

**BEFORE INDEPENDENT HEARING COMMISSIONERS
IN THE WAIKATO REGION**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
WAIKATO**

IN THE MATTER	of the Resource Management Act 1991
AND	
IN THE MATTER	of Session 1 hearing of submissions on Proposed Plan Change 9 (Historic Heritage) ('PC9') to the Operative Hamilton City District Plan ('ODP')

**STATEMENT OF PRIMARY EVIDENCE OF BRENDON SCOTT LIGGETT
ON BEHALF OF KĀINGA ORA - HOMES AND COMMUNITIES**

(CORPORATE)

28 APRIL 2023

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1. EXECUTIVE SUMMARY

1.1 My name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora - Homes and Communities (“**Kāinga Ora**”) and am presenting this evidence on behalf of Kāinga Ora.

1.2 The key points addressed in my evidence are:

- (a) A background to Kāinga Ora and particularly a focus on the Kāinga Ora portfolio within Hamilton City and the importance of redevelopment within the portfolio.
- (b) A summary of the Kāinga Ora submissions on the Hamilton City Council Plan Change 9 (“**PC9**”), including the rationale for the relief sought and in particular comments about:
 - (i) The methodology and assessment that has been undertaken to identify the proposed Historic Heritage Areas (“**proposed HHAs**”);
 - (ii) The quantity and quality of the proposed HHAs;
 - (iii) The impact of HHAs and scheduling of new Historic heritage buildings on the Kāinga Ora housing portfolio; and
 - (iv) Certificates of Compliance.
- (c) I also attach a copy of a peer review report commissioned by the Council which has not been provided or referred to in Council’s evidence for this hearing.

1.3 Kāinga Ora is generally supportive of the protection of historic heritage as a matter of national importance under section 6 of the Resource Management Act (“**the Act**” or “**RMA**”). However, as discussed through the evidence of Mr. John Brown (heritage) and Mr. Michael Campbell (planning), PC9 identifies characteristics and features of development periods over a 110 year period in Hamilton City’s history which are more appropriately considered as amenity

values under section 7 of the RMA than historic heritage values under section 6 of the RMA.

- 1.4 Kāinga Ora considers that the provisions of PC9, both in terms of the quantity of HHAs and the way in which they have been identified, unnecessarily and inappropriately constrain the ability to redevelop the existing urban environment.
- 1.5 In light of the above, the section 32 assessment has not sufficiently considered the wider potential costs of the provisions.
- 1.6 If the requested relief is adopted, heritage identified through the Operative District Plan (“ODP”) will continue to be protected, but the ability of Kāinga Ora to adequately increase and improve its public housing provision will not be compromised. The changes sought by Kāinga Ora will support the provision of significant additional development capacity and will aid in the consenting and delivery of housing in Hamilton City across the public and private housing market, thereby contributing to the redevelopment of the existing urban form and assisting in the creation of a well-functioning urban environment.

2. INTRODUCTION

- 2.1 My name is Brendon Scott Liggett. I hold the position of Manager of Development Planning within the Urban Planning and Design Group at Kāinga Ora - Homes and Communities (“Kāinga Ora”).
- 2.2 I hold a Bachelor of Planning from the University of Auckland. I have held roles in the planning profession for the past 20 years and have been involved in advising on issues regarding the RMA and District Plans.
- 2.3 My experience includes five years in various planning roles within local government. For the past 17 years I have been employed by Kāinga Ora.

2.4 I have been providing development planning expertise within Kāinga Ora (as Housing New Zealand) since 2006. In this role I have:

- (a) Undertaken assessment and identification of redevelopment land within the portfolio;
- (b) Provided input into the strategic land planning, including the Asset Management Strategy, various investment and land use frameworks, and various structure plan processes of Kāinga Ora;
- (c) Provided advice on, and management of, the regulatory planning processes associated with Kāinga Ora residential development projects;
- (d) Managed engagement with local authorities, local communities and other agencies on matters relating to regulatory policy frameworks associated with residential development;
- (e) Provided advice on, and management of, input into strategic planning activities including plan changes and plan review processes throughout the country, including more recently, technical lead and project management of Kāinga Ora submissions to the Proposed Whangārei District Plan, Proposed New Plymouth District Plan and the Proposed Waikato District Plan and submissions on Plan Changes implementing the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act and the National Policy Statement on Urban Development 2020 (“NPS-UD”).

2.5 I confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of PC9.

3. BACKGROUND TO KĀINGA ORA

3.1 Kāinga Ora was formed in 2019 as a statutory entity established under the Kāinga Ora - Homes and Communities Act 2019 (“**the Kāinga Ora Act**”). Under the Crown Entities Act 2004, Kāinga Ora is a crown entity and is required to give effect to Government policies.

3.2 The Government Policy Statement on Housing and Urban Development (“**GPS-HUD**”) was published on September 28, 2021, and provides a shared vision and direction across housing and urban development, to guide and inform the actions of all those who contribute to the housing and urban development sector. The GPS-HUD outlines the need for concerted and ongoing action across six focus areas to realise the vision, outcomes, and future envisaged for Aotearoa New Zealand:

- (a) Ensure more affordable homes are built;
- (b) Ensure houses meet needs;
- (c) Enable people into stable, affordable homes;
- (d) Support whanau to have safe, healthy affordable homes with secure tenure;
- (e) Re-establish housing’s primary role as a home rather than a financial asset; and
- (f) Plan and invest in our places.

3.3 Kāinga Ora is the Government’s delivery agency for housing and urban development. Kāinga Ora therefore works across the entire housing spectrum to build complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life. As a result, Kāinga Ora has two core roles:

- (a) being a world class public housing landlord; and
- (b) leading and coordinating urban development projects.

3.4 The statutory objective¹ of Kāinga Ora requires it to contribute to sustainable, inclusive, and thriving communities through the promotion of a high quality urban form that:

- (a) provide people with good quality, affordable housing choices that meet diverse needs;
- (b) support good access to jobs, amenities and services; and
- (c) otherwise sustain or enhance the overall economic, social, environmental and cultural well-being of current and future generations.

3.5 The statutory functions of Kāinga Ora in relation to urban development extend beyond the development of housing (which includes public housing, affordable housing, homes for first home buyers, and market housing) to the development and renewal of urban environments, as well as the development of related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works.

4. THE KĀINGA ORA HOUSING PORTFOLIO

4.1 Kāinga Ora provides housing to approximately 3350² households within Hamilton City, with approximately 47% of the existing portfolio being 3 and 4 bedroom dwellings. In contrast, the MSD housing waitlist shows demand for a further 1580 households³ within Hamilton City, with approximately 76% of this demand to be for 1 and 2 bedrooms dwellings⁴.

4.2 From these statistics, it is clear that Kāinga Ora needs to ensure that there is provision in the region to provide for a variety of housing types and sizes to meet demand. For Kāinga Ora, building and redeveloping the portfolio to satisfy changing and growing

¹ Section 12, Kāinga Ora Homes and Communities Act 2019

² Managed Kāinga Ora rental properties by Territorial Local Authority, 31 December 2022

³ MSD Housing Register, December 2022

⁴ MSD Housing Register, December 2022

needs in Hamilton is important while ensuring that the portfolio is not oversupplied in areas where demand is static, or declining.

4.3 Since 2019, the housing waitlist for homes in Hamilton City has seen a 178% increase in demand.⁵ To put this into perspective, this waitlist makes up 6.8% of the total waitlist across Aotearoa; whilst the population of Hamilton forms only 3.8% of the total population of Aotearoa⁶. It is therefore imperative to highlight the disproportionate need for public housing in Hamilton City in comparison to its population in the national context. This disproportion highlights the significance of the Kāinga Ora housing portfolio within Hamilton and the importance of reconfiguring the Kāinga Ora portfolio to meet the increasing need of the population of Hamilton City, through the redevelopment of existing properties.

4.4 In the context of PC9, approximately 390 Kāinga Ora properties are included with the proposed HHAs (approximately 11% of the Kāinga Ora portfolio across Hamilton City). A further six Kāinga Ora properties are proposed to be included as historic heritage buildings under PC9. This evidence will discuss the impact of this aspect of the plan change, in the context of the roles and functions of Kāinga Ora as both the provider of public housing across Aotearoa and the Urban Development Agency.

5. THE IMPORTANCE AND BENEFITS OF PORTFOLIO RECONFIGURATION

5.1 In response to the trends and demands relating to the public housing waitlist and the Kāinga Ora portfolio, identified through this evidence, it is clear that reconfiguring the portfolio is not just a ‘nice-to-have’ for Kāinga Ora. It is a vital mechanism to unlock the potential of the land within the portfolio and provide sufficient, decent affordable housing that will support the Country’s growth, and meet the current and future needs of those people most in need of housing assistance.

⁵ MSD Housing Register, December 2022

⁶ Based on 2022 population records from Statistics NZ

- 5.2 When redeveloping its portfolio, Kāinga Ora looks to make better use of land that has reasonable access to public transport; commercial centres; community services and facilities (such as public open space, educational facilities, or other social infrastructure); or areas of employment.
- 5.3 Redevelopment of existing brownfield land, especially in high demand locations, will enable the replenishment of existing housing stock and assist in appropriately meeting current and future social housing demand by:
- (a) making more effective use of Kāinga Ora land;
 - (b) designing houses that integrate with existing communities; and
 - (c) reconfiguring the portfolio to meet the needs of families now and into the future. Traditional state homes of 2 or 3 bedrooms built 50+ years ago on larger sections no longer meet the needs of today's families. Nationwide, as at December 2022, the most common household composition requiring social housing is now single person households (48%). This is followed closely by single parent households with one or more children (35%)⁷. As discussed in section 3 of this evidence, the nationwide changes in demand profile is also evident in Hamilton.
- 5.4 As such, Kāinga Ora is focussed on reconfiguring its portfolio to meet the needs of today's families and better match current demand, which has changed since the 1950s and 60s when a large portion of its housing stock was built. Over time the reconfiguration of the portfolio will enable improvements in the form, function and quality of the housing within Kāinga Ora portfolio. In managing the reconfiguration, Kāinga Ora acknowledges that changes to the built form will be necessary.

⁷ MSD Housing register by applicant demographics, December 2022

6. THE KĀINGA ORA SUBMISSIONS

- 6.1 Kāinga Ora generally supports the protection of areas of historic heritage where the requirements of Section 6 of the Act are met. However, for the reasons set out below, Kāinga Ora opposes the new proposed HHAs that are sought to be introduced under PC9 in their entirety. Kāinga Ora also opposes the identification of Kāinga Ora properties as newly scheduled historic heritage buildings.
- 6.2 Given the potentially significant impact that the proposed HHAs and historic heritage status would have on the ability to undertake intensification of brownfield land across Hamilton City, Kāinga Ora lodged comprehensive submissions on PC9. These submissions arise from the operational and development needs of Kāinga Ora, but also reflect a wider interest as New Zealand's Urban Development Authority, in delivering the strategic vision and outcomes sought through the NPS-UD.
- 6.3 The submission notes that whilst Kāinga Ora supports the need to protect historic heritage values within the Region:
- (a) The methodology followed to identify the proposed HHAs is not consistent with that established through either the Regional Policy Statement or the ODP;
 - (b) The threshold for an area being identified as historic heritage is 'moderate', which is considered to be a low bar for historic heritage that then dilutes the significance of historic heritage as a section 6 matter;
 - (c) There has been a conflation of section 6 RMA and section 7 RMA - with matters that could be considered as contributing towards amenity values, being identified as historic heritage;
 - (d) As a result, the extent of buildings and areas to be protected is unnecessarily large and will significantly impact upon the ability of landowners to undertake

intensified redevelopment of existing brownfield land in accordance with the NPS-UD.

7. KĀINGA ORA CONCERNS WITH APPROACH ADOPTED IN PC9

- 7.1 A key concern of Kāinga Ora is the lack of clarity in the information underpinning the proposed HHAs, for example what the values of the areas are; why they are representative of a particular development period; and why that justifies protection in section 6 RMA terms. The following paragraphs address this concern with particular reference to state housing.
- 7.2 The notified documentation for PC9, including the historic heritage assessment prepared by Mr. Richard Knott, identified historic heritage themes rather than development periods. This included the identification of areas that were considered to be representative of 'Comprehensive state housing schemes and control by the State Advances Corporation' and 'The Construction Company Era'. The concern was that by adopting such a broad category, any public housing development of the time which has not yet been redeveloped or retrofitted could be identified as representative of this time period and protected in turn.
- 7.3 Since notification, Council have revised their historic heritage theme approach and replace the historic heritage themes with development periods. This is acknowledged as a more acceptable means of identification for historic heritage areas. However, it does not resolve the concerns held by Kāinga Ora regarding the actual evidential basis.
- 7.4 What remains unclear from the notified provisions, is why the 32 HHAs have been identified; specifically, the values of these areas that are sought to be protected, and why they are representative of that respective development period. The further question is then why these values are considered to be worth historic heritage protection as opposed to what might have been more appropriately considered as amenity values.

7.5 The assessment prepared by Mr. Knott does not clearly highlight the historic heritage significance at either a regional or national level. That is, it is unclear what sets the identified streets apart from other streets within Hamilton City which have very similar values and appearances.

7.6 For example, Hayes Paddock is subject to historic heritage protection under the ODP and is identified as:

‘ a surviving example of a former state housing area, designed and built by the first Labour Government from the late 1930s following the design principles of the ‘garden suburb’ movement. The layout of the neighbourhood and design of individual houses reflected the economic circumstances and social ideals of the time in terms of the provision of high-quality worker housing.

The area has been identified as being worthy of protection for the following historic heritage characteristics: It provides a relatively intact example of a planned state housing neighbourhood, providing high-quality worker housing constructed before 1945 and following contemporary design elements of the ‘garden suburb’ movement’⁸

7.7 The existing identification of Hayes Paddock raises the question of the significance and necessity to identify further examples of state housing developments. To protect such developments under section 6 of the RMA, it is considered that each area should have its own significance to the narrative of the provision of state housing in Hamilton, the Waikato and Aotearoa. From the notified provisions; is it not clear if the new HHAs protecting state housing have this significance and instead, there are multiple examples of state housing developed at the same time and of varying degrees of quality, that are proposed to be protected through this plan change.

⁸ Hamilton City Council Operative District Plan, Chapter 5.1.2.2.b.

- 7.8 Kāinga Ora considers that the identification of streets or suburbs that contain a concentration of state housing from a specific period of time, such as those constructed under the Savage Labour government, should not be afforded a blanket historic heritage protection simply for this reason. Whilst Kāinga Ora acknowledge that this is a significant marker in the history of the provision of social housing in Aotearoa, and an important built form to recognise to some extent, the broad protection that has been identified through PC9 dilutes the significance of areas such as Hayes Paddock.
- 7.9 Similarly, this same concern is shared for the other non-state housing HHAs that have been identified. As noted above, the report prepared by Mr. Knott does not clearly articulate what the significance of each of these HHAs is and the specific narrative that these tell about the history of Hamilton. Kāinga Ora consider that further work should have been undertaken to demonstrate why each of the proposed HHAs were justified to be afforded section 6 RMA protection.

8. ADAM WILD PEER REVIEW

- 8.1 It appears that similar issues were highlighted in a peer review undertaken by Mr. Adam Wild commissioned by the Council. However, this peer review report has not been provided or included as part of the notified documentation, nor has it been provided through the Council's evidence.
- 8.2 Kāinga Ora was provided a copy of this peer review by another submitter, who obtained it through a Local Government Official Information and Meetings Act 1987 ("LGOIMA") request. A copy of the Council's response to the LGOIMA request, including the peer review is attached as **Annexure A**.
- 8.3 Having read the peer review report, Kāinga Ora has found that Council were advised by Mr. Wild as an independent advisor of similar concerns to those held by Kāinga Ora. It is unclear to Kāinga Ora why the Council has not disclosed the advice that it has received

from Mr. Wild in this process and this information may be pertinent to the Hearings Panel's decision making. Kainga Ora contacted Mr. Adam Wild to see if he would be prepared to present evidence as part of PC9 on behalf of Kāinga Ora to discuss this peer review report. Mr. Wild declined on the basis that he had been engaged by the Council prior to the preparation and notification of PC9 and there may be a potential issue of conflict. Should the Commissioners wish Mr. Wild to confirm his findings of his peer review report through evidence, I note that there is an ability under section 41 of the RMA for a decision maker to issue summons to compel a person attend a hearing or produce a document.

- 8.4 While I do not intend to summarise Mr. Wild's report in any detail, I note that the peer review raises significant concerns with the methodology and level of assessment undertaken as part of the notified report. For example, in relation to the historic heritage statements for each proposed HHA, Mr. Wild records that they:⁹

'are too generic and lack the necessary specificity to distinguish areas from each other or describe their particular historic heritage values.'

- 8.5 It does not appear that these concerns were addressed by the Council prior to notification.

9. IMPACT OF HISTORIC HERITAGE AREAS AND SCHEDULING ON THE KĀINGA ORA PORTFOLIO

- 9.1 Kāinga Ora has substantial landholdings within a number of the HHAs and owns six buildings that have been proposed for scheduling and identified as historic heritage buildings. The proposed historic heritage status will place a significant constraint on the ability of Kāinga Ora to comprehensively plan for and enable sustainable land-use efficiency in the ongoing delivery of its housing and urban redevelopment program across Hamilton City. For example, in the Fairfield-Enderley area where neighbourhood-wide master planning

⁹ Memorandum prepared by Archifact Limited, dated 6 June 2022

is intended to take place with input from Council, the community, tangata whenua and stakeholders¹⁰.

- 9.2 In addition to the above, there is also concern over the burden that such restrictions would impose on private property across the proposed HHAs and those that are proposed as newly scheduled historic heritage buildings through PC9. The protection afforded through PC9 to these properties significantly limits (if not precludes) the ability for private landowners to exercise their private property rights. It is therefore imperative that there is a sufficient evidential basis to confirm that the HHAs and historic heritage buildings do in fact qualify as historic heritage and therefore justify 'protection' under section 6 RMA rather than 'maintenance and enhancement' under section 7 RMA. Kāinga Ora does not consider this evidential basis exists.
- 9.3 The Kāinga Ora housing portfolio that is impacted by the proposed HHAs is predominantly comprised of housing stock that is most suitable for, and in need of, comprehensive redevelopment. This is because of its:
- (a) single ownership and tenure pattern: i.e. physically consolidated ownership;
 - (b) age: approximately two-thirds of the Kāinga Ora housing portfolio was built before 1980, and half of it before 1960;
 - (c) housing type: generally 3-4 bedroom homes on larger lots. As outlined earlier in my evidence, demand for social housing has changed from 3-4 bedroom houses, to 1-2 bedroom homes; and,
 - (d) location: dwellings that are located in areas that would be considered well-connected to amenities, transport and services under policy 3(c) of the NPS-UD; i.e. Fairfield and Enderley, Hamilton East and Claudelands.

¹⁰ Hamilton-Waikato Metropolitan Spatial Plan; September 2020

- 9.4 As previously acknowledged, whilst public housing delivery throughout the ‘post-war’ period is a feature of New Zealand’s past, the very nature of state public housing was and remains at its core, to provide housing for those in need. Much of the existing housing stock throughout Hamilton is nearing the end of its serviceable life and is located on low-density residential zoned land which does not reflect the significant increase in New Zealand’s population since their original construction, nor the relative increase and demand for public housing in the current environment. Securing such areas or groupings of houses (and in some instances identification as ‘built historic heritage’) effectively-ascribes historic heritage value to past urban development patterns that are demonstrably not an efficient use of land, and present a significant loss of opportunity cost for public housing delivery.
- 9.5 Kāinga Ora understand that there may be circumstances where some of its housing stock nationally may be subject to protection under section 6 of the RMA. This is evident not only through national examples such as one of the first examples of state pensioner housing schemes in Point Chevalier and Ponsonby, Auckland, housing along Savage Crescent in Palmerston North and through examples of historic heritage buildings such as the first state house in Miramar, Wellington and the Greys Avenue flats in Auckland. Kāinga Ora generally support the protection of historic heritage within urban environments where it is clearly an area of either regional or national significance is afforded and where there is an evidential basis which justifies that protection; however, this need to protect must also be balanced against the national direction to undertake urban redevelopment and prioritise intensification in well-located urban environments. Kāinga Ora consider it to be inappropriate and inconsistent with section 6 RMA to adopt an approach which protects all developments that represent a certain time period.

Cost of Historic heritage Protection for Kāinga Ora

- 9.6 As a public housing landlord, Kāinga Ora is required to provide housing that meets the ‘healthy homes’ standards by July 2024¹¹. This would apply to all Kāinga Ora homes within the proposed HHAs and would therefore require a strong focus on retrofitting these homes and maintaining the existing, low density level of development.
- 9.7 To retrofit a standard Kāinga Ora dwelling, there is a cost of up to approximately \$350,000; this will generally extend the life of the building by another 20-25 years. To be clear, the cost of this retrofit does not include any fees associated with historic heritage assessments and the resource consent process. This as an option is often taken up where a site may not be well suited for intensification, there is a pressing need for the size of dwelling or the age of the building is such that the increased lifespan is warranted; i.e. constructed in the 1980s-2000s.
- 9.8 As previously mentioned, there is a need to adapt the existing Kāinga Ora portfolio to adequately address the changing need of housing across the population of Hamilton. The retention of Kāinga Ora homes through HHAs puts a focus onto retrofitting dwellings rather than redevelopment, and removes the ability to better utilise land and provide a greater variety of housing that is both required by the MSD waitlist and an outcome sought through the NPS-UD. 386 properties under Kāinga Ora ownership are included with the HHAs; this amounts to approximately 11% of the Hamilton City portfolio. As a result, these properties will lose development outcomes currently afforded through the ODP and more notably, under the notified provisions of Plan Change 12 (“PC12”). Subsequently, there is a net loss in the ability to deliver the potential of at least 772¹² new homes as a permitted activity under PC12; this number of units has the potential to address the need of housing for 48% of the

¹¹Residential Tenancies (Healthy Homes Standards) Regulations 2019

¹² Based on the application of the Medium Density Residential Standards and Hamilton’s PC12

public housing waitlist for Hamilton City¹³. Notably, there is an even greater potential of increased housing provision to be realised through the Restricted Discretionary framework of PC12, which would further contribute to the public and private housing need across Hamilton City.

- 9.9 The proposed PC9 provisions require the historic heritage values of the area to be protected, with consent for a Restricted Discretionary Activity being required for any works on a site within a HHA other than repairs and maintenance. Notably, other than minimum site areas under the subdivision section, a limit of 1 dwelling per site and standards for fencing, there are no separate development standards for these HHAs. As such, any development relies heavily on an assessment against the identified historic heritage values for the area of which, are vague, high level and provide little certainty over what is to be protected other than low density residential development.
- 9.10 On the matter of density controls that are proposed in relation to the HHAs, Kāinga Ora are concerned that the density of past developments is being inappropriately referenced as a matter that points to the historic heritage of the City. Whilst it is acknowledged that build patterns, architecture and setting can heavily influence the narrative of a development - it doesn't follow that increased density adversely impacts on such values. An example of this is Sunderland and Cochrane Avenues in Hobsonville Point, Auckland, where old Royal NZ Airforce homes were relocated and placed on sites at a much greater density to their original layout (see Figure 1) to showcase their architectural values and history.

¹³ MSD Housing Register, December 2022



Figure 1 - Sunderland Avenue Hobsonville RAF homes (source: <https://hobsonvillepoint.co.nz/about/history>)

10. CERTIFICATES OF COMPLIANCE

- 10.1 The addendum report prepared by Richard Knott recommends the deletion of the Marama Street HHA and the Oxford Street (West) HHA *‘due to extant certificates of compliance for the demolition of dwellings which would significantly impact the integrity of the HHA’*¹⁴
- 10.2 Kāinga Ora lodged applications for Certificates of Compliance (“COCs”) prior to the notification of PC9 for the demolition of all buildings across 195 of its properties in the East/North-East of Hamilton City that would otherwise have been affected by these provisions. The COC applications related to the demolition or removal of buildings in accordance with the ODP provisions for the sites located within the following proposed HHAs:
- (a) Casey Avenue;
 - (b) Fairfield Road;
 - (c) Sare Crescent;
 - (d) Chamberlain Place;

¹⁴ Addendum – Hamilton City Historic Heritage Area Assessment; dated 6 March 2023, page 9

- (e) Riro Street
- (f) Te Aroha Street;
- (g) Hamilton East; and,
- (h) Pinfold Avenue

10.3 These COC applications largely remain on hold at the Council's request, but are being processed and COCs issued as Kāinga Ora commences redevelopment of the sites' affected. To date, this has been limited to two dwellings.

10.4 Kāinga Ora remain hopeful that the provisions of PC9 will shift into a form which would mean that the organisation does not need to exercise its rights with respect to the COCs. As previously mentioned, Kāinga Ora is concerned that the Council's proposed changes could compromise the ability to have flexibility in deciding its development responses to meet the responsibility of providing social and affordable housing in the Region.

11. CONCLUSION

11.1 Kāinga Ora is generally supportive of the identification of historic heritage as a matter of national importance under section 6 of the RMA. However, as discussed through my evidence and the evidence of Mr. John Brown and Mr. Michael Campbell, the methodology and assessment which has informed the identification of HHAs and historic heritage buildings is not reliable or representative of best practice.

11.2 It is important that decision-makers appreciate the need to create a substantially more enabling planning framework. Not enabling further development in an area based on its current attributes, which are considered to be more likely amenity values rather than historic heritage, leads to undue planning restrictions and the protection of amenity to an extent that is contrary to the NPS-UD, specifically policy 6.

- 11.3 The Kāinga Ora submissions partially arise from the operational and development needs of Kāinga Ora. The Kāinga Ora submissions also ensure Kāinga Ora can economically and socially manage and reconfigure its housing portfolio, which, as I have noted, is important to ensure housing stock is matched to demand. This is to enable provision of warm dry and healthy homes that are in the right location, right condition and of the right type to meet the current and future needs of those people requiring public housing assistance, as well as enable the development of affordable housing more generally.
- 11.4 Kāinga Ora considers that if its submission on PC9 is adopted, then the constraints applied by the provisions of PC9 would be reduced. It would provide a greater development capacity for delivery of significant additional public housing, affordable housing, homes for first-home buyers, and significant market capacity across the city, and a choice of housing typology and size for all New Zealanders.

Brendon Liggett

28 April 2023

APPENDIX A - LGOIMA REQUEST & ADAM WILD PEER REVIEW

Subject: FW: PC9 HCC - additional information re HHA Peer Review
Attachments: 2022-05-30_peer review memo.pdf

Importance:

From: Official Information <officialinformation@hcc.govt.nz>

Sent: Wednesday, 07 December 2022 13:43

To: [REDACTED]


Cc: Official Information <officialinformation@hcc.govt.nz>

Subject: Final Response (Part 2) - LGOIMA 286468 - David Whyte - peer review information of Mr Richard Knott's report

Importance: High

Kia Ora,

I refer to your **information request below**, Hamilton City Council is able to provide the following response.

Please note some parts of your response required the provision of additional documentation in the way of reports and correspondence. The relevant material can be found in the following OneDrive link:  [LGOIMA 286468 - David Whyte - peer review information of Mr Richard Knott's report](#)

We have had to withhold some information from the documents which we are releasing in response to your request. We have applied digital black redactions over the withheld information and have supplied the code to identify the section of the Local Government Official Information and Meetings Act 1987 (LGOIMA) which we are relying on. We have withheld information on the basis that it is necessary to protect the Privacy of natural persons per s 7(2)(a) LGOIMA

1. *Who within the Hamilton City Council did the QA/QC peer review of Mr Richard Knott's report that is presented as Appendix 9 Historical Heritage in Plan Change 9?*

Council contracted Richard Knott to produce a Historic Heritage Area assessment over a 5 month period. This included 462.25 hours, of which 154.5 hours were spent physically reviewing the sites. The following Council staff reviewed the report from a readability and structure perspective (not a technical heritage expert peer review).

- Alice Morris, Principal Planner
- Katherine Hu, Senior Planner
- Paul Bowman, Team Leader, City Planning
- Mark Roberts, Team Leader, City Planning

2. *Who within the Hamilton City Council did the QA/QC peer review of Ms Carolyn Hills two reports prepared as part of the previous historical heritage review undertaken by the Hamilton City Council a decade ago and cited continuously by Mr Knott in his report?*

The Historic Heritage Area assessment criteria used in Mr Knott's report referenced Carolyn Hill's 2020 Hamilton City Special Character Study. That study was reviewed by Alice Morris, Principal Planner, from a readability and structure perspective (not a technical heritage expert peer review).

3. *If either of the three QA/QC peer reviews was done by an external consultant, who was it done by and how much were they paid?*

Council engaged Chessa Stevens, Andy Ball and Wendy Turvey from WSP to undertake a review of Richard Knott's draft methodology and assessment criteria. This was undertaken as part of a WSP contract for various work as part of Plan Change 9 and this task and fee was not itemised specifically. Invoice attached in OneDrive link above.

Council also engaged Adam Wild from Archifact – Architecture & Conservation to undertake a technical, desktop-only, peer review of Richard Knott's draft report. That desktop review noted Mr Wild was "generally supportive of the ranking and scoring approach promoted for HHAs". This draft report was provided to Mr Knott, who reviewed his recommendation, which remained unchanged. The fee for this service was \$4300 plus GST.

4. *Please provide all correspondence (emails, file notes, records of telephone conversations, letters etc) between the peer reviewers and Mr Knott pertaining to the peer review of Mr Knott's report, particularly all correspondence to do with edits, rewording or changes that the Council required.*

Please see OneDrive link above for the requested correspondence

5. *In Plan Change 9 there is reference to dates such as pre-1930's early existence of a service town (both ends of Oxford Street East and West HHA's, or 1930-1950's railway workers suburbs etc). What is the information source (titles, other reports, plans, consents etc) used by the HCC to impose these dates?*

Richard Knott's report.

6. *Since Oxford Street did not become part of the city until 1949, can the Council please confirm what if any records (land titles, building consents, plans of houses etc) that are held by the Council for properties in Oxford Street that definitively prove that present domestic dwellings were in existence pre-1930's. I understand from my own research that many earlier Council records were disposed of or destroyed in a fire (Waikato District Council records). If the Council has no records can the Council please provide the reason for this lack of documentation?*

Council have searched the Council property files for all properties on Oxford Street and can confirm that there are no pre-1930's documents for any of the properties. The earliest held is a drainage plan for 1949. As this information does not exist, we are refusing this part of the request per s17(e) of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

7. *I understand that the real estate website Oneroof, purports to use Council information to base its indicated age of buildings. In terms of Oxford Street, they seem to believe (presumably) from Council sources that the buildings were built in the 1920's to 1930's. What is the actual source of the Council's information (or records if they exist) that makes Oneroof believe this is correct, when land titles clearly show this is not the case? Is this belief that the buildings were in existence due to the Council's reliance on a subdivision plan dated 1921 for the Oxford Street and Marshall Street area? A subdivision plan is simply that, it does not record when any buildings were constructed, who owned them and the fact that the earliest aerial photograph shows most of Oxford Street was not yet built at around 1943 to 1945 confirms that the subdivision plan is largely irrelevant to dating buildings and hence determining historical heritage.*

This is not a request for specific information held by Hamilton City Council. As this information does not exist, we are refusing this part of the request per s17(e) of the Local Government Official Information and Meetings Act 1987 (LGOIMA).

8. *Can the Council please provide a definitive written typology (a description of the many architectural features present within a particular type of building that distinguishes it from others) for a railway cottage/house as defined in either Carolyn Hill's two reports or a "novel" typology made up by Mr Knott. Since typology is a factor in the classification of housing it is necessary to have a valid and correct description of the typology used to classify buildings. Since there is an error (as admitted by Council staff) in Ms Hill's reports there is not a correct written typology presented in her reports, however, Mr Knott cites her typologies in his report continuously. We have been seeking this since before submission closed and still have no answer from Council.*

Carolyn Hill's report has been updated to correct an identified error. A copy of this updated report is attached in OneDrive link above. Other aspects of this request do not relate to specific information held by Hamilton City Council.

Council also wanted to note Plan Change 9 is currently progressing through a legal process set out in the Resource Management Act 1991. As part of this process, Hamilton City Council has received numerous submissions and further submissions on the proposed HHAs, both for and against them. Council expects all issues raised in the submissions to be resolved at the hearing in May 2023, which is the appropriate forum for these matters to be tested.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Kind Regards,

Laura | Official Information Coordinator
Governance & Assurance Team | People and Organisational Performance
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memorandum

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attn: katherine hu

from: archifact – architecture & conservation ltd (archifact)

date: 6 June 2022

re: plan change 9 historic heritage areas peer review

1. background

- a. The Hamilton City Council [**HCC**] is preparing documents in support of Plan Change 9 - historic heritage areas. You have asked that I undertake a Peer Review of:
 - i. the applied methodology;
 - ii. evaluation criteria; and,
 - iii. *Hamilton City Historic Heritage Area Assessment - version 2* dated 26th of May 2022 prepared by Richard Knott of Richard Knott Limited (**RKL**).
- b. In order to undertake that Peer Review you have supplied me with a number of documents including, but not limited to:
 - i. a copy of the Richard Knott Limited [**RKL**] letter addressing *HCC NPS-UD Area Plans*:
 - *A structure for Historic Heritage and Heritage Character Protection in HCC District Plan*; and,
 - *Criteria for the Identification of Potential Historic Heritage Areas and Heritage Character Areas*;
 - ii. a copy of the RKL *Hamilton City Council – Hamilton City Historic Heritage Area Assessment*, dated 10th of April 2022;
 - iii. a copy of the *Hamilton Boundary Extensions 1878 – 2011 plan D-568810*; and,
 - iv. a copy of the *Hamilton City People and Place Building Age Indicator plan*.
- c. In addition to those documents we have also been provided with copies of:
 - i. Lifescapes Ltd, *Hamilton City Review of Existing Character Areas*, March 2020, draft;
 - ii. Lifescapes Ltd, *Hamilton City Review of Existing Character Areas*, March 2021, final; and,
 - iii. Morris, A. and Caunter, M. *Kirikiroa – Hamilton's European Settler History – Area Plan Area: Hamilton East, North of Central City, Five Cross Road and Chartwell*. October 2021.

- d. Further to receipt of that material we have also participated in a virtual meeting held on the 3rd of May 2022 to discuss the tasks and programme.
- e. Work commissioned to date by the HCC has resulted in the identification of 182 new potential individual sites for inclusion in the Operative District Plan [ODP] through Plan Change 9 [PC9] as sites of historic heritage value and the introduction of 32 historic heritage areas [HHAs]. HHAs are not currently recognised in the ODP. Further, a number of notable trees have been identified as well as 57 sites of archaeological value.
- f. In response to the requirements under provisions of the National Policy Statement – Urban Development 2020 [NPS-UD] PC9 aims to ensure that areas (and sites) identified as places of historic heritage value constitute ‘qualifying matters’ under clause 3.32(1)(a) of the NPS-UD.

2. constraints

In my proposal to undertake this Peer Review I had indicated that ground-proofing a number of the more consentable areas could aid in resolving consideration of the RKL assessments. This process has not occurred and instead this Peer Review has been based on my expert skills and my general knowledge of the study area.

3. credentials

- 2.1 My full name is Adam Wild. I am a director of Archifact – architecture & conservation limited (Archifact) an Auckland-based architectural practice specialising in building conservation and heritage management accredited in accordance with the rules of the New Zealand Institute of Architects (NZIA) and the Registered Architects Board (RAB). I have been in this position since December 2003. I am a registered architect and Fellow of the NZIA.
- 2.2 I hold a Master of Arts degree in Conservation Studies (Historic Buildings and Landscapes) from the Institute of Advanced Architectural Studies at the University of York and a Bachelor of Architecture degree from the University of Auckland.
- 2.3 I am a full member of the International Council on Monuments and Sites (ICOMOS) New Zealand, a member of ICOMOS Pasifika, and an expert member of the International Polar Heritage Committee (IPHC) (a scientific committee of ICOMOS) and member of the IPHC Sub-Antarctic Islands Working Group. I am a member of (and Peer Reviewer for) the International Association for Preservation Technology International and am also a Peer Reviewer for the Endangered Wooden Buildings Programme at Oxford Brookes University, UK..
- 2.4 I have undertaken area studies around New Zealand, including in Whangarei, Auckland, Coromandel, Arrowtown, and Akaroa which have resulted in new design guidelines for these distinctive historic areas. I am currently, or have been, conservation architect for a number of nationally and internationally significant building conservation projects. Included amongst these projects are the Treaty House at Waitangi (1834); Hulme Court, Auckland (1843); the Old Government House Precinct, Auckland (1840 and 1856; the Heroic Era huts of Scott and Shackleton in the Antarctic; the former Court House in Apia, Samoa, and I am currently working as conservation architect on the seismic

strengthening and refurbishment project of the Wellington Town Hall for the Wellington City Council.

- 2.5 I have been associated with the Envisaging Project commissioned by the Church of Jesus Christ of Latter-day Saints at Temple View since 2011 and am currently the conservation architect for the Waikato Regional Theatre project on Victoria Street which includes the former Hamilton Hotel building.
- 2.6 I have been associated with the Department of Architecture at Unitec as an external examiner for their Master of Architecture candidates. Since 2009 I have acted as guest reviewer and as lecturer in a range of architectural conservation subjects including contributions to the History of New Zealand Architecture series at Unitec
- 2.7 In the professional roles I have had and perform today as outlined above, I have acquired a sound working knowledge in the specialist discipline of building conservation, issues relating to the recognition and assessment of cultural heritage values, and methodologies for conserving these in accordance with national legislation and national and international conservation Charters.

3. historic heritage in the rma as a matter of national importance

- 3.1 The purpose of the RMA is to promote the sustainable management of natural and physical resources. The HCC has, through the ODP and proposed District Plan (PDP) set out the purpose of meeting Council's obligation under the RMA to recognise historic heritage, and more particularly "*protect*" recognised historic heritage from "*inappropriate subdivision, use, and development*", as a matter of national importance aligned with Section 6(f) of the RMA.¹
- 3.2 The 'protection' afforded historic heritage by the RMA does not preclude change, but test whether development in the historic heritage context is 'inappropriate' in accordance with the protection afforded historic heritage at s6(f). Of note the RMA qualifies 'protection' as being concerned with "*appropriate subdivision, use, and development*", so the test for anticipated change in a heritage context must be measured against consideration of "*appropriateness*". The RMA anticipates change and development in the historic heritage context where it is "*appropriate*."
- 3.3 In addition to the RMA consideration of historic heritage, the Heritage New Zealand Pouhere Taonga Act (NZHPTA) (2014) operates as a parallel legislative regime. Its sole purpose (Part 1 section 3) is to:
"promote the identification, protection, preservation, and conservation of historical and cultural heritage of New Zealand".
- 3.4 It is also acknowledged that sites and areas associated with human activity before 1900 may be defined, in accordance with the Heritage New Zealand Pouhere Taonga Act 2014, as an archaeological sites.

¹ RMA Part 2 Section 6(f)

4. historic heritage in the opd

4.1 the hamilton city council – operative-district plan

The ‘protection’ afforded historic heritage as a matter of national importance in the RMA focusses on the appropriateness of anticipated subdivision, use, and development and implies an expectation for change and not a veto to it. In giving effect to the RMA such an understanding is reflected in the ODP where development is not regarded as a prohibited activity but is necessarily considered against a high threshold.

5. plan change 9 – historic heritage areas

- a. The Briefing Document *Plan Change 9 – Historic Heritage and Natural Environments*, dated April 2022 prepared by the HCC proposes a range of criteria to be applied. The first approach here is thematic and chronological, but I wonder if a finer-grained thematic approach might better reflect locally distinctive heritage area triggers? Equally, while the “*dominance*” of the private car may be considered a generator to development areas (suburbs), the particular heritage values that distinguishes an area may be better reflected and more clearly expressed as legibly distinct design principles of subdivision patterns and architectural response specific to those areas.
- b. The *Plan Change 9 – Historic Heritage Areas Briefing* document dated 27 April 2022 also promotes a range of *consistency assessment* criteria which I do not contest. However, I do question the qualifier used under the criterion responding to “*consistent design and layout responds to the topography*” as I am unconvinced how this criterion is a primary determinant to identifying an area’s particular historic heritage values and what those values are.
- c. I do not agree with the proposed criteria approach in looking for consistency across a number of attributes necessarily reflects and supports the identification of an area as having historic heritage value. There is a risk in conflating areas of special character as areas of historic heritage value and in doing so having these areas constitute a qualifying matter under the ‘*any other matter*’ catch-all provision of the NPS-UD.
- d. “*character*” is not listed as a matter of national importance under Part 2 s6. Instead it is typically considered under “other matters” in s7(c) and (f), which focus on overall amenity.

5.1 methodology

- a. I am generally supportive of the ranking and scoring approach promoted for HHAs. I am convinced by Mr Knott’s approach to the identification of some HHAs based on the collective values of individually listed assets within those areas as contributing to the recognition of the wider area’s recognisable historic heritage value. However, some proposed HHAs do not, in my opinion, have an equally clear distinction that can be drawn. I feel that some proposed HHAs (as evidenced through the assessment sheets) risk redefining Special Character areas as some form of de facto HHA. Mr Knott’s letter of the 20th of September 2021 makes the point well that:

“the use of the term Historic Character Area causes confusion, as it appears to add confusion by referring to matters covered by both s6 (matters of national importance – including (f) historic heritage) and s7 (other matters – including (c) the maintenance and enhancement of amenity values.”

- b. For these reasons and that “risk” I prefer a single category of HHA based on the principles distinguishing an HHA as something clearly supported by historic heritage values above what might otherwise be considered amenity matters.
- c. With that in mind, I would be interested in exploring more and understanding better the analysis undertaken by WSP with respect to the identification they have undertaken that has seen the promotion of a further 182 individual sites as these become key determinants to the recognition of potential wider HHA values. It does seem to me that a greater reliance on the earlier *Review of Existing Character Areas prepared by Lifescapes Ltd in 2020 and 2021* has been applied without a more particular historic heritage lens having been applied. The risk here is the potential for a conflation between special character and historic heritage.
- d. I consider the promotion of “*five periods of development which have historic heritage significance in the development of the city*”² to be a rather bald approach and lacks a level of specificity or particularity that may have been better drawn out in a thematic study drawing on a wider basis for assessment and which might better identify more historic heritage values that distinguish HHAs from each other based on particular values. I feel that some of the subtlety and sophistication that modern Hamilton draws on risks being missed (for example villa suburbs distinct from railway housing, cultural areas, commercial centres, industrial areas, or architectural quality as opposed to mass production).
- e. I feel the current approach appears to focus too heavily on ‘residential’ as a theme and misses other HHA typologies such as commercial areas (accepting the inclusion of HHA #31 *Victoria Street*).
- f. I note, by way of contrast to the approach taken here, that the Auckland Council, in assessing HHAs³, requires that in addition to describing the historic heritage values of the area (something that appears lacking here), HHA statements also include those criteria (topography, lot size subdivision patterns etc) that have been examined and that the respective statements of significance are typically more comprehensive than those for individual assets.
- g. I consider an area (like a group) needs, by definition, to warrant at least three elements to provide sufficient critical mass to warrant HHA recognition. Critically a sufficient critical mass should be recognisable to warrant the identification of an HHA. The proposed HHA #2 *Anglesea Street HHA* comprises only four sites. I believe the *Section 6 Assessment in the RKL Hamilton City Council – Hamilton City Historic Heritage Area Assessment* would be more robust in recognising

² RKL HHA Assessment report (10th April 2022), p16

³ Auckland Council, *Methodology and guidance for evaluating Auckland's historic heritage*, August 2020, Version 2

HHAs as including three or more “*interrelated but not necessarily contiguous individual historic heritage items*”.

- h. Use of StreetView images should be avoided.

5.2 criteria

- a. I support the approach promoted in the *Plan Change 9 – Historic Heritage Areas Briefing* document dated 27 April 2022 document that looks to “*extend to areas developed over the periods of 1960s and 1970s [...]*”, but remain mindful of my comments in the *Methodology* review (above) that a wider thematic study (see my comment at 5.1c above) may have lent greater sophistication to the criteria to be applied and the recognition of distinctive HHAs.
- b. The RKL *Hamilton City Council – Hamilton City Historic Heritage Area Assessment*, refers to and appears to rely on the themes and criteria applied in the *Special Character Study 2020*. I think this is a potentially flawed approach, as the identification of historic heritage (collectively as HHAs) is necessarily drawn through a different lens. I note also that Mr Knott has visited the “*significant majority of streets which contained a predominance of pre-1980 buildings*”, but fear that unless a comprehensive historic heritage assessment is undertaken it may expose the process to levels of scrutiny it cannot resist.
- c. While I agree with the approach Mr Knott has applied to the identification of the potential structure for historic heritage in the Hamilton District Plan for HHAs, I think some further refinement is still required in order to clearly define heritage value as without clarity on the meaning and threshold such descriptors represent it leaves scope for a lack of clarity and subsequent challenge.

5.3 identification of proposed areas

- a. I believe that any HHAs containing individually listed historic heritage assets would be well supported with identification of those various individually-listed sites that collectively distinguish those areas.
- b. The suggested thematic and chronological criteria approach promoted may risk over-simplifying the complex evolutionary historic heritage values evident in the proposed Temple View Heritage Area? The shift from education to housing and enhancement of and focus on the Temple complex and wider public landscape generated by the same organisation and community adds a number of site-specific matters of interest for consideration, but it seems a little too simplistic to bundle the whole change into one area?
- c. The Assessment identifies 32 proposed HHAs. 9 HHAs identified are highly supportable and their distinctive heritage values are clearly recognisable. However, I believe the reasons for identifying Temple View (being one of these supportable areas) warrants some reconsideration. A further 10 HHAs may be supportable, but warrant greater clarity on their particular historic heritage values before they can be more enthusiastically supported. 14 HHAs identified lack a sufficiently clear assessment statement describing their particular and distinctive **historic heritage values** and risk being perceived as conflated Special

Character areas, and as such should not be pursued through PC9, HHA #17 *Lamont Street* et al being a case in point.

- d. I am a little confused as the distinction between proposed HHA *Graham Street* and the wider proposed HHA *Hamilton East* area as *Graham Street* appears to lie inside the *Hamilton East HHA* and is described as part of the “*planned subdivision of the main Hamilton East HHA*”, but MR N=Knott has indicated that the distinction comes from its particular topography.
- e. I wonder at the proposal of the HHA *Oxford Street East* et al as a perceptible HHA when it comprises houses addressing different streets and the sense of collective value is accordingly disrupted. This can be contrasted with proposed HHA *Riro Street* or proposed HHA *Springfield Crescent* which comprises Lots facing each other that can be perceived collectively.
- f. My overall impression of the individual one-page Summary Statements for the 32 proposed HHAs is that they are too generic and lack the necessary specificity to distinguish areas from each other or describe their particular historic heritage values. I have found the commentary lacks a substantive qualifier describing the particular HHA values evident for each proposed HHA.
- g. I believe a map of each area which shows the defined extent of each HHA should, where applicable, identify each of the various individually-listed historic assets within the HHA.

6. conclusion

- a. I believe there is great merit in identifying HHAs in Hamilton City.
- b. I believe there is merit in a finer-grained analysis that distinguishes HHAs from the previously recognised areas of Special Heritage Character areas and provides discipline in not conflating special character with historic heritage in robust District Plan-making.
- c. I believe that while generally those proposed HHAs with more clearly recognisable historic heritage values (such as the collective value of an area containing a number of individually listed historic heritage assets) are supportable and should be promoted through the PC9 process, I have concerns about the robustness of assessment and HHA statement supporting inclusion of many of the proposed HHAs that have been identified through the Hamilton City Special Character Study 2020.
- d. I would like to see more specific and particular historic heritage commentary in each of the HHA statements that provide clarity to distinguishing their respective historic heritage values as currently I find these are too generic.
- e. In considering the 32 proposed HHAs I have applied a conservative approach to the support of those HHAs I consider to appropriately cross the threshold for recognition and protection afforded them through inclusion in the Hamilton City District Plan.

- f. Based on the material I have been able to consider, of the 32 proposed HHAs advocated I believe the following 15 areas warrant identification and protection in the District Plan:
- a. Claudelands
 - b. Fairfield Road
 - c. Franklin Railway Village
 - d. Graham Street
 - e. Hamilton East
 - f. Hayes Paddock
 - g. Marama Street
 - h. Marire Avenue, Parr and Taniwha Streets
 - i. Matai, Hinau and Rata Streets
 - j. Myrtle Street and Te Aroha (West)
 - k. Oxford Street (West)
 - l. Te Arohas (East)
 - m. Temple View
 - n. Victoria Street
 - o. Wilson Street and Pinfold Avenue
- g. Based on the material I have been able to consider, of the 32 proposed HHAs advocated I believe the following 6 areas warrant further testing before they can be appropriately considered for inclusion and protection in the District Plan:
- a. Anglesea Street
 - b. Casey Avenue
 - c. Chamberlain Place
 - d. Oxford Street (East)
 - e. Riro Street
 - f. Sare Crescent
- h. Based on the material I have been able to consider, of the 32 proposed HHAs advocated I believe the following 12 areas do not warrant inclusion in the District Plan:
- a. Acacia Crescent
 - b. Ashbury Avenue
 - c. Augusta, Casper and Roseberg Streets
 - d. Cattnach Street
 - e. Hooker Avenue
 - f. Jamieson Crescent
 - g. Jennifer Place
 - h. Lamont, Freemont, Egmont and Claremont
 - i. Seifert Street
 - j. Springfield Street
 - k. Sunnyhills Avenue.

Adam Wild fnzia

Archifact – architecture & conservation ltd