TO:	Hamilton City Council
SUBMISSION ON:	Proposed Plan Change 9 – Historic Heritage and Natural Environments
FULL NAME:	David Edwin Whyte, Jean Mary Dorrell
COMPANY NAME:	
POSTAL ADDRESS:	31 Oxford Street, Fairfield, Hamilton 3214
EMAIL ADDRESS:	dwhyte@xtra.co.nz
PHONE NUMBER:	021 664 559

DO YOU WANT TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?

☒ **YES** ☐ **~~NO~~**

IF OTHERS MAKE A SIMILAR SUBMISSION, WOULD BE PREPARED TO CONSIDER PRESENTING A JOINT CASE WITH THEM AT ANY HEARING YOU WANT TO BE HEARD IN SUPPORT OF YOUR SUBMISSION?

☐ **~~YES~~** ☒ **NO**

COULD YOU GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION?

☐ **~~YES~~** ☒ **NO**

Signature: _____ Date**:** 19 August 2022

Signature: _____ Date**:** 19 August 2022

Signature: _____ Date**:** 19 August 2022

Signature: _____ Date**:** 19 August 2022

Signature: _____ Date**:** 19 August 2022

THE SPECIFIC ELEMENTS OF THE PROPOSED PLAN CHANGE OUR SUBMISSION RELATES TO ARE:

☐ Archaeological sites	☐ Built Heritage	☒ Historical Heritage Areas
☐ Significant Natural Areas	☐ Notable Trees	☐ Plan Change 9 in its entirety

THE SPECIFIC PROVISIONS OF THE PROPOSED PLAN CHANGE OUR SUBMISSION RELATES TO ARE:

Chapter 19: Historic Heritage Zone in particular the proposed creation of Oxford Street (East) and Marshall Street "Railway Cottages" HHA and listing in Schedule 8D.

Appendix 3 Proposed Change 9 Provisions Appendix 1.1 Definitions and Terms
Appendix 3 Proposed Change 9 Provisions Appendix 1.2 – Information Requirements
Appendix 3 Proposed Change 9 Provisions Appendix 8 – Historic Heritage

Placement of Oxford Street (East) and Marshall Street "Railway Cottages" HHA in Schedule 8D.

OUR SUBMISSION IS THAT:

We generally support the plan to protect "*those parts of Hamilton City which are of such heritage value locally, regionally or nationally that they should be identified as Historical Heritage Area (HHA) in the Hamilton District Plan.*" as the stated objective of the HCC[1].

We do not believe the methodology has been as robust as it should be and that it has not been applied consistently. A lack of due diligence is shown by the fact that HCC did not bother to check the LINZ titles of the Oxford Street (East) and Marshall Street "Railway Cottages" HHA. This simple check would have shown the properties were never owned by Railways or the Crown and that most of them were built after 1930 and thus could not meet the two historical heritage themes designated for this proposed HHA.

We oppose the establishment of the Oxford Street (East) and Marshall Street Railway Cottage HHA and its listing in Schedule 8D. Our reasons are summarised below with further details, discussion, and photographs in this document:

1. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA do not represent the historic heritage themes of "railway workers suburbs (1930s-1950s)" and "establishment of an early service town (pre-1930s)" as claimed in Mr Knotts report for Plan Change 9.

2. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA are not and never have been railway workers' cottages and so cannot be representative of the "railway workers suburbs" (1930s-1950s) heritage theme. This is proven by the following:

   a. The property titles prove all of the properties were privately owned and always have been. This means that they were never owned by the Railways or another Crown entity.

[1] Appendix 9: Historic Heritage Areas Report page 4

b. The houses in both streets do not fit with the definition of Railway Houses in the HCC Operative District Plan (ODP).

c. The houses do not fit with the housing typology of a "Railway House" as cited by Mr Knott from Ms Hill's two reports on Special Character Areas in Hamilton[2].

d. There is no proof in the public realm, that the houses were pre-cut in the Frankton Railway Factory (1923 to 1928)[3].

e. There is no documented proof of any association with railway workers available in the public realm, so it is impossible for the houses to be "*representative of railway workers suburbs*".

f. The area (12 properties on two streets) is too small to be classified as a "suburb"[4].

3. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA are not representative of a pre-1930 service town.

a. By 1930, evidence (provided later in this document) suggests that there were only four houses (one in Marshall Street and three in Oxford Street). Two of those houses were owned by farmers. The other 9 houses (8 properties) or 69% in the proposed HHA did not exist pre-1930, let alone represent the establishment of a service town.

b. Both Oxford Street and Marshall Street (at least until the mid-1950s) were short no exit roads that terminated in a rural setting (peach orchard, hence name of Peachgrove Road). A service town would not be established on two short no-exit roads, with no commercial buildings within it, but would be created on a main thoroughfare, such as is the case in Morrinsville, Matamata, Huntly etc. The main street in all those service towns is the main highway leading to the areas they service.

c. The two streets did not become incorporated into Hamilton City until the fifth boundary enlargement in 1949.

4. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA do not meet the consistency criteria. The consistency criteria have not been applied consistently or accurately to the proposed HHA.

a. After Mr Knott assessed the consistency of "Oxford Street" (being two small groups at either end of a street with around 40 properties) as 6/7, he suggested that Oxford Street could be divided into two HHAs (based upon different heritage themes) but **did not**

[2] as defined in Hamilton Special Character Study prepared for Hamilton City HCC 31.07.20 by Lifescapes Ltd (page 15). HOUSING TYPOLOGIES

[3] Page 32 of Names & Opening & Closing Dates of Railway Stations in New Zealand, 1863 to 2010. Scoble, J for the Rail Heritage Trust of New Zealand 2010.

[4] Concise Oxford Dictionary definition of suburb is an outlying district of a city, especially a residential one. Definition of district is 1. an area of a town or Country and 2. A division of a Country or region that elects its own councillors. Compare Frankton Railway Village (118 houses) versus 7 in Oxford Street and 5 in Marshall Street.

assess and score each subset separately. He scored every other street in every other HHA as separate entities, before combining the total scores. This fact alone should exclude the HHAs identified from being imposed and placed in Schedule 8D as Mr Knott has failed to follow his own methodology.

b. Oxford Street (East) and Marshall Street "Railway Cottages" HHA was not scored together. If the two small groups of houses areas are deemed to be one HHA, they need to be consistent with each other. As the Council states "***if an area is assessed as being not consistent it cannot be considered to be representative***".

5. When the consistency of the HHA is scored accurately and in its entirety, it does not meet the required 5 or more out of 7 points.

WE SEEK THE FOLLOWING ACTION FROM THE COMMISSIONERS

6. The commissioners make a site visit to the proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA to see the housing types, variations and inconsistencies for themselves. This is requested since on the 9 August 2022 visit to the area by the City Planning Manager, Mark Davey, he was unable to explain why the area met the two heritage themes.

7. When reviewing other submissions, consider that the other proposed HHAs' may also be fabricated or erroneous and/or based on an inconsistent methodology but the submitters may not have the resources or skills to prove this.

WE SEEK THE FOLLOWING DECISION FROM THE COMMISSIONERS:

The proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA not be created and be removed in its entirety from Schedule 8D in the HCC ODP due to it not being representative of the two historical heritage themes as stated.

SUBMISSION OPPOSING OXFORD STREET (EAST) AND MARSHALL ST "RAILWAY COTTAGES" HHA

19 August 2022

Contents

Overview

1. The proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA does not add any additional value to Hamilton's historic heritage, its unique story or character and as such should not be listed in the District Plan nor on any property owners LIM reports.

2. The Oxford Street (East) and Marshall Street "Railway Cottages" HHA report states that the dwellings (23-35/35A Oxford St and 28-36 Marshall St) are "*consistent with a significant number of the features of the early establishment of a service town and the railway workers suburbs heritage themes and is of at least moderate heritage value"*.

3. The use of the qualifying words "*significant number of features*" without further explanation is concerning. What are these features that define early establishment of a service town? Since the HHA was not incorporated into the growing Hamilton City until April 1949, it is clearly not part of the early service town of Hamilton. I would also note here that a similar description is also given for the Marama Street HHA except the qualifying words are "It is clearly representative of the early establishment of a service town (pre-1930s) heritage theme." The Marama Street HHA is within the 2nd extension of the Borough, (April 1917), and Marama Street is within 832 metres (by road) from the intersection of Claudelands Road and Victoria Street (Hamilton CBD) whereas Oxford Street is approximately 2,296 metres (by road) from the same point and was not part of Hamilton until the 5th boundary extension in 1949.

4. Unfortunately, the areas have not been ranked by Mr Knott as separate entities. Mr Knott ranked the entirety of both Oxford Street (minus around 26 properties) and Marshall Street. He then identified two smaller subsets of Oxford Street (representing less than 27% of the total Lots on Oxford Street) as having potential to be unrelated HHAs. Mr Knott did not prepare or report an assessment on either the separate Oxford Street HHAs, the five Lots in Marshall Street or prepare and report an assessment for the combination of the Oxford Street (East) and Marshall Street "Railway Cottages" HHA.

5. Mr Knott and HCC did not do any research to assess if in fact these houses were built by the Railway Corporation to house railway workers, yet he has labelled them "Railway Cottages" and are therefore representative of "railway workers suburbs heritage theme" which represents a period of development of 1930 to 1950s. **The houses were not and never have been owned by Railways Corporation or any other Government entity.** They were all privately owned, with the bulk of Oxford Street[5] purchased by Paterson the Elder (builder) in 1938. Four of the of Lots in Marshall Street were brought by one person (presumably land banking) who subsequently went bankrupt around 1927

[5] Lots 6-20, 24,26-28,30-32,34,36 and 38

suggesting that he had not got around to building houses on the lots prior to going bankrupt.

6. The area was a rural setting pre-1930s and there is no evidence that any significant commercial buildings were established in Oxford Street (East) or Marshall Road pre-1930.

7. None of the houses meet the definition in the Operational District Plan (ODP) of “Railway Cottages”. They are dissimilar to the Frankton Railway Village cottages in many ways as I have documented. They are not prefabricated buildings. Had they been prefabricated; they would be identical to the Frankton Railway Village houses. Also, to state the obvious, Oxford Street and Marshall Street are is nowhere near the railway station, railyards, rail workshops etc and so they cannot be deemed to be representative of a “railway workers suburb (1930-1950s) heritage theme”.

Issues with the Methodology Used for Assessing Consistency and Scoring Representativeness

8. Mr Knotts methodology states that the consistency criteria can be "considered at street, group of streets or block level as appropriate". For Oxford Street he assessed the "entire street" of around 40 properties, and then excluded 26 of them in the middle and those opposite the proposed Oxford Street East HHA properties and then rated the street as 6/7. Mr Knott suggested that Oxford Street could be divided into two HHAs (based upon different heritage themes) but **did not assess and score each subset separately.** He scored every other street in every other HHA as separate entities, before combining the total scores. This fact alone should exclude the HHAs identified from being imposed and placed in Schedule 8D as he has failed to follow his own methodology.

9. Given the Oxford Street West HHA contains three (of seven) properties which are proposed Schedule 8A properties, it is likely that the Oxford West HHA would score higher than the Oxford Street East properties, especially when Oxford Street East was joined with five properties from Marshall Street.

10. He assessed Marshall Street in its entirety as not meeting the consistency criteria but noted that "*Some buildings may be railway cottages forming block with those in Oxford Street (Needs to be checked)*" and "*The area of Railway Cottages would score more highly if considered as group with those in Oxford Street*." He did not score that new smaller group of five properties (as well as forgetting to check that they were railway cottages!) it is unclear to me how this group of houses could be given a higher rating if joined to another group of unrelated houses.

11. Mr Knott and HCC present a "methodology" for evaluating historical heritage which is highly subjective when it should not be. A methodology should allow any person to easily follow the methodology and reach the same conclusion as others would. Think of the methodology as that performing a chemical experiment. If you do the same thing, you should get consistent results. Mr Knott has not applied his methodology in a consistent and impartial manner.

12. This is the only proposed HHA which includes small parts of two streets with the other end of a small street in a separate HHA.

13. In Appendix 8 Historical Heritage at [10] Frankton Railway Village is placed within a HHA with the description that "***is of at least moderate heritage value***". This is a nationally, regionally, and locally important heritage area and should be described as having "outstanding historical value". Oddly, Frankton Railway Village has not been listed as meeting the theme of "early establishment of a service town", despite containing 118 cottages built in the 1920s. Mr Knott apparently rates this HHA the same as the Oxford Street (East) and Marshall Street "Railway Cottages" HHAs.

14. In Appendix 8 Historical Heritage at [13] Hayes Paddock is listed and this nationally, regionally, and locally important historical area should also be described as having "outstanding heritage value".

15. In Appendix 8 Historical Heritage at [18] Marama Street HHA consists of 10 Lots and is described as "*having at least moderate historical heritage value*". Yet it contains No's 6, 8, 12 and 16 (or 40% of the buildings) which are planned to be added to Schedule 8A listing of the built heritage.

a. The scoring methodology used by Mr Knott and the methodology used by the HCC does not allow any building anywhere to be **ranked below** "moderate" for any criteria since it only has three categories: Outstanding, High, or Moderate.

16. Similarly, the representativeness rating[6] only allows the following: Green if the area is representative with no or little change, Orange if it is partly representative but has seen some change and Red where the area is not representative, whether **as originally built or currently existing due to change**

17. The consistency criteria only allow the following: Green (1 point) if the area shows the consistency of the criteria, Oddly, the criteria for Orange (0.5 point) includes if the area either **has never been consistent or there has been some change in the area which has affected its consistency**. Red (0 point) if the area is not consistent. **So both Red and Orange mean it is not consistent** but then allow the scorer to deliver two different scores either 0.5 or 0.[7]

18. In comparison, the Wellington methodology, referred to by Carolyn Hill[8] in her 2021 report prepared for Hamilton City Council, is a much more robust methodology as it ranks each building into one of four groups. A building is:

a. "Primary" which is defined as properties where attributes that are largely intact and predominantly illustrate the characteristics described in the relevant District Plan Residential Guide for the area.

b. "Contributory" which is properties where attributes have been modified (e.g. garaging, windows, verandah enclosure) or redeveloped, but where most of the characteristics described in the relevant District Plan Residential Guide for the area are illustrated/still visible.

c. "Neutral" which is for properties that neither exemplify nor detract from the characteristics described in the relevant District Plan Residential Design Guide for that area. This also includes **properties not clearly visible from the street.**

[6] Appendix 8 Historical Heritage Operative: 19-Jul-2022, page 7. Hamilton City Council.
[7] Appendix 9, Historic Heritage Areas, page 17
[8] Boffa Miskell. *Wellington City Urban Character Assessment*

d. “Detractive” for the properties with attributes that undermine/detract from the characteristics described in the relevant District Plan Residential Design Guide for that area

19. The identification that properties that are not clearly visible from the road are not primary or contributory to a HHA is common sense that appears to be lacking in the HCC methodology. If a property cannot be seen, how can its heritage be of any value? Unless HCC plan to order residents to remove existing hedges and high fencing, this makes a mockery of identifying the historic heritage.

20. Under the Wellington methodology the Thorndon area for example has 324 properties (45%) identified as primary, 214 properties (30%) contributory, 130 (18%) neutral and 56 (8%) detractive. For the Wellington areas recognised as HHAs, the sum of the properties within the HHA considered primary or contributory ranges from 72% to 82% with the exception of one small HHA (Holloway Road with only 81 houses, ranking 57%)

21. Applying the Wellington methodology to the Oxford Street (East) and Marshall Street “Railway Cottages” HHA for the two separate themes produces the following. If we put aside the fact that none of the houses were ever owned by Railways or lived in by railways workers and most of the houses were not built by 1930, the following scores would be given based on houses being neutral where properties are not clearly visible from the street and detractive where there are two storeys or the front façade is highly modified in recent years. This would clearly not meet the requirements of the Wellington methodology to be an HHA.

Both Themes (if they were valid)	**Primary**	**Contributory**	**Neutral**	**Detractive**
Oxford Street	0	3 (43%)	2	2
Marshall Street	0	2 (40%)	2	1
Total	**0**	**5 (42%)**	**4**	**3**

22. If we actually take on board the evidence provided by LINZ land titles and common sense, but ignore the fact the area was semi-rural or rural, the scoring would be as follows. This would also clearly not meet the requirements of the Wellington methodology to be an HHA.

Railway Workers Suburb Theme	**Primary**	**Contributory**	**Neutral**	**Detractive**
Oxford Street	0	0	0	7
Marshall Street	0	0	0	5
Total	0	0	0	12 (100%)

Early Establishment of a service town (pre-1930s)	Primary	Contributory	Neutral	Detractive
Oxford Street	0	3	0	4
Marshall Street	0	0	1	3
Total	0	3 (25%)	1	7

23. Appendix 1.1 – Definitions and terms. In the definition of HHA there needs to be further words added to the definition proposed. It must include the words "well documented" since in the Heritage Plan it discusses the avoidance of "enhancing the fabric" of assumed historical heritage.

24. HCC have failed to define the following in Appendix 8

25. 8-3.3 states "one of the themes" so how many of the themes can one area of housing be "classified" as being representative of? What is the dominant theme, and should the area only be described in terms of the dominant theme?

26. In terms of modification what constitutes "some change", "significant change" and how do these terms relate to the "representativeness" of that area or building? Is an original Frank Llyod Wright[9] building still his, if 10%, 20%, 30% or more is remodelled?

27. HCC has not used a suitably robust methodology[10] to identify HHAs, as there is no full description of a robust methodology[11] in any reports provided to date. The ranking system in the ODP is inadequate (only 3 levels ranging from outstanding to moderate, even though clearly many buildings will have low to no historical heritage value), a building only has to "qualify" in one criteria as moderate to enable it to be deemed by the HCC as having "historical heritage", and simply viewing buildings from Google street view or from the roadway as you drive by does not ensure a suitable high-quality impression and record of each and every building.

28. HCC methodology is inconsistently applied by Mr Knott and many of the "themes" are very broad and cover large time spans. For example, "early establishment of a service town" covers from 1860 to 1930s, and "the railway workers suburbs (1930s – 1950s)[12]

[9] Frank Lloyd Wright (June 8, 1867 – April 9, 1959) was an American architect, designer, writer, and educator who designed over 1,000 structures over a 70-year period.
[10] This is in contrast to other Teir 1 cities i.e. Auckland, where there is a document entitled "Methodology for Evaluating Auckland's Historic Significance", August 2020 Version 2.
[11] A suitable methodology is described within the evidence of Marian Isobel Kohler in the environment Court ENV-2016-AKL regarding an appeal under Section 156(3) of the LGATPA against a decision of the Auckland HCC on a recommendation of the Auckland Unity Plan Independent Hearings Panel on the proposed Auckland Unitary Plan at [3.13 to 3.22].
[12] Appendix 8 Historic Heritage Print date 19/07/2022 at [22] page 44.

29. The report on the proposed HHA focuses on the consistency of many external features apart from building typology that are consistent among any subdivision developed at a specific period in time. These external features have nothing to do with the historic heritage value of the buildings in that area but only the overall visual impression of that area. These features include width of berms and footpaths, straight or curved carriageways, housing density, green structure, streetscape (presence or absence of overhead power lines, telephone lines and poles, street lighting, street trees etc). This "general physical and visual" appearance does not necessarily relate to or add value to "historical heritage" of a building in that area.

30. I am concerned that the "historical heritage" being preserved is predominantly European-centric (from 1860 onwards) and that little of the pre-European Heritage appears within the Plan 9 changes or the Operating District Plan (ODP).

31. Appendix 9: Historic Heritage Areas Report[13] states:

> *"The following assessment criteria have been developed to identify the very best and most consistent areas which are representative of the Heritage Themes, identified above.*
>
> *The intention is to identify areas which have historic heritage significance to the development of the city and which are of such heritage value locally, regionally or nationally that they should be identified as a Historic Heritage Area (HHA) in the Hamilton District Plan."*

32. The criteria used to identify a HHA is:

> *"That the area is representative of a Heritage Theme which has historic heritage significance to the development of the city AND The area displays consistency in physical and visual qualities that are representative of their identified Heritage Theme."*

33. So, a two-stage approach with both stages having to be proven correct for an area to be made an HHA. Yet both stages refer to "**representative of a Heritage Theme**".

34. The first stage is determining what theme the area represents from (early establishment of a service town (1860-1929), railway workers suburbs (1930-1950s)**[14]**, comprehensive state housing schemes and control by the State Advances Corporation (1940-1960), construction company era, and the dominance of the private car and changing suburban form (1960-1970s).

35. The second stage is then to determine how consistently does the area represent that identified heritage theme.

[13] 22 June 2022
[14] The only Housing type identified within this "theme" is railway house with no other details.

Consistency – Not Evidence of Significant Historic Heritage

36. Apart from the Architecture and Building Typologies, none of the "consistency" criteria necessarily add to the historic heritage theme.

37. The consistency criteria (stage two of the process) used to evaluate possible HHAs are as follows:

The area displays consistency in physical and visual qualities that are representative of their identified Heritage Theme and assessed as being at least moderate value in relation to the majority of the consistency criteria:

Criteria for Assessing Consistency	My Comments
A consistent **Street/Block Layout** which makes a positive contribution to the heritage significance and quality of the area	This is not relevant unless you are assessing an entire block, street or larger area where the street layout then may be important. Can a street/block layout make a negative contribution to the heritage significance and quality of the area? Yes, I would say so think of the speed humps and street furniture currently being placed in streets around Hamilton to "calm traffic" i.e. Caseys Ave, Marshall Street, Alfred Street etc. The Oxford/Marshall Street HHAs are too small to effectively apply this criteria.
Consistent **Street Design**, including street trees, berms, carriageways and other planting within the street which make a positive contribution to the heritage significance and quality of the area.	Size of berms, street trees and internal planting are completely unrelated to the history or typology of house and beyond the homeowner's control as this is determined by the HCC/Developer. This is shown when HCC planted additional trees in Oxford St in July 2022 to match the description that there were regular street trees.
Consistency in **Lot Size, Dimensions and Development Density**, including shape and size of lots which makes a positive contribution to the heritage significance and quality of the area.	Completely unrelated to the historic heritage or housing typology as it is controlled by the HCC and Developer. The two Oxford Street HHAs have inconsistent housing density since both contain subdivided Lots.
Consistent **Lot Layout**, including position of buildings on lots, dominance of car parking, and landscape and tree planting within the lot which makes a positive contribution to the heritage significance and quality of the area.	Tree planting within the lot has nothing to do with the history of the house unless it is a significant tree. Oxford Street (East) has many dominant extra wide driveways and hence should fail this criterion.
Whether the overall **Topography and Green** Structure of the area makes a positive contribution to the heritage significance and quality of the area.	Oxford Street and Marshall Street are inconsistent in green structure and what there is does not make a positive contribution to the heritage significance.

Criteria for Assessing Consistency	My Comments
Consistency of styles of **Architecture and Building Typologies**, including overall shape, form and material, and whether these factors make a positive contribution to the heritage significance and quality of the area.	Oxford Street and Marshall Street both have inconsistent building typology with the Heritage Theme and also inconsistency within this theme and are therefore not representative of the Heritage theme.
Consistency in **Street Frontage Treatments**, such as walls, fences and planting, and whether these make a positive contribution to the heritage significance and quality of the area.	Oxford Street and Marshall Street are inconsistent in this criterion and have many high dominant fences, meaning they should fail this criterion.

38. The factors listed (a to g) above can be said to be consistent for many subdivisions without necessarily making a positive contribution to any building's historical heritage.

39. For example, Rototuna North has 600m^2 sections with large homes on them all built around the same time. While the almost contemporaneous suburb of Greenhill has 450m^2 sections with homes built around the same time. Will HCC be placing HHAs on these in 50 years' time?

40. Street width and berm size is also unrelated to the historic heritage. Main streets or throughfares are generally wider in both roadway and footpath. While lesser roadways are generally narrower in roadway and berm. This has more to do with the transport routes themselves rather than the historic heritage displayed by the buildings.

41. All streets in Fairfield have similar berm sizes and footpaths (except for Heaphy Terrace, Peachgrove and Hukanui Road as main through roads), except Oxford Street, which is wider at the Heaphy Street end at approximately 14.5 m of the first 64 metres (or 23%), then narrower at approximately 8.5 metres for the next 275 metres, before widening to approximately 13 metres for the final 63 metres (or 21%) by Claudelands Croquet Club grounds. **This is hardly the "*consistent width*" as recorded by Mr Knott who subsequently scores it at 1 on this consistency criteria**.

42. The evaluation of consistent elements in the HHA reports which suggest a property or area has "heritage value", such as each lot having "a vehicle access" and street planting is bordering on farcical as to making a positive contribution to historic heritage. In fact, for Oxford Street (7 Lots) there are 3 Lots that have a single vehicle entrance (3.0 m wide) formed at the carriageway, with the other 4 Lots (or 57%) having double or larger vehicle accessways (ranging between 6.2 to 13.5 metres in width) formed at the carriageway.

43. The ranking system used by the HCC for historic heritage values only has three ratings[15] [16] with moderate being the lowest. Other Tier 1 cities have five levels of ranking with the addition of none and little.

Comparison with Neighbourhood Streets Scoring < 5

44. Mr Knott has discounted several adjacent neighbouring streets from being placed within HHAs. These include Walter Street, Claude Street and Alfred Street (south of Oxford Street towards Boundary Road) all incorporated in the 5th boundary extension in 1949 at the same time as Oxford and Marshall Streets.

45. Mr Knott states, for Walter Street, the following:

> *Mid block link from Alfred Street through to Holland Road. Wide carriageway. Berms but very limited street trees (at southern end only). Lot sizes diverse. Lot layout varies with typology. Some large area of parking, and redevelopment at northern end. No apparent influence from topography or green structure. Architecture and material vary, as do frontages which include a number of dominant fences.*

46. So, Mr Knott states "very limited street trees" "large areas of parking" "redevelopment" "no apparent influence from topography or green structure", "architecture and material vary as do frontages which include a number of dominant fences" as reasons not to include Walter Street from being included in an HHA. Yet all these comments can equally be applied to Oxford Street (East) and Marshall Street "Railway Cottages" HHA. Especially the lack of street trees, no apparent influence from topology or green structure, variable architecture and variable frontages, Mr Knott scores Walter Street at 1 out of 7.

47. For Alfred Street, Mr Knott states:

> *One of a grid of streets which links from Heaphy Terrace to Peach Grove Road. Street deflects along its length and road corridor in west is* ***approximately 5m wider*** *than in east; this inconsistency impacts representativeness of street. East end, narrow carriageway, narrow berms and footpaths with irregular street trees. West end, wide carriageway, narrow berms and footpaths and a greater number (still not consistent) street trees; street appears vast and featureless. Lot sizes and frontage widths vary along street. Building setbacks also vary and some garages in front yards. Grid network overlaid on relatively flat topography. Some consistency with building materials and building styles (especially at east end). Some redevelopment. Frontages vary including open plan, planting, low fences and some dominant higher fences.*

[15] Appendix 8: Heritage – Proposed District Plan
[16] This is covered in depth in Statement of Evidence Of Adam Wilde on Behalf of Hamilton City HCC – Community Facilities. Dated 25 October 2019 at [paras 34 to 46].

48. So, Mr Knott states Alfred Street has irregular carriage way width (as has Oxford Street), “irregular street trees” (as has Oxford Street and Marshall Street), “garages in front yards” (as does Oxford Street and Marshall Street), “frontages vary” and “dominant higher fences” (as does Oxford Street and Marshall Street). Mr Knott scores Alfred Street at 2.5 out of 7.

49. For Claude Street Mr Knotts states:

> *One of a grid of streets which links from Heaphy Terrace to Peach Grove Road. Narrow carriageway, wide berms and footpaths with irregular, large street trees. Lot sizes vary, due to lot widths varying along street (wider at west) and due to significant number of sites being subdivided. A large number of garages, large hard surfaced parking areas and driveways disrupt front yard areas. Grid network overlaid on relatively flat topography. Some consistency with building materials and building styles but garages in front yards, alterations etc take away from this Some redevelopment. Frontages vary including open plan, planting, low fences and some dominant higher fences.*

50. So, Mr Knott states Claude Street has “large hard surfaced parking areas and driveways disrupt front yard areas” (as has Oxford Street), “irregular large street trees” (as has Oxford Street and Marshall Street, but not large ones), “garages in front yards” (as does Oxford Street and Marshall Street), “frontages vary” and “dominant higher fences” (as does Oxford Street and Marshall Street). Mr Knott scores Claude Street at 3.5 out of 7.

51. These assessments are blatantly inconsistent when compared to how Mr Knott scored Oxford Street.

Modifications to buildings

52. In an official information request response from Jamie Sirl (Team Leader City Planning) he acknowledges that “*in some instances, there are buildings with HHAs which have been modified. However, they are located within an HHA covering an area that together represents a significant period in the development and evolution of the city*”. So, what the HHA reports and the response to the OIA request are saying can be summarised as:

a. If there are consistent features, even if irrelevant to the typography or history of the structure, it should be considered to have at least moderate heritage value as consistency is the key element of deeming a property to have moderate heritage value.

b. If there are inconsistent features, such as houses in an HHA which is supposedly a railway cottage having a second storey, or in fact houses deemed to be “Railway Cottages” (despite not meeting the definition in the ODP, not being owned by the government at any point in time, or not matching the indicated typology) this should be

ignored, and the property should be deemed to have moderate heritage value and placed within an HHA.

53. The methodology does not define what level of modification would cause an area or building to be deemed "not representative" or "inconsistent with a Heritage Theme".

Fabrication or Enhancement of Heritage

54. The "areas" assessed for consistency vary from a small number of adjacent houses to entire streets and suburbs. The methodology does not directly recognise this and allow for differences in scale. For example, street and block layout. How is a very short section of a street containing five lots able to be rated on this criterion? Oxford Street has two distinct and unconnected HHAs identified that do not each cover an entire block so this criterion is not relevant and should then be scored at 0.

55. The fact that the houses in the Oxford Street (East) and Marshall Street "Railway Cottages" HHA have been classified by Mr Knott as "Railway Cottages" is incorrect seems to have escaped HCC's attention. Mr Knott falsely fabricates this by saying "*they represent a significant number of criteria of the themes of "early establishment of a service town (pre-1930s) and the railway workers suburbs (1930s to 1950s) heritage themes*." So, Mr Knott is saying that the 12 Lots in the Oxford Street (East) and Marshall Street "Railway Cottages" HHA contain houses representative of "early establishment of a service town" (despite only 33% having houses built on them by 1930), then he says it also has houses representative of "railway workers suburb" 1930 to 1950s (ignoring the fact that the houses are demonstrably not railway houses in typology or original ownership). In either case **the majority of houses do not match the indicated Heritage Themes** and cannot be deemed to be representative of either theme nor consistent in representing either theme.

What is the Story of Hamilton?

56. From the HCC website introduction to Plan 9:

> *"A Historic Heritage Area (HHA) is a defined area that has heritage values worthy of protection for present and future generations. They represent a period of Hamilton's development and help tell our story. They give people a glimpse into our past and where we've come from."*[17]

57. So, what is Hamilton's unique character and identity? Does the HCC know and if so, can they explain it to the ratepayers so we can determine if in fact that is the consensus?

a. Is it a military township (from early settlement or the association with the New Zealand Airforce via the Te Rapa Base) and does this make Hamilton unique?

[17] This definition is very different to that used in the Lifescapes Ltd 2021 review document.

b. Is Hamilton a Railway Town (Frankton Railway Village) and does this make Hamilton unique?

c. Is it an early service town and does this make Hamilton unique?

d. Is it a State Housing town (Hayes Paddock) and does this make it unique?

e. Is it an educational town and does this make Hamilton unique?

f. Is it a major river port, rail, transport hub and does it make Hamilton unique?

g. Is it a River City?

    i. The HCC website states that "Hamilton is the only major river city in the country"[18]. (This is incorrect. The title of "River City' is more commonly associated with Whanganui[19].)

    ii. Previously HCC went out of their way to ensure that the CBD was developed with its back to the river.

    iii. Hamilton did not have a sewage treatment plant until 1975. Prior to this sewage was untreated and collected in community septic tanks from 1925 (totalling 17 tanks at the end) then discharged directly into the Waikato River or Waitawhiriwhiri Stream. Thereby greatly diminishing the mauri of the river and generating a significant environmental effect on the river flora and fauna.

    iv. If Hamilton is in fact a "River City" how does this then relate to the story told by the houses on Oxford Street, which has no direct connection to the river, nor appears to have housed people who worked on the river?

58. Other than the areas previously identified by HCC as special character zones (being parts of Frankton, Hamilton East, Claudelands and Temple View) the other proposed HHAs do not appear to have any nationally or regionally important historic significance, nor any buildings worthy of Historic Places listing. While it is nice to walk around the Frankton Railway Village and look at the cottages, it is unlikely anyone will take a stroll down Oxford Street, Marshall Street, Casey Ave, Sare Crescent or Fairfield Road to appreciate the historic heritage of Hamilton or admire the consistency of carriageway width, berm width, density, streetscape (power poles, street trees), frontage treatments or green structure.

[18] https://hamilton.govt.nz/property-rates-and-building/district-plan/plan-changes/plan-change-12/
[19] The Charm of Wanganui A River City of Enterprise and Culture. Gillespie, O. N. 1937 in The New Zealand Railways Magazine, Volume 11, Issue 10 (January 1, 1937). https://nzetc.victoria.ac.nz/tm/scholarly/tei-Gov11_10Rail-t1-body-d3.html

59. Does HCC plan to put up signage and make these HHAs part of a city-wide linked heritage walk? Will they add "historic touches" such as old-style street lighting[20] (which would be an improvement on the current street lighting) or repair unbroken paving so the "heritage tourists" do not have to avoid the cracked footpaths while admiring the history and character of these areas? Do they plan to fix the storm water drains so the "heritage tourists" will not have to walk through the surface flooding which appears every time it rains? Prior to doing this, the HCC and Police would need to deal with the issues of roaming dogs and intimidation from the criminal element.

60. It is also interesting to note that the Oxford Street (East) and Marshall Street "Railway Cottages" HHA, Casey Avenue HHA (down till No 23), and neighbouring streets of Claude Street, Alfred Street, Moncreiff Avenue, Bettina Road and Heaphy Terrace have streetscapes that remain dominated by ugly overhead powerlines. In sharp contrast to Holland Road (and all off roads), Fairfield Road HHA, Sare Crescent HHA, Clarkin Road and parts of Peachgrove Road which are all without these "detrimental to physical and visual experience"[21] dominant overhead powerlines.

[20] This concept is also proposed for the Frankton Railway Village in Discover Frankton The Frankton Neighbourhood Plan prepared by Hamilton City HCC.

[21] Hamilton Special Character Study, Lifescapes Ltd, 2020 on page 2 "Overhead powerlines are detrimental to the physical and visual experience of Hamilton's suburban streetscapes. It is recommended that a clear strategic direction be adopted by HCC for a phased undergrounding of overhead lines systems."

HCC Responses to OIA and Other Queries About Proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA

61. Prior to identifying that the houses were never owned by Railways and thus were not representative of a railway workers cottage, I sent a request under Section 10 of the Local Government Official Information and Meetings Act 1987, asking the question:

> *"Why are so many poor-quality examples of railway houses or workers cottages needed to be placed within HHAs when the vast majority of them are very poor examples of those types of building? I can understand wishing to preserve the "Railway Cottages" close to the Railway Factory (where they were prefabricated) but not the vast number of cottages across the city."*

62. Mr J Sirl (Team Leader City Planning) responded with:

> *"There are* ***two main proposed HHAs*** *that contain "Railway Cottages", Frankton Railway HHA, Oxford Street (East) and Marshall Street "Railway Cottages" HHA.*
>
> ***The HHA identification assessment does not consider the condition of each individual building****. Each of the identified HHA are representative of* ***an identified Heritage Theme*** *which has historical heritage significance to the development and growth of Hamilton from early establishment up to development eras of 1970s. These areas also* ***represent a level of consistency in their physical and visual qualities including street pattern, lot layout, and density, green structure, housing typologies and street frontage treatments*** *[emphasis added].*
>
> *It is acknowledged that, in some instances, there are buildings within HHAs that have been modified. However, they are located within an HHA covering an area that together represents a significant period in the development and evolution of the city[22]. For examples, some HHAs contain sites with a number of different design variations or housing typology variations but yet the overall area is still considered to be representative of an identified Heritage Theme and represents general consistency in lot size, shape and the layout of buildings within them."*

63. In his response Mr Sirl indicates that there are several, but two main HHAs sharing the Railway Cottage theme and that the HCC does not do any assessment of the "*quality or the actual condition of individual buildings*". Basically, **if it is old, it is historic and hence needs to be preserved.**

64. Mr Sirl states that the HCC does not consider "*the quality or the actual condition of individual buildings*". If so, he is in error and is not following the assessment

[22] The 1920s and 1930s were not a prosperous period, following the Great War and then the Great Depression, so it is unlikely that there was development and evolution of Hamilton City in those decades.

methodology in Volume 2 of the HCC ODP[23] which judges if the place **has integrity**[24], i.e. if the building as found retains significant features from its time of construction, or later periods when important modifications or additions were carried out. This is also out of step with the methodology used by the Auckland Council[25] and followed by Ms Laura Kellaway and Ms Kohler.[26]

65. The proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA (an area of 0.88 ha) is deemed to have Historical Heritage under two separate themes, "establishment of an early service town (pre-1930s)", and "railway workers suburbs (1930s-1950s)". Yet we know that they are not "Railway Cottages" (by ownership, definition in HCC ODP, different typology etc), they are not located close to any significant railway infrastructure, and Fairfield was not incorporated into Hamilton City until 1949 (so not really an early service town as Hamilton was made a city in December 1945 and Fairfield has never been a separate town) and most of the houses in the proposed HHA were not built by 1930.

66. It is remarkable that in such a small collection of dissimilar houses spread over two small sections of two streets in one of Hamilton's poorer areas[27], which does not rate a mention in other published historical accounts of Hamilton, is now deemed to contain so much historical significance and that this history was not identified until this year (when HCC first advised residents by letter on Queens Birthday weekend). Yet both streets fell under the Hamilton City HCC umbrella in 1949, when 208.413 ha of what then become Fairfield (along with a further 594.483 ha of other suburbs) was added to Hamilton City and the HCC has had a Heritage Plan in operation since 2016.

[23] b) Physical /Aesthetic/Architectural Qualities, Integrity
[24] Concise Oxford English Dictionary defines integrity at [1] as the quality of having strong moral principles, and at [2] "the state of being whole, the conditions of being unified or sound in construction, internal consistency or lack of corruption in electronic data.]
[25] Methodology for Evaluating Auckland's Historic Significance", August 2020 Version 2.
[26] Evidence of Marian Isobel Kohler in the environment Court ENV-2016-AKL regarding an appeal against a decision of the Auckland HCC on a recommendation of the Auckland Unity Plan Independent Hearings Panel on the proposed Auckland Unitary Plan at [3.17].
[27] Being Fairfield and neighbouring Enderley, the highest-ranking suburb of socio-economic deprivation in eastern Hamilton.

Assessment of Pre-1930s Service Town Theme

67. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA are not representative of a pre-1930 service town. There is no evidence or logic that this "area" would be part of a service town.

68. Both Oxford Street and Marshall Street (at least until the mid-1950s)[28] were two short no exit roads that terminated in a rural setting (peach orchard, hence the name of Peachgrove Road). A service town would not be established on two short no-exit roads, with no commercial buildings within it. It would be created on a main thoroughfare, such as is the case in Morrinsville, Matamata, Huntly etc. The main street in all those service towns is the main highway leading to the areas they service.

69. The houses in the proposed HHA are old and were built before Fairfield was incorporated into HCC in 1949. As detailed further in Appendix G, there are no historical records which provide evidence of any significance in the history of these houses or area. The 1948 aerial photograph in Appendix C shows that, at that time, both Oxford and Marshall Street ended in farmland where the western edge of Pountney Park now is. Since both Marshall and Oxford Street did not at that time connect through to Peach Grove Road, it is very unlikely that they were part of a "service town" but more likely to be simply people living in a semi-rural area.

70. Research of the property titles[29] suggests that **as at 1930 there were only four houses** (being 32 Marshall Street and 23, 29 and 33 Oxford Street). Two of those properties were owned by farmers. The other 9 houses (8 properties) in the proposed HHA did not exist pre-1930, let alone represent the establishment of a service town. So, **69% of the houses in the proposed HHA were not built by 1930**.

    a. 28, 30, 34 and 36 Marshall Street were all purchased by Charles Edwin Clarkson in 1922 and 1923. The transfers on the titles indicate that the official assignee seized all of the properties around 1927. Economic depression hit the building industry in late 1927, and it took 11 years for the value of building work to reach pre-depression levels30. It is very unlikely that Mr Clarkson had built houses on these lots if he was having such financial difficulties. Each of these four houses are very different styles to each other which also suggests they were built/owned by different people. The next owners purchased the properties during the years between 1930 and 1941. 26 Marshall Street31, which is not part of the HHA, was also purchased by Mr Clarkson. This is shown as a vacant lot in the 1948 aerial photograph in Appendix C. (He may also have purchased other lots that are not in the HHA. As I had to pay for the title searches, I have limited them.)

[28] See map in Appendix D
[29] A summary of titles is in Appendix B
[30] Carl Walrond, 'Building and construction industry - Early builders', Te Ara - the Encyclopedia of New Zealand, http://www.TeAra.govt.nz/en/building-and-construction-industry/page-1 (accessed 12 August 2022)
[31] LINZ title SA431/130

b. The Lots for 27 and 31 Oxford Street were purchased (along with most properties on Oxford Street not included in this HHA or the Oxford Street (West) HHA) by a “builder” on 27 January 1938. It is reasonable to assume that 27 and 31 Oxford Street were built between 1938 (when the builder/developer purchased the lots) and 1948 (when they are shown in the aerial photo in Appendix C) and so are definitely not part of a pre-1930s service town.

c. The Lot for 25 Oxford Street was listed on a cancelled title in 1937 which included the same builder (John Paterson the Elder) as 27 and 31 Oxford Street along with his son (John Paterson the Younger, also a builder). It is unclear why the title was cancelled or what this means. The next title is dated 1940.

d. The house at 35 Oxford Street was relocated from Auckland in the 1950s and so also is definitely not part of a pre-1930s service town.

e. 35A Oxford Street was built in the 1980s when 35 Oxford Street was subdivided.

Assessment of Railway Worker Suburb Theme

71. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA are not and never have been railway workers' cottages and so cannot be representative of the "railway workers suburbs" (1930s-1950s) heritage theme. This is the only "**railway workers suburbs HHA**" other than Frankton Railway Village that was identified within Hamilton by Mr Knott, so it is a very small and highly specific heritage theme.

72. The LINZ titles[32] show that the properties have always been privately owned and suggest the houses were built over a period spanning from the early 1920s to the late 1940s.

73. The houses are not located near railway infrastructure.

74. The Operative District Plan defines "railway house" as "Railway Houses – means pre-cut timber detached dwellings constructed in the 1920s by the Railways for railwaymen and their families and located in the Frankton Railway Village." [33] The draft district plan does not record a change to this definition.

75. In Mr Knott's report, he referred to the railway cottage typology which is based on prefabricated houses built in the Frankton Railway Factory (between **1923 and 1928)**. However, in the draft district plan, the "theme" is referred to as "railway worker suburbs (**1930s-1950s**)". As it appears HCC are undecided as to which period they are referring to, I will explain why the typology of the Oxford Street (East) and Marshall Street "Railway Cottages" HHA is neither of these.

Assessment of Typology of a Railway House: 1923-1928

76. In Mr Knott's report on the proposed HHA he stated that the "dwellings within the area appear to be "Railway Cottages" and cited "as set out in Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies". I requested Ms Hill's report from HCC and received it. Unfortunately, as shown below, it appears the version they sent me had an error (a duplicate of the text of the typology referred to immediately above it) and does not contain a verbal description of a railway house. It does display a picture of a Frankton Village Railway house. On 25 July 2022 I advised HCC of this error and asked if there was a later corrected version. At the date of this submission, Council have not responded.

[32] Appendix B

[33] ODP Appendix 1 District Plan Administration 1.1 Definitions and Terms

Railway cottages

Figure 7: Typical cottage in the Frankton Railway Village.

Transitional villas became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends.

An exemplar collection of railway cottages has been retained in the Frankton Railway Village, and are patchily distributed elsewhere in Frankton and Swarbrick.

Description of "Railway Cottages" Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), Chapter 3. Housing Typologies

77. Note that in the above report, there is no mention of "Railway Cottages" in Fairfield.

78. Appendix A compares each house in the proposed Oxford Street (East) and Marshall Street "Railway Cottages" to the image used in the above report. Appendix A also identifies other features of the houses in the proposed HHA.

79. Mr Knott states of the houses in the proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA: "The dwellings within the area each **appear** to be "Railway Cottages"[34] with simple ridged **roof forms parallel** to the street and more **ornate porches** projecting towards the street in the centre of the front elevation or **full width veranda roofs**. Elevations are weatherboard with shallow pitched corrugated steel roofs. Each building has **side hung casement windows**" [emphasis added]. **This description does not match the Frankton Railway Village houses.**

80. The houses in the proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA are not prefabricated "Railway Cottages" cut at the Frankton Railway Factory as defined in the Operative District Plan. The houses are dissimilar to and distinct from the houses in the Frankton Railway Cottage HHA as follows:

Feature	Frankton Railway Village	Proposed HHA
Windows	Sash windows	Side hung casement
Porch	Elaborate four posted porch	Some have plain two-post porches, some half or full verandas
Bargeboards	No elongated sharp pointed barge boards	11 (out of 13) houses have elongated sharp pointed barge boards
Setback	Consistent at 5-8m	Oxford Street is consistent at 11-12m. Marshall Street is not consistent

[34] As set out in Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies. Mr Knott footnote.

81. Houses in Oxford and Marshall Streets have side hung casement windows not double sash windows (All 118 Frankton "Railway Cottages"[35] have sash windows This is strongly reinforced by diagrams in the Frankton Design Guidelines – February 1992.)

82. On Oxford Street, only No's 25, 29 and 33 have plain porches (not more ornate), but none are like the drawing of Roof A. Porch A variation in the Frankton Design Guidelines – February 1992. On Oxford Street No's 23, 27, and 35 have an addition to the front that makes it impossible to have a porch entrance or a verandah and this destroys the front elevation in terms of the Railway Cottage typology in Frankton Village (central entrance door with single sash window to either side). On Marshall Street only 30 Marshall Street has a porch, and it is very different in appearance to the porches in the Frankton Railway Village or any porches in Oxford Street. (All 118 Frankton Railway Village houses have ornate four post porches.)

83. A quick tour of Frankton Railway Village shows than not a single house in this special character area (or Historical Heritage Area) has an original verandah. From my own inspection there are possibly two houses (out of 118, so 1.7% of the houses) have some form of verandah (full-length front or down the side of house) that has been added subsequently.

84. Several of the houses in Oxford Street that resemble a bungalow cottage[36] have elongated sharp pointed bargeboards. These are not a feature of the Frankton railway cottages.

85. The houses in Oxford Street have a consistent setback (if you ignore any modern additions) which is larger (at approximately 11 to 12 metres) than the consistent setback seen in the Frankton Railway Village (5 to 8 m). The Marshall Road houses (No's 28 to 36 and No's 19 to 33) do not have a uniform setback, based on aerial photographs. Although the Oxford and Marshall Street setbacks are not consistent, they can be described as typical of most NZ houses with medium to large sections, with a front area (whether lawn, garden, paved area or a standalone garage) which is just slightly smaller than the backyard. This is significantly different in functionality and design to the Frankton Railway Village and other villas of that time where the front yard is just an entrance to the property.

86. A quick look at an aerial image of the Frankton Railway Village shows the roofs of the houses are not **simple ridged roof forms** parallel to the street[37] as described by Mr Knott as a feature of a railway cottage. For example, see 8 Pukeko Street, 14 Pukeko Street, and 13 Kea Street. This is reinforced by a quick perusal of the Frankton Design

[35] Refer to photographs of Railway Typology Examples 1 to 4 in Appendix E.
[36] Appendix F
[37] For further proof see the photographs of houses from Frankton Village in this stuff article https://i.stuff.co.nz/life-style/homed/123497539/opening-the-door-on-franktons-railway-village

Guidelines – February 1992[38]. In the proposed HHA all houses on Oxford Street have a ridge line parallel to the carriageway while for Marshall Street 3 out of 5 are the same.

87. There is no connection to the railway in terms of people who built or inhabited the houses.

88. The Frankton Railway Village[39] is identified as worthy of protection and has the following heritage characteristics:

a. It provides a **relatively unmodified example**[40] of a planned railway settlement, representing design elements of the 'garden suburb' movement, fashionable at that time (with the hall and central open space for workers).

b. It contains a **number of different design variations on the railway house**, which is a **basic villa design, with front porch**, horizontal weather boarding, and galvanised corrugated iron roofing[41].

c. It comprises predominately separate, single-storey residential dwellings.

d. It has consistent building setback from the street frontage with houses orientated to the street (in all cases emphasis is added).

89. This description is also supported by the "Railway Cottages" at 188 to 195 Anzac Parade in Wanganui.[42] The description by OPUS experts states "*a number of single storeyed, timber framed, standardised railway cottage plans with their typical symmetrical street elevations,* ***variety of roof forms*** *and entries with a range of porch designs. The* ***houses have a double hung sash window either side of the front door*** *with most having a hood over the windows, either as an independent element or as a continuation of the entry porch roof* (emphasis added)." Later it describes the windows as "*Windows were timber double hung sash with Queen Anne styled multi-planes on the upper sash*."

90. In his assessment Mr Knotts use of the qualifying phrase "***each appear to be***" indicates that he is unsure if in fact they are "Railway Cottages". **This should have been verified prior to Public Notification of Plan 9 Change.**

91. The typology and recommended treatment of the Frankton "Railway Cottages" has been well documented, so it is appropriate to review this documentation in conjunction with assessing whether the proposed Oxford Street (East) and Marshall Street HHA **are** "Railway Cottages" (ignoring the fact that not owned by Railways or Government!).

[38] Frankton Railway Village Typical Elevations Plan AB/296 at [page 20].
[39] Section 5.1.2.1 in Operative District Plan. Hamilton City HCC 18 October 2017.
[40] Unlike those houses in the Oxford Street East- and Marshall Street HHA where the expert (Mr Knott) acknowledges that the houses have under gone extensive modifications.
[41] Unlike Mr Knott's description of simple ridged roof parallel to the road.
[42] Built Heritage Inventory, Wanganui District HCC, Wanganui OPUS Heritage Report.

92. There is no proof in the public realm, that these houses were pre-cut in the Frankton Railway Factory (1923 to 1928)[43]

93. So, Mr Knott is incorrect and inaccurate in his statements concerning both "Railway Cottages" and that the "typology" exhibited in Oxford Street (East) and Marshall Street HHA being the same as that described in his referenced report.

Assessment of Typology of a Railway House: 1930s-1950s

94. Railway houses (1930s to 1950s) were built in areas in NZ where new (not established) railway lines were being developed but which had insufficient local housing to house the railway workers. Since there was no new railway line work being done in Hamilton in the 1930-1950 period it is a mystery to me why anyone would think this was a suitable heritage theme to use for Hamilton, or why this type of housing would only be seen in 12 houses in total in Hamilton in streets well away from any railway infrastructure.

95. Examples 5-7 in Appendix E shows pictures of houses built by Railways in the 1930s-1950s which were not prefabricated.

96. The houses in Oxford Street (23-35A) and Marshall Street (28-36) are not like any examples of the 1930 to 1950s railway houses I have viewed in other areas from around New Zealand. If they have a front porch, these have a four-post porch and are generally more like a villa with one side projecting forward of the other and do not have elongated sharp pointed barge boards.

Assessment of Typology of Houses in Oxford Street (East) and Marshall Street "Railway Cottages"

97. There is no documented proof of any association with railway workers available in the public realm, so it is impossible for the houses to be "*representative of railway workers suburbs*". Especially since the area of two small parts of two streets is too small to be classified as a "suburb"[44]. So, what is the typology?

98. 25, and 33 Oxford Street appear to be consistent with what can be termed a Bungalow Cottage as shown in Appendix F[45] (built around the 1920s or 1930s, with a simple roof line parallel to road, corrugated iron roof, front porch, weatherboard cladding, exposed rafters at approximately 0.3 m centres, no soffit[46], elongated and sharp pointed bargeboards, and two to three sets of side hung casement windows either side of a central front door)[47]. 23 and 29 Oxford Street and 30 Marshall Street have some

[43] Page 32 of Names & Opening & Closing Dates of Railway Stations in New Zealand, 1863 to 2010. Scoble, J for the Rail Heritage Trust of New Zealand 2010.
[44] Concise Oxford Dictionary definition of suburb is an outlying district of a city, especially a residential one. Definition of district is 1. an area of a town or Country and 2. A division of a Country or region that elects its own councillors. Compare Frankton Railway Village (118 houses) versus 7 in Oxford Street and 5 in Marshall Street.
[45]
[46] An eave is part of a roof system, and a soffit is part of the (underside) of the eave. In simple terms, eaves and soffits are two different parts of the same structure.
[47] See Photographs "Railway Cottages" Examples 1 to 4 in Appendix E.

similarity to this style. This style is not known to reflect railway workers housing in the 1920s to 1950s. **The other properties in the proposed HHA do not clearly fit any identified typology**.

99. It is interesting to note that the Albert Street house shown in Appendix F is not identified as being of any historic heritage value as it is not included in the HHA with other Albert Street houses in the Hamilton East HHA.

100. In Lifescapes Ltd 2020 report entitled "Hamilton Special Character Study – Final 31.07.2020", both Oxford and Marshall Street are in an area identified as East Area 3[48]. The themes represented in East Area 3 are discussed[49]. Statements made include that in addition to the existing special character areas, "*Claudelands streets as far north as Bettina/Alfred Street also variously exhibit the urban characteristics [of] this early development*". This suggests that Alfred Street (which is one street south from Oxford Street) is as far north as considered early **urban** development had occurred. There is no mention of "Railway Cottages", railway suburbs, Oxford Street or Marshall Street.

101. The report further lists the key house types in East Area 3[50]. No mention is made of "Railway Cottages".

Housing typology

Key house types represented in East Area 3 are:

Pre-1940:

- Villas / transitional villas – uncommon but some present in Claudelands;
- Bungalows – common through Claudelands (e.g. Claude and Alfred Streets);
- Early State houses – also a feature in Claudelands.

Late 1940s, 1950s:

- Comprehensive state housing – a relatively large area of this type remains intact in the centre of East Area 3, extending from Holland Road. The period's street pattern is retained to the east of Peachgrove Road, but much of the 1950s housing has been modified / lost due to later development.

102. It would appear given these factors that Mr Knott and the HCC are attempting to create a false heritage fabric (around the houses identified in Oxford Street and Marshall Street "Railway Cottages" HHA). In the Heritage Design Guide – August 2017 it explicitly states the following warning on page 5:

Avoid the creation of a false heritage fabric

[48] Page 28
[49] Page 28-29
[50] Page 30

The creation or enhancement of a heritage fabric that previously did not exist or the alteration or adding to that existing fabric for which there is not clear documentary evidence, can be misleading and detract from the items true history.

Assessment of Consistency for Oxford Street (East) and Marshall Street "Railway Cottages" HHA 0.5 or 0/7

103. The houses in Oxford Street (East) and Marshall Street "Railway Cottages" HHA do not meet the consistency criteria. The consistency criteria have not been applied consistently or accurately to the proposed HHA.

104. When the consistency of the HHA is scored accurately and in its entirety, it does not meet the required 5 or more out of 7 points. As the Council states "***if an area is assessed as being not consistent it cannot be considered to be representative***".

105. The initial consistency rankings were completed (separately) for all of Oxford Street and all of Marshall Street. The two separate groups of houses in the proposed HHA as a whole were not assessed. The Appendix 9: Historic Heritage Report[51] indicates that Oxford Street and Marshall Street were not looked at as one area but were merged because "The area of "Railway Cottages" [in Marshall Street] would score more highly if considered as a group with those in Oxford Street"[52]. (So long as you ignore the fact that none of the houses **are** "Railway Cottages" in either street).

106. Mr Knott comments that the Marshall Street houses are linked to those in Oxford Street. However, the only "link" they have is that the Lots back onto each other and are old. There is no direct physical link such as a walk through connecting these groupings of houses. The only physical connection is via either Pountney Park (a 0.5976ha community park acquired by HCC in 1962[53]) to the east or via Walter Street to the west. Oxford Street and Marshall Street were, up until the 1950s, of a similar length (terminating where Pountney Park is now) and neither connected through between Heaphy Terrace and Peach Grove Road[54]. The connection of Marshall Street with Peach Grove Road (as it was denoted pre-1950s) occurred in the Housing Corporation development of the area in the 1950s[55] and this explains why that section of Marshall Street and off roads are curved rather than the straight street seen in the pre-1950s section of Marshall Street. The curved street mirrors those in Hayes Paddock, rather than following the gridded street pattern of Frankton, Hamilton East and Claudelands.

107. Internally within the HHA the houses are not consistent in typology, displaying many visually and physically inconsistent features, extensive modifications, visually and physically inconsistent greenscape, streetscape and frontage treatments.

---

[51] 22 June 2022

[52] Page 151 in Appendix 9: Historical Heritage Report

[53] Pountney Park Site Plan. At [Page 143] in the Neighbourhood and Amenity Reserves Management Plan. Hamilton City HCC 2007.

[54] The road is identified on the map as Peach Grove Road and this also appears in numerous other historical texts from that time. Also Hukanui Road ran from Peach Grove Road to Heaphy Terrace and is now named Brooklyn Road. Also at that time Gillies Ave was a short no exit road, not connected to Peach Grove Road. Ranfurly Road was also not connected to Caseys Avenue

[55] Hamilton 1950 New Zealand's Prosperity and Centre of Limitless Opportunity, New Zealand Section, Hamilton City Main Library, Street map in centre of book. Map attached in Appendix A.

Street/Block Layout 0/1 or Not Applicable

108. This is not relevant when looking at such a small area being seven lots (over a 130-metre section) in one street and five lots (over a 86-metre section) in another.

Street Design 0/1

109. The Oxford Street (East) streetscape is inconsistent along the approximately 130 metres of street frontage. The trees are inconsistent (most just recently planted) in species and placement, the fencing in front of the house front lines is inconsistent and dominated by high > 1.2 m fences, plantings, and gates. Photographs of all frontages are provided in Appendix A.

110. The street design on Oxford Street changes (over a mere 130 metres) with different widths of carriageway, footpaths and berms and inconsistent street planting. The Marshall Street layout is consistent for the five properties but different to Oxford Street.

111. Mr Knott reports that there are "regular street trees (mainly newly planted in Marshall Street)". The table[56] states there is "consistent street design including street trees".

112. At the time Mr Knott wrote his report there were only two street trees in front of the seven Oxford Street properties. This is further confirmation that Mr Knott did not visit Oxford Street or, if he did, he took very little notice of the streetscape. However, on 5 July 2022, after Jean Dorrell advised HCC of this error, six trees of a different variety to the two existing trees (on this side of Oxford Street), were planted to supposedly match what Mr Knott said was there prior to June. Now, this short stretch of road frontage on Oxford Street has two unidentified trees and five banksia trees[57]. The trees are now:

    i. outside 21 – 1 new tree,
    ii. 23 - no tree,
    iii. 25 – 2 new trees,
    iv. 27 – 1 old tree,
    v. 29 - 1 new tree,
    vi. 31 – 1 old tree,
    vii. 33 - 1 new tree,
    viii. 35 – no tree,
    ix. 37 – a completely different type of tree

[56] Table at bottom of the report.
[57] Trees were attempted to be identified using an app, but the identification may be incorrect.

113. These new trees are planted the same distance from the carriageway in a line. The two old trees are both the same distance as each other from the carriageway, but it is not the same distance or line as the new trees, producing a random zig-zag effect of the trees on the berms. These trees are different to most of the other trees along the full length of Oxford Street so there is little to no consistency in streetscape green structure.

114. So, the tree planting appears to be an attempt to "enhance the fabric" of the heritage identification[58] by HCC to support Mr Knotts incorrect assertion. While I acknowledge that planting trees in front of properties enhances the "found" streetscape and environment, it does nothing to enhance the historical heritage. Also, given that these trees were not there when the houses were supposedly built, these recently planted trees of two varieties have no historical connection to the houses and thus do not "make a positive contribution to the heritage significance and quality of the area".

Lot size, dimensions and density 0/1 or Not Applicable

115. Housing density in Oxford Street is inconsistent with one Lot out of seven already subdivided with a modern two-storey building erected which dominates both Oxford Street and Marshall Street.

116. The lot sizes are the same. This is also true for all the houses now built on in the area that were subdivided in 1921. It does not make a positive contribution to any supposed historic heritage when there are only twelve lots.

Lot Layout 0/1

117. Position of buildings on lots: The five houses on Marshall Street are in different positions on each lot. 35 Oxford Street is at the front of the lot. The other Oxford Street houses (23-33) are placed in similar positions to each other, ignoring the more modern frontal additions.

118. Five of the seven properties on Oxford Street and all five on Marshall Street have garages/car port added to the property since the 1943 aerial photograph[59]. Of these garages only the one at 31 Oxford Street is constructed largely from weatherboards. All the other garages are the iconic Skyline garages (established in 1965). Skylines advertising uses the catch phrase "*With our garages you can make tweaks to the cladding, paint finish, doors, roof pitches and stud heights,* ***so there's no danger of it looking like your neighbour's***." So, their marketing pitch is that no two garages in a neighbourhood need to look the same or provide consistency with your neighbours. Presumably all these garage additions have been consented by the HCC.

119. Dominance of carparking: As most of the lots have high fences, carparking cannot be seen from the road for those houses. In the lower fenced areas, there are (in front of

[58] Hamilton City HCC Heritage Design Guide – August 2017 it explicitly states the following at [page 5]
[59] Appendix C

the house) a double garage (38 Marshall), a carport (35 Oxford), and some houses which frequently or permanently have vehicles on their lawn or in front of the house (23, 31and 33 Oxford Street). Oxford Street (East) has many "dominant" extra wide driveways. These are as follows, 23 has a 3.0 m width, between 25 and 27 is a 13.5 m width, between 29 and 31 is a 6.2 m width, 31 and 33 have 3.0 m widths, between 33 and 35 is 9.2 m width and between 35 and 37 has 7.6 m width, so another very inconsistent streetscape feature.

120. Landscaping and tree planting within the lot: Four of the properties (27-31 Oxford and 35 Oxford) have tall hedges or trees at the front edge of the property. None of these are especially attractive or well-maintained and are there for the purpose of privacy and security. The other properties without high fences (30 and 36 Marshall, 23, 25 and 33 Oxford St) have minimal or no planting in the front of the lot. None of these "make a positive contribution to the heritage significance of the area".

Topography and Green Structure 0/1 or Not Applicable

121. In both his reviews of all of Oxford Street and all of Marshall Street, Mr Knott states "unclear how responds to topography" and for Oxford St he adds "although links to park at end of street". For all of Oxford Street he ranks it 0.5/1. For all of Marshall Street, he ranks it 0/1.

122. Topography is defined as "the arrangement of natural and artificial features of an area"[60]. There are no natural features which relate to supposed heritage significance. Pountney Park was acquired by HCC in **1962** and thus is unrelated to any housing prior to that and makes no contribution to the historic heritage significance theme[61].

Architecture and Building Typology 0 or 0.5/1

123. The housing typologies vary considerably. This is expected as apart from 27 and 31 Oxford Street and possibly 25 Oxford Street, there is no indication the houses were built or designed by the same developers or owners. Mr Knott appears to have formed his opinion based on the erroneous belief that all the houses were "Railway Cottages" and any variations in typology are modifications. As the houses were not the same typology in the first place, it is not clear what variations are due to modifications and which different features are original.

124. The consistent feature is that the houses are mostly weatherboard with mostly iron roofs built between the 1920s and the 1950s (excluding 35A Oxford Street). This is true for a large proportion of privately owned houses in the less wealthy suburbs in Hamilton and the rest of New Zealand. It does not indicate this adds any value to any "historic heritage" but at most this could qualify as 0.5/1.

[60] Concise Oxford English Dictionary, Twelfth Edition
[61] Pountney Park Site Plan. At [Page 143] in the Neighbourhood and Amenity Reserves Management Plan. Hamilton City HCC 2007.

125. Two of the properties in the proposed HHA (36 Marshall Street and 35A Oxford Street) and an adjacent property (37 Oxford St) have a prominent second storey. If the HHA consisted of 50 or 100 houses, this may not be a significant factor but when there are only 12 Lots, this is 17% plus one adjacent property.

126. As HCC states that Mr Knott did not trespass on the properties **and** approximately half of the properties have fences/vegetation/gates preventing the house being clearly seen from the street (See photographs in Appendix A) it is apparent that Mr Knott could not have viewed and considered the true extent of the inconsistencies between the properties and also between the Frankton Village typology.

Frontage Treatments – Score 0/1

127. Mr Knott states that front boundaries include a range of low/medium fences with many also having plantings along the boundary. The table in the report states that there is "*consistency in street frontage treatments*" and these "*make a positive contribution to the heritage significance and quality of this area*". This is yet another vague and incorrect statement, (as clearly identified in the photographs in Appendix A) further indicating that Mr Knott did not undertake a proper review of Oxford Street. How can the following "make a positive contribution to the heritage significance and quality of this area"?

128. Eight of the twelve lots either have high fences, planting or garaging which limit visibility of the house from the street. This is 66.6% of the proposed HHA. Mr Knott excludes many other streets from being in HHA using the basis that they have some dominant high fences, but does not consider this an issue in Oxford Street or Marshall Street.

a. 36 Marshall has a medium height fence, with a garage in the front of the (2 storey) house which hides most of the house from the street view.

b. 28, 32, and 34 Marshall Street have high fences and gates which hide the house from the street.

c. 27, 29, 31 and 35 Oxford Street have combinations of low to high fences with heavy planting (up to 2m+ in height) which make the houses barely visible from the road.

d. 33 Oxford Street has a mid-height wooden fence/gate and hedging which makes the house only partially visible from the road.

129. The fences are all different materials and heights and styles:

a. 23 Oxford Street has a medium height modern white PVC solid panel fence.

b. 30 Marshall St and 25 Oxford St have low wooden fences.

c. 27 Oxford Street has a white picket fence with high planting.

d. 29 Oxford Street has a brown stained solid wood fence with high planting.

e. 31 Oxford Street has a low (<0.5m) white picket fence with high planting.

f. 33 Oxford Street has a solid unpainted or unstained solid wood fence.

g. 35 Oxford Street has a high black corrugated iron fence.

h. 28 Marshall Street has a high green solid wooden fence.

i. 30 Marshall Street has a low wooden fence.

j. 32 Marshall Street has a high solid wooden fence.

k. 34 Marshall Street has a high white wooden fence.

l. 36 Marshall Street has a black corrugated iron fence.

130. Side boundary fences on all Lots in Oxford Street and Marshall Street are dominant, high, and run from the front boundaries to the back boundaries on all lots.

Inequality Created by HHAs

131. The imposition of a HHA is effectively a post-purchase covenant being imposed by a third party not involved in the actual purchase process. If the property has some true historic heritage value (such as being a Schedule 8A, A or B house), the heritage of the house may add to the value of the property or have a neutral effect. However, where the property is designated to have a false historic heritage simply because it is old or was a state house, the HHA creates a loss of value on the property.

132. Consider this simple example: House A and House B are similar houses with similar resale values and in similar poor condition but (for whatever reasons) only House A is in an HHA. Both property owners expect to move out in five years to retire.

a. Assume a new roof of a similar type to the existing roof costs $20k and will result in an increase in the property value in five years of $10k and also improve quality of life for those five years by not leaking. House B pays $20k and gets a new roof. House A, as it is in an HHA, pays $20k for the roof, **plus consenting costs, plus a heritage impact assessment**. House A also has to spend **time** on this application (or pay someone else to do so).

b. Assume both houses are deemed to be in too poor a condition to renovate by the owners who are selling in five years' time. House B sells to a developer who will demolish and build new houses. House A can only sell to someone who wishes to renovate and will only buy at a lower price.

133. Using the subdivision and intensification of 35 and 35A Oxford Street as the economic model this means that each third of a share of a single lot could have a minimum capital value of approximately $590,000 or a total of $1,770,000 per lot, an approximate $1,000,000 return on property investment but not for landowners of No's 23 to 33 Oxford Street due to the actions of the HCC. The HCC needs to have a robust, easily understood, plain language planning document that defines the "quality and visual appearance" of any infill dwellings that are going to spring up rather than try to stem the tide by pretending to preserve historical heritage as "qualifying matters".

134. The HCC recognises that heritage protection incurs a cost in terms of maintenance and upkeep and that this may be viewed as a barrier (for individual private landowners) to the ongoing protection and use of these resources. To this end it has established an annual fund of $80,000[62] that built heritage owners (i.e., owners of buildings that are registered in Schedule 8A of the District Plan and archeological and cultural sites listed in Schedule 8B of the District Plan, but not all houses deemed to fall into the HHAs) may apply to get funds to help re-roof, preserve, replace rotten weather boards etc. HCC is setting up three classes of ratepayers in Hamilton. Those that own a building or

[62] The Heritage Fund.

structure listed on the District Plan as Built Heritage (122 at present but HCC is proposing to increase this by another 182 and presumably at some stage also increase the annual fund above $80,000), those whose buildings fall within a HHA and those who fall into neither classification (and thus can develop their property under the Resource Management Enabling Housing Supply and Other Matters Amendment Act 2021). The latter two classes cannot apply for financial assistance in maintaining the historical heritage they own. Given that the current identification of historical heritage only includes structures up to 1970, what is going to happen when these younger buildings (1970 to 2020) become deemed to be historical heritage buildings?

135. A new financial incentive is spelt out in another HCC document[63] entitled "The Frankton Neighbourhood Plan"[64], where it states the following:

> **Frankton Railway Cottage Area Conservation Plan**
>
> Frankton's "Railway Cottages" are the largest intact collection of "Railway Cottages" in New Zealand.
>
> This project is to develop a conservation plan for the railway cottage area which will include:
>
> • A paint colour palette for the cottages' exteriors.
>
> • **A financial incentive scheme for cottage owners to encourage adoption of the colour palette.**
>
> • A streetscape and road design to complement the historical cottages and enhance the street as a visitor attraction.

[63] But not yet in the District Plan as you would expect since the Plan Change 9 relates to the District Plan, not some side plan for a specific "special residential zone" or "character zone".
[64] Discover Frankton The Frankton Neighbourhood Plan prepared by Hamilton City HCC, at [page 16] undated.

Conclusion

136. It is difficult to see how Mr Knott and therefore the HCC, reaches the conclusion that the houses on Oxford and Marshall Street can be consistent with a significant number of features to be deemed “Railway Cottages”, evidence of the “early establishment of a service town (pre-1930s) or the “railway workers suburbs 1930s-1950s)” heritage theme, given the proven facts that they were never owned by the Railways, only four houses were built in the 1920s, the variations described between houses, inconsistent visual and physical factors, lack of connection to railway activities, definition of Railway Houses in the ODP, and the fact that they were not part of Hamilton City until after 1949.

137. So, this submission, supported by several other property owners within it, is to reject the proposed Oxford Street (East) and Marshall Street “Railway Cottages” HHA outright. The HCC has not provided any evidence to substantiate the imposition of such a designation in this instance. The proposed HHA report does not include any actual knowledge of the history of the two streets. The fact that Mr Knott’s report states that the houses “***appear to be Railway Cottages****”* indicates that Mr Knott has not completed a thorough review. Apart from not being “Railway Cottages” or part of a “railway workers suburb”, there is also no evidence of any historic heritage value. Even ignoring the high degree of modifications, the houses have different typologies both within the two streets and between the two streets. The fact that there are “consistent” features such as berm width and the roofline position does not prove historic heritage value.

Appendix A: Photos and Analysis by Property

View of 23 Oxford Street.

Note the following:-

i) decramastic iron roof (galvanished iron with stone chip covering)
ii) the modern medium height > 1.2 m pvc panel fence and gate
iii) cars parked over the front lawn
iv) small plain "porch" on the driveway side of the house, not the front of the house as per Railway House/Cottage in th Frankton Railway Village
v) addition of a new room at the front of the house (where the porch should be to conform to a Railway style house a per Mr Knott)
vi) large garage behind the house
vii) elongated sharp pointed barge boards
viii) this house does not have a lean-to back end but a flat roof section which is lower than the main roof

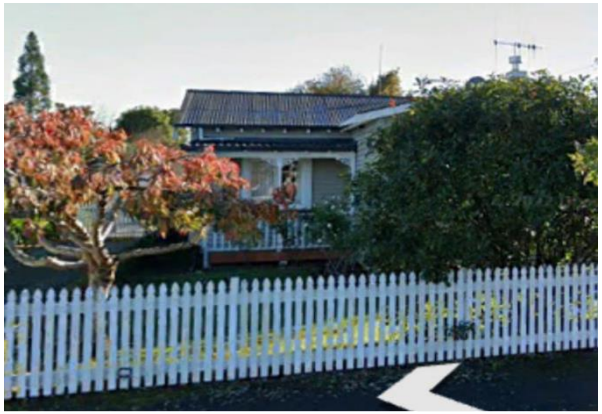
LINZ Title SA420/13

Transitional villas became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends.

Railway cottages Figure 7: Typical cottage in the Frankton Railway Village.

Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies and referenced by M Knott.

	**View of 25 Oxford Street.** Note the following:- i) simple two post porch ii) double side casement windows iii) wooden front door with single pane of glass iv) lack of roof over windows v) height of side fences >1.5 m vi) large garage behind the house down wide driveway vii) elongated sharp pointed barge boards viii) photograph taken from inside front fence so much larger setback that in “Railway Houses” LINZ Titles: SA685/198, SA729/87
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 27 Oxford Street.** Note the following:- i) short verandah, with a tiled floor (normally a wooden floor) leading into the new addition on the front of the house rather than a “more ornate porch” or a full-length verandah as described by Mr Knott. ii) verandah post decoration with some simple fretwork (modern). iii) Addition of new front room iv) green structure (planting that virtually obscures house from road view) v) garage added to house on left hand side obscured by tree in this view vi) traditional white picket fence vii) casement windows not sash windows viii) elongated sharp pointed barge boards LINZ Titles SA697/44, SA1284/21
	**View of 25 and 27 Oxford Street.** Note the following:- i) double width driveway between adjacent properties, also a feature between 29 and 31, and even larger between 33 and 35 , 35 and 37 Oxford Street ii) dominant side boundary fence between properties iii) new front addition more evident from this view iv) garages clearly visible on both properties v) double chimney evident on No 25
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 29 Oxford Street.** The property has tall planting which prevents the house from being seen from the carriageway. The following is only identified from having visited our neighbour in the past. Note the following:- i) double side casement windows ii) plain front central porch. iii) height of side fences >1.5 m iv) elongated sharp pointed barge boards v) heavy tall planting prevents any other view of house than this from the carriageway. vi) front fence low < 1.2 m vii) extra wide driveway (double width) viii) large double garage with extra bedroom in backyard LINZ Title SA387/6
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 31 Oxford Street.** Note the following:- i) only view of 31 Oxford Street from the carriageway ii) gate is > 1.2 m, as is hedge in front of house iii) double french doors on verandah rather than a single central wooden door iv) garage addition to back right side of house v) wider berm here then it narrows as you pass No 33 vi) narrow footpath vii) single driveways to each of 31 and 33 Oxford Street LINZ Title SA697/44, SA1420/57
	**View of 31 Oxford Street (from inside property)** Note the following:- i) photograph is **inside** of the pittosporum hedge ii) double french doors on verandah rather than a single central wooden door iii) irregular spacing of verandah roof posts and plain relatively unadorned look of the posts iv) wide weather boards unlike every other house in proposed HHA v) verandah wraps around left side of the house vi) fence on left hand side of house is > 1.5 m vii) well planted sustainable vegetable garden planting in front yard viii) car parking in front of house
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

<table>
<tr>
<td> 
</td>
<td>View of 33 Oxford Street.

Note the following:-
i) Gate is > 1.2 m, as is hedge in front of house
ii) Side boundary fences all > 1.5 m in height
iii) New addition to house on right hand side (power pole marking this)
iv) Dominance of two storey modern A frame building (green roof) on No 35 A
v) Extra wide driveway in kerb
vi) Widening of the carriage
vii) Simple porch
viii) No sash windows
ix) Elongated sharp pointed bargeboards
x) Narrow weatherboards
LINZ Title:SA417/270</td>
</tr>
<tr>
<td>  </td>
<td>Mr Knotts View of 33 Oxford Street, typical house in Oxford Street (East) Marshall Street Railway Cottage HHAs.

Note the following:-
i) gate and hedge are > 1.5 m
ii) council recently planted new tree almost in line with the fire hydrant
iii) narrow footpath
iv) narrow berm
v) simple plain porch with only two posts not four
vi) elongated sharp pointed bargeboards
vii) no roof over windows
viii) no longer simple single ridge roof due to new addition on right hand side with second ridge line
ix) dominance of modern two storey building on No 35 A</td>
</tr>
<tr>
<td>  </td>
<td>Transitional villas became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends.

Railway cottages Figure 7: Typical cottage in the Frankton Railway Village.

Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.</td>
</tr>
</table>

	**View of 35 Oxford Street.** Note the following:- i) side boundary fences all > 1.5 m in height ii) front boundary fence is black corrugated iron fence > 1.5 m iii) carport in front of the front line of the building iv) room for two cars to be parked v) dominance of two storey modern A frame building (green roof) on No 35 A vi) extra wide driveway in kerb (equal to 4 normal driveways) vii) very simple porch viii) no sash windows ix) elongated sharp pointed bargeboards x) narrow weatherboards Historic Title not listed as it has been subdivided.
	**View of 35 Oxford Street.** Note the following:- i) side boundary fences all > 1.5 m in height ii) front boundary fence is black corrugated iron fence > 1.5 m iii) carport in front of the front line of the building iv) room for two cars to be parked v) very simple newly added porch vi) new addition on front of house vii) no sash windows viii) elongated sharp pointed bargeboards ix) narrow weatherboards
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

View of 28 Marshall Street.

Note the following:-

i) front fence is > 1.5 m, as is hedge in front of house
ii) side boundary fences all > 1.5 m in height
iii) newly planted and staked tree is visible in front of No 26 (just to left of the tree trunk on the right-hand side of the photograph
iv) existing trees on that side are road are visible in front of No's 28 and 30, but are a different species to the newest ones, and different in species and age to those on the opposite side (side the photograph is taken from)
v) the curved roof on the full-length verandah, both features not seen on any house in the Frankton Railway Village nor any other house in this manufactured HHA.
vi) At the left top edge, you can clearly see the second storey of No 38 Marshall Street.
vii) A-frame two storey building at 35A Oxford Street is obscured by the vegetation within the Lot of No 28 Mashall Street above the red lidded bin in the middle of the photograph
viii) carport attached to house just behind the chimney of 28 Marshall Road.

LINZ Title SA355/16

View of 28 Marshall Street Front Treatment.

Note the following:-

i) front fence is > 1.5 m, as is planting in front of house
ii) Nothing visible of house from this straight on view
iii) side boundary fences all > 1.5 m in height
iv) newly planted and staked tree is visible in front of fence to right hand side of gate

Transitional villas became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends.

Railway cottages Figure 7: Typical cottage in the Frankton Railway Village.

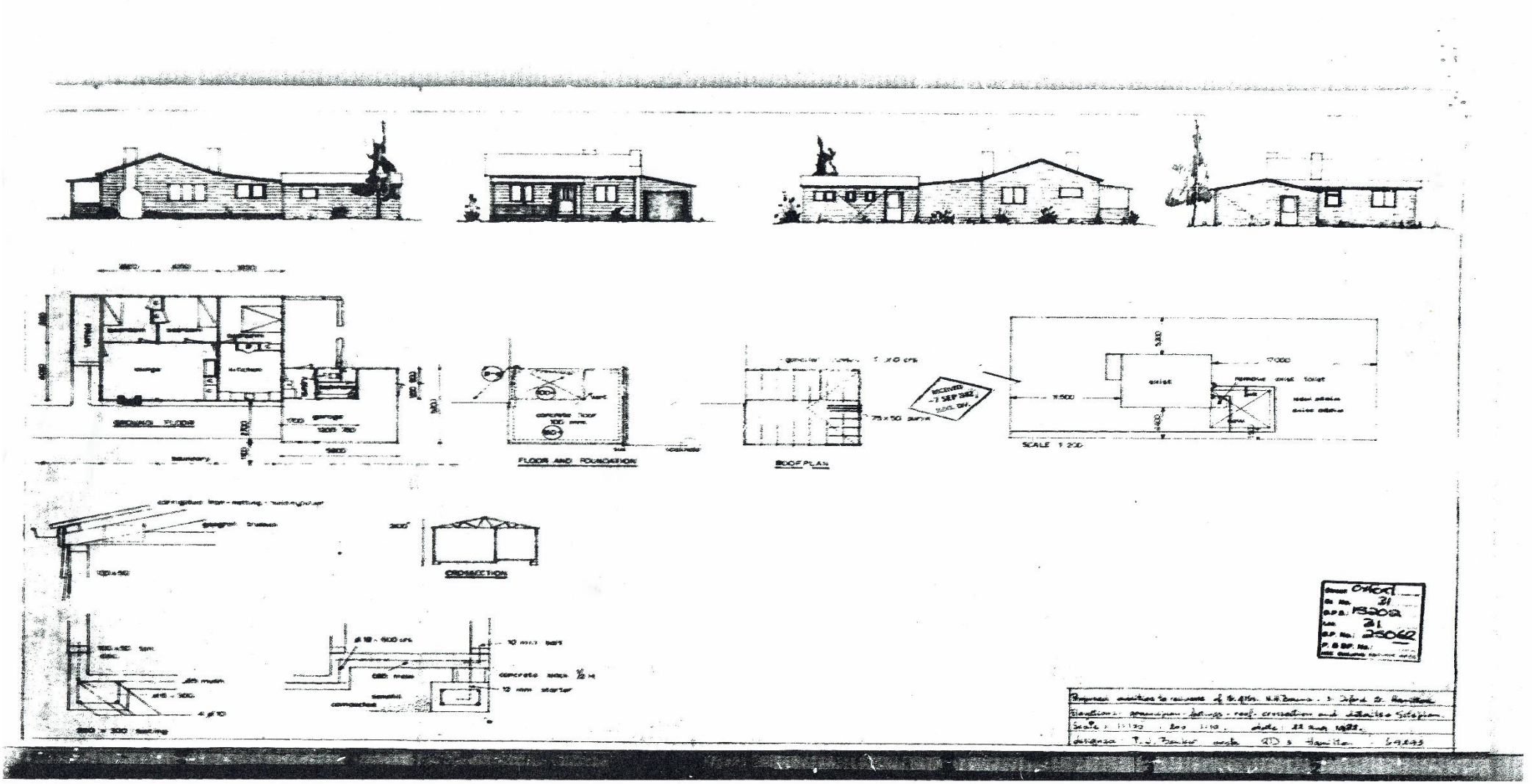
Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 30 Marshall Street.** Note the following:- i) front fence is < 1.5 m, brown stained wooden fence ii) side boundary fences all > 1.5 m in height iii) the two storey A-Frame on 35A Oxford Street (green roof above garage of No 30 Marshall Street) iv) multiple side casement windows (not double sash windows as seen in Frankton Railway Village) v) front façade exhibits a similar typology as the “bungalow cottage” noted in Albert Street by Ms Diana Porteus in her thesis dated 1991 vi) inconsistent frontages in fence heigh, colours and materials to houses on either side vii) garage prominent on left hand side of house LINZ Title SA355/17
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 32 Marshall Street.** Note the following:- i) front fence is > 1.5 m ii) side boundary fences all > 1.5 m in height iii) the two storey A-Frame on 35A Oxford Street iv) the two storey section of No 36 is visible over the roof of No 34 v) full length front verandah with plain posts at regular intervals (unlike 31 Oxford Street) vi) no sash windows vii) inconsistent frontages in fence heigh, colours and materials LINZ Title SA351/182
	**View of 32 Marshall Street.** Note the following:- viii) front fence is > 1.5 m, painted a light green with white trellis on top ix) side boundary fences all > 1.5 m in height x) inconsistent frontages to neighbours in fence height, colours and materials
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of 34 Marshall Street.** Note the following:- i) front fence is > 1.5 m ii) side boundary fences all > 1.5 m in height iii) the two-storey section of No 36 is visible iv) half length front verandah with plain posts at regular intervals v) no sash windows vi) very different (not a simple single ridge) roofline evident vii) inconsistent frontages in fence height, colours and materials viii) wide driveway off carriage LINZ Title SA358/29
	**View of No 34 Marshall Street Frontage.** Note the following:- i) front fence is > 1.5 m and painted white ii) side boundary fences all > 1.5 m in height iii) the two-storey section of No 36 is clearly visible iv) very different (not a simple single ridge) roofline evident v) inconsistent frontages in fence height, colours and materials with No36 vi) speed hump in carriageway (none in Oxford Street) vii) driveway on left hand side of photograph to carport alongside house
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.

	**View of No 36 Marshall Street.** Note the following:- i) front fence is < 1.5 m ii) side boundary fences all > 1.5 m in height iii) double garage in front of house iv) the two storey section of No 36 is visible v) no front porch or verandah vi) no sash windows (most are aluminium framed) vii) very different (not a simple single ridge) roofline evident viii) inconsistent frontages in fence height, colours, and materials ix) narrow footpath LINZ Title SA383/187
	**View of No 36 Marshall Street Frontage Treatment.** Note the following:- i) front fence is < 1.5 m and black T-rib corrugated iron (different style to that at 35 Oxford Street) ii) side boundary fences all > 1.5 m in height iii) double garage in front of house in different colours (walls and roof) to house iv) very different (not a simple single ridge) roofline evident v) inconsistent frontages in fence height, colours, and materials with the neighbouring No 34 vi) narrow footpath but extra wide driveway off carriageway
	**Transitional villas** became common in the austerity after WWI and as architectural aesthetics changed. They show influences of the American bungalow and Australian Federation styles, and often feature shallower roof pitches, exposed rafters and simpler pattern-cut ornamentation. Shingles are common on gable ends. **Railway cottages** Figure 7: Typical cottage in the Frankton Railway Village. Taken directly from Hamilton City Special Character Study 2020, Lifescapes (Carolyn Hill), 3. Housing Typologies.



Council Held Plan for 31 Oxford Street showing Front Façade and other elevations prior to addition of full length verandah and addition of garage and extension to bedroom. Plan shows two chimneys but only one is now visible with the missing one changed over to a gas fire flue.

Oxford Street Streetscapes View 1 Looking West

Oxford Streetscape looking back towards Walter Street and Heaphy Terrace. Claudeland Croquet Club and Pountney Park behind. White car is parked in front of the two-storey modern Te Whanau Putaki building. Note the change in the width of the carriageway, berms and footpath. Also the dominant black corrugated iron fencing on the first two properties on the right hand side (which is the side included in the HHA).

Oxford Street Streetscapes View 2 Looking West

The change in berm width and carriageway width is more easily seen in this view. Note predominance of high solid fencing at this end of the street. Driveway just behind the power pole is for access to 35A. There is only a single street light visible in this photograph on the first power pole on the lefthand side in front of the low brown fence.

Appendix B: LINZ Title Information

Address	Title Reference	Title Date	Owner
23 Oxford St	SA420/13 Lot 23	2 Sep 1925	Joseph Bertram Dufty, carrier
25 Oxford St	SA685/198 title cancelled SA729/87 Lot 25	10 March 1937 3 May 1940	John Paterson the Elder and John Paterson the younger, builders Ernest Haines, Railway employee
27 Oxford St	SA697/44 SA1284/21 Lot 27	27 Jan 1938 20 Feb 1957	John Paterson the Elder, builder Charles Henry Andrew, courier
29 Oxford St	SA387/6 Lot 29	20 Feb 1924	Alfred John Ingle, farmer
31 Oxford St	SA697/44 SA1420/57 Lot 31	27 Jan 1938 17 Dec 1957	John Paterson the Elder, builder Jack Bartlett, contractor
33 Oxford St	SA417/270 Lot 33	12 Aug 1925	Ellen Margaret Holstein, wife of farmer
28 Marshall St	SA355/16 Lot 37	23 Jun 1922 Next purchase 1941? (illegible)	Charles Edward Clarkson, hardware merchant
30 Marshall St	SA355/17 Lot 38	23 Jun 1922 Next purchase 1930? (illegible)	Charles Edward Clarkson, hardware merchant
32 Marshall St	SA351/182 Lot 39	8 May 1922	William Donald Taylor, butcher
34 Marshall St	SA358/29 Lot 40	8 Sept 1922 Next purchase 1941	Charles Edward Clarkson, hardware merchant
36 Marshall St	SA383/187 Lot 41	21 Nov 1923 Next purchase 1930	Charles Edward Clarkson, hardware merchant

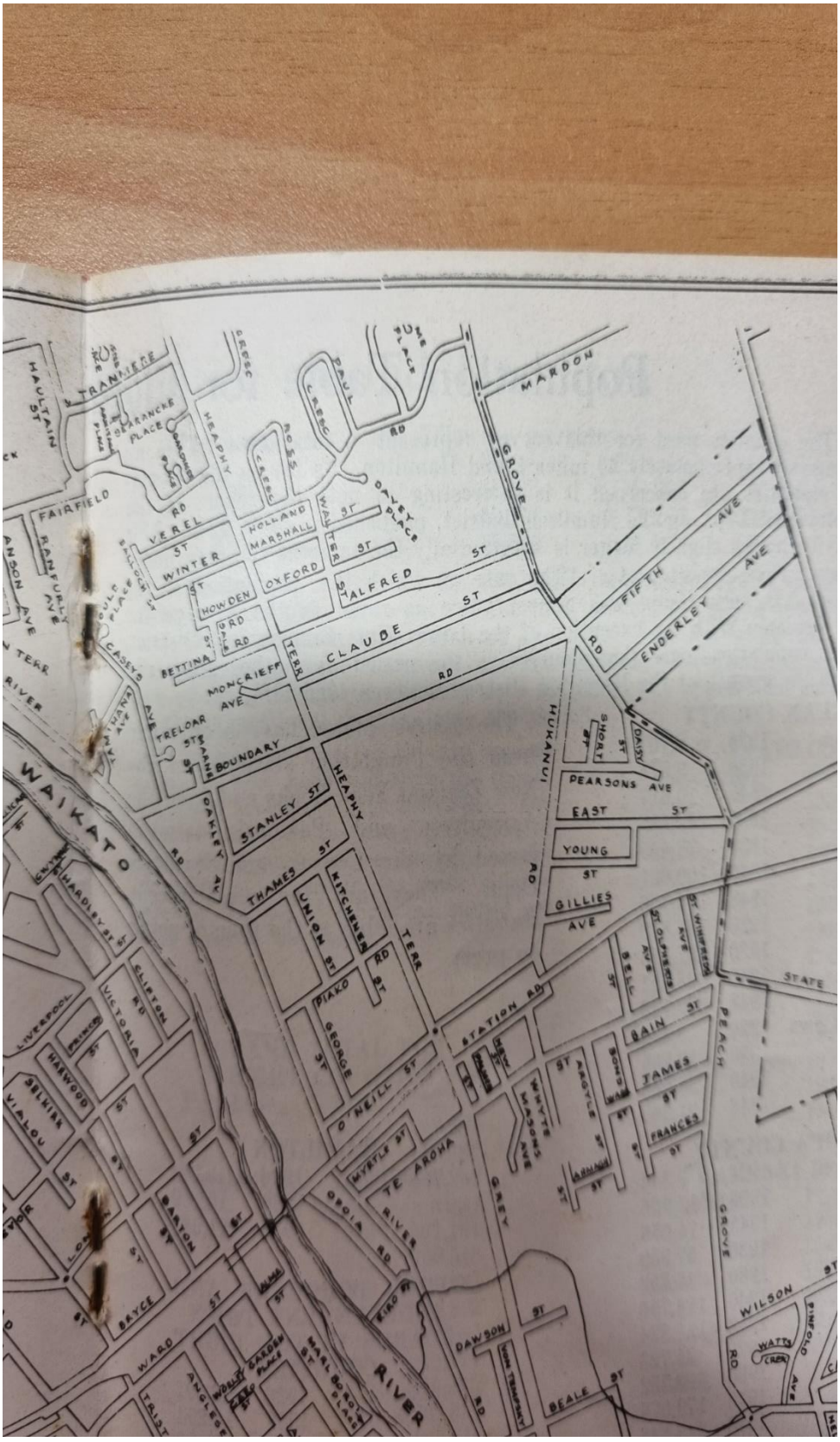
Appendix C: 1948 Aerial View vs Current Aerial View

Aerial Photograph 1 from 1948

Aerial View of parts of Claudelands and Fairfield from 1948. Claudelands Park on the righthand side. Boundary Road running through the centre of the photograph with Five Cross Roads evident at the top center. Peach Grove Road runs across the top of the photograph from Five Cross Roads with the peach orchard clearly visible below that. Heaphy Terrace runs across the bottom of the photograph and Oxford and Marshall Streets are on the lefthand side the only roads not connecting between Peach Grove and Heaphy Terrace. Immediately to the left of Boundary Road is Claude Street (fully developed) and then Alfred Street (partially developed towards Peach Grove Road). Oxford Street at that time housing mainly only on one side (a most unusual method of housing development). Area that becomes Claudelands Croquet Club clearly visible at end of Oxford Street. Marshall Street in contrast is fully developed on both sides of the roadway.

Photograph 2: Aerial view looking south-west across Marshall Street and Oxford Street towards Alfred Steet. Marshall Street is on the right-hand side with the red car parked on the grass berm. The red lines at bottom left hand side demark No 36 Marshall Street (the two-storey house, smaller photographs are of that property). Walter Road runs across the top of the picture bisecting Oxford and Marshall Streets, with Heaphy Terrace at top of picture. Note the irregular setback for the houses on Marshall Street (28 to 36) and the similarities in building typology with the houses opposite on Marshall Street which are not included in the HHA. The two storey (green roofed) A-Frame on Oxford Street is clearly visible on the back half of Lot 35. 31 Oxford Street is the large white and blue building two lots up Oxford Street from that building. Note the lack of trees on the lefthand side of Marshall Street on the berm and on Oxford Street on the berms. Also note the heavy greenscape evident on the front of No's 35, 31, 29 and 27 Oxford Street.

Appendix D: Map of the Fairfield/Claudelands Area circa 1953



Appendix E: Examples of "Railway Cottages" Typology from Around New Zealand

Prefabricated Railway Cottages built in Frankton 1923-1928	
	**Railway Cottage Example 1:** View of front facade of Railway Cottage 188 Anzac Parade Whanganui. Note the "more ornate porch" with four posts, wooden door with 4 panes of glass and the two sash windows (not side hung casement windows) either side of the front door and the lack of elongated sharp bargeboards on the roof of the house or porch. Weatherboards are narrow gauge unlike those on 31 Oxford Street. Also note the low height of the fence and proximity to the front of the lot. Compare this front façade with the following photographs. No driveway, garage, or carport.
	**Railway Cottage Example 2**: View of front facade of Railway Cottage in Frankton Railway Village. Note the symmetrical "more ornate" side entrance porch (with four distinct decorated posts) and the two single, double sash windows (not side hung casement windows) either side of the front door and the lack of elongated sharp bargeboards on the roof or the house or porch. The simple gable roof ridge is not parallel to the roadway. The gable is not weatherboard but board and batten. Also note the low height (,1.2 m) of the fence and proximity to the front of the lot.
	**Railway Cottage Example 3**: View of front facade of Railway Cottage in Frankton Railway Village. Note the "more ornate" front entrance porch, with a wooden door with four glass panes and the symmetrical distribution of the two sash windows (not side hung casement windows) either side of the front door and the lack of elongated sharp bargeboards on the roof or the house or porch. The simple gable roof is replaced with a hip roof, with the ridge not parallel to the roadway.

Railway Cottage Example 4:
208 Mill Road, Otaki. Historic Place Category 2. Note the very ornate four post central porch and double sash windows symmetrically placed. No elongated sharp pointed bargeboards. Door is wooden with 4 panes of glass.

Later Railway Houses (built after Frankton factory had closed)	
	**Railway Cottage Example 5** 4 Porritt Street, Paeroa. Date period 1920-1943. Type B design, although lacking the three windows on the lefthand side. Note the slight protrusion of a section (right or left-hand side) of the front façade, while maintaining the central front door entrance. Note also the typical lower angle roof and lack of roof detail over windows. These three examples were taken from Historic Heritage Inventory District Plan Schedule Number:HAU200 of the Hauraki District Council. Doc Ref: 547261-v2
	**Railway Cottage Example 6** 6 Porritt Street, Paeroa. Type A design, although also lacking the three windows on the lefthand side. No elongated sharp pointed barge boards. Porch roof is incorporated into a second gable in this design.
	**Railways Cottage Example 7** 52 Aorangi Road, Paeroa. Roof C / Porch C, although lacking the second chimney on the lefthand side. Note the ornate four post porch and roof over the sash windows.

Appendix F: Example of "Bungalow Cottage"

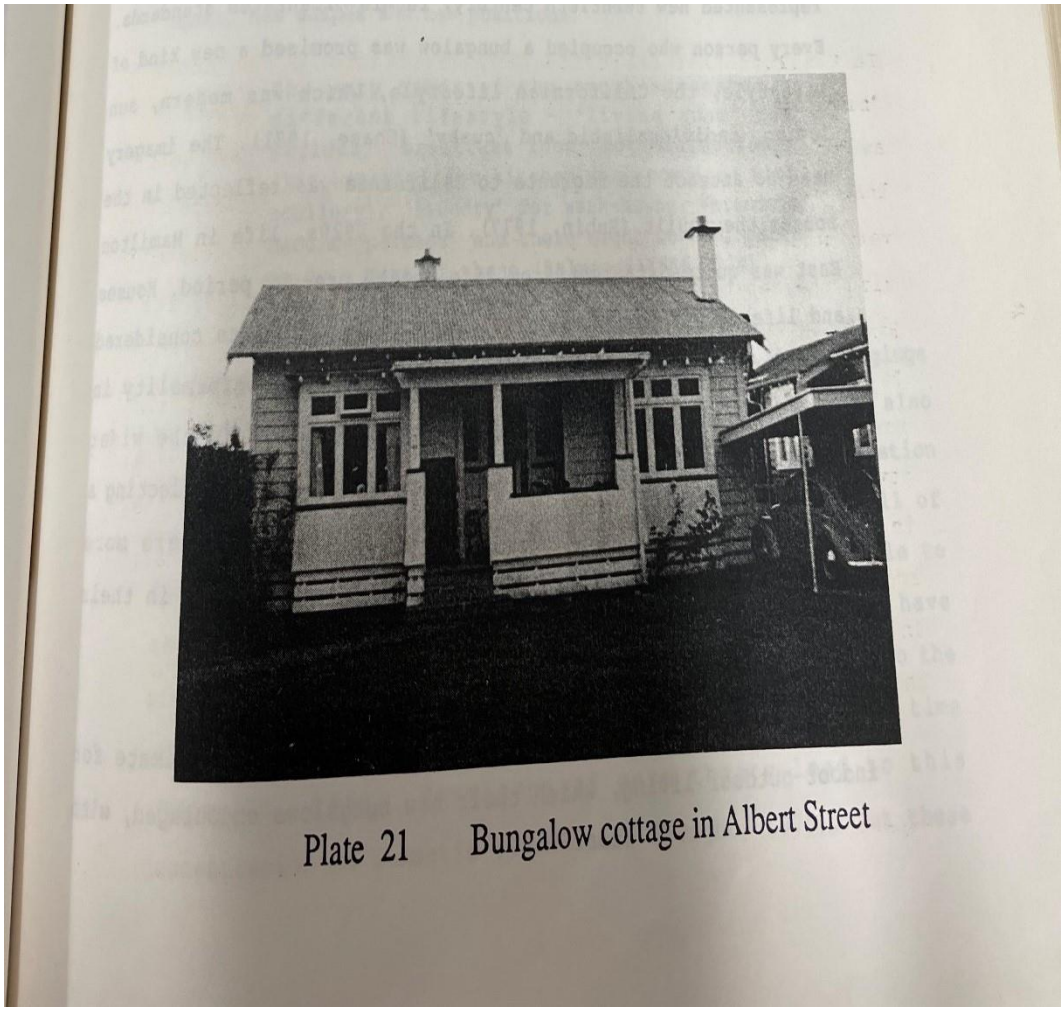


Plate 21 Bungalow cottage in Albert Street

Source: Hamilton East: Interpretation of Housing Styles and Infilling the One Acre Sections. Master of Social Sciences thesis, Porteus D. L. 1991. Page 79 at [Plate 21].

Appendix G: The Story of Oxford St (East) and Marshall Street "Railway Cottages" HHA

What story do the houses in the proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA tell?

1. Given that there appear to be no historical records of these properties, it is difficult to see how "*they give people a glimpse into our past and where we've come from*"[65].

2. A review of books and other documents on Hamilton's history held by Hamilton City HCC[66] provided few mentions of Fairfield and none specifically of Oxford Street or Marshall St.

3. HCC created or commissioned a book for the centenary of Hamilton in 1964[67]. The A4 book contains just under 100 pages of text and photographs covering many aspects of the history of the city of Hamilton. The only mentions of Fairfield are the opening of St Josephs Primary School in Clarkin Road in 1950 and the opening of Fairfield High School in 1957.

4. Another book covering Hamilton's history "Hamilton – from Military Outpost to City 1864-1964"[68] contains no mention of Fairfield other than the building of the Fairfield Bridge.

5. The index of "Astride the River – A History of Hamilton"[69] includes references to Fairfield as follows:

   a. Around 1940 the health authorities made a requisition to provide sewer drains to some suburbs outside what was then the city, including Fairfield.[70]

   b. Around 1950 two extensive housing estates were built at Melville and Fairfield.[71]

   c. How Fairfield voted in elections in the 1950s[72][73]

   d. Schools opening in Fairfield[74]

6. "A Brief Chronology of Hamilton Events 1864-1976[75] includes the dates various schools were opened, and:

   a. 1937: Fairfield Bridge opened

   b. 1949: Beerescourt, Melville, Fairfield and Hillcrest come into the city boundary

[65] From the HCC website introduction to Plan Change 9.
[66] Heritage Collection, Level 3 Hamilton Central Library and https://heritage.hamiltonlibraries.co.nz/explore
[67] Hamilton - Hub of the Waikato 1864-1964, published by Commercial Publicity Limited, copy held in Hamilton Central Library reference section
[68] Dated July 1964, printed by National Printing Co Ltd
[69] Author PJ Gibbons, published for HCC by Whitcoulls Ltd 1977
[70] Ibid at [Page 234]
[71] Ibid at [Page 238]
[72] Ibid at [Page 241]
[73] Ibid at [Page 244]
[74] Ibid at [Page 260]
[75] Compiled by Vicki Jones, 1985

7. The “Hamilton Street History Project”[76] records the history of many street names in Hamilton. It includes other streets which were named before areas were incorporated into Hamilton City but does not mention the history of the street names of either Oxford or Marshall Street.

8. Hamilton Central Library has several folders collecting information about suburbs. The Chartwell/Fairfield Information Kit contains no information suggesting there is any knowledge of the history of Fairfield (either significant or insignificant) and there is no mention of the houses included in the proposed Oxford Street (East) and Marshall Street “Railway Cottages” HHA. In contrast the Frankton information kit is full of documents about the “Railway Cottages” and the history of Frankton.

9. An excerpt from what appears to be a book on the history of St Pauls Collegiate School[77] includes information about the purchase of 100 acres for a dairy farm which was named “Fairfield”. There are details about the history of building in Davies Corner, Clarkin Rd and Hukanui Rd.

10. A 1962 thesis on “Hamilton City It’s Establishment and Development”[78] mentioned the addition of Fairfield to Hamilton City in a table[79]. In the text the only reference (inferred from the table to include Fairfield) is “Further extensive additions were made in April 1949”[80] (Interestingly, this 1962 thesis predicts a trend for smaller sections as “those determined to make the greatest use of their free time find the maintenance of a large property very much of a tie” [81].)

11. In response to an email to HCC asking why we were not advised of the proposed HHA which includes 31 Oxford St until June 2022[82], Jenny from the City Planning Unit responded “*we have only recently identified additional properties that fall within the HHA categorical requirements*”[83] thus suggesting that despite the houses being around for 80 to 100 years, they were not identified and considered significant until the middle of 2022.

12. So, what is the story (preferably able to be backed up with reliable documentary evidence) of Oxford and Marshall Streets and the wider suburb of Fairfield? The main story as far as I can determine is one of nothing significant.

    a. No significant historical person lived here,

[76] Karen Leitch 1981, Published by Hamilton Public Library
[77] Page 7 of A Venture in Faith; St Pauls (extract in folder “Hamilton Suburbs 8 Chartwell/Fairfield Information Kit”, Heritage Collection, Level 3 Hamilton Central Library).
[78] LG Westwood, University of Auckland, thesis for requirements for Diploma of Town Planning
[79] Page 23
[80] Page 22
[81] Page 113
[82] Undated letter from the City Planning Manager received 4 June 2022.
[83] Email from HCC to Jean Dorrell, 9 June 2022 10:26am

b. No significant historical events occurred here,

c. No significant architect designed a house here,

d. No significant builder (or renowned practitioner) built a house here,

e. No significant advances in scientific, cultural, or technological advances were made here.

f. The suburb of Fairfield is essentially one dominated by Housing Corporation developments starting sometime in the 1950s.

g. The suburb once housed personnel from the Te Rapa Air Force base in Hocking Place (11 houses), but these are not considered by HCC to have any historical heritage and hence are not identified in a proposed HHA. Several houses have been recently removed from this short cul de sac.

13. Searching through the Waikato Times archives reveals as the first reference to Oxford Street, Fairfield the following:

> "Boundary Road an extension of 11 poles has been completed and 3 consumers connected. A L.T.[84] line has been erected off Grey Street[85] down Oxford Street (even though Oxford Street is off Heaphy Terrace which at that time extended from Albert Street in Hamilton East northward to what is now Clarkin Road), a distance of 10 poles and six consumers connected to same[86].
>
> L.T. Marshall Street – extension of 7 poles and 2 consumers connected."[87]

14. It is unlikely that the ten poles mentioned in Oxford Street are all down one side of the roadway, but more likely to be five poles on each side of the road (a length of approximately 190 metres if pole spacing is the same as todays) to reconnect back to Heaphy/Grey Street. This means that the furthest the power line could reach is the intersection of Oxford Street and Walter Street. To service the HHA houses (No's 23 to 35, seven houses) with power would require poles to cover a return distance of 680 metres requiring a minimum of 18 poles. Even if the poles were in a single line down the street, you do not require 10 poles to reach the houses at the eastern end of the street. Oxford Street is currently supplied power via a transformer and a total of 20 power poles. Marshall Street currently has 23 power poles from Heaphy Terrace to No 36.

[84] L.T. line being a low tension line i.e. 240 to 1,000 volt supply.
[85] Note that this note is inaccurate in calling the main road Grey Street since Grey Street at no time extended beyond the railway tracks at Claudelands. This was always known as Heaphy Terrace.
[86] Yet if this relates to the houses at the eastern end of Oxford Street (Nos 23 to 25) representing 7 lots (not 6) meaning that one lot would not have had a house on it. Is this No 31?
[87] Waikato Times Volume 96, Issue 15092, 13 November 1922.

15. The next reference to Oxford Street states, in an engineer's report for work done in March 1927, "*service lines laid in the following districts*" included is Oxford Street (no mention of Marshall Street).[88] If upgrading the lines, it could be expected that a neighbouring street with similar aged lines would also be serviced at the same time.

16. The history of the properties in the proposed Oxford Street (East) and Marshall Street "Railway Cottages" HHA has not been deemed significant enough to be recorded anywhere prior to the work done by Mr Knott and advised in a short letter to homeowners in June 2022 by HCC. This is despite a review of heritage done just over a decade ago[89].

[88] Waikato Times Volume 102 Issue 17077, 14 April 1927, page 5 1927.
[89] Personal comment from Mr Mark Davey during a conversation held on 9 August 2022 outside 31 Oxford Street.

Appendix H Sources of Information Used in this Submission

The following sources of information, excluding referenced legislation, were used in the preparation of this submission:

a. LINZ title search

b. Proposed District Plan Volume 1, HCC

c. Proposed District Plan Volume 2, HCC

d. Frankton Design Guidelines, HCC February 1996

e. Variation 20, Proposed Soldier's Cottage Precinct report prepared by Mr Ian Bowman for Hamilton City HCC (circa 2008)

f. Hayes Paddock Design Guide, HCC 2006

g. Neighbourhood and Amenity Reserves Management Plan, HCC May 2007

h. Playgrounds of the Future (HCC but undated)

i. Hamilton Heritage Plan, HCC 2016

j. Beale Cottage Historic Reserve Management Plan, HCC 2016

k. Statement of Evidence of Adam Wilde on behalf of Hamilton City HCC – Community Facilities, 25 October 2019

l. Built Heritage Inventory, Wanganui District HCC, "Railway Cottages" 188 – 195 Anzac Parade, OPUS Report

m. Historical Report on Hamilton Street and City Names, Lifescapes Ltd 2020

n. Hamilton Special Character Study, Lifescapes Ltd 31 July 2020

o. Methodology and guidance for evaluating Auckland's historical heritage, August 2020 Version 2

p. Hamilton Special Character Zones Review, Lifescapes Ltd

q. Discover Frankton The Frankton Neighbourhood Plan prepared by Hamilton City HCC (HCC but undated)

r. Claudelands Croquet Club History Abbreviated and Updated, 2021

s. Aerial photographs from 1943 from Retrolens

t. Various books and documents from the Hamilton Central Library Heritage Collection