

**BEFORE INDEPENDENT HEARING COMMISSIONERS
AT LOWER HUTT**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ MOTUHAKE
TE AWA KAIRANGI**

**IN THE MATTER
AND
IN THE MATTER**

of the Resource Management Act 1991

**of the hearing of submissions on Plan Change
56 to the City of Lower Hutt District Plan**

HEARING TOPIC:

**Plan Change 56: Enabling Intensification in
Residential and Commercial Areas**

**STATEMENT OF PRIMARY EVIDENCE OF DAVID ALAN PEARSON
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES**

HERITAGE ARCHITECT

29 MARCH 2023

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1. EXECUTIVE SUMMARY

- 1.1 In response to the National Policy on Urban Development (NPS-UD), the Hutt City Council initiated Plan Change 56. The Plan Change includes a proposal to create additional heritage areas including one to be known as the Petone State Flats Heritage Area.
- 1.2 My company, DPA Architects, was commissioned by Kāinga Ora to undertake a review of the heritage area proposed by Council. That report found that various buildings within the area were considered to have little residue heritage value due to the changes that had taken place, either to the buildings themselves or to the context.
- 1.3 Discussions were then between Kāinga Ora and Council which resulted a reduction in the size of the proposed heritage area by the removal of a number of blocks known as 'Star' Blocks, on account of the fact that they had been substantially modified, in particular, by the removal of their original distinctive roof forms.
- 1.4 Kāinga Ora's submission is that there still remain within the amended heritage area additional buildings that were identified in the DPA Architect's report as having been modified to the extent that they now have little heritage value.
- 1.5 These include two multi-unit blocks at 2-6 East Street and 80 Adelaide Street which were once part of a larger cohesive group of buildings arranged around a courtyard and a row of single units and duplexes between 81 and 91 Adelaide Street that have been modified by the removal of some of their original distinguishing characteristics.
- 1.6 I support the submission of Kāinga Ora that seeks to reduce the boundary of the proposed heritage area to exclude the buildings described above. Kāinga Ora also proposes that the heritage area be known as the Petone State Housing Area and I also support that part of the submission.

2. INTRODUCTION

- 2.1 My full name is David Alan Pearson. I graduated from the University of Auckland in 1973 with the degree of Bachelor of Architecture.
- 2.2 I am currently a registered architect and an Associate of the New Zealand Institute of Architects.
- 2.3 In 1996, I established my own architectural practice with the aim of specialising in heritage and conservation architecture. I have also attended specialist conservation courses at the University of York in the United Kingdom. Today, I remain the principal of the firm, now known as DPA Architects.
- 2.4 Since it was established, DPA Architects has grown in size to a staff of 13. Conservation architecture continues to be the mainstay of the firm's work. Over the years, our work has been recognised by the receipt of a number of awards from institutions including the NZ Institute of Architects and UNESCO.
- 2.5 My experience includes all aspects of conservation architecture from individual houses through to large commercial projects including museum redevelopment. For 10 years, I acted as the heritage architect for the reconstruction of the Arts Centre of Christchurch following the Canterbury earthquakes of 2010-2012.
- 2.6 Other experience has included town centre studies and advising councils on the establishment of heritage and character areas. In addition, I have also appeared at numerous council and local authority hearings and have previously appeared as an expert witness in the Environment Court.
- 2.7 I have also undertaken work in the Wellington region, working particularly in the retirement village sector.

Code of Conduct

- 2.8 I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2023 and I agree to

comply with it. My qualifications as an expert witness are set out above. I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

3. TASKS UNDERTAKEN FOR KĀINGA ORA

Heritage Review

- 3.1 In February 2022, I was engaged by Kāinga Ora – Homes and Communities to undertake a critical review of a proposal by Hutt City Council to create a Heritage Area that would consist of an area of State in Lower Hutt. Following the completion of the report, which found that some of the buildings within that area had little heritage value, my company, DPA Architects, was engaged to prepare a map to indicate what an area which excluded those buildings might look like. That map is reproduced on page 21 of my evidence.
- 3.2 In February of this year, I was commissioned to prepare evidence in support of a submission by Kāinga Ora to be presented at this hearing.

4. SCOPE OF EVIDENCE

- 4.1 My evidence has been prepared in response to proposed Plan Change 56 which has been initiated by Hutt City Council. It specifically addresses the following matters in regard to the proposed Petone State Flats Heritage Area:
- a) My understanding of the reasons for proposed Plan Change 56 and what it seeks to achieve.
 - b) The s32 and s42 reports prepared for Council as background for the plan change.
 - c) A description of the proposed Petone State Housing Heritage Precinct including building typologies and changes that have occurred to the area over time.

- d) My assessment of the heritage values of the proposed Petone State Housing Area and recommendations for an amended extent of the area.
- e) Comment on the WSP report which was prepared in response to the report written by DPA Architects.
- f) Kāinga Ora's submissions as they impact on the proposed Petone State Flats Heritage Area.
- g) Other matters.

5. HUTT CITY COUNCIL PROPOSED PLAN CHANGE 56

Background

- 5.1 In December 2021, Parliament passed legislation aimed at increasing the supply of housing in urban areas by amending the Resource Management Act (RMA) and issuing the National Policy Statement on Urban Development 2020 (NPS-UD). Territorial authorities are now required to prepare an Intensification Planning Instrument (IPI) – a district plan change to enable greater building heights and density. Proposed Plan Change 56 is the IPI prepared by Hutt City Council.

Section 32 Report

- 5.2 Hutt City Council has subsequently prepared an evaluation of the proposed plan change in accordance with the requirements of section 32 of the RMA.
- 5.3 The NPS-UD aims to achieve intensification by allowing increased building heights and densities. Plan Change 56 proposes to limit building heights and densities in areas that have been identified as having significant historic heritage value. Under Section 6f of the RMA, the protection of historic heritage from inappropriate subdivision, use and development is included as a matter of national significance.
- 5.4 The Hutt City District Plan already has provisions to protect historic heritage through its Historic Residential Activity areas which include

Patrick Street and Riddlers Crescent. Following a heritage review, Council is proposing to incorporate another five residential areas including one to now be known as the Petone State Housing Heritage Area.

- 5.5 Section 7.3.4.4 of the s32 report describes policies and objectives that aim to protect the historic heritage of Residential Historic Precincts from new developments with inappropriate heights and densities and to manage the impacts of new developments on the precincts. This would be achieved by requiring a resource consent as a Restricted Discretionary Activity for any development that seeks to increase building height or density.
- 5.6 It is noted that other changes to a building in a residential area including full or partial demolition would not necessarily require a resource consent (unless there are other provisions within the plan which would require a resource consent, for example if a scheduled historic heritage building is involved). Council considers that a separate plan change would be required to provide additional protection for historic heritage.

Section 42A Report

- 5.7 I have read the Section 42A report prepared by Chessa Stevens of WSP dated 7 March 2023. The report makes reference to a district-wide technical review of heritage items, sites areas in Lower Hutt that was carried out in September 2020. Amongst other requirements, the report was required to identify items, sites and areas of historic heritage in Lower Hutt that had not been previously identified for protection and which were therefore vulnerable to inappropriate subdivision, use and development.
- 5.8 The report notes that the RMA defines 'historic heritage' and identifies its protection from inappropriate subdivision, use and development as a Matter of National Significance. In the absence of any National Direction on how to assess historic significance, the review used the criteria that the Wellington Regional Policy Statement uses to assess heritage significance.

- 5.9 A number of new areas with the potential to meet the criteria for scheduling were identified. Amongst those, the Petone State Housing Precinct was identified as an Area Requiring Further Investigation. Following site surveys and visits, a Draft Heritage Inventory Review included the Petone State Flats as a Heritage Area.
- 5.10 A discussion was then held between WSP and Kāinga Ora to discuss a review undertaken by DPA Architects of the proposed heritage area. As a result, WSP amended their recommendations regarding the naming and extent of the Petone State Flats Housing Area. Specifically, the 'Star' Flats and the area they occupied was deleted from the proposed heritage area.
- 5.11 The s42 report also reviews the Kāinga Ora submission on Plan Change 56. With respect to the request from Kāinga Ora to adjust the boundary of HA-09 which would have the effect of excluding 2-6 East Street and 82 Adelaide Street and 81-89 Adelaide Street, Ms Stevens does not see any reason to adjust the boundary of HC-09 as it had already been reviewed prior to notification of PC56.
- 5.12 In my opinion, there are valid reasons for seeking an adjustment of the boundary of HC-09 as I will describe later in my evidence.
- 5.13 Kāinga Ora also requests that the name of the Petone State Flats Heritage area be changed to "Petone State Housing Area". Ms Stevens does not have any particular objection to the proposed name change, other than to say it should include the word "heritage" to be consistent with other areas. In my opinion, the name "Petone State Housing Heritage Area" is an appropriate name.

6. KĀINGA ORA SUBMISSIONS

- 6.1 The Kāinga Ora submissions as they relate to the proposed Petone State Flats Heritage Area are summarised as follows:
- a) Kāinga Ora opposes in part the establishment of the Petone State Housing Heritage Area as proposed by Hutt City Council, considering that there remain buildings within the area that have

little heritage value, based on the heritage assessment undertaken by DPA Architects.

Kāinga Ora is seeking to reduce the extent of the proposed Heritage Area HA-09 by excluding landholdings/buildings that retain little heritage value (consistent with the amendments of the map attached at Appendix 2 of Kāinga Ora's submission).

Specifically, Kāinga Ora seeks the exclusion of 2-6 East Street and 82 Adelaide Street and the single dwellings and duplexes located at 81-89 Adelaide Street.

- b) Kāinga Ora is seeking to change the title of heritage area HA-09 to Petone State Housing Area, rather than Petone State Flats Heritage Area.
- c) Kāinga Ora considers that qualifying matters should be addressed in a district-wide heritage chapter, rather than through precincts and rules located within the residential chapters of the District Plan.
- d) Kāinga Ora questions the potential loss of heritage buildings as currently demolition of unscheduled buildings within a heritage area is a permitted activity. Kāinga Ora considers that Council should undertake a further plan change to strengthen the heritage provisions.

7. PROPOSED PETONE STATE HOUSING HERITAGE PRECINCT

Background

- 7.1 In September 2020, Hutt City Council commissioned WSP and Ian Bowman as heritage consultants to undertake a desk top review and assessment of existing and potential heritage items, sites and areas within Lower Hutt. This review was followed by site investigations in 2021. The report was completed in April 2021 and included a proposal to create seven heritage areas with a proposal to undertake further investigations to determine if another seven areas could also be included. Amongst them was the Petone State Housing Heritage Precinct.

- 7.2 The area is currently occupied by a number of housing typologies that were constructed by the Department of Housing Construction between the 1940s and 1960s. They included a group of individual dwellings and duplexes in Jackson and Adelaide Streets, a number of two storied blocks of flats in Scholefield, East and Adelaide Streets and a number of three storied blocks that had distinctive butterfly roofs that became known as ‘Star’ flats, based on their internal planning layout.
- 7.3 Although some of the units in the area are now in private ownership, the majority are still owned by Kāinga Ora as the successor of the department and remain occupied by tenants.

4.2 Extent of Place



Fig. 1 Original proposal for Petone State Housing Heritage Area

- 7.4 In April 2022, a meeting was held between Kainga Ora and Council, following the completion of a review undertaken by my company, DPA Architects. As a result of that meeting, a recommendation was made by Council’s heritage advisor that the area of the proposed Petone State Flats Heritage Area be reduced in size specifically by deleting the areas occupied by the ‘Star’ flats.
- 7.5 In August 2022, Hutt City commissioned a Heritage Inventory Report to provide a background to proposed Plan Change 56. Amongst other areas, that report recommended that a new Historic Area be created comprising the Petone State Flats Housing Area in Lower Hutt. The proposed area was generally similar to the original proposal, although

the areas occupied by the 'Star' flats in Jackson and Adelaide Streets were deleted as recommended by Council's Heritage Advisor.

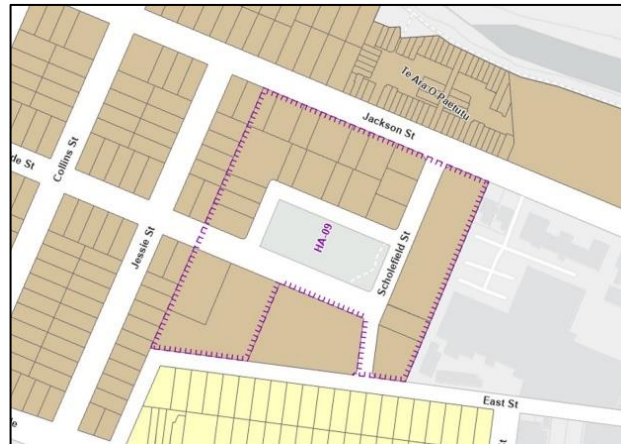


Fig. 2 Revised State Housing Heritage Precinct as proposed by Hutt City Council in PC56.

- 7.6 As seen in the revised plan above, the area of the precinct has been reduced from the original proposal for a Heritage Area and is now proposed to be incorporated into the Plan as a Residential Heritage Precinct. It includes part of the southern side of Jackson Street, Scholefield Street and parts of East and Adelaide Streets but excludes the areas occupied by the blocks of 'Star' flats, located on the northern side of Jackson Street and to the south of Adelaide Street.

8. DESCRIPTION OF BUILDINGS

Background

- 8.1 The first Labour government of 1935, with the establishment of the Department of Housing Construction in 1936, began a state housing scheme to provide homes and stability for people following the Depression. While the initial, iconic state houses resembled an English cottage, Housing Division architects also began to experiment with higher density housing, producing multi storey buildings containing greater numbers of units.
- 8.2 During this period, the architects also increasingly began to incorporate stylistic features associated with the International Modernist movement, incorporating simplified geometric forms and featuring terraces, roof

gardens and cooperative shops, with the style lending itself to the economic construction of sizeable domestic buildings. Later, the department developed 'Star' flats, each containing twelve flats across three levels, beneath a distinctive butterfly roof.

- 8.3 Petone was included as part of the state housing programme and between the 1940s and 1960s the eastern end of Jackson Street and surrounding streets including Scholefield Street and sections of Adelaide and East Streets, were developed with a variety of accommodation typologies being constructed.

Single Dwellings and Duplexes

- 8.4 The first buildings to be erected in what would become a State Housing area was a group of single dwellings and duplexes that faced onto Jackson Street with street addresses of 452 – 470 Jackson Street. Behind them and located around two sides of a village square were further single houses and duplexes with current street addresses of 69 – 91 Adelaide Street. These dwellings were mostly one storeyed although a single two storeyed house was built to face Jackson Street, while two similar buildings faced Adelaide Street alongside a single level dwelling connected to a duplex.
- 8.5 Along the northern side of Adelaide Street is a group comprising two duplexes and two detached houses, all single storied, located between 81 and 91 Adelaide Street. These particular dwellings originally had shallow pitched roofs which were concealed by parapets in accordance with Modernist influences. The parapets have since been removed and the buildings reroofed with shallow lean-to roofs in contrast with the Jackson Street houses.
- 8.6 The last two dwellings to make up the group were a single storey house at 1 Scholefield Street and a duplex at 3-5 Scholefield Street. The latter is an anomaly in the area as it has a shallow pitched gable roof, rather than a flat roof. The single dwellings and duplexes in the area were all in place by 1941 as seen in the aerial photograph below.



Fig. 3 Single dwellings and duplexes in Jackson and Adelaide Streets, 1941.

- 8.7 These single dwellings and duplexes, particularly those facing Jackson Street area are mostly intact and, in my opinion, represent a remarkable collection of dwellings designed in the International Modernist style. Unlike state housing which, up to that point had been designed in an English Cottage style from the Garden City era with tiled hipped roofs, these units were a radical departure, with flat facades, 'flat' roofs (in reality a shallow pitched roof behind a parapet) an emphasis on horizontality and spare, geometric forms. While there is a common theme throughout, there is also a range of plan layouts giving rise to a variety of external forms with no two adjacent houses being the same.
- 8.8 Nevertheless, details which suggest influences, however slight, of other architectural styles have crept in. An example is the brick arched entrance ways which could have had origins in the Art Deco Movement while the three-pane timber sash windows recall the former English Cottage Style state houses, rather than slender steel joinery which might have been more appropriate for the style. The use of timber joinery was likely an economical choice, given that the government owned two timber joinery factories at the time.

Two Storey Multi-Unit Flats

- 8.9 The second typology of housing to be constructed was a group of two storeyed elongated blocks of flats, the largest of which faces Scholefield

Street. The flats were constructed with a series of partly enclosed balconies at the upper level, while entry was provided at the front through small porches at the lower level. A second smaller block was constructed on the corner of Scholefield and East Streets, but with the balconies facing away from the street towards the sun and the entrances at the rear.

- 8.10 At the same time, four similar blocks were constructed on land between Adelaide and East Streets. These were grouped around a courtyard with the obvious intention of encouraging communal interaction.
- 8.11 The Petone multi-unit flats were again a departure from earlier multi-unit blocks constructed by the Housing Division which were effectively larger versions of stand-alone English Garden State houses with their pitched roofs and eaves. The units in Petone were also influenced by the International Style which was gaining favour in the Housing Division at the time. In reality, however, the designs tended to shy away from being true embodiments of the Modernist International style, instead combining some elements of the style with stylistic references deriving from the Arts and Crafts and Art Deco movements (such as the brick entranceways of many of the Petone flats).
- 8.12 The multi-unit blocks in Petone also feature timber multi-sash windows separated by mullions which recall the earlier cottage-style state houses. In fact, steel joinery would have been truer to the machine aesthetic of the International Style, effectively presenting as a continuous line of windows. The apparent flat roofs which were a feature of the Modernist movement were again on these blocks merely parapets which concealed a shallow mono-pitched roof behind.



Fig. 4 Photo taken in 1955 with the elongated Scholefield block at right and four blocks between Adelaide and East Streets bottom left.



Fig. 5 1959 Whites Aviation photo with single dwellings and duplexes and elongated blocks.



Fig. 6 Enlargement of above photo showing blocks grouped around the courtyard.

'Star' Flats

- 8.13 The final group of buildings to be constructed were what became known as 'Star' flats. During the 1950s, the Housing Division looked to increase the density of state housing, partly due to the cost of land and concerns regarding urban sprawl. The result was the 'Star' flats which

derived their name from their Greek cross plans. These were three storied in height and also characteristically modern with roots in the International Style, heralding a significant move away from the “English Garden City” model. The Star flats were notable for their butterfly shaped roofs.

- 8.14 The area in question contains two groups of Star flats. The first of these is a pair located between East Street and Adelaide Street. The second set of Star Flats is a group on the northern side of Jackson Street. A fourth block with a different floor plan was subsequently added to the Jackson Street group.



Fig. 7 Photo taken 1976 with Jackson Street flats top right and Adelaide Street flats bottom left.

Changes in the Area

- 8.15 Of the individual dwellings and duplexes along Jackson Street, only the two storeyed dwelling at 452 Jackson Street has been modified with a small addition having been added to the front. The remaining units have survived in remarkably original form.



Fig. 8 & 9 Duplexes and single dwellings, Jackson Street

- 8.16 By contrast, and other than a pair of two storeyed houses and a single dwelling connected to a duplex in the northwest corner of Adelaide Street, the dwellings facing Adelaide Street have undergone a greater degree of change.
- 8.17 The two duplexes at 83-85 and 89-91 Adelaide Street originally had 'fake flat roofs' (concealed shallow-pitched roofs set behind parapets, designed to appear as the flat roofs in the Modernist tradition). The original roofs of both buildings have since been replaced with mono-pitch roofs with projecting eaves. At 83-85 Adelaide Street, the duplex has also sustained additions to its primary eastern façade with awnings having been added. The dwelling at 87 Adelaide Street has also been significantly altered, with a large addition having been made to the front elevation which is not in keeping and detracts from its original style.



Fig. 10 Single dwellings and duplexes as constructed at 81–91 Adelaide Street



Fig. 11 81 and 83-85 Adelaide Street



Fig. 12 87 and 89-91 Adelaide Street

- 8.18 Of the multi-unit flats, the elongated block facing Scholefield Street appears to be largely unmodified since construction, with changes to the rear parapet and rear elevation being relatively unnoticeable from the street. In keeping with the International Style, the block was probably originally painted white, but is now beige in colour. The low fencing along the frontages is later fabric. The smaller block to the south also appears generally original.



Fig. 13 Scholefield Street flats (Google Maps)

- 8.19 With respect to the four blocks originally constructed around a courtyard between East and Adelaide Streets, only two of the four blocks now remain with newer housing now occupying the area where two similar blocks and the courtyard were previously located.



Fig. 14 Aerial view of housing between Adelaide and East Streets showing newer housing in area previously occupied by other blocks and open courtyard.

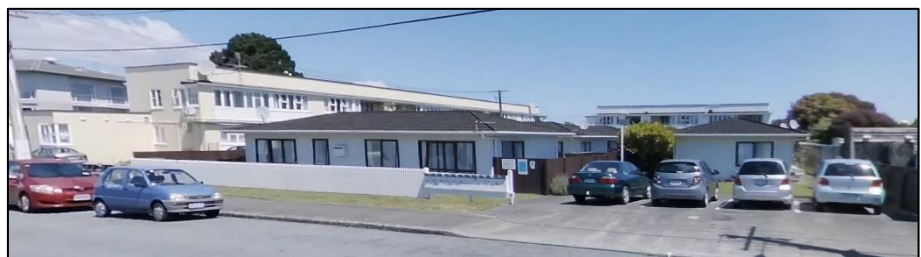


Fig. 15 Original multi-unit flats between Adelaide and East Streets with newer housing in foreground.

- 8.20 With respect to the 'Star' blocks, the two located between Adelaide and East Streets have been unsympathetically remodelled over the years and now bear little resemblance to their original form. In particular, the original very distinctive butterfly roof forms have been replaced with nondescript hipped and gabled forms.



Fig. 16
Remodelled Star
flats at 82
Adelaide Street.

8.21 Similarly, the Star flats on the northern side of Jackson Street are currently undergoing a programme of works to upgrade them to modern living standards. Two of the blocks have already lost their butterfly roofs and other distinguishing features and it is understood that the third is soon to follow.

9. DPA ARCHITECTS ASSESSMENT

9.1 In the following section of my evidence, I assess the significance of the buildings that make up the proposed Heritage Precinct and assess their suitability for inclusion in such a precinct. As a reference, I have used the criteria included in the Greater Wellington Regional Council's Regional Policy Statement. The criteria have seven main headings, while three of the headings also have a number of sub headings.

9.2 The criteria include: (a) **historic values** (with sub-headings of (i) themes, (ii) events, (iii) people and (iv) social); (b) **physical values** (with sub-headings of (i) archaeological, (ii) architectural, (iii) technological, (iv) integrity, (v) age and (vi) group or townscape values); (c) **social values** (with sub-headings of (i) sentiment and (ii) recognition); (d) **tangata whenua values**; (e) **surroundings**; (f) **rarity**; and (g) **representativeness**.

9.3 Overall, I consider that the area as a whole has historical, physical and social values. However, the various building typologies, in my opinion have varying degrees of significance.

Single dwellings and Duplexes

- 9.4 A group of single dwellings and duplexes are located along the southern side of Jackson Street and the northern side of Adelaide Street, returning around the northwest corner. The buildings were all constructed around the same time and therefore have historic value. They do, however, have varying degrees of physical values under headings of architectural, integrity and townscape.
- 9.5 The dwellings along Jackson Street have generally had few modifications and comprise a near intact group of building designed in the International architectural style. I consider that this group has high architectural and integrity values and is worthy of being included in a heritage precinct. Similarly, the two double-storey dwellings and the single dwelling coupled with a duplex located at 71 – 79 Adelaide Street are all generally in their original form and I also consider them to have high heritage values under these same criteria.
- 9.6 Along the northern side of Adelaide Street are two duplexes and two single dwellings located between 81 and 91 Adelaide Street. The duplexes and one of the single dwellings have all been substantially modified with altered roof forms or unsympathetic additions. It is my opinion that they detract from the more intact buildings in the vicinity and should not be included in a heritage precinct. There are also some individual houses located at 69 Adelaide Street and 1 Scholefield Street that have also been unsympathetically modified and I believe these could also be excluded.

Two Storey Multi-Unit Flats

- 9.7 The elongated two storey block of flats facing Scholefield Street, along with the smaller block to the south are notable features in the local townscape. While they may not have the architectural confidence of the Modernist Jackson Street dwellings with their references to the buildings of an earlier period, they are nevertheless notable for their architectural and integrity values and worthy of being included in a heritage precinct.

- 9.8 The other blocks of flats at 80 Adelaide Street and 6 East Street were originally constructed as two buildings of a group of four located around a central courtyard. The grouping, I suggest, was a clear architectural statement about the desirability of forming communities amongst their inhabitants. Although the two buildings that remain appear to be reasonably intact and therefore retain moderate heritage values, they are missing the other half of the group and the courtyard. What was originally devised as a group can no longer function.
- 9.9 As noted the buildings that remain have moderate architectural values, however, I consider that the Scholefield Street flats which have a similar architectural language are a better representative example of the typology. For these reasons I consider that there is little reason to include the remaining two buildings at 2-6 East Street and 80 Adelaide Street in a heritage precinct.

Star Flats

- 9.10 The Star flats have been, or will be, very substantially modified. The distinctive details and particularly the butterfly roof will also be removed, leaving them with minimal architectural value or integrity. For that reason, I believed they should not have been included in any heritage precinct. That was recognised in the WSP review and the 'Star' flats were deleted prior to the Plan Change being notified. The extent of the revised Petone State Housing Heritage Area as proposed by DPA Architects is shown below.

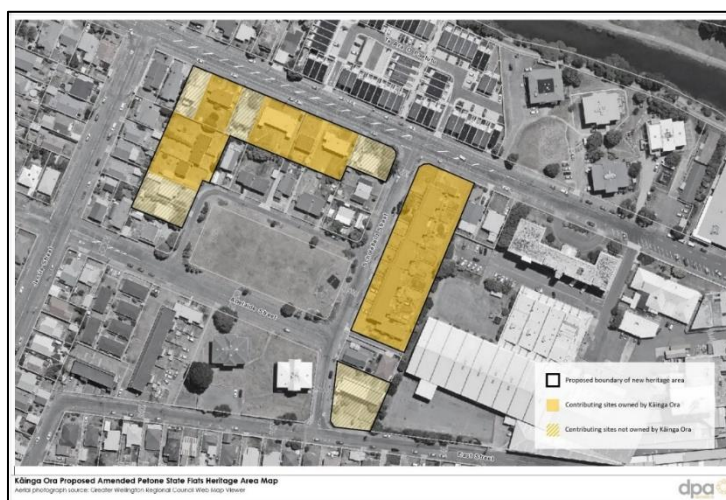


Fig 17. Heritage Area as proposed by DPA Architects

10. WSP REVIEW

- 10.1 A review of the DPA Architect's report was undertaken in June 2022 by Chessa Stevens of WSP and Ian Bowman. My response to their comments is as follows:
- 10.2 2-6 East Street and 80 Adelaide Street. As described earlier, two of the four blocks have been demolished and the area that was previously open space has been infilled with later housing.
- 10.3 The removal of two of the blocks has reduced the two that remain to a pair of individual blocks rather than a carefully planned group of four around a courtyard. The other similar blocks, being the large block facing Scholefield Street and the adjacent smaller block, are more prominent and have retained their context. I believe they make a strong contribution to the proposed heritage precinct and suggest there is little reason for including the two blocks remaining at 2-6 East Street and 80 Adelaide Street.
- 10.4 With respect to the buildings constructed as Star blocks which have now lost their original distinctive butterfly roofs, WSP agreed with DPA Architects that they do not meet the threshold for inclusion in a heritage precinct.
- 10.5 With respect to the single dwellings and duplexes at 81, 83-85, 87 and 89-91 Adelaide Street, I accept that 81 Adelaide Street may be largely original, however, it is largely obscured and makes little contribution to the streetscape.
- 10.6 83-85 and 87-89 Adelaide Street were designed as Modernist duplexes, however, they have been extensively modified. In particular, they were designed with a near flat roof behind a parapet to give the appearance of having a flat roof. They now have a mono-pitched roof with an overhang. In a similar way to the loss of the original roofs to the star flats, the duplexes have now lost one of their most distinguishing characteristics being the parapet with the flat roof behind.
- 10.7 The remaining single dwelling at 87 Adelaide Street is recognisable as an original State house, however, the addition on the front is completely

out of character and detracts from its original design. My opinion regarding this group of buildings has not changed and I consider that there are more intact and more original examples in the group at 452-470 Jackson Street. Consequently, I consider that the group between 81 and 91 Adelaide Street does not warrant inclusion in the proposed heritage precinct.

11. RECOMMENDATION

11.1 Overall, I support the submission of Kāinga Ora and recommend the removal of the following sites from the Petone State Housing Heritage Area:

- (a) 81, 83-85, 87 and 89-91 Adelaide Street
- (b) 2-6 East Street and 80 Adelaide Street

12. OTHER MATTERS

Heritage Provisions

- 12.1 Plan Change 56 as proposed by Hutt City Council has currently included the heritage provisions and the Heritage Precincts within the residential chapters of the District Plan. The plan change also does not include any demolition controls on the basis that while building height and density are able to be controlled in heritage areas, Council does not consider that demolition controls are a valid ISPP purpose.
- 12.2 In Auckland, the Auckland Unitary Plan is intended to guide the use of Auckland's natural and physical resources. Chapter D Overlays and, in particular, section D16 Historic Heritage Overlay contains objectives and policies that are aimed at protecting, maintaining restoring and conserving scheduled historic heritage places.
- 12.3 Following the directive by the Government with regards to enabling intensification in urban areas, Auckland Council has introduced Plan Change 78 to the Unitary Plan. Chapter D is retained but proposed to be modified to give effect to Plan Change 78.

- 12.4 Similarly, the Christchurch District Plan has Chapter 9 Natural and Cultural Heritage with subsection 9.3 Historic Heritage which has similar policies and objectives.
- 12.5 By contrast, the proposal by Hutt City Council to include the heritage provisions within the residential sections of the District Plan, rather than in a separate heritage chapter, in my opinion, will have the effect of weakening the heritage provisions by effectively “burying” them amongst the general residential provisions. I therefore support the submission by Kāinga Ora that these areas should be included and managed within a separate heritage chapter in the Hutt City District Plan.
- 12.6 I also support the submission by Kāinga Ora for there to be demolition controls within Plan Change 56. At present, demolition of non-scheduled buildings within the heritage areas is a Permitted Activity and this could result in changes that could considerably reduce the heritage values of the heritage areas if buildings are able to be demolished.

13. CONCLUSION

- 13.1 In conclusion, I recommend that the proposed heritage area be known as the Petone State Housing Heritage Area.
- 13.2 I also recommend that the extent of the proposed heritage area be reduced to exclude two multi-unit blocks located at 2-6 East Street and 80 Adelaide Street and a group of single dwellings and duplexes located between 81 and 91 Adelaide Street.

Dated: 29 March 2023

A handwritten signature in black ink, appearing to read "David Pearson". The signature is written in a cursive, flowing style with a horizontal line above it.

David Pearson