proposed Historic Heritage Areas (“HHAs”), and a proposal to include several Duplex sites as individually scheduled historic heritage places. My primary Statement of Evidence dated 28 April 2023 sets out my experience and involvement in the PC9 process¹.
- 1.2 In addition to that work already described in my primary evidence, I have:
- (a) provided expert evidence in relation to proposed changes to thresholds and criteria for assessment of individual heritage places in the HCDP (PC 9 Session 2);
 - (b) engaged in expert conferencing on the methodology for Built Heritage and I am a signatory to the Joint Statement dated 24 November 2023 (JWS);
 - (c) Provided a rebuttal statement regarding the HHA Methodology Thresholds, dated 06 October 2023;
 - (d) Provided a supplementary statement dated 01 February 2024 outlining why several HHAs had not been demonstrably shown to merit that level of protection; and
 - (e) Supplementary evidence dated 26 July 2024 providing independent assessment of several proposed HHAs against criteria and thresholds proposed to be adopted by Hamilton City Council (“HCC”) as noted above at (2.4a).
- 1.3 This is a summary statement to accompany my evidence of 26 July 2024.

¹ Statement Of Primary Evidence of John Edward Brown On Behalf Of Kāinga Ora – Homes And Communities (#428) (Heritage) 28 April 2023

2. SUMMARY STATEMENT OF EVIDENCE

2.1 My supplementary evidence addresses the following:

- (a) Summary of November 2023 JWS on individual built heritage methodology;
- (b) The Threshold for Inclusion of HHAs; and alignment with proposed Council Method (Counsel’s Memorandum dated 13 December 2023);
- (c) Review of individual Scoring of HHAs; and response to proposed scheduling of the Pinfold Avenue Duplex group; and
- (d) Review of Rebuttal Conclusions for the HHAs.

2.2 I participated in expert caucusing on 24 November 2023 and am a signatory to the resulting Joint Witness Statement (“JWS”). In summary I agree that:

- (a) the use of the WRPS and HCDP criteria for assessment was appropriate;
- (b) this same threshold is proposed to be adopted for HHAs as noted in the Memorandum of Counsel for Hamilton City Council dated 13 December 2023²; and
- (c) I agree that the proposed changes to Historic Heritage Assessment methodology, criteria and thresholds set out by the JWS and supported by HCC should be adopted also for HHAs.

2.3 Richard Knott provides a summary scoring table which split out the 29 proposed HHAs into three broad groups³):

- (a) Those with at least one ‘outstanding’ criterion;
- (b) Those with at least one ‘High’ criterion; and

² Memorandum Of Counsel on Behalf Of Hamilton City Council Dated 13 December 2023. Paragraphs 21-23

³ Supplementary Statement of Evidence of Richard John Knott In Response To Panel Direction 8 (Historic Heritage Areas) Dated 22 September 2023

(c) Those with at least one 'moderate' criterion.

2.4 I agree that the following areas (or part thereof) exhibit 'outstanding overall' historic heritage qualities, based on the statements of significance provided:

(a) Hayes Paddock;

(b) Victoria Street;

(c) Hamilton East;

(d) Te Aro Street;

(e) Frankton Railway Village; and

(f) Temple View.

2.5 I noted that with modification, the following areas might also be included:

(a) Riro Street;

(b) Claudelands; and

(c) Catternach Street.

2.6 I support HCC's recommendation to withdraw the following proposed HHAs on the basis of insufficient value to merit inclusion in Schedule 8D:

(i) Augusta, Casper and Roseburg Street;

(ii) Casey Avenue;

(iii) Hooker Avenue;

(iv) Jennifer Place;

(v) Lamont, Freemont, and Egmont Streets;

(vi) Oxford Street (East) and Marshall Street;

(vii) Seifert Street;

(viii) Springfield Crescent; and

(ix) Sunnyhills Avenue.

2.7 Additionally, in my opinion, the following areas exhibit ‘State House’ development characteristics, but in my opinion, there is no defining aspect presented in the council evidence that demonstrates why they should be included on a HHA schedule:

(a) Fairfield Road;

(b) Matai, Hinau and Rata Streets;

(c) Acacia Crescent;

(d) Ashbury Avenue;

(e) Wilson and Pinfold Street;

(f) Sare Crescent; and

(g) Chamberlain Place.

2.8 I have previously set out my reasons in my rebuttal evidence⁴, and have undertaken additional evaluation for the following proposed HHAs by way of testing and verifying those concerns, in accordance with both the WRPS and HCC criteria and the threshold method now proposed to be adopted by PC 9:

(a) Fairfield Road (previously provided as an attachment to my primary statement of evidence);

(b) Wilson Street and Pinfold Avenue (Attachment A of my July 2024 Statement);

(c) Chamberlain Place (Attachment A Attachment A of my July 2024 Statement); and

⁴ Brown – Statement of Rebuttal 2023.

(d) Sare Crescent (Attachment A Attachment A of my July 2024 Statement).

2.9 Having previously undertaken site visits of these areas and also additional analysis of historical aerials, property data and other sources of information, I consider that these areas do not merit inclusion as areas of 'high' significance.

2.10 Additionally, I have reviewed the information provided to support the proposed scheduling of the group of three duplex properties at Pinfold Avenue.

2.11 I agree that the properties form a group of mid 1950s duplex buildings, and that they are associated with State Housing (I note one property is in private ownership currently), but I do not agree that state house duplex forms are rare in this context, as suggested by the assessors.

2.12 I do not consider that the simple association with 1950s state house development, in and of itself, imbues these buildings with additional heritage significance above and beyond other duplexes from the same period. I do not consider that the review of material provided by HCC introduces any significant new evidence to demonstrate this aspect.

3. CONCLUSION

3.1 In conclusion, and when considering the expert conferencing undertaken in November 2023 in relation to the Built Heritage Methodology, I remain of the view expressed in my rebuttal evidence for the HHAs:

(a) It is appropriate to introduce Historic Heritage Areas where they are significant (Considerable) or highly significant (Outstanding) value; and

(b) I consider however that a good proportion of the places proposed for Historic Heritage Areas do not merit scheduling under Section 6f. Rather I consider that they exhibit more of a 'character' aspect which requires the consideration of how

to maintain and enhance the amenity values under s7(c) of the Resource Management Act, rather than 'protection'.

- 3.2 Regarding the Pinfold Avenue properties proposed to be scheduled, I do not agree that state house duplex forms are rare in this context, as suggested by the assessors and therefore do not warrant scheduling.



John Edward Brown
15 August 2024