

BEFORE THE HEARING PANEL

IN THE MATTER of the Resource Management Act 1991

AND

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

**STATEMENT OF EVIDENCE
OF JEAN MARY DORRELL AND DAVID EDWIN WHYTE**

HISTORIC HERITAGE AREAS – VARIOUS

9 MAY 2023

Introduction

1. This rebuttal submission is made in line with Independent Hearing Panel Direction #4 as a "submitter". It was confirmed on 2 May 2023, and in line with Environment Court of NZ Practice Note 2023¹, that there is no requirement to be an expert in order to make a rebuttal submission.
2. We are impacted by HHAs as property owners in the Oxford Street (East) and Marshall Street Railway Cottages HHA. We have made three prior submissions opposing our own HHA, submissions opposing other HHAs and submissions on the quality assurance process and the methodology. We have also assisted other submitters in either opposing or supporting their HHAs.
3. With the change in the methodology and heritage values for almost all HHAs, we wish to make a rebuttal submission on the Addendum report prepared by Mr Knott, Mr Miller's peer review and the revised District Plan Schedule 8D.
4. This submission is not made as an expert. However, we do have skills in research, analysis, knowledge of RMA and environment court processes, and a common-sense approach to problem-solving in our professions (hydrogeologist, accountant and writer) and personal interests (architecture and genealogy).

Abbreviations used in this Submission

5. To avoid lengthy repetitions, the following abbreviated names are used throughout this submission.
 - a. The revised version of Schedule 8D, pages 35-123, sent to submitters on 6 April 2023, and which is currently found on a report linked as "PC9 Appendix A Appendix 8 Historic Heritage 11 Recommendations Version" on the HCC PC9 website² is referred to throughout this submission as "Revised Schedule 8D".
 - b. Attachment 1 of the Statement of Evidence of Robin Miller Historic Heritage Areas, sent to submitters on 14 April 2023, being a peer review assessment dated March 2023 (also on HCC PC9 website as

¹ Rebuttal Evidence (page 22): 8.4(a)i and (a)ii and 8.4(c)

² It was on the PC9 website under Plan Change Documentation > S42a when I began this report but has since been moved.

"Peer Review of HHAs – Robin Miller") is referred to throughout this submission as "Miller".

- c. Attachment 1 of the Statement of Evidence of Kai Gu Historic Heritage Areas, sent to submitters on 14 April 2023, being a peer review by Gu (undated in this instance but named as being March 2023 on HCC PC9 website as "Peer Review of HHAs – Kai Gu") is referred to throughout this submission as "Gu".
- d. Historic Heritage Areas (HHA) are generally referred to by the first or first two names of the HHA unless this would cause confusion or is relevant to the point being made.

Level of Evidence

6. **Unequivocal and documented evidence** of historic heritage values **must** be provided by HCC before an HHA, and its associated restrictions, are placed on properties.
7. Many homeowners were very surprised and upset to be included in proposed HHAs as this is effectively a post-purchase covenant on their property and restricts their future plans. As such **it is imperative that any HHAs are imposed based on evidence, not guesswork, supposition, theorising, speculation, personal unproven subjective opinions or because submitters wanted to be in an HHA to avoid intensification.**
8. Gu notes in his Peer Review³ that:

*"Under the heading Historic Qualities in the Historic and Cultural Heritage Assessment Criteria set by the Waikato Regional Policy Statement (10A, 2016, updated 2018), **the heritage place or area needs to have a direct association with, or relationship to, a person, group, institution, event or activity that is of historical significance to Waikato or the nation.**"*
9. Miller's peer review recommended Knott expand on the detail. While the latest Schedule 8D has some more background provided, there is still very little evidence provided for any actual heritage values. Details of a subdivision do not indicate historic heritage values.

³ Gu, page 7

10. Removal of the consistency scoring from Knott's methodology means there is now no clear reason given as to why one street was selected over another for inclusion within a specific HHA. There is still very little documented evidence to suggest that one group of houses in a proposed HHA, representing a very long time period, is any more valuable than any other group of houses in the same decade(s).
11. The proposed inclusion of HHAs with no evidence of significant heritage values dilutes the importance of valid, researched proposed HHAs such as Frankton Railway Village, Hayes Paddock, Hamilton East and Claudelands.

Fabricated and Incomplete Research

12. Miller's peer review of Oxford (East) states that "*Historic titles show the lots were all⁴ sold to private owners throughout the 1920s.*" (This is presumably stated as an indication that the houses were all built in the 1920s as Miller claims the houses were all built in the early 1920s.) **This is an outright fabrication.** Miller cites a LINZ reference SA351/126, which is presumably meant to be SA352/126. (LINZ has confirmed there is no SA351/126). SA352/126 is a 1922 title that shows just **three** Oxford Street properties were sold in the 1920s before the title was cancelled in 1926. Later titles show the first private sales for Oxford (East) as being **one property in 1940** and the other **three properties in 1957**. Four of the five Marshall Street properties were transferred **after** the 1920s. Details and support for these statements will be included in my oral submission. **The issue we are raising here is that HCC's "expert" indicated in his peer review report that he had checked land titles when he had not, and stated, falsely, what the titles showed.** This erroneous statement that the titles show all properties were sold in the 1920s is repeated, as if fact, in Revised Schedule 8D. Details and support for these statements will be included in our oral submission.
13. When Miller and Revised Schedule 8D identified our HHA as "*likely*" being "*Ellis & Burnand prefabricated houses*", without providing any reference as to what these were, we needed to do some research. It was not difficult to locate the 1933 Ellis & Burnand catalogue⁵ which showed the very distinctive

⁴ Throughout Miller's report on Oxford (East), he alternates between "all" meaning all twelve houses and "all" appearing to refer to just the seven Oxford Street houses. This lack of clarity is copied through to Revised Schedule 8D

⁵ <https://collection.pukeariki.com/objects/36532/house-designs-and-plans>.

features of their prefabricated houses, what the completed houses looked like and provides details and images of the process of erecting a prefabricated house. There is a copy in the Hamilton City Library Heritage Collection and a copy online on the New Plymouth Library website. We are uncertain why the supposed heritage experts failed to locate this document (or simply did not bother to look for any evidence) and verify whether the Frankton East or Oxford (East) houses resembled, or in fact are, Ellis & Burnand prefabricated houses as clearly illustrated in the 1933 catalogue. The errors and lack of research are discussed further under Frankton East in paragraph 110.

14. Revised Schedule 8D states that “*a new era of suburban housing vernacular was established in the 1960s with the introduction of architecturally designed houses from plan books*”⁶. A verbal request for “old NZ plan books” made to the Hamilton City Library Heritage room resulted in a large pile of books and evidence that NZ architecturally designed house plan books existed from **at least** the early 1950s.
15. Oxford (East) HHA, Ellis & Burnand prefabricated houses and NZ house plan books are the only aspects we have researched. But, given these significant errors, we suspect there are other significant errors in any “research” performed by Knott, Miller and HCC.

Visibility

16. As most HHAs are on minor roads, with many on cul-de-sacs, the general public are unlikely to ever see them. It is unlikely people will travel down Sare Crescent or Marshall Street to admire the old, not particularly attractive housing.
17. Several HHAs (including Acacia and Oxford (East)) have many houses which are not clearly visible from the footpath. More may be visible from Google Street View, especially when zooming in on a computer but the housing in these HHAs will not be seen by the majority of passers-by. (Google Street View records from the road with a camera at a height of 2.5 metres⁷ which is 39 cm taller than Steve Adams⁸.)

⁶ Acacia Avenue HHA Building and Streetscape Elements

⁷ <https://petapixel.com/2012/10/15/a-glimpse-of-googles-fleet-of-camera-equipped-street-view-cars/>

⁸ Steve Adams, NZ basketball player for Memphis Grizzlies in the NBA

18. If owners want to maintain their property, they are always free to do so, but **to have true historic heritage value, it needs to be of value to the city, region or country, beyond the property owners within the HHA.**

Significant Changes in Revised Schedule 8D

19. Revised Schedule 8D has significant changes from what was publicly notified in July 2022, including expanding HHAs, removing properties within HHAs, renaming an HHA, the addition of an unidentified⁹ number of properties to HHAs, deletion of four HHAs, change in methodology, the removal of the five themes (on which submitters made their initial submissions) and introduction of development periods. HCC have chosen not to publicly notify these changes. We disagree with this decision. This is unfair to property owners impacted directly or indirectly by the changes.
20. In his 22 June 2022 HHA report (used to recommend the proposed HHAs which were publicly notified in July 2022), Knott stated: *"The descriptions for each HHA have **purposely been kept brief**. My experience is that attempting to provide more detailed descriptions of areas inevitably results in either matters being missed or the temptation for applicants to respond to elements of the description which are not specifically relevant to the site in question."*
21. In his 6 March 2023 Addendum to Hamilton City Historic Heritage Area Assessment, Knott stated that: *"Time constraints meant that **there was not the opportunity for research to be carried out for individual HHAs**. The original report therefore pulled upon the city-wide reports prepared by other historic heritage experts."*
22. As such Knott is admitting that his June 2022 report (which resulted in 32 HHAs containing several thousand impacted homes being publicly notified on 22 July 2022, which immediately imposed restrictions on all of those properties) was completed **without any research** and with **a deliberate intention not to provide any detail** to impacted parties so they could not refute it. This is not in line with the intention of the RMA or **general ethics**.
23. As at 14 April 2023, there were 87 documents on the HCC PC9 website as well as 829 submissions plus numerous summaries of those submissions. The

⁹ The Statement of Evidence of Richard John Knott evidence dated 14 April 2023 has maps which refer to increases shown by white shading. As a rough estimate from the maps, around 50 properties were added.

volume of documents makes it difficult to identify what is important. Submitters and impacted parties, other than those who requested the opportunity for an oral submission, are largely unaware of the significant changes. It is also of note that several documents have been moved after being loaded on the website, including the document containing Revised Schedule 8D which was in the tab S42A under Plan Change Documentation. The name of the document which includes Revised Schedule 8D (image below) is not clear. Given this is a key document for HHAs, this makes the process more difficult than necessary for submitters.



Rebuttal Evidence

24. The opportunity to provide rebuttal evidence (following Independent Hearing Panel Direction #4 and a legal submission from Wynn Williams) has not been advertised widely and is only known to people who have requested an opportunity to make oral submissions. This means that other impacted citizens who either did not make an original submission or made a submission **and** indicate they did not wish to make an oral submission at the Hearings are not afforded an opportunity to raise their concerns about these major changes (if they are even aware of the changes).
25. It is also of note that when I¹⁰ made a request to Steve Rice on 3 March 2023 asking for the opportunity to present rebuttal evidence in line with the Environment Court Practice Notes 2023, **Mr Rice passed my request to Mr Davey, rather than the Independent Hearing Panel.** Mr Davey responded by saying "*Submitters can update their statements on the day in light of evidence filed or given by others since their statement was filed. **There is no opportunity for submitters to come back and present rebuttal – that is for the proponent**, whose evidence is given first and is to rebut evidence or statements not previously filed. If previously unseen evidence is produced by the proponent, then parties are certainly able to comment on that.*"
26. When a lawyer made an identical request on 5 April 2023, it was accepted, and Independent Hearing Panel Directive #4 was issued the following day. The

¹⁰ David Whyte

different treatment from my request to that of a lawyer erodes the integrity of the process.

27. On 26 April 2023 we made a request as to whether impacted people who had not previously made a submission, could make a rebuttal submission due to significant changes made in March and April 2023. Again, this request was passed to HCC and not the Independent Hearing Panel. We were advised by both Craig Sherman and Steve Rice that in fact, **we**, as non-experts, were not permitted to make a rebuttal submission at all. We made several requests that this be verified with the Independent Hearing Panel before it was acknowledged on 2 May 2023 that as a submitter, Direction #4 applied to us.

Archifact/Adam Wild Peer Review

28. It is important to note that many of the issues raised in the two 2023 peer reviews¹¹, which have resulted in significant amendments, were also raised in a peer review by Archifact which HCC commissioned in 2022, prior to public notification. It is unfortunate that Knott and HCC chose to ignore the recommendations until they were made again in March 2023 by two different reviewers and at further cost to the ratepayers. The peer review is not included in HCC plan change documents made available to the public and was only identified after a Local Government Official Information and Meeting Act request.
29. Recommendations of note from the 6 June 2022 Peer Review report which have since been adopted in 2023 include:
 - a. Did not agree with using consistency criteria as a key factor in identifying HHAs (now removed from methodology)
 - b. Did not agree with the five themes (now replaced)
 - c. Omission of commercial areas in HHAs (now added)
 - d. All streets should be visited (supposedly actioned in Feb 2023)
 - e. Hamilton East and Graham Street HHAs should be merged (now actioned)
 - f. Removal of Jamieson HHA (actioned)
 - g. Maps should be included for each HHA (actioned April 2023)

¹¹ Gu and Miller

30. Other recommendations/comments of note that Gu and/or Miller supported and have been partially actioned include:
- a. A peer review of Knott's report should include ground truthing (completed for eight HHAs with visits completed by Knott and Miller together in February 2023)
 - b. Lack of detail in HHA statements (agreed by 2023 peer reviews and partially actioned by Knott/HCC)
 - c. More research should be completed for Angelsea, Casey, Chamberlain, Oxford (East), Riro and Sare HHAs (partially actioned)
31. Other recommendations/comments of note which have been ignored include:
- a. There is a risk of defining special character as HHAs.
 - b. Wild would expect HHAs to have at least one built heritage building (Schedule 8A or 8B).
 - c. Removal of HHA was recommended for Acacia, Ashbury, Augusta, Cattanach, Hooker, Jennifer, Lamont, Seifert, Springfield and Sunnyhills.

Review of Revised Schedule 8D - Overview

32. The Revised Schedule 8D has multiple errors and typos which suggest that it has been neither prepared nor reviewed carefully. For example, Marire Avenue (which only has around 26 properties per Google Maps) is listed in two HHAs (HHA 11 Frankton East (a newly named HHA) and HHA 18 "Marire, Hinau and Rata") and is referred to alternately as Marire Street or Marire Avenue. There are also 85 footnote references without any actual footnotes¹². These footnotes are presumably from a report by Knott or HCC. This report, with its footnotes and references, has not been presented as part of the PC9 documentation.

Meaningless Heritage Values

33. The summaries of heritage values in Revised Schedule 8D, and supporting information consistently refer to various common factors without acknowledging the following:

¹² Where the HHAs were reviewed by Miller, the footnotes can be seen in Miller's report.

Integrity of Lot Size

34. While we agree that it is not appropriate to include an area which has had significant later subdivision, the fact that, a section has not yet been subdivided since its initial subdivision is not a heritage value in itself.

Inconsistencies in the Application of the Revised Methodology

35. Although Knott's revised methodology (adopted after Gu's review) is supposedly not based on housing typology, Schedule 8D still reflects typologies as being heritage values but does not treat them consistently. The Revised Schedule 8D is inconsistent as to whether house typologies should be an HHA because they are similar¹³ (and as such this is a good example) or should be an HHA because they are varied¹⁴ (and as such this is a good example), whether streets should be included because the street layout is typical of the decade(s) or included because they are considered "interesting" as they are considered atypical examples of the decade(s).

Growth as a Heritage Value

36. Hamilton from its earliest days has continued to grow and expand. This is well-documented with twelve expansions of the city since the Borough was formed in 1877. It is a logical outcome that when an urban centre grows in population, there is an automatic corresponding outcome resulting in additional houses being built, and new suburbs being developed. Following this same logic, the need for State housing will also increase as the population increases.
37. As it is a given fact that any developments are a result of growth, this is not a heritage value in itself.

State Housing

38. Hayes Paddock HHA is acknowledged as a model of (ex)State housing¹⁵. It is a large area with around 200 similar houses. The area has been well-maintained. It is near the Waikato River and associated parkland which makes it a very pleasant area which is frequented by both Hamilton residents and visitors on their way to Wellington Beach, the River path or the popular café near Wellington Beach.

¹³ Eg State housing.

¹⁴ Eg 1960s/1970s housing.

¹⁵ Hayes Paddock Design Guide prepared for Hamilton City Council by Boffa Miskell Limited in 2005.

39. Hayes Paddock HHA provides a considerable contrast to the other State (or ex-State) housing areas in Hamilton, including those proposed to be HHAs. The other proposed State (or ex-State) housing HHAs only have small pockets (generally one street) of State housing. Most¹⁶ of these are currently either a combination of State-owned, private rentals and lower-income homeowners. The frontage treatments are not consistent. Many of the properties do not have garages and so there are cars parked on the front lawns. The exterior of many houses have not been well-maintained. Although many do not have high (or any) front fences (which was identified as a required feature for all HHAs in the July 2022 version of Schedule 8D), this actually means that the common issues of cheaper rentals (unmown lawns, lack of garden and generally unattractive frontage) are highly visible. Are these really the heritage values we want our city to reflect and be proud of?
40. We do not support any State Housing HHAs other than Hayes Paddock.

Pattern or Plan Book Houses

41. Acacia, Ashbury, Lamont and Seifert HHAs all have references to the houses being from “plan books” or “pattern books” in Revised Schedule 8D but there is no explanation as to **why** this is a heritage value, no explanation as to **which** plan books the house designs come from, **which** design(s) from that plan book they think the houses are and **why** this makes them important. As a result, these plan book HHAs have no direct association with, or relationship to, a person, group, institution, event or activity that is of historical significance to Waikato or the nation, which is what Gu states in his peer review as a requirement of a heritage area.¹⁷

42. These HHAs are referring to house plan books which, like a knitting pattern, give you a design, describe materials needed and give instructions as to how to make the house.

43. Another analogy is a supermarket providing a pack with ingredients for a meal and a recipe.



¹⁶ Casey and Marire, are exceptions with a mixture of generally well-maintained state and non-state housing.

¹⁷ Gu, page 7

44. They are not a new unique feature of the 1960s and 1970s and, as such, it is unclear why it would be a heritage value specific to these two decades, or in fact at all.

45. Internationally, plan books have been around since at least 1910 when Henry L. Wilson (self-proclaimed as "The Bungalow Man")¹⁸ published his first book.

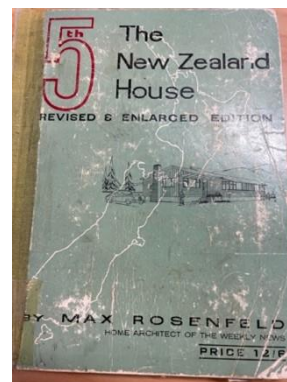
46. In NZ, Ellis & Burnand's 1933 catalogue included a plan book section after the "ready-to-erect" houses, but it appears to have been added to the catalogue as an afterthought with no supporting information as to how to buy a plan.



Practical Home Designs 2nd edition, circa 1947

47. From 1945 onwards, Ellis and Burnand produced several editions of a very professional-looking plan book called "Practical Home Designs".¹⁹ Ellis & Burnand said the plans were created by "a woman designer".

48. Max Rosenfeld is noted as a New Zealand architect who sold over 100,000 copies of his various plan books with multiple editions from the early 1950s onwards. He also wrote a column in the "Weekly News" called "Home Architect" from 1949 for two decades.



The New Zealand House 5th edition, circa 1957

49. He sold the house plans very cheaply. The usual cost for other house plans by registered architects was five percent of the cost of the building. When asked why they were so cheap, Rosenberg stated "*I'm letting them go at a nominal price because I had to draw them anyway (for use in the book) and because I want to do something for the*

¹⁸ https://www.goodreads.com/book/show/938136.The_Bungalow_Book, Henry L. Wilson, The Bungalow Book: Floor Plans and Photos of 112 Houses, 1910

¹⁹ Details of both Ellis & Burnand plan books are in Appendix B.

community in order to promote building activity."²⁰

50. A 1954 publication called "Your Own Home, HOW?"²¹ "issued by direction of the Minister of Housing" in 1954 advertises a low-cost plan service. Fourteen plans were made available for five pounds each from the State Advances Corporation. A limited plan service for small houses developed by the Institute of Architects is also offered. The limited plan service cost around half the normal fee for full services.
51. Based on the Rosenfeld and the Institute of Architects limited plan service examples, the statement in Revised Schedule 8D and Miller's peer review²² that "a new era of suburban housing vernacular was established in the 1960s with the introduction of architecturally designed houses from plan books" is **factually incorrect**.
52. All of the NZ plan books we viewed, whether designed by a draftsman, "a woman designer" or an architect, have a variety of designs. The point of them was to offer many ideas so people could find one that they wanted. As such it is impossible to define a house (or group of houses) as being similar to a plan book unless you identify one specific plan in one specific plan book.
53. In fifty years, will all homes by Jennian Homes and GJ Gardener be considered to have historic heritage value for this reason?

Street Shapes

54. Street shapes are stated as being "interesting" without applying common sense and looking at the reasons for the shape, which are largely due to economic or physical constraints, rather than being representative of a heritage value of a development period.
55. For example, what is now Fairfield Road was initially developed at the River Road end by 1948 with the curved middle section and straight section linking to Heaphy Terrace created due to other physical constraints such as Balloch Street, Anson Avenue, a gulley and stream (Ranfurlly Park) on the south side (which separated the two ends of Casey Avenue and lead to the northern end

²⁰ Sources: Obituary on <https://www.holocaustcentre.org.nz/>, Max Rosenfeld: "The Home Architect", Daniele Abreu e Lima, School of Architecture, Victoria University, Wellington, 2008

²¹ Copy held in Hamilton City Libraries Heritage Collection

²² Regarding Acacia Crescent HHA

being renamed Ranfurly Avenue once the stream had been culverted) and Caro Park to the north. Consequently, when the decision was made to put a road through to Heaphy Terrace and build State Housing, a straight road connecting River Road and Heaphy Terrace was neither physically possible nor an economical design as it would require the infilling of a gully. Interestingly, Alfred Street, which was also developed separately from both ends (Peachgrove Road and Heaphy Terrace) and has a slight kink in its alignment was as a result, deemed under the original scoring system²³, to be too inconsistent to be an HHA **due** to its inconsistent alignment.

56. For Jennifer Place, Revised Schedule 8D states that the street works with the original topography. As Jennifer Place, along with many other streets not included in HHAs, is a steep street flowing down a gully, this is not a heritage value or a factor worthy of any note.
57. In fact, many of the street layouts described as being typical of the development period, for example, Augusta, Casper and Roseburg are more likely to be based upon economic reasons and physical constraints rather than some town planning principle. For Augusta, Casper, and Roseburg the subdivision is for a small area of land already constrained to the North by St Pauls, to the East by Fairfield Intermediate and to the West by existing subdivision. Therefore, the street layout is designed to maximise access for the greatest number of properties with the least cost of infrastructure (roading, water and sewage, power, telephone, and street lighting) rather than because the developer wanted to be fashionable or trendy. The existing design involves approximately 500 metres of roadway, while a more regular grid pattern could involve up to 1,100 m of roadway.
58. In Hayes Paddock the street layout follows the contours of the land, and the curve of the river which forms the western boundary and the straight MacFarlane Street which forms the eastern boundary. As a result of these physical constraints the most economical road design to maximise the number of house units able to be built was to have a series of narrow curved streets and cul-de-sacs.
59. Another example is Chamberlain Place which is a small P-shaped road off Snell Drive. The roadway as it exists is approximately 321 metres in length. If a more regular grid layout had been utilized the roadway would need to be at

²³ PC9, Appendix 9, June 2022, page 105.

least 425 m in length. A considerable additional expense (additional stormwater drains, streetlights, power poles, cables, telephone wiring etc) to provide services to the same number of houses. So again, the layout is due to economic reasons, not the decade of subdivision.

60. The typical street layout for the 1950-1980 development period is described as "*including linked roads and cul de sacs*". Looking at this logically, Revised Schedule 8D is saying that roads are either connected to other roads or they are not connected to other roads. The reality is there is no third option for roads and thus this is a meaningless statement and therefore is not a heritage value.

Generic Heritage Values

61. Much of the described "values" and descriptions can be attributed to any street, or group of connected streets developed in the same decade as those proposed to be HHAs. It is of note that, excluding the HHAs which were previously Special Character Zones or Areas, there are almost no HHAs with properties on a major road. Given that the major roads (eg Heaphy Terrace, Hukanui Rd, Peachgrove Rd) were key to the development of the city, and have existed since the early days in some form or another, this seems to be a major omission if the nearby HHAs actually have valid heritage value.

Developers

62. Revised Schedule 8D refers to "private developers", "private owner with commercial developers" and "commercial developers" as though they are somehow distinct types, driven by different motives without defining either the difference or the significance of each type. All developers, other than State and NZ Railway housing, were undoubtedly developing with the intention of making a profit.
63. Whether their legal structure was an individual (sole trader), a partnership, a trust, a small family company or a large, limited liability company neither provides nor indicates any heritage value.
64. While the developer's names are given as part of the heritage values for most HHAs, there are no reasons given as to why this is a heritage value. For example, although Houchen is named as the developer for Acacia, by subdividing an area of their farm, they also developed Houchens Road yet this is not included in an HHA and was presumably an earlier development by the

Houchen family. If the developer is so important as to be considered a heritage value, the main street of the development should definitely be included.

Use of Qualifiers

65. It is not appropriate for the District Plan or historical heritage experts to describe historic values using qualifiers such as “likely”, “appear”, “strong similarity” or “reportedly”. **Either HCC and its heritage experts are certain of something or, if not, it should not be listed as a heritage value or reported as an element relevant to the decision to make an area an HHA.**
66. The use of qualifiers is particularly prevalent in the Acacia, Augusta and Oxford (East) HHAs.
67. [Appendix A](#) lists the occurrences of these qualifiers in Revised Schedule 8D.

Misleading Statements

68. Revised Schedule 8D includes several statements which may mislead the reader if no further reading or investigation is done.
69. Overall values for the 1950-1980 development period appear to have been cut and pasted into values for individual HHAs. For example, the summary of values for six of the HHAs deemed to be from the 1950-1980 development period has the values as “*this subdivision is typical of the Early Post War Expansions (1950-1980) development period, including linked roads and cul-de-sacs and building plans which incorporate L, T and shallow V shapes*”. Revised Schedule 8D does not state that the multiple elements are not necessarily all applicable to the specific HHA. This “heritage value” is given for (among others) Acacia. However, as Acacia is only one street, it clearly can’t be both a linked road and a cul-de-sac. Further into the Acacia description, the buildings are described as being L and T shapes (only).
70. Fairfield Road HHA is recorded as spanning two development periods as if this makes it something special. It is a group of state houses built between 1949 and 1953, with little visible difference in the housing typology.
71. There is no evidence whatsoever that the images and descriptions of advertisements included in the Oxford (East) HHA²⁴ relate to the 25-35 Oxford

²⁴ Revised Schedule 8D, page 95

or 28-36 Marshall Street properties (being the properties in the HHA). While the report acknowledges that *"it is unclear exactly which sections these advertisements relate to"*, it is not clearly stated that there is no evidence that the ads relate to **any** houses included in this HHA. The HHA only contains twelve properties. Street directories indicate that the Marshall Street development (with 41 lots) commenced at the Heaphy Terrace end of Marshall Street. Per Mr Knott's June 2022 report, houses in the now deleted Oxford Street (West) HHA (also at the Heaphy Terrace end of the street), had houses built in the 1920s.

72. Both Revised Schedule 8D and Miller include a list of *"1960s architectural elements **present** at Acacia Crescent"* which are *"particularly visible on the western side of the road"*. The list of eight elements under streetscape elements suggests these are **prevalent** on the fifty properties and, as such, this is a heritage value. *"Tiled roofs"* are listed as a feature. Acacia has a combination of decramastic, iron and clay tiled roofs without tiled roofs being obviously dominant. A walk along Acacia Crescent failed to locate a *"white painted panel between windows."* (We did see a blue one.) Knott and Miller may have seen at least one, but it is not a prevalent feature. *"Front doors glazed with small panels"* are listed as an element. Like the white painted panels, we did not locate one of these.
73. Where houses are considered to be *"largely unchanged"*, this does not necessarily make them of value. In many cases, it means they are nearing the end of their economic life. This is particularly of note with pre-1950s housing in Fairfield and Enderley, and State housing across Hamilton. Unlike the Claudelands and Hamilton East villas, these houses were not built to last forever and unlike Hayes Paddock, many have not had owners with the financial ability (or desire) to perform ongoing maintenance or major renovations required to keep an old house going. The "Healthy Homes" requirements mean several hundred thousand dollars would need to be spent to make some old houses suitable for rentals.

Subjective, Nonsensical or Vague Statements

74. The District Plan (including Schedule 8D), as a legal document, needs to contain **clear and factual statements**. Parts of Revised Schedule 8D read more like a badly written creative writing exercise than part of a District Plan. The following are examples of subjective and nonsensical statements included in the Revised Schedule 8D [Emphasis added in all cases]:

- a. Augusta: "There are **direct views** along the each (sic) of the street within the HHA, although the **curved alignment curves** of Augusta Steet (sic) **adds interest** to the views along it."
- b. Chamberlain: "This appears create new lot boundaries to ensure that semi-detached (duplex) dwelling has its own independent lot."
- c. Frankton East has "an **interesting** subdivision design and layout".
- d. Frankton Railway: "By 1928 the construction industry was so **envious** of the railway factory that they lobbied for it's (sic) closure."
- e. Hooker: "The curved alignment, with berms of regularly spaced trees, limits views along the street and **brings greater interest as views emerge as a visitor travels along it.**"
- f. Riro: "The **current impression** is that the land at the end of the formed street is within 14 Riro Street, **although boundary plans indicate that this is not the case.**"
- g. Sare Crescent has "an **interesting** curve."
- h. Sare: "Sare Crescent also appears to demonstrate **some watered-down ideals** of the Garden Suburb..."
- i. Sunnyhills: "The curving alignment of the street and changing levels **add interest** [and] illustrate how developments of the era worked with the topography..."
- j. Victoria Street: "At ground level the narrow shop fronts provide **rhythm** in the frontages and **contribute to the creation of a human scale**. They **provide interest** to pedestrians by bringing the opportunity for a diversity of ownership and uses."
- k. Wilson: "The area also illustrates the first Labour Government's (1935-1949) **ambitious** rollout of state housing..."
- l. Various HHAs: The buildings for the eleven HHAs within the 1950-1980 development period are described as being "**cohesive yet varied**". Using the dictionary²⁵ definitions, "cohesive" means "tending to unite

²⁵ The ODP states the dictionary to use is OED, but as this is not at hand, Websters was used. There should not be a significant difference in meaning between the two major UK-based dictionaries.

in a mass, having the power of cohering” and varied means “different”. Cohesive is used subjectively here and the phrase appears to mean “different but sort of the same” which is both subjective and meaningless/vague.

Historic Heritage As Found

75. Many of the HHAs descriptions in Revised Schedule 8D include “*appears to be relatively unmodified*”. This suggests the heritage experts are uncertain whether the houses are unmodified or not. The heritage value must be judged on the found condition.
76. In a report prepared by Adam Wild, Director of Archifact, on the demolition of the municipal pools he states the following²⁶: [emphasis added]
“In accordance with conservation best practice a building or place is assessed as found. Such a process avoids predeterminations as to value and recognises that values are dynamic and can go up and down over time. I am aware from my own professional practice that HNZ recognise this phenomenon and acknowledge that “*heritage values can alter (increase or diminish) with time and circumstance, and that significance may be reassessed if impacted by various factors* (footnote omitted). Accordingly, I undertook my own objective and independent assessment of the Hamilton Municipal Pools which was completed in 2018, and which considered the place **as found.**”
77. There are at least four further examples of Wild repeating the same point that the historic heritage of a building or place is as it is found (or in common parlance, as it looks today, not how it looked on the day it was built or could be made to look again if renovated).
78. As an aside, Wild’s report was accepted and Knott’s own submissions to retain the pools was rejected and the pools have now been demolished.

Anti-Intensification Submissions

79. There are a large number of submissions which support HHAs but do not provide any reason other than they do not want intensification. While this may be a valid concern for submitters, it should be considered under PC12, not PC9,

²⁶ Statement of Evidence of Adam Wild on Behalf of Hamilton City Council – Community Facilities dated 25 October 2019, page 11, paragraph 34

unless the submitter can provide justification to support an HHA based on proven and valid heritage values.

80. The volume of PC9 anti-intensification submissions confirms that HCC have not clearly communicated to the community/ratepayers which issues are being debated under PC9 vs PC12. This has resulted in confusion, with many PC9 submissions focussing on the impact of intensification, rather than heritage values. While this is not an issue that the Independent PC9 Hearing Panel can deal with, it is a major flaw in the process caused by poor communication.

Rebuttal Comments on Individual HHAs

81. For the eight HHAs selected by HCC and reviewed by Mr Miller, the Revised Schedule 8D is largely the content of the sections of Mr Miller's report under the headings of summary of values, background and streetscape elements. These differ significantly from Knott's 2022 report and the earlier version of Schedule 8D.
82. All the other HHAs presented in Revised Schedule 8D were amended significantly after Mr Miller's peer review of a limited number of HHAs.
83. There has been no evidence provided of an independent peer review of these further revisions.
84. In the absence of an independent peer review, we took it upon ourselves to review Revised Schedule 8D. We have visited all of the following HHAs commented on, at least once.

Acacia

85. The Summary of Values first records these houses as being "*largely **1960s and 1970s** builds, dating from original subdivision of the street*" but in the next sentence they are described as "*a cohesive yet varied collection of **1960s** buildings*". It is unclear (and contradictory) whether the heritage value relates to one decade or two. It is important that the HHA values are accurate and clearly stated.
86. The summary of values states there are linked roads and cul-de-sacs. Given the HHA only contains Acacia Crescent, this appears to be talking about more than this HHA.
87. The summary of values records L, T and shallow V shapes. However, the background records only L and T shapes.

88. It is stated (erroneously²⁷) that in the 1960s, architecturally designed houses from plan books were introduced. The buildings are stated to “*appear to have strong similarities with the 1960s plan books*”. As noted previously, there is no indication **which** plan books they supposedly have similarities to, and **why** this makes them important. As noted by Wild²⁸, heritage values need to be as found. “Strong similarities” do not meet the criteria for a heritage value.
89. A walk along Acacia Crescent showed that most houses on the side furthest from Houchens Road have minimal visibility from the footpath due to fences and the houses being downhill and below street level. On the side closest to Houchens Road, many houses have heavy tree planting in the front of their sections which greatly limits visibility. For example, an attempt to look at the described front door element was unsuccessful as very few front doors could be seen as they were hidden by either trees or screen doors.
90. Revised Schedule 8D notes that there is “*more variation in styles, materials, and layouts compared to the earlier State housing vernacular*”. Given that early NZ State housing was all virtually identical, this is a meaningless description. **Any** two non-State houses in NZ will likely have more variation than State housing.
91. We do not believe HCC have provided sufficient evidence of heritage values for the Acacia HHA and request this HHA be removed from the proposed District Plan. Note that all²⁹ submissions from property owners oppose this HHA.

Ashbury

92. Is being one of a series of subdivisions by Chartwell Properties actually a heritage value? No reason is given as to why all other subdivisions by Chartwell Properties are not included as HHAs if there is something important about Chartwell Properties.
93. The subdivision is recorded as being “*evidence of a commercial developer bringing forward a subdivision within an area recently added to the city*”. How does this represent a heritage value? As previously mentioned, all developments relate to growth, and Hamilton has been steadily growing since its inception.

²⁷ Refer to earlier discussion on Plan Books at paragraph 41

²⁸ Paragraph 76

²⁹ Submissions 111 (Jeffer) and 265 (Gow)

94. Buildings supposedly show “*designs and materials typical of the 1960s plan books*”, but as for Acacia, it does not provide details of which plan books or why this is a heritage value.
95. We do not believe HCC have provided sufficient evidence of heritage values for the Ashbury HHA and request this HHA be removed from the proposed District Plan.

Augusta

96. The summary of values states this HHA is evidence of an owner/developer bringing forward a subdivision within an area recently added to the city. As discussed previously, this is not a heritage value.
97. We do not believe HCC have provided sufficient evidence of heritage values for the Augusta HHA and request this HHA be removed from the proposed District Plan. Note that all³⁰ submissions from property owners opposed this HHA.

Casey

98. Casey Avenue’s summary of values states that “*a mix of housing typologies [...] reflect the historical context of the site*”. So, in **this** HHA, unlike most others, housing from different decades, a mix of State and private development and houses in different materials and styles is considered to **be** a heritage value. This matches the description of many of the streets in Hamilton which were expressly excluded from HHAs in Knott’s 2022 report.
99. Although there were no submissions specifically for Casey HHA³¹, two Casey Avenue property owners contacted us asking for help with submissions to oppose the Casey HHA as they felt unable to navigate the complexity of the PC9 submission process.³²
100. We do not believe HCC have provided sufficient evidence of heritage values for the Casey HHA and request this HHA be removed from the proposed District Plan.

Cattanach

101. The summary of values states that this is part of a subdivision developed by DV Bryant Trust. The DV Bryant Trust website states that over 200 acres was

³⁰ Submissions 34 (Mulligan) and 254 (Smith)

³¹ Kainga Ora appears to oppose it as they have CoCs for Casey Ave.

³² We were unable to assist at the time due to a conflict of interest.

subdivided in the 1960s after Mr Bryant died in 1962. The Revised Schedule 8D for the Cattnach HHA gives no reasons as to why Cattnach Street, containing around only 13 properties, is differentiated as being more significant than the streets and houses on the other 200 acres of the subdivision.

102. The buildings are described as *"largely 1970s builds, with some 1980s buildings"* that *"form a cohesive, yet varied collection of 1970s and 1980s buildings"*. Given the development period in Schedule 8D is either *"Early post-war expansion (1950s-1970s)"*³³ or *"Early Post-War Development (1950-1980)"*³⁴ it is very questionable how these 13 houses should be an HHA reflecting a period of development that only extends to either 1979 or 1980.

103. The background further details the good works of the Trust. While we do not dispute the accuracy of this, we do not see the altruistic values of the Trust who developed the street as having any historic heritage value in regard to the housing subdivision, or the evidence of the HHA.

104. We do not believe HCC have provided sufficient evidence of heritage values for the Cattnach HHA and request this HHA be removed from the proposed District Plan.

Chamberlain

105. As noted in paragraphs 38-40, we do not believe there are heritage values in any State housing HHAs other than Hayes Paddock and request this HHA be removed from the proposed District Plan.

Fairfield Road

106. The Fairfield Road HHA is recorded as covering two development periods³⁵ and supposedly displays features from each period. As noted already, this is misleading, it is simply the current housing of a State housing area that was built in a five-year period from 1949-1953 and not a heritage value.

107. Like all State housing developments, it was built as there was a need for more State housing. This is not a heritage value, just a common-sense housing approach by the government of the day.

³³ Page 5

³⁴ Page 6

³⁵ 1890-1949 and 1950-1980

108. It is recorded that the *“curving street design moves away from previously regimented grid street layout into post war free flowing street form”*. As stated previously the obvious explanation for the curved alignment has been missed by Knott. The street was started from the River Road end and was then joined on a steep hill and is bound on one side by a gully, stream, existing streets, Ranfurly Park and Caro Park. Again, this is not a heritage value.
109. We do not believe HCC have provided sufficient evidence of heritage values for the Fairfield Road HHA and request this HHA be removed from the proposed District Plan. Note that all³⁶ submissions from property owners opposed this HHA.

Frankton East (Ellis & Burnand Prefabricated Houses and HHA Expansion)

110. Revised Schedule 8D states that: *“Importantly the area contains a large number of Ellis & Burnand’s pre-fabricated houses: one of Waikato’s earliest and largest house building companies.”* It further states that *“This HHA is considered to have at least moderate **regional** and local heritage significance as an example of the late Victorian and Edwards and during and after inter-war growth 1890 to 1949 development period and due to the large number of Ellis and Burnand houses which remain in the area.”*
111. There appears to be significant confusion in both the submissions³⁷ and Revised Schedule 8D regarding what Ellis & Burnand prefabricated houses are and what the company’s business was.
112. The 1933 Ellis & Burnand catalogue³⁸ shows that Ellis & Burnand prefabricated housing has three very distinctive features. This is further confirmed by numerous photographs in the Hamilton Library Heritage collection. (Ellis & Burnand call their prefabricated houses “ready-to-erect”. The word “standardised” is used by the Waikato Times (eg “*standardised motor garage*”³⁹.)
- a. The prefabricated houses all have highly visible **regularly spaced vertical battens over joins between the prefabricated panels**. These are particularly noticeable above and below window frames and

³⁶ Submissions 187 (Bielby) and 242 (Naing) and Kainga Ora

³⁷ Submissions 452 (Kellaway) and 474 (Frankton East Residents Group)

³⁸ <https://collection.pukeariki.com/objects/36532/house-designs-and-plans>.

³⁹ Waikato Times, volume 100, issue 16813, 3 June 1926, page 8

above doors as the prefabricated panels did not include windows and doors and so these elements had to be inserted when the house is being put together like a jigsaw puzzle.

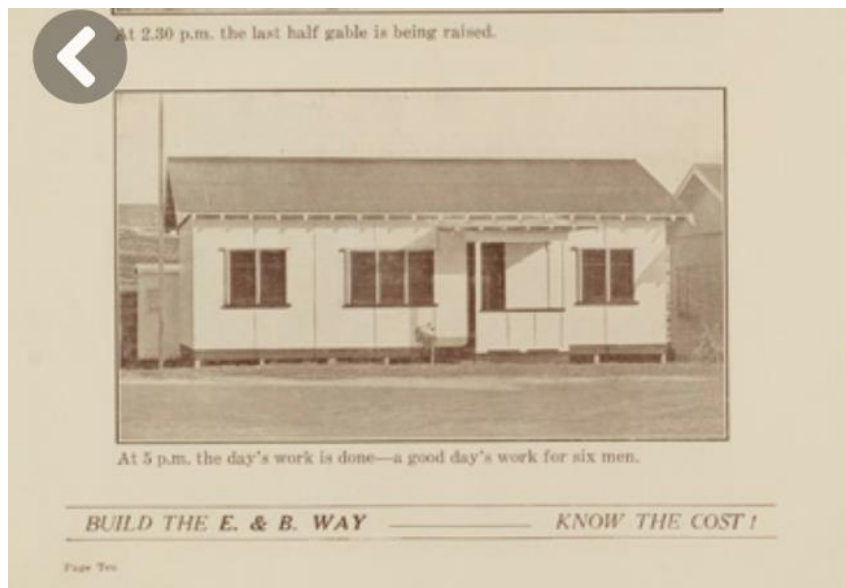


Image from 1933 catalogue⁴⁰ of an Ellis & Burnand “ready to erect” (prefabricated) house showing highly visible joints, consisting of vertical battens over joints between the prefabricated panels.

- b. The Ellis & Burnand prefabricated houses all have a unique **flat weatherboard profile** (which is very different to the serrated weatherboard profile that is common in NZ houses). In their 1933 catalogue, Ellis and Burnand describe this in detail and also note that it is different to their normal rusticated weatherboards⁴¹ which, superficially, have a slightly similar appearance (i.e. a flat profile).

⁴⁰ <https://collection.pukeariki.com/objects/36532/house-designs-and-plans>.

⁴¹ A superficially similar style using traditional rusticated weatherboards is seen in the Laurenson Settlement (c. 1915-1916) in Forest Lake Road and in the c. 1910 Police House on Grey Street (Houses of Hamilton. W. Kellaway. July 2010. NZ Pamphlets No 2985 in NZ Collection). These can also be seen at Hills Funeral Home, 717 Grey Street.

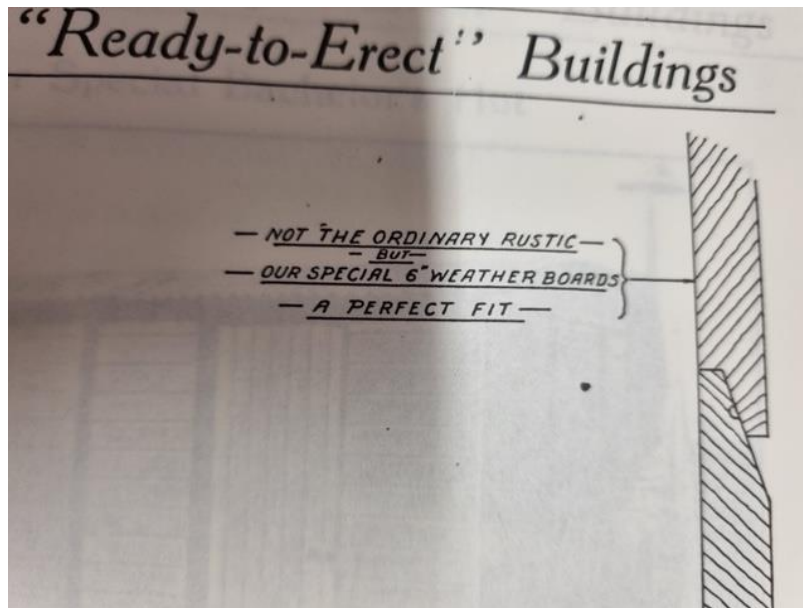


Image from 1933 catalogue⁴² of weatherboard detail for an Ellis & Burnand “ready to erect” (prefabricated) house. The note alongside the image says “Not the ordinary rustic, but our special 6” weatherboards – A perfect fit”

- c. The designs for all the prefabricated houses have very small floor areas (a 1930s version of modern tiny houses). The thirteen designs ranged in size from a 6m² “Bachelor’s Hut” (fitted with two bunks and a folding table) with the **largest, at under 58m²**, being the “Four-roomed cottage – combining every convenience with economy”⁴³. Note that a four-roomed house means four rooms in total, not four bedrooms.

113. In **1928** Ellis & Burnand first advertised prefabricated houses in the Waikato Times.

114. Ellis & Burnand applied to the Hamilton Borough Council in **1930** to be allowed to erect their standardised⁴⁴ cottages within the Borough boundaries. The issue was that the floor-to-ceiling clearance (8’ 9”) did not comply with the Borough bylaws. On **20 November 1930**, the Council formed a committee to look into this and report back.⁴⁵ It is unknown whether the Hamilton Borough eventually permitted any Ellis & Burnand prefabricated houses to be erected in the Hamilton Borough.

⁴² <https://collection.pukeariki.com/objects/36532/house-designs-and-plans>.

⁴³ Appendix C lists the calculations for the sizes of all the prefabricated houses in the 1933 catalogue.

⁴⁴ “Standardised” is used here by the reporter instead of “prefabricated”.

⁴⁵ Waikato Times, Vol 103, Issue 18181, 20 Nov 1930, page 11.

115. The Frankton East submissions describe the houses as "**1920s Ellis and Burnand prefabricated houses**". Given that the Hamilton Borough Council did not permit the Ellis & Burnand prefabricated houses to be erected in the Hamilton Borough in the 1920s, it is impossible for these houses to be examples of Ellis & Burnand prefabricated houses.
116. The house shown in submission 474⁴⁶ and described as "*Torrington Avenue - Ellis & Burnand home in 2022*" appears to be 2 Torrington Ave. The two catalogue images of ready-to-erect homes on the same page of the submission (presumably meant to show similarities) are the 47.3m² "*well built farm house*" and the 57.6m² "*four-roomed cottage*"⁴⁷. The Torrington Avenue house has a serrated weatherboard profile, no visible vertical battens and is listed on OneRoof as being 112m² and thus has none of the highly distinctive features of an Ellis & Burnand prefabricated house.⁴⁸ OneRoof records the floor sizes for most houses in Taniwha, Torrington and Wye as well over 100m², with many around 120m².

⁴⁶ At page 16

⁴⁷ Appendix C lists the calculations for the sizes.

⁴⁸ Mr Knott has excluded 2 Torrington Street from his map for Frankton East HHA (Statement of Evidence of Richard Knott, page 68), so it may be that he has realised this is not an Ellis & Burnand prefabricated house.

STANDARD HOUSES. ERECTION IN BOROUGH.

PROPOSAL TO COUNCIL.

An application to erect standardised houses in the borough of Hamilton was received by the Borough Council from Messrs Ellis and Burnand last evening.

The applicants stated that with a view to reducing the cost of buildings they had adopted a plan of standardisation and for some time past had been supplying dwellings, outhouses, workmen's huts, etc., to country districts.

They now proposed to erect some standardised cottages within the borough, but found that the standard adopted did not comply with the by-laws in respect to height of stud. They had consulted the building inspector, who informed them that before a permit could be issued for the erection of these dwellings in the borough, it would be necessary to obtain permission to allow a lesser clearance between floor and ceiling than that provided for in the by-laws. The actual clearance in their standardised houses was 8ft 9in, whereas the by-laws provided for 9ft.

STANDARD HOUSES.

WAIKATO TIMES, VOLUME 108,
ISSUE 18181, 20 NOVEMBER 1930,
PAGE 11

The building inspector had approved of the houses in all other respects and agreed that for the type of building under review the clearance mentioned was sufficient for all practical purposes. They therefore made application that 8ft 9in clearance be allowed. If any member of the Council cared to inspect these houses the writers would be glad to show them several types which they had at their factory in Bryce Street, and at the same time explain the method of construction which enabled them to re-

duce the cost of production.

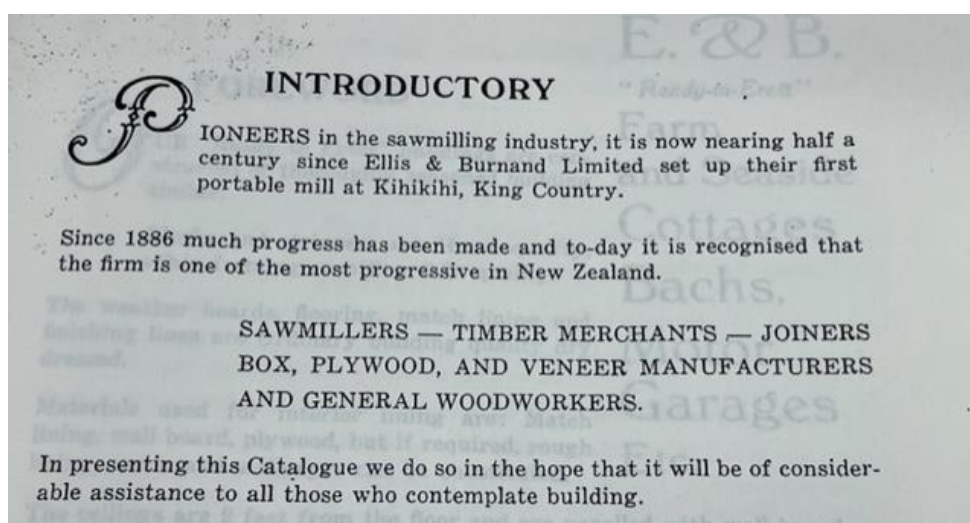
The borough inspector, Mr J. Lewis, reported that he had inspected two of the houses at the works and found that they did not comply with the borough by-laws in several respects. He had no recommendation to make, and suggested that before dealing with the request representatives of the Council should view the houses with him.

The suggestion of the Mayor, Mr J. R. Fow, that a committee consisting of the Mayor and Crs. G. J. W. Barton, F. J. Farrell, F. W. Luxford and D. D. Wilson go into the matter and report, was adopted.

Waikato Times article, 20 November 1930

117. Unless the Frankton East houses have all been modified extensively, including being **fully reclad**, and **were originally erected without the permission of the Hamilton Borough Council**, the **size** of the current houses, along with the **absence of vertical battens** and the **unique flat weatherboard profile**, means that **there is no physical evidence that they are prefabricated Ellis & Burnand houses**. It is also of note that W Kellaway's 2010 report entitled Houses of Hamilton does not mention Ellis & Burnand prefabricated houses at all, let alone state that they are a significant architectural type found within the Hamilton Borough or City.

118. Submissions⁴⁹ refer to the homes of the “*Ellis & Burnand builders*” being in the Frankton East HHA. The 1933 Ellis & Burnand catalogue states that “*a 4-roomed cottage can be erected by two men in from four to six days*”. While Ellis & Burnand did offer to “*send our men to erect the building for you*” if required, or “*let you have the services of a trained man to assist*”, **they were not builders**. These men would be similar to the modern companies which currently put flatpack items together such as Kitset Assembly Services⁵⁰. Messrs Ellis and Burnand (who were **also not builders**) were both dead before 1920 and did not live in the area so it is unclear what builders these submissions are referring to.



Introduction in 1933 Ellis & Burnand catalogue: Note that they do not describe themselves as builders or a house building company.

119. Ellis & Burnand sold building supplies to builders. They manufactured and sold kitsets for prefabricated houses. They manufactured and sold doors and windows. They did not build houses in the normal sense. As such, the company never advertised itself as a house-building company. In fact, the marketing for the prefabricated houses promotes the fact that a builder is **not** required.
120. The Frankton East houses may be built with timber from the Ellis & Burnand sawmill and may contain some elements (such as doors and windows) manufactured by Ellis & Burnand, but this does not make them “Ellis & Burnand prefabricated houses”. As Ellis & Burnand were a large supplier of timber and joinery to the building industry, many homes built in Hamilton from 1891

⁴⁹ Submissions 452 (Kellaway) and 474 (Frankton East Residents Group)

⁵⁰ <https://www.kitsetassemblyservices.com/new-zealand/>

onwards probably have Ellis & Burnand timber and homes built from 1904⁵¹ onwards probably have Ellis & Burnand windows and doors. These are not unique to Frankton East and this is not a heritage value.

121. Submissions by both Laura Kellaway⁵² and the Frankton East Residents Group⁵³ (correctly) state that there was a need for HCC (or its consultants) to do research for the proposed HHA. **It is clear that no such research has been performed into Ellis & Burnand prefabricated houses by either Mr Miller or Mr Knott, despite the Frankton East HHA being recorded in Revised Schedule 8D as having at least regional significance “due to the large number of Ellis and Burnand houses which remain in this area”.**

122. **It is important that the proven history is documented and verifiable, rather than making guesses and assumptions.**

123. We do not believe HCC have provided sufficient, accurate and verifiable evidence of the history, importance, or **the actual existence of any Ellis & Burnand prefabricated houses** in the proposed extension. Given the age of the area, it is possible there is some historic importance, but it needs to be researched and accurately described before it can be included as an HHA in the District Plan. We request this proposed extension to the HHA be removed from the proposed District Plan unless fully researched and amended to accurately record the history of the area. (Also, see below re Marire Avenue)

124. Details of the research that we have completed, and additional images, are in [Appendix B: A Brief History of Ellis & Burnand Prefabricated Buildings](#).

Frankton East (Marire Avenue)

125. Marire Avenue is part of the newly named Frankton East HHA. The Revised Schedule 8D also records Marire Avenue (presumably in error) as being part of an HHA with Hinau and Rata Streets that appears to have previously included Matai Street.

126. The housing on Marire Avenue has a large variety of styles. Even within the State houses, there are two different styles. (Some are like the brick houses in Casey, whereas others are weatherboard like those found at the Peachgrove Road end of Marshall Street). There is also new housing and houses which

⁵¹ After buying Coyle and Jolly’s Hamilton sash and door factory

⁵² Submission 452 (Kellaway)

⁵³ Submission 474 (Frankton East Residents Group)

have been modified significantly and houses which appear to be old houses which are not state housing (although they could be more recent builds designed to look like old houses).

127. The detailed Frankton East Residents Group submission⁵⁴ excludes the street from most of the discussion and provides little to support the inclusion of Marire.
128. Revised Schedule 8D is inconsistent overall as to be whether it is important to preserve small areas that contain multiple housing styles, like Marire Avenue, or to preserve an HHA which is all one particular decade and style. These two alternatives cover all housing and would result in every street in Hamilton potentially being deemed to have heritage value.
129. Note that the two submissions from residents of Marire Avenue⁵⁵ oppose the inclusion of Marire in the HHA. No other submissions provide evidence to support the inclusion of Marire Avenue in the HHA. What this street provides as part of an HHA containing much older housing is unclear and we support the two submissions recommending it be removed from the Frankton East HHA (and the Marire, Hinau and Rata HHA).

Frankton East (Summary)

130. The summary of values states that the area, except Marire, is evidence of Hamilton growing and that the later development of Marire is evidence of infill State housing. As noted previously, neither growth nor the existence of State housing as infill housing are heritage values.
131. The area is recorded as containing a variety of 1920s and 1930s dwellings, with a mixture of architectural styles including bungalows and villas with no detailed background to explain why these houses have heritage value, other than just being bungalows or villas.
132. The only specific reference to historic heritage is to the "*large number of Ellis and Burnand pre-fabricated houses*" which, as discussed above, is not a proven heritage value.
133. The background contains the development history but no actual heritage values. The streetscape elements repeat the summary of values.

⁵⁴ Submission 474

⁵⁵ Submissions 47 (Bourke) and 213 (Musa)

134. Unless HCC can provide documented and verifiable evidence why a mixture of old State houses, bungalows and villas is a heritage value worthy of protection, we request the Frankton East HHA be removed from the proposed District Plan in its entirety.

Hamilton East

135. Hamilton East contains housing types that range from early settler time through to today's infill housing. Yet in Revised Schedule 8D it is listed solely under Hamilton's Pioneer development period (1860-1889). This ignores the early 1900s Bay villas, 1920s California bungalows, 1930s Spanish Mission houses and early modern houses. Hamilton East reflects the full historical heritage development of Hamilton City in one well defined and identifiable area (1860-1980).

136. In the early stages of Hamilton's development, infill housing was accomplished by early settlers subdividing their one-acre city block into smaller and smaller land holdings. This is a well-documented feature of Hamilton East.

137. We support the incorporation of the Graham Street HHA into the Hamilton East HHA.

Hooker

138. Like the other 1960s and 1970s HHAs, Revised Schedule 8D has very little to indicate why Hooker Avenue should be an HHA.

139. Schedule 8D states "*The original subdivision plan is unusual for the period in that some of the lots on the west are very long*". This omits the fact that these long lots include a large proportion of gully land which was then removed in a subdivision revision and so is not a heritage value. This is also seen in the later northern subdivision involving Hillary, Bernard Streets and Cooper Place, which is constrained by a gully, but these are not included within the HHA.

140. The curved road alignment is commented on, ignoring the fact that it is following the rim of the gully system at a respectable distance, rather than a specific design feature or heritage value.

141. We do not believe HCC have provided sufficient evidence of heritage values for the Hooker HHA and request this HHA be removed from the proposed District Plan. Note that all⁵⁶ submissions from property owners oppose this HHA.

⁵⁶ Submission 406 (Ma)

Jennifer

142. The summary of values refers to “*link roads, loop roads and cul-de-sacs*”. This is clearly not referring to Jennifer Place which is one short cul-de-sac. This is yet another example where the supposed heritage values are actually a description of all features in the 1950-1980 period. The heritage values should refer only to the HHA.
143. Most of the background refers to the larger Chartwell area, with the only element specific to Jennifer Place being the curving street, which as commented on already⁵⁷, is not a heritage value.
144. We do not believe HCC have provided sufficient evidence of heritage values for the Jennifer HHA and request this HHA be removed from the proposed District Plan.

Lamont

145. The Lamont, Freemont, Egmont and Claremont HHA contains four streets in Chartwell in a small grid in between Hukanui, Comries and Belmont, with Ruapehu Street on the fourth side, parallel to three of the streets but excluded from the HHA as Knott considered it “*less attractive*.”⁵⁸
146. In Knott’s June 2022 report he stated that the Lamont grid street layout was “**typical of the period**.”⁵⁹ However, in the Revised Schedule 8D, the grid street development (containing only four small streets) is noted as standing out as “**not typical**” of the development period and **this** is now considered a heritage value. This area of the subdivision is well away from any physical constraints such as gullies and streams and thus it could easily be developed in the Hamilton East style grid pattern. **Knott has provided contradicting subjective views as the heritage values reasons for the HHA.** (Note that the street layout has not changed in this time and can be clearly seen by looking at a map or Google Earth, so even without any research Knott would know what the street layout was both when he wrote his 2022 report and when he changed his views in 2023.) This is another example of inconsistency in Knott applying his methodology (commented on in many submissions on his

⁵⁷ Paragraph 56

⁵⁸ Appendix 9, Knott HHA report, June 2022, page 167

⁵⁹ Appendix 9, Knott HHA report, June 2022, page 30

report based on his earlier methodology) and it appears he is still inconsistent even with a new, supposedly more robust, methodology.

147. The summary of values states that the streets are part of a wider subdivision by Ascot Downs Limited. However, there is no clear statement as to why these four streets have heritage values such that they should be in an HHA while the remainder of the wider Ascot Downs subdivision is excluded.
148. Like all streets near retail developments, they were developed knowing of this future development. This is not a heritage value. Housing has, and always will be, developed near retail, and retail will be developed near housing. While this sounds like a chicken-egg argument, it is how urban growth works.
149. The houses are largely brick houses, and do not appear to have any outstanding, rare or unique features. Revised Schedule 8D describes them as being "*dwelling typical of the period*" and "*typical of pattern book type houses*". Once again, there are no details provided of which plan/pattern books or why this is a heritage value.
150. HCC have not provided sufficient evidence of heritage values for the Lamont et al HHA and we request this HHA be removed from the proposed District Plan. It is important to note that there are three submissions opposing the HHA⁶⁰ and one submission⁶¹ where the submitter states that while she is against intensification, she does not understand what the HHA means. The anti-intensification submission does not comment on whether she believes the described heritage values are valid or not. In contrast, the three submitters opposing the HHA provided detailed criticism of the reasons for the HHA. (Although the methodology has been revised, the 1960s and 1970s HHAs appear to still be based on a belief that a street or a few streets of brick houses have heritage values just by being brick houses.)

Marire, Hinau & Rata

151. This HHA appears to have been misnamed in Revised Schedule 8D and is probably meant to be the Matai, Hinau & Rata HHA. This highlights our previously stated concerns that this very important, legally binding process, which has a significant impact on private property owners, has been performed lackadaisically and still lacks a robust quality assurance process.

⁶⁰ Submissions 361 (Hoffman), 401 (Lee) and 418 (Taylor)

⁶¹ Submission 214 (Nichols)

152. The summary of values lists the history of Frankton in general but makes no reference specifically to the history or heritage values of these three streets (or Matai Street). In fact, the only street mentioned in Revised Schedule 8D for this HHA is Rimu Street which is not in the HHA.
153. The background records that this HHA is typical of the 1890-1949 period with *"a grid layout draped over the existing landform with minimum earthworks to accommodate the street and little changes of contour made to lots"* which just means they did not do major earthworks and flatten the site.
154. We do not believe HCC have provided sufficient evidence of heritage values for the Marire (or Matai), Hinau and Rata HHA and request this HHA be removed from the proposed District Plan.

Oxford Street (East) and Marshall Street Railway Cottages HHA

155. As the supposed heritage values were changed completely in March/April 2023, research is still being completed on this (our) HHA and will be presented as part of the oral submission process. As noted in our previous submissions, we oppose this HHA and believe it should be removed from the proposed District Plan as there are no clear proven heritage values.

Riro

156. The Riro HHA is a small straight section of road leading down towards the Waikato River from the intersection of Opoia Road. The Revised Schedule 8D values and the following descriptions of the Riro HHA are one of the most difficult to read and comprehend of all the HHAs. This is an example of a poorly written and researched HHA description which defaults to it being an invalid HHA. Given the Riro St HHA had submissions both for⁶² and against⁶³ it, it is important that the property owners, other interested parties, and the Independent Hearing Panel understand **why** HCC believe this is a valid HHA.
157. As a section of a small street, it is described as having (or being) an *"orthogonal layout"*⁶⁴. Yet the HHA consists of only one street with another Opoia Road (not included in HHA) running off it at a right angle. It is then stated that *"The current impression is that the land at the end of the formed*

⁶² Submission 17 (Whittle)

⁶³ Submissions 27 (Schramm), 127 (Bourke), 148 (Bourke), 150 (Deecan) and 202 (Cox)

⁶⁴ While I understand that "orthogonal" means at right angles, it is not a layperson term and is unnecessarily verbose. It is also of note that Riro Street actually joins River Road at around a 45-degree angle, so it is also inaccurate.

street is within 14 Riro Street, although boundary plans indicate that this is not the case⁶⁵".

158. It is described as illustrating *"the pressure for development along the boundaries of the Borough⁶⁶"* and then goes onto talk about Riro Street residents accessing amenities without having to pay rates⁶⁷.
159. We do not believe HCC have provided sufficient evidence of heritage values for the Riro HHA and request this HHA be removed from the proposed District Plan.

Sare Crescent

160. The summary of values and following description for the Sare Crescent HHA is minimal but can be summed up as State housing with a supposedly "interesting" curve in the road. To state the obvious, **it is a crescent!** Again, the curved street design is caused by the physical constraints of the site, not because the developers wished to design the street with an interesting curve. The site was constrained by Clarkin Road to the North, Heaphy Terrace to the West and Fairfield Park to the East.
161. Given the State housing areas in Fairfield/Enderley, apart from connecting roads (eg Holland Road), are all curved roads/crescents (eg Poets Corner, Ross, Yeats and the Peachgrove end of Marshall) this is hardly a rare, unique or distinctive feature.
162. We do not believe HCC have provided sufficient evidence of heritage values for the Sare HHA and request this HHA be removed from the proposed District Plan. Note that all⁶⁸ submissions from property owners oppose this HHA.

Seifert

163. This HHA description starts with a reference to Springfield Cres in the first sentence. As such, it is unclear whether the values and description are referring to Springfield Crescent or Seifert Street.

⁶⁵ This statement has been included in the nonsensical statements listed above.

⁶⁶ This is just yet another way to say that development occurred because Hamilton was growing.

⁶⁷ No source is cited for this. It is known that other areas outside the Borough boundary (eg Fairfield) were **unable** to access the Borough amenities so evidence needs to be provided that Riro Street residents could access amenities while outside the boundary.

⁶⁸ Submissions 261 (Fernandez) and 314 (Bredin-Grey) and Kainga Ora

164. As with Acacia and Ashbury HHAs, this HHA states the houses are typical of pattern book type houses. It does not however state **which** pattern book was used for these houses, **which** house pattern and **why** it is important.

165. We do not believe HCC have provided sufficient evidence of heritage values for the Seifert HHA and request this HHA be removed from the proposed District Plan. Note that all⁶⁹ submissions from property owners opposed this HHA.

Springfield Crescent

166. The summary of values for this HHA are yet another example of the generic and meaningless values which we have already described. It was subdivided by someone, has a curved link road, most of the 1960s houses "*appear to be relatively unmodified*" and the curved road (ie a crescent) and houses are typical of the 1950-1980 development period. No explanation is given as to why only half of the "*curved road*" is included in the HHA.⁷⁰

167. We do not believe HCC have provided sufficient evidence of heritage values for the Springfield HHA and request this HHA be removed from the proposed District Plan.

Sunnyhills

168. Like Springfield, the summary of values for this HHA are yet another example of the generic and meaningless values which we have already described. It was subdivided by someone, has a curved road, most of the 1970s houses "*appear to be relatively unmodified*" and the curved road and houses are typical of the 1950-1980 development period. The only supposedly unique feature is "*the retention of the existing topography*" which just means they did not do major earthworks and flatten an undulating site. In the background for Marire, Hinau and Rata HHA, this is given as a feature of the 1890-1949 development period.

169. We do not believe HCC have provided sufficient evidence of heritage values for the Sunnyhills HHA and believe this HHA should be removed from the proposed District Plan.

⁶⁹ Submission 42 (Briggs)

⁷⁰ Knott statement of evidence, page 81

Te Aroha Street (East)

170. We support the proposed extension of this HHA to include one side of Frances Street which is a small street containing several buildings recommended for Schedule 8A or 8B, with one (the Star Flats) already listed.

Conclusion

171. While the latest revision of Schedule 8D has more information about the proposed HHAs than previously provided, most of the information is simply background research which does not substantiate heritage values. Revised Schedule 8D still contains factual errors, uncertain and unproven statements, subjective and inconsistent opinions and unclear language.

172. Our view is unchanged from our three earlier submissions that "*HCC has failed to provide documented proof of the historical heritage of most HHAs*".

173. The Wild Peer Review (June 2022) was ignored by Knott and effectively hidden from submitters by HCC. As well as raising concerns with the methodology used, Mr Wild recommended the removal of ten proposed HHAs and the completion of further research for six proposed HHAs. Following Gu's review and revision by Knott, four HHAs have been removed and two added with various other changes to boundaries and descriptions. No review has been made of these changes. The 2023 peer review by Miller appears to be a collaboration, rather than a peer review, with Miller and Knott visiting proposed HHAs together and agreeing on the new heritage values which are then recorded in Revised Schedule 8D. No evidence has been provided by HCC that these new heritage values have been independently peer reviewed.

174. We do not believe that HCC have provided adequate evidence of heritage values to support the majority of the HHAs.

175. HCC have not provided adequate evidence of heritage values to support the 1950-1980 development period HHAs. It is of note that Mr Wild also recommended these ten HHAs be removed from the district plan in his 2022 peer review. We request the removal of the following 1950-1980 development period HHAs from Schedule 8D in their entirety:

- a. Acacia Crescent
- b. Ashbury Avenue
- c. Augusta Street, Casper Street and Roseberg Street

- d. Cattanach Street
- e. Hooker Avenue
- f. Jennifer Place
- g. Lamont, Freemont, Egmont and Claremont Street
- h. Seifert Street
- i. Springfield Crescent
- j. Sunnyhills Avenue

176. HCC have not provided adequate evidence of heritage values to support any HHAs containing State or ex-State housing, other than Hayes Paddock. We request the removal of the following HHAs from Schedule 8D in their entirety:

- a. Casey Avenue
- b. Chamberlain Place
- c. Fairfield Road
- d. Sare Crescent

177. We request the removal of Marire Avenue from the Frankton East HHA for the same reasons as the other State housing HHAs in the previous paragraph.

178. HCC have not provided sufficient, accurate and verifiable evidence of the history, importance, or **the actual existence of any Ellis & Burnand prefabricated houses** in the proposed extension of Frankton East. We do not believe HCC have provided adequate evidence of heritage values for the remaining streets in the HHA. We request both the removal of the proposed Frankton East HHA extension (Wye, Torrington, Taniwha et al) and the original Frankton East HHA (Marire, Parr and Taniwha) from Schedule 8D.

179. HCC have not provided adequate evidence of heritage values to support the following HHAs. It is of note that Mr Wild recommended Oxford Street (East) and Riro Street "*warrant further testing before they can be appropriately considered for inclusion and protection in the District Plan*"⁷¹ in his 2022 peer review. We request the removal of the following HHAs from Schedule 8D in their entirety:

⁷¹ At page 8

- a. Marire⁷², Hinau and Rata Street
- b. Oxford Street (East) and Marshall Street Railway Cottages
- c. Riro Street

180. We fully support the addition of Frances Street to the Te Aroha Street (East) HHA.

181. We fully support the proposed removals of the Oxford (West), Marama and Jamieson HHAs.

⁷² This is probably meant to be Matai, not Marire

Appendix A: Qualifiers

Some of these examples may sound like “just semantics”. However, the District Plan should not include or be based on statements containing qualifiers and other uncertain and unproven statements.

| Qualifier | Count | HHA Name |
|--|-------|--|
| appear(s) ⁷³ | 13 | Acacia, Augusta, Casey, Cattanach, Chamberlain, Hooker, Jennifer, Lamont, Oxford (East), Seifert, Springfield, Sunnyhills |
| likely These statements mostly refer to features which are deemed heritage values. | 8 | Acacia, Ashbury, Fairfield, Jennifer, Oxford (East), Riro, Sare, Penfold |
| strong similarities | 2 | Acacia, Oxford (East), |
| reportedly | 3 | Acacia, Ashbury, Frankton East, No indication is given as to who reportedly stated this. Was it from Wikipedia or a heritage expert? Revised Schedule 8D has footnote references without the footnotes so it is unknown as to who “reportedly” provided the evidence for their statements. |
| Double qualifier: most appear to be relatively unmodified Compare this statement with “John appears to be relatively sober”. Is he sober? Would he pass a breath test? Would you let him drive you home? | 9 | Augusta, Cattanach, Chamberlain, Hooker, Jennifer, Lamont, Seifert, Springfield, Sunnyhills, In contrast, Frankton Railway Village is recorded as a relatively unmodified example, rather than just appearing to be so. |

⁷³ “Appear” used in the sense of probably/possibly

Appendix B: A Brief History of Ellis & Burnand

Company History

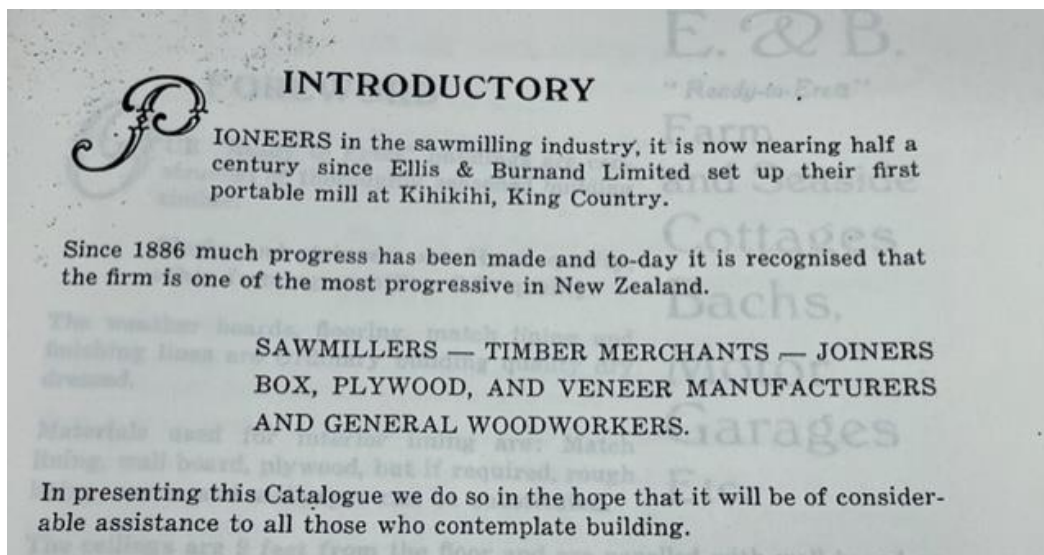
Ellis & Burnand was a saw-milling company based in the Waikato originally owned by John William Ellis and John Henry Davis Burnand. They started the business in 1891 and it was incorporated in 1903.

In 1904 Ellis & Burnand bought Coyle & Jolly's Hamilton sash and door factory and then expanded it.⁷⁴

The 1914 electoral roll show that Mr Ellis lived on Lake Road in 1914. Mr Ellis was the Mayor of Hamilton for 15 months before dying in office in 1918.

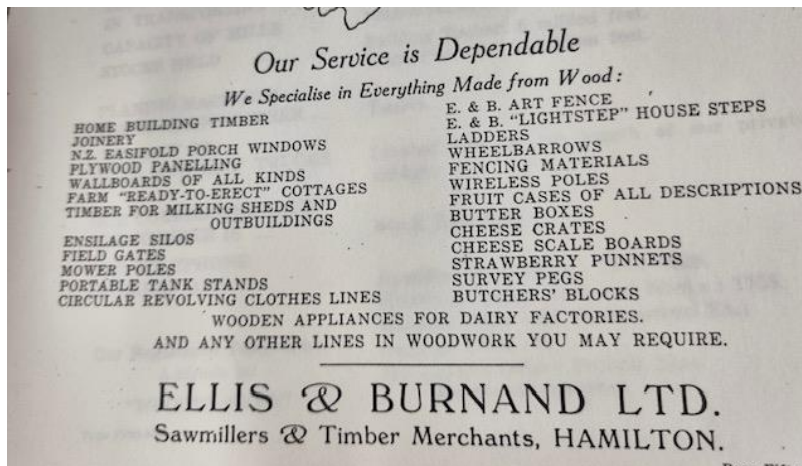
Mr Burnand lived in the King Country. Mr Burnand died in 1919.

Ellis & Burnand sold products to builders. Along with many other products, they manufactured and sold kitsets for small prefabricated houses. They did not build houses.



Introduction in 1933 Ellis & Burnand catalogue: Note that they do not describe themselves as builders or a house building company.

⁷⁴ Waikato Argus, Volume XVII, Issue 2631, 2 July 1904, Page 2



Description of available products from 1933 Ellis & Burnand Catalogue

Over the three decades from 1961, Fletcher Holdings acquired a majority interest in Ellis & Burnand, eventually purchasing the company in 1990.⁷⁵

⁷⁵ <https://collection.fletcherarchives.co.nz/persons/22/ellis-burnand-ltd>

Ellis & Burnand Prefabricated Houses

In June 1926, the Waikato Times⁷⁶ reported that an Ellis & Burnand prefabricated garage had been converted into a bach by Mr Coombs, the local factory manager. In this same article it lists all the products that the company supplies.

| | |
|--|---|
| <p>ELLIS AND BURNAND, LTD AN INTERESTING EXHIBIT.</p> <p>-----</p> <p>ATTRACTS MANY VISITORS.</p> <p>-----</p> <p>Messrs Ellis and Burnand, Ltd., the well-known sawmillers and timber merchants, are again attracting large numbers of visitors to the Waikato Winter Show. Messrs Ellis and Burnand, Ltd., whose yards and workshops are situated in Bryce Street, Hamilton (and which are second to none in New Zealand), mill daily at their mills in the King Country 100,000 super feet of New Zealand's famous mountain timbers, which include totara, rimu, matai and kahikatea. This to the reader may seem incredible, but when it is known that 600 hands are employed by the company this statement can be readily understood.</p> <p>To meet the requirements of builders, dealers, farmers and others, the Hamilton branch carries large stocks of all grades and classes of timber, aggregating over 5,000,000 super feet. In all timber products Messrs Ellis and Burnand, Ltd., deal, the firm specialising in building timber, fencing posts, farm gates, pickets, plywood panels, slab firewood, butter boxes, fruit cases, strainer posts, veneers, motor garages, cheese crates, farmers' timber, and other articles too numerous to enumerate. The firm carry large stocks of dry dressed timber, mouldings, and sash materials, and can supply all orders at shortest notice. The company's joinery department is replete with all the latest machinery, and can deal promptly and efficiently with all orders.</p> | <p>ELLIS AND BURNAND, LTD.</p> <p>WAIKATO TIMES, VOLUME 100, ISSUE 16813, 3 JUNE 1926, PAGE 8</p> <p>and efficiently with all orders.</p> <p>Show Exhibits. ..</p> <p>Amongst the exhibits at the firm's stand at the Waikato Winter Show is the Standardised Motor Garage. This handsome garage is replete in every way and can be purchased for £35. This small but useful construction was the idea of Mr Coombs, the local factory manager. With a view of increasing its utility the inventor</p> <hr/> <p>after much thought converted this garage into a seaside cottage without in any way destroying its utility as a garage. This cottage is replete in every way, and is being purchased by farmers for use by their sharemilkers and their families. When purchased as a seaside cottage, extra fittings are supplied, with the result that the whole of the interior may, during the day, be used as a sitting-room and kitchen, and at night the whole may (by a partition on hinges) be converted into a bedroom. The price of this remarkable cottage is £55 complete.</p> <p>During a conversation with the company's representative, our representative learned that 60 per cent. of the price paid for timber in the Dominion went into the pockets of the worker. This, then, is one of the few industries in which the mainstay receive the benefit.</p> <p>Visitors to the Show should not fail to view the exhibits, which are to be found midway between the Home Industries and Roots Sections.</p> |
|--|---|

⁷⁶ Waikato Times Volume 100, Issue 16813, 3 June 1926, page 8.

In June 1928, the Waikato Times reported that “*Ellis & Burnand Ltd, sawmillers and timber merchants*” had produced an “*artistic booklet*”⁷⁷ that was “*fully illustrated and liberally filled with diagrams and plans of “ready-to-erect” cottages and farm-houses*”.⁷⁸ It refers to the last page being “*On the last page is a picture of a motor-lorry loaded with timber for a complete cottage on way to its new home.*” An image matching this description appears on page 26 of the 1933 catalogue which suggests that the “general house section” that appears in the 1933 catalogue was not included in the 1928 catalogue.



Photograph included in 1933 catalogue

Ellis & Burnand applied to the Hamilton Borough Council in 1930 to be allowed to erect their standardised cottages within the Borough boundaries. The issue was that the floor to ceiling clearance (8' 9") did not comply with the Borough bylaws. On 20 November 1930, the Council formed a committee to look into this and report back.⁷⁹ It is unknown whether the Hamilton Borough eventually permitted any Ellis & Burnand prefabricated houses to be erected in the Hamilton Borough after this.

In 1933, Ellis & Burnand produced a catalogue⁸⁰ that included two parts: “ready to erect buildings” which include farm buildings, huts and very small dwellings and a “general buildings section” which includes 20 front elevations of weatherboard-clad housing of up to 3-bedrooms. These “general buildings” are discussed further below.

The marketing for the prefabricated houses appears to intend for them to be used as farm workers cottages or baches, rather than substantial homes that would last 100 years.

The designs for all the prefabricated houses are very small (a 1930s version of modern tiny houses). The thirteen designs ranged in size from a 6m² “Bachelor’s

⁷⁷ We have been unable to obtain the 1928 catalogue.

⁷⁸ Waikato Times, Volume 103, Issue 17423, 18 June 1928, Page 8

⁷⁹ Waikato Times, Vol 103, Issue 18181, 20 Nov 1930, page 11.

⁸⁰ This is the earliest catalogue that we have been able to obtain. There is a copy in the Hamilton City Library Heritage collection and online (via New Plymouth Library website)

<https://collection.pukeariki.com/objects/36532/house-designs-and-plans>.

Hut" (fitted with two bunks and a folding table) with the largest, at under 58m² being the "four-roomed cottage combining every convenience with economy."⁸¹ (Note that this is four rooms in total, not four bedrooms.)

The 1933 Ellis & Burnand catalogue states that "a 4-roomed cottage can be erected by two men in from four to six days". Ellis & Burnand offered to "send our men to erect the building for you" if required, or "let you have the services of a trained man to assist". These men would be similar to the modern companies which currently put flatpack items together such as Kitset Assembly Services⁸².

The 1933 catalogue contains pictures of how the prefabricated buildings are erected and several pictures of completed prefabricated houses. The Hamilton City library historical photo collection contains many undated photographs of prefabricated houses. They all have highly visible joins, particularly noticeable near doors and windows, where the prefabricated panels butt against each other.

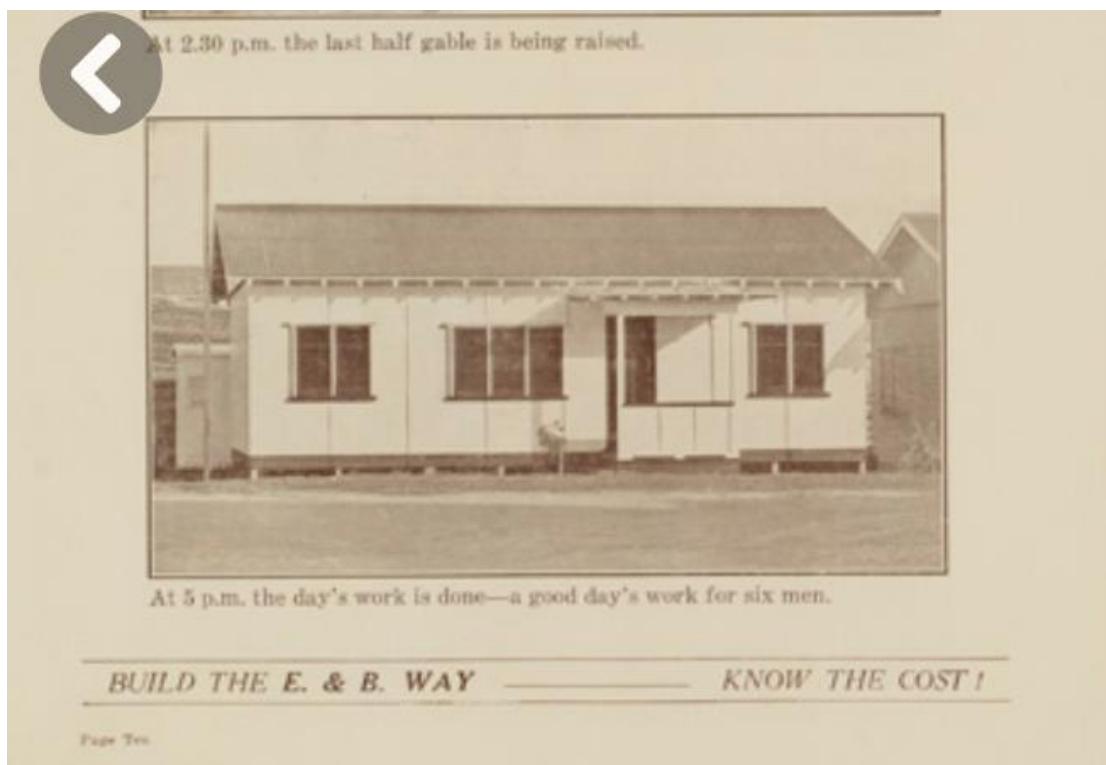


Image from 1933 catalogue of an Ellis & Burnand prefabricated house showing highly visible joins.

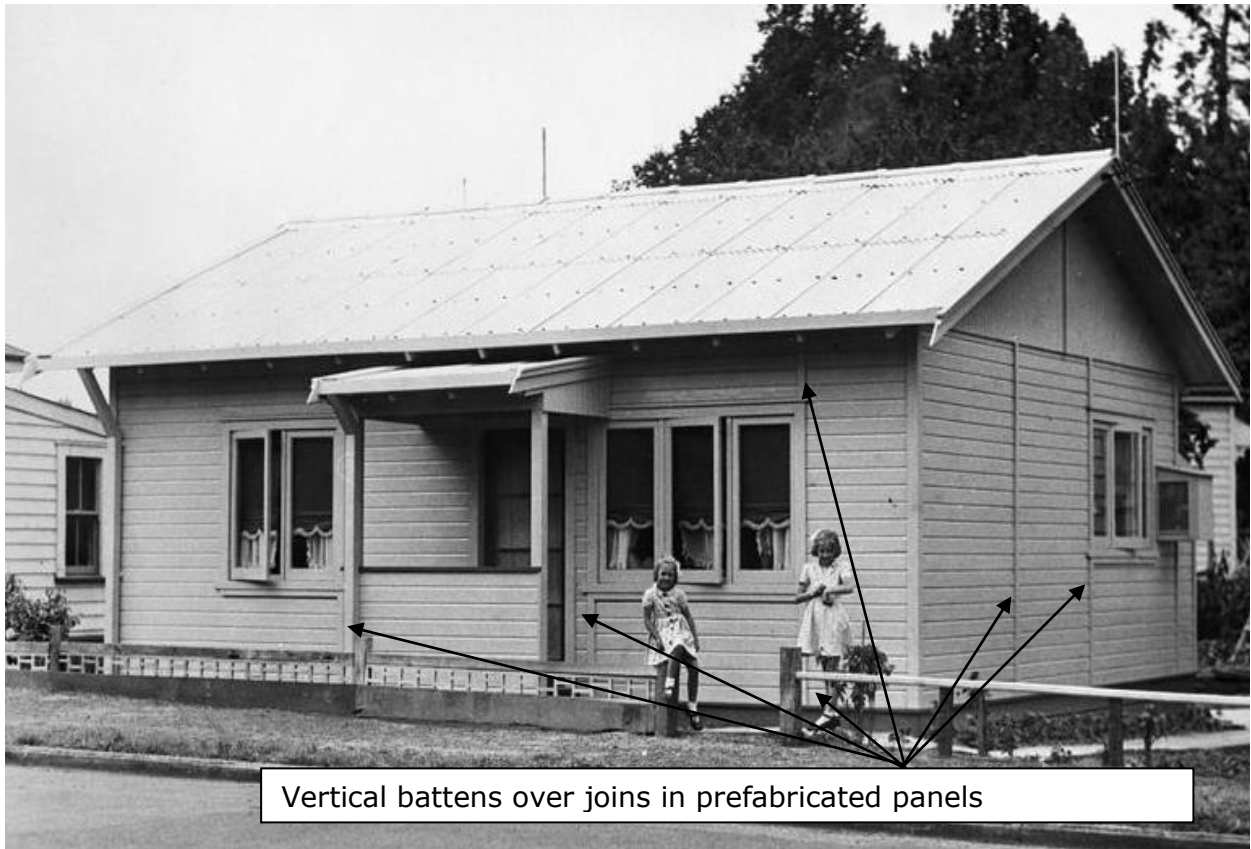
⁸¹ [Appendix C](#): Calculations of Size of Ellis & Burnand Prefabricated Houses

⁸² <https://www.kitsetassemblyservices.com/new-zealand/>

The 1933 catalogue also shows the detail of how the weatherboards are attached in such a fashion that they present a flat surface rather than the saw tooth profile of most weatherboards. The explanation for this rather odd system is that to transport the panels which already have the weatherboards attached, without incurring damage during transport and handling on site, required a flat surface. The abutting sections of the prefabricated panels could then be setup and then a vertical batten simply nailed over the join to make it weatherproof.



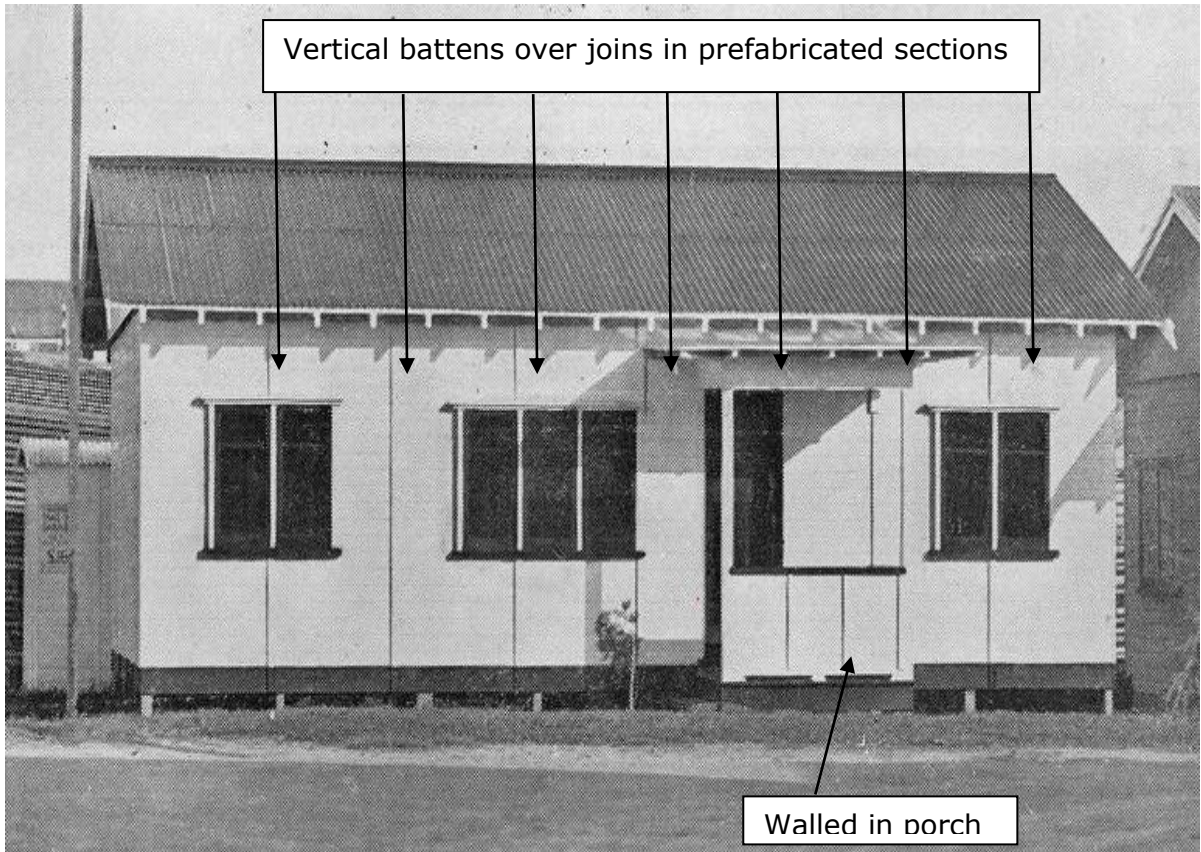
Image of weatherboard detail on Ellis & Burnand prefabricated houses



Ellis & Burnand Company house in Putaruru⁸³.

The features to note are the flat profile of the weatherboards, regularly spaced vertical battens placed over the join between the prefabricated sections of weatherboards, the semi-walled porch and asymmetric casement windows on either side of the front door.

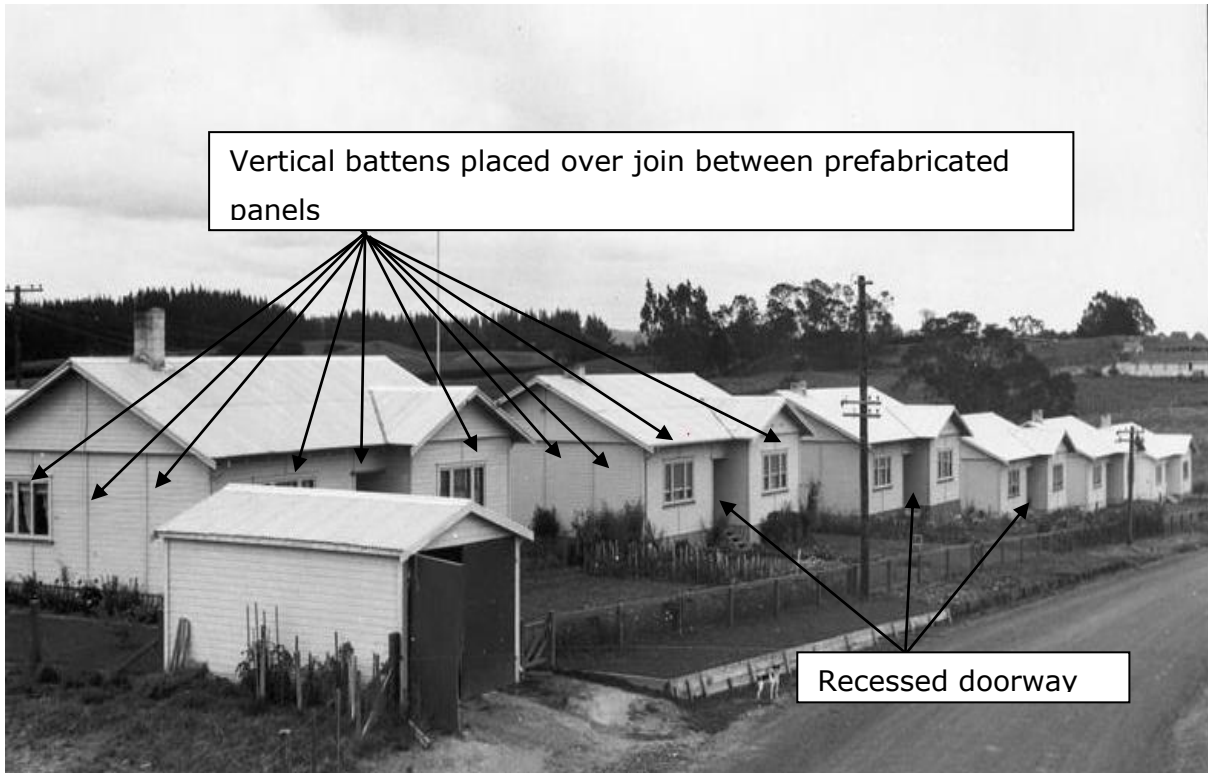
⁸³ HCL_07479 Hamilton City Library Historical photographs collection. Date unknown



E & B Ready-to-erect cottage p.10 1933 catalogue⁸⁴

Note the vertical battens (marked by black arrows) at regular intervals extending from the eave down to the bottom weather board. These battens are placed over the join between the seven prefabricated panels used for this elevation of the building to ensure a weather tight structure is formed.

⁸⁴ Also HCL_09375 Hamilton City Library Historical photographs collection.



Six Ellis & Burnand company houses at Putaruru⁸⁵

Note the presence of regular vertical battens to cover over and provide watertight joining of prefabricated panels of these company houses built to house workers at the Putaruru Sawmill. All these houses clearly have a single chimney placed through the main roof ridge and all front elevation windows are triple casement windows. No roof ventilator in roof gable.

⁸⁵ HCL_07478 Hamilton City Library Historical photographs collection. Date unknown.

In 1953, Ellis & Burnand were still making prefabricated houses in their "house factory".



House Factory and Yard Offices, Hamilton

*Interior of House Factory,
Bryce Street*



THE Company's Plant at Bryce Street now includes a modern, well equipped House Factory of 18,000 square feet, capable of turning out over 100 houses per year when working to capacity. The Joinery, Door and Block Board Factories, with the help of an efficient Planing and Resawing Department, plus three drying kiln compartments and mechanical handling in the Timber Yard, enables the Company to give an efficient service to the Building Trade.

Source: Ellis & Burnand 50 Years of Service in the Timber Industry, 1953⁸⁶

⁸⁶ Copy held by Fletcher Archives

Ellis & Burnand Plan Books

The 1933 Ellis & Burnand catalogue included 20 varied house plans at the end, after the “ready-to-erect” houses. The catalogue makes no reference to them or how to purchase the plans. They are another example of plan book houses and were likely copied from other buildings that were popular at that time. For example, Design D is somewhat similar in design to the prefabricated Railways houses built in the 1920s except for its recessed front door, side entry, five post porch and triple casement windows instead of double sash windows and the roof ventilator in the porch gable. There is nothing to indicate who designed the plans, but it is likely to be a draftsman rather than an architect as no names are attached to any of the plans.

In 1945 Ellis & Burnand produced their first edition of a plan book called Practical Home Designs “*in the hope that it would provide a useful building guide to the many men and women then being released from war service.*”⁸⁷ The second edition was printed less than two years later⁸⁸. The second edition contained colour images of the houses and included a variety of styles with no particular common features. It was also stated that the aim was that this plan book would assist people who wished to build their own homes.

⁸⁷ Practical home designs: a building guide for New Zealanders, Ellis and Burnand, second edition circa 1947. Copy in Hamilton City Libraries Heritage collection.

⁸⁸ 4th edition Introduction. Copy in Hamilton City Libraries Heritage collection.



An example of page in second edition showing an art deco house

The second edition states that *"Plans and elevations (1/8 in scale) of buildings illustrated, together with a standard specification, can be supplied at a moderate cost"*.

The second edition states that *"the responsibility of providing the plans in this publication was placed in the hands of a woman designer, who viewing the matter from the angle of a home-maker, has used her talents in planning."*

The fourth edition of Practical Home Designs *"is the outcome of persistent demands from Home-makers who desire some assistance in the efficient planning of their future homes"*.

The introduction further notes that *"It is, as in the past an effort to help clear the way for the average New Zealander who desires to build his own home. We hope also that our 4th edition will prove helpful to our many Builder friends, when planning for their clients."*

It contains 40 plans. It offers a price list for the plans.



Prices for plans as listed in 4th edition of Practical Home Designs

Appendix C: Calculations of Size of Ellis & Burnand Prefabricated Houses

The following is calculated from the diagrams in the 1933 Ellis & Burnand catalogue (pages 13-25)⁸⁹. Note that as the catalogue was produced in 1933, the measurements are imperial. 1 sq ft = 0.092903 sq m

E&B Ready-to-erect floor areas

| Page # | Title in 1933 Catalogue | Dimensions (ft) | | Floor Area (m ²) |
|--------|--|-----------------|-------|------------------------------|
| | | Length | Width | |
| 13 | Our special bachelor's hut | 10.0 | 6.50 | 6.0 |
| 14 | Farmers! Your attention please! (3 sizes) | 12.00 | 10.00 | 11.1 |
| | | 14.00 | 10.00 | 13.0 |
| | | 16.00 | 10.00 | 14.9 |
| 15 | A comfortable two-roomed bach | 22.50 | 15.00 | 31.4 |
| 16 | An ideal seaside bach | 18.50 | 15.00 | 25.8 |
| 17 | A compact three-bedroomed cottage | 18.50 | 18.50 | 31.8 |
| 18 | Attractive farm or seaside cottage | 22.50 | 19.00 | 39.7 |
| | less porch | 7.50 | 9.50 | 6.6 |
| | | | TOTAL | 33.1 |
| 19 | A useful attractive cottage for seaside or farm | 24.00 | 20.00 | 44.6 |
| 20 | Compact four-roomed cottage | 23.25 | 20.50 | 44.3 |
| 21 | Well-built farm house | 24.00 | 18.50 | 41.2 |
| | plus front room | 10.00 | 6.50 | 6.0 |
| | | | TOTAL | 47.3 |
| 22 | Our special four-roomed cottage | 26.50 | 22.50 | 55.4 |
| 23 | Very compact and convenient for seaside or farm | 21.00 | 18.00 | 35.1 |
| | plus scullery (estimate) | 11.00 | 6.00 | 6.1 |
| | minus front porch | 11.00 | 6.00 | 6.1 |
| | | | TOTAL | 35.1 |
| 24 | A family cottage offering maximum accommodation | 25.50 | 18.50 | 43.8 |
| | minus porch | 11.00 | 5.00 | 5.1 |
| | | | TOTAL | 38.7 |
| 25 | Four-roomed cottage combining every convenience... | 26.00 | 22.25 | 53.7 |
| | plus Laundry | 8.00 | 6.00 | 4.5 |
| | minus front porch (estimated) | 3.00 | 2.00 | 0.6 |
| | | | TOTAL | 57.6 |

It is possible that larger prefabricated houses were developed as technology evolved, but these were the maximum sizes as at 1933.

⁸⁹ Some of the measurements are difficult to read in the online version. However, Hamilton City Library hold a copy that is legible.