

BEFORE THE PLAN CHANGE 1 HEARING PANEL

IN THE MATTER of the Resource Management
Act 1991

AND Plan Change 1 to the proposed
Second Generation Dunedin
City District Plan (2GP)

**STATEMENT OF EVIDENCE ON HERITAGE MATTERS OF MARK MAWDSLEY AND HEATHER BAUCHOP
FOR DUNEDIN CITY COUNCIL
Dated 17 April 2025**

QUALIFICATIONS AND EXPERIENCE

1. My name is Mark Ross Mawdsley.
2. I am employed by the Dunedin City Council ("the Council") as the Team Leader Advisory Services with the City Development team. In my current role I am responsible for leading a team comprising heritage, urban design, and biodiversity professionals.
3. I hold a bachelor's in architecture (First Class Hons) and a Master in Heritage Conservation. I am a registered architect under the NZ Registered Architects Board, an Architect Member of the NZ Institute of Architects, and a member of ICOMOS (International Council on Monuments and Sites) Aotearoa New Zealand. My professional experience has included practising as an architect and heritage consultant in the private sector, both in New Zealand and Australia, and in the public sector as a heritage advisor to local government.
4. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

SCOPE OF EVIDENCE AND OVERVIEW

5. My evidence relates to submissions where the DCC Policy Planning team require further advice about the heritage assessment process and thresholds used, and to respond to specific matters raised by submitters in relation to the heritage assessment of individual places.

DATED this 17 day of April 2025



Mark Ross Mawdsley

QUALIFICATIONS AND EXPERIENCE

1. My name is Heather Louise Bauchop.
2. I am employed by the Dunedin City Council ("the Council") as the heritage advisor with the City Development team. In my current role, I am responsible for providing heritage advice to building owners, members of the public, consent applicants and council staff.
3. I hold a BA (Hons) (First Class) Degree majoring in history. I also have a Post Graduate Diploma in Museum Studies from Sydney University. My experience has included 16 years as list entry advisor for Heritage New Zealand Pouhere Taonga (formerly New Zealand Historic Places Trust). My role involved assessing places nominated to be included on Rārangī Kōrero, Heritage New Zealand's list. I assessed over 300 places while in that role. I was also heritage advisor for Waitaki District Council for 4 years, during which time I assessed c.130 places for inclusion on the heritage schedule as part of a plan review.
4. I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

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DATED this day the 17 of April 2025



Heather Louise Bauchop

INTRODUCTION

1. The heritage assessments were undertaken as part of our role as heritage advisor (Heather Bauchop) and team leader of advisory services (Mark Mawdsley). Generally, either an external consultant or the heritage advisor was responsible for the research and preparing the draft assessments. Peer review was undertaken by the team leader advisory services (and/or the heritage advisor where external consultants were used). The assessments were completed between the period from mid-2022 to mid-2024 ahead of Plan Change 1 (PC1) being notified.
2. Our comments are made based on our qualifications and roles with DCC as heritage experts. Therefore, our comments are limited to the evidence base to support the identification of buildings with heritage values for protection in accordance with the criteria set out in 2GP Policy 2.4.2.1.b. Other matters raised by submitters will be addressed by other experts, including by the reporting planner in their s42A report.
3. This evidence addresses submissions made on PC1 on Change SHB3 – the addition of specified new scheduled heritage buildings. It comprises the following:

Section 1 - An explanation of the heritage assessment process, including the significance criteria and thresholds used.

Section 2 - Information outlining the relative significance of all buildings that have been specifically opposed for scheduling by submitters compared with existing scheduled buildings.

Section 3 - A response to individual submissions that have challenged the accuracy or conclusions of the heritage assessment prepared to support the protection of buildings in the 2GP as scheduled heritage buildings.

SECTION 1 - AN EXPLANATION OF THE HERITAGE ASSESSMENT PROCESS, INCLUDING THE SIGNIFICANCE CRITERIA AND THRESHOLDS USED

Assessment Methodology

4. DCC maintains a list of places considered to have potential significance for heritage assessment. The list is compiled with input from several sources, as outlined in the Section 32 report¹. Buildings on this list are assessed for their heritage significance, as time allows, and if significant, are proposed for inclusion on the 2GP heritage schedule through a plan change process.
5. The 'Dunedin Contextual Thematic History'² (DCTH) is used to assist us in identifying important themes and places of heritage significance to Dunedin. The study comprehensively analyses the main themes of Dunedin's history and identifies significant places, or the types of places, associated with those themes. The study serves as a citywide-scale framework that aids us in understanding the potential heritage values of individual places. The study also identified

¹ [Section-32-Report.pdf](#)

² Dunedin Contextual Thematic History. Findlay, M, 2009. [Dunedin Thematic Study - Dunedin City Council](#)

under-represented themes in the then-operative (2006) district plan heritage schedule, on which the 2GP heritage schedule is based.

6. Between 2022 and 2024, 146 buildings were identified as having significant heritage values and proposed for inclusion in PC1. The heritage assessments undertaken for PC1 have generally been limited to desktop research and viewing the building (or structure) from an adjoining public place. We have been provided access to only a few places, usually for another purpose, e.g., assisting the owner with a Dunedin Heritage Fund application/grant or processing a resource consent application. In a few instances, we have been provided access at the owner's invitation.
7. The research that supports our heritage assessment involves sourcing and analysing historical information about that place, including land information (i.e., titles and surveys), contemporary newspapers/sources, photographs, plans, and published material. The research methodology is generally consistent with that used by other councils and by HNZPT, although there are differences in the scope and detail of individual assessments.
8. To support scheduling, the heritage assessment must determine if heritage values exist and to what extent. Full access to a property is naturally beneficial for the person undertaking the assessment but is not always necessary to determine if a place demonstrates heritage significance. Without access to a property, the assessment must rely on both desktop research and an understanding of aspects of the place that are visible from the public domain. The extent of the protected parts of the proposed scheduled heritage building is generally limited to the exterior as visible from a public place - this is discussed in greater detail below.

Heritage Significance and Thresholds

9. To be considered for heritage scheduling in the 2GP, a place must demonstrate sufficient heritage value as per one or more of the criteria in Policy 2.4.2.1. The 2GP criteria were developed from the significance criteria (referred to as Method 13.4.3 Schedule) in clause 13.4.3.i.c of the 2006 District Plan.
10. This approach differs from that taken by Heritage New Zealand Pouhere Taonga (HNZPT) in their list reports. The HNZPT list has a national focus but noting that a place does not have to be nationally significant to be listed. HNZPT's assessments are different in that they assess for two categories: Category 1 ('of special or outstanding historical or cultural heritage significance or value') and Category 2 ('places of historical or cultural heritage significance or value') under Sec65(4)(a)(i) and (ii) of the *Heritage New Zealand Pouhere Taonga Act* (HNZPT Act 2014). A place's Category 1 listing is established through comparative analysis – comparing it with other listed places/or similar places that are not listed, to determine if it is considered special or outstanding. Buildings that meet the Category 2 criteria do not typically undergo a comparative assessment against other buildings.
11. Our approach is to undertake sufficient research/assessment to determine whether a place demonstrates heritage significance and can meet the threshold for scheduling, rather than exhaustive research on all aspects of a building's history and values. We seek to demonstrate local heritage significance within a Dunedin context rather than regional or national significance (noting that contemporary Dunedin includes individual settlements that were

separate before local government amalgamation in 1989). However, the proposed places range in significance from places of representative local significance to places of potential national significance.

12. In this evidence, 'scheduled' refers to a place on the 2GP heritage schedule, and 'listed' refers to a place on the HNZPT New Zealand Heritage List/Rārangi Kōrero. 2GP schedule numbers are identified by the prefix 'B', e.g., B123, and listed places by 'List No.' e.g., List No. 1234. Listed buildings (that are not included on the DCC heritage schedule) have no protection.
13. To establish an appropriate threshold for including a place on the 2GP heritage schedule, we compare the proposed places with similar places already scheduled. A building is considered to meet the threshold if it is comparable to or has greater significance than similar buildings already on the schedule. This is similar to, but much simpler and less detailed than, the approach taken by HNZPT for Category 1 buildings described above, where significance is determined by comparative analysis. It is important to compare places with similar heritage values, i.e., a place identified for its social or technological value (e.g., a construction method) may not compare with a place of outstanding architectural quality (i.e., aesthetic qualities).
14. Our intention is for the 2GP heritage schedule to represent a diverse range of Dunedin's historic buildings, as a reflection of the city's settlement and development. It is important to tell not only the story of the 'elite' of colonial society, but also to represent ordinary people's lives. The extent of available evidence differs for each place. Information relating to significant public or commercial projects (for example, a defence structure or place of public interest) generally provides a great deal more evidence of heritage value than places of representative heritage value (such as working-class housing). As a result, the assessment of more notable places is usually more comprehensive and easily understandable. Where a place is of more representative significance (for example, workers' housing or where significance is based on a building typology), contextual evidence is used to establish significance. Representative significance relies more on a place being a good example of its type or representing a particular settlement era or period of suburban development.
15. The places on Dunedin's 2GP heritage schedule are not ranked or classified in hierarchical groups or tiers. Some heritage places will demonstrate greater heritage significance than others. For example, the place may be the only example of its type in Dunedin (or regionally, or even nationally), or it may be of outstanding architectural quality. Equally, a place may be an intact and representative example of a common typology, e.g., working class housing, or a place important to an early outlying settlement, or a particular community/suburb. The 2GP heritage schedule contains a variety of places (and arguably needs to demonstrate more diversity). The diversity of the schedule is important if we are to accurately reflect Dunedin's history.
16. Across the country, territorial authorities adopt different approaches to arranging/classifying their respective heritage schedules. Some territorial authorities use a single category heritage schedule similar to the 2GP. This single category approach is provided for in the 2021 Proposed Otago Regional Policy Statement (PORPS). This includes additional assessment criteria if a building is to be considered as having 'special or outstanding' values; however, it does not require that a 2-tier system is used. Moving to a multiple-tier system would likely require all existing scheduled places to be reassessed. This would require a significant amount of

specialised work and is not planned. The 2GP more strictly manages some activities affecting a HNZPT Category 1 historic place that is on the 2GP schedule, in effect creating a higher level of protection for places with a greater degree of heritage significance.

2GP Significance Criteria

17. The 2GP significance criteria are similar to those of HNZPT in Section 66(1) of the HNZPT Act 2014 ('aesthetic, archaeological, architectural, cultural, historical, scientific, social, spiritual, technological, or traditional significance or value'). The criteria in the 2GP policy 2.4.2.1 (historic/social, technological/scientific, spiritual/cultural, and design) broadly encompass the same values.
18. The 2GP criteria are also consistent with both the PORPS criteria, which again, are similar to the HNZPT criteria. One notable difference between the DCC heritage assessments (to support scheduling in the 2GP) and an assessment by HNZPT (to include a place on their list) is the scale of heritage significance of the place. The 2GP heritage schedule exists to protect the places significant to Dunedin and that tell the city's stories. HNZPT's national role relates to all of Aotearoa New Zealand. We are seeking only to demonstrate heritage significance at a local level, our threshold considered on a city-wide scale. The 2GP schedule contains many entries of places that are not identified on the HNZPT list, however, many places proposed for scheduling could meet the criteria for being included on the HNZPT list.
19. Although the significance criteria are paired in 2GP Policy 2.4.2.1, i.e., historical/social, spiritual/cultural, and technological/scientific, this pairing should be read as 'and/or'. It does not mean that the criteria are assessed together as one. For example, a place can have historical significance without having social significance. Demonstrating significance under only one of the criteria means that a place is considered to have met the combined criteria.
20. A place does not have to meet all the criteria to be included on the schedule. Meeting a single criterion is sufficient reason to include a place on the schedule. Places are only assessed against relevant criteria (for example, a house built using standard construction methods of the time is not assessed against the technological criterion, even though it provides evidence of historic building technologies; a typical commercial building is not assessed for spiritual significance).
21. In general, the historic criterion relates to aspects of Dunedin's history that a place represents. Significance could be at a suburban (which may be an early settlement in its own right) or community level, as a place may be a key community building or represent an aspect of the history of that community or location.
22. Historic significance could be representative (e.g., a house representing the pattern/type of settlement in a particular area, whether that be early settlement or a change to an area over time), or relate to a specific event (for example, an association with World War One in the case of gun emplacements). The history of a place can be represented by more than one aspect of its past; for example, an early residence of, or longstanding association with, a significant person or family, or several significant people or families, may also relate to the history of an architectural style (for example, the Modern Movement), or settlement of a particular area now regarded as a suburb.

23. Social significance generally relates to aspects of community over time. It is usually attributed to places where there was established community use or association, for example, a community hall, a residence used as a meeting place, or somewhere where a particular community or interest group gathered.
24. For design significance, we consider aesthetics, architectural style, technical accomplishment, and representativeness. The range allows us to consider good representative examples of building types (for example, terrace housing and workers' housing). It also allows us to consider intact examples of styles or periods, buildings of exceptional architectural quality, or work by a significant architect or builder. It is important that the schedule includes a range of building types and represents the diversity of the people of Dunedin.
25. Not all buildings designed by a particular builder/architect will be significant, but some will be notable examples, which, when combined with other attributes, may mean the place meets the threshold. It may also be that some places are notable examples of a period/style/history and were designed by a significant builder/architect. Some architectural practices have worked for a long time and will have significant buildings from various eras representing the lifetime of the practice (for example, Mason & Wales are New Zealand's oldest architectural practice, established in 1862).
26. Our practice for assessing technological significance is to attribute it only when it relates to a technological advance or notable new construction material or method, or an example of a particular technology (for example, concrete construction, a truss system, an industrial processing system – like Donaghy's rope walk (B381) or the Dunedin gasworks (scheduled site HS08), or an early example of a construction type or method).
27. Scientific significance may relate to a place's contribution to science (technical aspects of archaeology, for example), or represent a place where significant scientific work took place (an observatory, for example).
28. Spiritual or cultural significance relates to spiritual or cultural practices, including religious worship, memorialisation, or a place where particular cultural practices took place. Usually, these criteria also have associations with identifiable communities, past or present. Cultural significance may also refer to places that demonstrate in a broader sense the way of life for a particular community or population of people.

Protected Parts

29. From a heritage perspective, best practice is to consider a place and its setting in its entirety (ICOMOS NZ Charter 2010, 14, (iv)). The conservation (or management) of a protected place should seek to focus change on the least significant parts (identified by grading the physical fabric/setting) of the place, with as little change as possible to the more significant aspects.
30. The approach that the Dunedin City Council has used for a number of years is to identify the 'protected parts of a building'. With some exceptions, the DCC 2GP heritage schedule has generally not protected interiors or settings. Generally, HNZPT list entries recognise the place as opposed to specific parts of the building; however, including a place on the HNZPT list does not provide protection as a district plan does.

31. For consistency with other buildings on the 2GP heritage schedule, we sought to take a pragmatic approach by generally only protecting aspects of the individual buildings with high visibility from the public domain. We provided an opportunity for building owners to nominate interior spaces for protection, which one owner has wished to do.
32. This pragmatic approach potentially enables sympathetic development of a place; for example, for numerous places proposed for scheduling we have excluded the rear of the building to allow for alterations and additions without resource consent in an area of the building that is likely to have less significance and/or visibility from the public domain. By focusing protection on the areas of the building that are visible to the public, it is hoped that any future development will be focused on the remainder of the building (to avoid the requirement for a resource consent). We have not excluded the rear elevation from all places proposed for scheduling; in some cases, the rear may be visible from a public place, understood to be architecturally intact or significant, or we cannot justify excluding it.
33. A place does not have to be visible from a public place to demonstrate heritage significance. However, visibility may be an aspect of its significance (for example, when a building is prominent or a landmark such as the Dunedin Railway Station (B005)).

Peer Review Process

34. All heritage assessments are peer reviewed by a heritage advisor who was not the original author. Peer reviewing the heritage assessment involves reviewing and agreeing (or not) with the evidence and assessment that demonstrates heritage significance and meets the threshold for scheduling. The primary research is not repeated and is generally considered complete unless gaps are identified during the peer review. We are grateful for any additional information or corrections submitters provide, and several assessments have been updated accordingly.

Policy for Government Management of Cultural Heritage Places

35. Manatū Taonga Ministry for Culture and Heritage published the 2022 *Policy for Government Management of Cultural Heritage Places*. 'Policy 9 - Support proposals to protect cultural heritage' states that 'government agencies will support initiatives to publicly recognise the values of cultural heritage they manage. For example: inclusion on a regional or district plan heritage schedule'.³
36. The Policy applies to all state sector organisations, including tertiary institutions. We understand that this policy applies to Fire and Emergency New Zealand, the Ministry of Defence, the Ministry of Health, Kāinga Ora - Homes and Communities, and the University of Otago. We have noted where we understand this policy applies to a specific place discussed in Section 3.

³ Policy for Government Management of Cultural Heritage Places, Manatū Taonga Ministry for Culture & Heritage, 2022. [Policy for Government Management of Cultural Heritage Places | Manatū Taonga | Ministry for Culture & Heritage](#)

SECTION 2 - ASSESSMENT OF THE RELATIVE SIGNIFICANCE OF ALL BUILDINGS THAT HAVE BEEN DIRECTLY OPPOSED FOR SCHEDULING BY SUBMITTERS

37. As discussed above, the 2GP District Plan is a single-tier heritage schedule. Scheduled places have varying degrees of significance. Places on the 2GP schedule that have a high degree of significance (including at a national level) include The Dunedin Railway Station (B005, List No. 59), the University Clock Tower (B599, List No. 62), and First Church (B412, List No. 60). Places with significance either to a lesser degree or at a local level include the cottages at 2-16 Prendergast Street (B440-B447), the house at 48-50 Fitzroy Street (B105, List no. 4777), the house at 2 Willowbank (B750, List No. 7431), and the houses at 107A and 107B Stafford Street (B544, List No. 4787).
38. For the places we have proposed for scheduling and where a submission has been received directly opposing the scheduling, we have grouped these places into three groups (A, B, or C), in Table 1 below. The groups indicate the level of significance compared to other places included on the 2GP heritage schedule and the HNZPT list. The qualities of each group are described in greater detail in paragraphs 42-44 below.
39. We consider that places assigned to these groups are comparable to existing places on the 2GP heritage schedule and are considered to meet the threshold for scheduling in the 2GP. We have been open to the possibility that additional information may mean that a place is no longer considered to demonstrate significance or meet the threshold for scheduling.
40. In addition, for all places where we have received a submission directly opposing the scheduling of a building, we have endeavoured to identify comparable places, either scheduled (including those proposed in this plan change) and/or on the HNZPT list. Table 1 below lists all buildings where opposing submissions were received, except for the two places that are already on the HNZPT list.
41. If we have responded to a submission in Section 3 of this evidence, a list of comparable places is included in that discussion. A reference to the relevant part of Section 3 is provided in column 4 of Table 1. If we have not responded to the submission in Section 3 (as the submission did not challenge the heritage assessment), a list of comparable places has been provided in column 4 of Table 1.
42. Group A – The place is considered likely to be comparable to HNZPT Category 1 historic places. If the place were to be assessed under HNZPT criteria, we strongly consider that it could meet the threshold for a Category 1 historic place (a detailed comparative analysis would be undertaken to support a proposal for a HNZPT Category 1 listing). For Group A, we have outlined in column 5 of Table 1 the reason/s that would form the basis for considering a place special or outstanding. We have provided this information to support our view that the place has high heritage significance.
43. Group B – The place is considered likely to be comparable to HNZPT Category 2 historic places. Comparative analysis to identify it as being ‘special or understanding’ would not be typical. Assigning the place as Group B does not preclude it from being upgraded to Group A if additional information becomes known.

44. Group C – The place demonstrates significance on a local level only, i.e., the place is significant to Dunedin. The extent of its significance would be unlikely to meet the threshold for a HNZPT Category 2 historic place; however, it is comparable to other places on the 2GP heritage schedule that are not on the HNZPT list (there are 415 existing buildings on the 2GP schedule that are not listed). Assigning the place as Group C does not preclude it from being upgraded to Group B (or even A) if additional information becomes known.
45. Four places that were proposed for scheduling were not directly opposed by the submitter, however, the submitter sought a variation to the protected part (or variation of the plan provisions). These four places are also omitted from Table 1 below. These are BX014 Mason & Wales Architects' Studio at 46 York Place, BX059 Queen Mary Maternity Hospital (former) at 310 Castle Street, BX060 Dunedin Hospital Nurses' Home (former) at 490 Cumberland Street, and BX112 Petherbridge Residence at 9 Alton Ave.
46. Note that two buildings already on the HNZPT List are omitted in Table 1. These are BX001, the former Andersons Bay Presbyterian Church at 76 Silvertown Street, which is a Category 2 historic place (List No. 9695); and BX005, the former Arthur Street School Infant Department at 26 Arthur Street, which is also a Category 2 historic place (List No. 9717).

Table 1: Relative significance of buildings proposed to be added to 2GP heritage schedule

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
BX013	Cargill's Court Apartments, 27 Arthur Street	A	- Richardson Building (B826, List No. 7809) – same architectural practice - Apartment Blocks are generally underrepresented, but some are recognised, including Chevening Flats, Wellington (List No. 1347), although these date from 1929, and the Dorset Street Flats (List No. 7804)	An architecturally significant mid-late twentieth-century apartment block by a leading Dunedin architectural practice
BX015	38 Michie Street, former Rutherford House	A	Noted in the discussion on the submission. Refer to paragraph 60	An early example of modernist domestic architecture. Early work of the notable architecture partnership of Warren and Mahoney

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
BX018	58 Grendon Street, former JS & MW Campbell House	B	Noted in the discussion on the submission. Refer to paragraph 71	N/A
BX021	421 Highgate, former W & E Scoular House	B	Noted in the discussion on the submission. Refer to paragraphs 76 and 77	N/A
BX023	580 Highgate, Highgate Presbyterian Church	B	Noted in the discussion on the submission. Refer to paragraph 84	N/A
BX028	24 Melrose Street, Melrose House	B	Noted in the discussion on the submission. Refer to paragraphs 90, 92 and 93	N/A
BX030	10 Claremont Street, former S & F Bowman House	A	Noted in the discussion on the submission. Refer to paragraph 97	Arts and Crafts design of high architectural value and one of the finer examples of Basil Hooper's work
BX034	127 Taieri Road, Kaikorai Presbyterian Church	B	- St Peters Caversham (B828, List No. 9545) - Former Andersons Bay Presbyterian Church (BX001, List No. 9695)	N/A
BX036	24 Bridgman Street, Kensington Drill Hall	A	- Other equivalent Drill Halls in main NZ centres have been demolished as outlined in the heritage assessment. - Drill Hall, Napier (List No. 1134) – note this is a Category 2 historic place. We consider the Kensington Drill Hall to have greater significance than this. - Garrison Hall and Orderly Building (B055/B057, List No. 3176)	A rare surviving main centre World War I-era drill hall

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
BX037 & BX038	211 St Andrew Street, former Mobilisation Store and Office and RNZNVR Divisional Headquarters	A	- Royal New Zealand Air Force (RNZAF) Headquarters and Parade Ground (Former), Auckland (List No. 9771) - General Headquarters Building (Former), Wellington (List No. 7518) - Garrison Hall and Orderly Building (B055/B057, List No. 3176)	Defence building associated with response to South African War and naval training
BX046	45 Beach Street, former Albert House	B	- Paradise Homestead, Glenorchy (lost to fire in 2014, List No. 7766) - Travellers Rest, Stewart Island (List No. 2563)	N/A
BX049 (i) and (ii)	58, 60 and 60A Carroll Street, former Chinese Mission Church and Manse	A	- Lawrence Chinese Camp (List No. 7526) - Sew Hoy Building (List No. 9730) - St Michael's Antiochian Orthodox Church (B749, List No. 7341)	Significant association with the Chinese community and with Reverend Alexander Don
BX055	255 Great King Street, former Dunedin Hospital Administration Block	A	Noted in the discussion on the submission. Refer to paragraphs 106 and 107	Notable Interwar hospital building
BX067	311 Stuart Street, former Salmond Residence	A	- B275 Dr Stephenson's Residence (earlier Salmond-designed residence) (List No. 2200) - B325 McPherson Residence (earlier Salmond-designed residence) (List No. 2175) 433 High Street, contemporary Salmond-designed residence	Architect JL Salmond's residence and an early example of his Arts and Crafts style

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
			(Edwardian rather than Arts and Crafts)(B330) - Note the comparative examples are Category 2 places but we consider that 311 Stuart Street may potentially more significant. The two examples below are proposed for scheduling. - BX082 Harptree (proposed for scheduling) - BX039 Salmond House (proposed for scheduling)	
BX069	62 Queen Street, Inglewood	B	- McKellar House, 4 Pitt St (B427, List No. 5233) - Dr Stephenson's Residence (B274, List No. 2200) - Aorangi (B594, List No. 2139)	N/A
BX071 (i), (iv), (v), (viii), (ix)	139, 145, 157B, 147, 157A Carroll Street, Cairns' Buildings	B	Noted in the discussion on the submission. Refer to paragraph 129	N/A
BX076 (i)	54 Manor Place, Paired Dwellings	C	780 George Street (B188) 784 George Street (B189) 788 George Street (B190)	N/A
BX078	217 Musselburgh Rise, Cintra	A	Noted in the discussion on the submission. Refer to paragraph 139	Architect Edmund Anscombe's own home, built using his patented construction system
BX079	11 Wilkinson Street, Dunedin's first state house	B	Noted in the discussion on the submission. Refer to paragraphs 146 and 147.	N/A

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
BX080	290 Leith Street, Archway Lecture Theatres	A	Noted in the discussion on the submission. Refer to paragraph 159	An enduring and unique example Ted McCoy's brutalist architecture
BX087	56 Carroll Street, former Hanna Residence	B	Noted in the discussion on the submission. Refer to paragraph 166	N/A
BX091	5 Melville Street, former Mosgiel Knitwear House	B	- Charles Begg Piano Factory (Former) (B100) - Association with B637 (Mosgiel Woollen Factory) (List No 5243) - B754 Gregg & Co. Building (B754)	N/A
BX093	169 Forbury Road, former Brinsley Residence	A	Noted in the discussion on the submission. Refer to paragraph 178, 179 and 180	Interwar period residence of special architectural quality associated built for significant Dunedin figure
BX117	182 and 184 Mornington Road, Kenmure, Lookout Point Fire Station	B	Refer to the discussion on the submission, paragraph 194.	N/A
BX120	93 Church Street, Mosgiel, former Holy Cross College	A	- Former Trinity Methodist Church Theological College, Auckland (List No. 548) - Knox College (B006, List No. 2187) - Antonio House, Christchurch (List no. 7336) Note that these comparative examples are Category 2 places, but we consider Holy Cross may potentially be more significant than these	New Zealand's only national training seminary for Catholic Priests, and has a significant association with Arthur Burns, founder of Mosgiel Woollen Mills

Building ID	Address, Name	Group	Comparable examples of buildings on 2GP Schedule or the HNZPT list that demonstrate the place meets the threshold for scheduling	For Group A, the reason/s that the place may be considered special or outstanding
BX121 (i) and (ii)	22 and 24 Clyde Street, Dunedin, Terraced Houses	B	- Gladstone Terrace of Houses, (B393, List No. 5231) - Stafford Terraces, Dundas Street (B066-B080, List No. 3189)	N/A
BX122 (i), (ii), (iii), (iv)	14, 16, 18, 20 Clyde Street, Terraced Houses	B	- Gladstone Terrace of Houses, (B393, List No. 5231) - Stafford Terraces, Dundas Street (B066-B080, List No. 3189)	N/A
BX127	46 Gordon Road, Mosgiel, former Allan Residence	B	- Dr William's House (Former) (B286, List No. 4730) - Dr Talbot's House (Former), (List No. 602) - Dr Hogg's Residence and Surgery (Former), (List No. 2508)	N/A

SECTION 3 - RESPONSE TO SPECIFIC SUBMISSIONS THAT HAVE CHALLENGED THE ACCURACY OR CONCLUSIONS OF THE HERITAGE ASSESSMENTS

47. The following sections respond to submissions that have questioned or disputed the heritage assessment for that building, or sought changes to the protected parts. These buildings are listed in Table 2. Where we consider that the relevant heritage assessments should be updated in response to submissions, we have attached our updated assessments in Appendix A - M.

Table 2: Buildings subject to submissions challenging the heritage assessments or seeking amendments to the protected parts

Site Number	Building Name	Address	Submissions that challenge the heritage assessment
BX014	Mason & Wales Architects' Studio	46 York Place	Hamish Muir (S293)
BX015	Rutherford House (former)	38 Michie Street	Vaughn Malkin (S214)
BX018	JS & MW Campbell House (former)	58 Grendon Street	John Matheson (S50)
BX021	W & E Scouler House (former)	421 Highgate	Stephen Christensen (S31)
BX023	Highgate Presbyterian Church	580 Highgate	Highgate Presbyterian Parish (S38)
BX028	Melrose House	24 Melrose Street, Dunedin	Craig Smith (S235)
BX030	S & F Bowman House (former)	10 Claremont Street	Alastair Hepburn (S143)
BX055	Dunedin Hospital Administration Block (former)	255 Great King Street	Health NZ Te Whatu Ora (S252)
BX059	Queen Mary Maternity Hospital (former)	310 Castle Street, Dunedin	University of Otago (S251)
BX060	Dunedin Hospital Nurses' Home (former)	490 Cumberland Street	University of Otago (S251)
BX071(i) BX071(iv) BX071(v)	Cairns' Buildings	139 Carroll Street 145 Carroll Street 147 Carroll Street	John Horrocks (S53)
BX078	Cintra	217 Musselburgh Rise	Pauline Geddes (S221)
BX079	Dunedin's first state house	11 Wilkinson Street	Kāinga Ora (S269)
BX080	Archway Lecture Theatres	290 Leith Street	University of Otago (S251)
BX087	Hanna Residence (former)	56 Carroll Street	Mark Thom (S291)
BX093	Brinsley Residence (former)	169 Forbury Road	Marcel Choo (S113) Sharmaine Pang (S119) Isabelle Ang (S124) Petrus Yen (S125) Weta Family Trust (S270)
BX112	Hudson/Petherbridge House	9 Alton Avenue	David Petherbridge (S56)

Site Number	Building Name	Address	Submissions that challenge the heritage assessment
BX117	Lookout Point Fire Station	182 and 184 Mornington Road, Kenmure	Fire and Emergency NZ (S257)

BX014 – Mason and Wales Offices, 46 York Place

48. Hamish Muir (S293) provided additional information supporting the heritage significance of the building.
49. Mr Muir requested that alterations and additions to 46 York Place, including signs, be permitted activities if designed by a registered architect from Mason & Wales, and that earthquake strengthening be a permitted activity if coordinated by a registered architect from Mason & Wales.
50. The submitter has also requested that protection be limited to the street elevation of the building.

Discussion

51. The extra information (the NZIA award citation and the DOCOMOMO fiche) provided by the submitter has been added as an appendix to the heritage assessment. Our updated heritage assessment is attached in Appendix A.
52. As the building was purpose-designed by Mason & Wales and remains in use as their offices, we agree that it is in keeping with the building's history and architectural philosophy that the practice continues to shape the future of the building.
53. We acknowledge that this is a unique scenario, where the design significance is attributed to the present owner and occupier and warrants a bespoke provision in the 2GP. Flexibility in the 2GP provisions for this particular building will enable DCC to work proactively with Mason and Wales to recognise and conserve their building. Assuming that bespoke plan provisions for alterations and additions and earthquake strengthening are included in the 2GP, DCC would only require resource consent if demolition of the protected part of the building is proposed.
54. We do not agree with the submitter's request that protection be limited to the street elevation. The building was conceived in the round, not solely as a façade. The side elevations are visible from York Place and contribute to the overall form, composition, and materiality of the building. The driveway on the subject property and the driveway on the adjoining (rear) property increase the visibility of both side elevations from York Place. We have proposed to exclude the rear elevation to allow any required changes/services to be focused on this location.
55. The building is not easily compared with other scheduled places in Dunedin, however, there are similar examples across the country. These include the Athfield House and Office in Wellington (scheduled in the Wellington City District Plan and a Category 1 historic place, List no. 9662), and 65 Cambridge Terrace in Christchurch, which was built as the Warren and

Mahoney office and a residence for Sir Miles Warren and is scheduled in the Christchurch City District Plan (No. 1356).

56. Signage is permitted in the CMU zones, subject to a performance standard. At present, there are no signage rules specific to scheduled buildings outside a heritage precinct, i.e., the signage provisions applying to the subject building will not become more stringent as a result of the proposed scheduling. Proposed signage can continue to be managed under the existing plan provisions, and bespoke plan provisions relating to signage at the subject site are not considered necessary.
57. In conclusion, having reviewed the additional information provided by the submitter it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building notified in PC1 should not be amended;
 - c. we support bespoke 2GP provisions for additions and alterations that are designed by a registered architect employed by Mason & Wales, and earthquake strengthening works that are coordinated by a registered architect employed by Mason & Wales, to occur without the requirement for resource consent. We are comfortable that these activities can be designed to be sympathetic to the heritage values of the building under the direction/guidance of Mason & Wales Architects and that this is an appropriate way to manage the long-term conservation of 46 York Place.

BX015 – Rutherford House (former), 38 Michie Street (S214)

58. Vaughn Malkin (S214) submits that:
- Rutherford House does not meet the threshold for historical/social significance or design significance;
 - There are other more significant examples of Modern Movement architecture in Dunedin;
 - The focus on dwellings of well-off Dunedinites overlooks other significant heritage places (such as the state housing of a similar period); and
 - The house is obscured by trees and does not contribute to the streetscape.

Discussion

59. The heritage assessment was amended in response to the initial feedback from Mr Malkin before notification of PC1. Further information was included on the place of the house in Warren and Mahoney's architectural practice. We consider the house a significant early design by Warren and Mahoney, and we are confident that it meets the criteria for design significance. We also note that the house contributes to the history of Warren and Mahoney's

work and the context of the design history of Modern Movement architecture in Dunedin. Modern Movement architecture was an area identified as underrepresented in the DCTH.

60. The building is comparable in design and historical significance to other twentieth-century residences proposed for scheduling in PC1, including 9 Alton Avenue (1937, Mandeno and Fraser) and the Curtis House (1936, Stone and Sturmer), although these are both from an earlier period. We note that Warren and Mahoney's Dorset Street Flats in Christchurch, which are contemporary with the Rutherford House, are listed with HNZPT as a Category 1 historic place (List No. 7804). Another comparative example is the Bowman House in Nelson (1953, List No. 9984, Category 2 historic place), architect Alex Bowman's own home, which is recognised as an early Modern Movement design built using hollow concrete block.
61. The Rutherford House demonstrates the history of the Modern Movement as it unfolded in New Zealand, and specifically in Dunedin. It is included in *Modern: New Zealand Homes from 1938-1977* (Random House, 2013) with text by respected architectural historian Michael Findlay. The book traces the development of modernism in New Zealand through 24 notable houses.
62. Mr Malkin submits that other, more significant modern buildings could be scheduled. Each place is assessed against the policy criteria on its own merits. Other examples of twentieth-century architecture have been included in PC1, recognising the emerging and accepted significance of Modern Movement buildings. The work to identify and protect buildings from various underrepresented periods, including the Modern Movement, is ongoing.
63. While the wealth of the previous owner was not a determining factor in initiating or completing the heritage assessment, we recognise that having the financial means to commission an architect does indicate a certain level of wealth. As recognised in the report, the Rutherford family were prominent but not outstanding in Dunedin. The historical significance provides context for the design of the house and its place in the history of the Modern Movement, and Warren and Mahoney's practice. If it were to be assessed under HNZPT criteria, we consider the place may meet the threshold for a Category 1 historic place. If a place were to be proposed as a Category 1 historic place, it would be subject to comparative analysis.
64. We agree that the historic/social significance is minor compared with the design significance; however, references to social significance result from the combined historic/social significance criterion. For clarity, we have removed the reference to social significance in the heritage assessment ('Assessment of Heritage Significance' and 'Statement of Significance' sections) and revised the wording in these sections. We do not consider that removing the reference to social significance affects the overall heritage significance. Rather, it focuses the discussion on the more salient aspects of the heritage assessment.
65. We note that the submitter considers the property to be obscured by the boundary fence (included in the recommended protection) and vegetation (which can be removed) and so does not contribute to the streetscape. Although, as noted above, a place does not have to be visible to be significant, we note that the house is on a corner site and is partially visible from both Michie and Ross streets. The arrangement of the boundary fence, courtyard garden, and offset gables forms demonstrate how the design responds to (and creates privacy for the occupants) a corner site.

66. In conclusion, having reviewed the additional information provided by the submitter, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.
67. Our updated heritage assessment is attached in Appendix B.

BX018 – JS & MW Campbell House (former), 58 Grendon Street (S50)

68. John Matheson (S50) submitted in opposition to scheduling and raised the following matters:
- There were errors in the chronology of construction in the heritage assessment; and
 - If scheduling is to proceed, the garage should be excluded from protection.

Discussion

69. The heritage assessment has been amended in response to the submission to correct the construction sequence and details. We note that the house was not constructed according to the original plans, and there were additions c1990 and c1994.
70. We agree with the submitter that the garage is a recent addition and that it can be excluded from the protected parts. The 1994 addition can also be excluded as it is at the rear. Excluding the garage and the later addition does not alter the outcome of our initial assessment that the overall building demonstrates heritage significance. However, the extent of the protected part should be updated accordingly.
71. We consider that the house is comparable to the other residences proposed for scheduling on Grendon Street, specifically 70 Grendon Street (BX031) and 54 Grendon Street (BX017), despite being more modest in scale. It can also be compared to existing scheduled dwellings at 2 Warrender Street (B611), and 238 High Street (B286), which is also identified as a Category 2 historic place (List No. 4730).
72. In conclusion, having reviewed the information provided by Mr Matheson, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' statement should be amended to read 'Entire external building envelope, excluding the rear elevation, the later garage extension (c. 1990) and the rear dormer addition (c. 1994).
73. Our updated heritage assessment is attached in Appendix C.

BX021 – W & E Scoular House, 421 Highgate (S31)

74. Stephen Christensen (S31) states in his submission that the technical justification for scheduling BX021 is weak and that the property does not reach an appropriate threshold of heritage significance to warrant being listed. The submitter has not provided any reasons as to why the assessment is insufficient.

Discussion

75. It is our view that 421 Highgate meets the threshold for historic, technological, and design significance. The submitter has not provided any new information or research for us to review.
76. 421 Highgate is of similar design and historical quality to other scheduled buildings such as the nearby Mahara (B099, List No. 2161) and Leebank (B595, List No. 2162), which date from a similar period. Both buildings are scheduled and listed by HNZPT as Category 2 historic places.
77. The subject dwelling meets the technological significance criterion due to its innovative construction methodology. Further information has been added to the report, providing more detail on the construction methodology. To indicate comparative significance, we note that a more modest residence, the former Thomson Residence (B051), using the same construction methodology, is listed with HNZPT as a Category 2 historic place (List No. 4696). The list entry report for the former Thomson Residence has been appended to the assessment.
78. It is our view that 421 Highgate meets the threshold for scheduling when compared to the former Thomson Residence (B051), Mahara (B099), and Leebank (B595).
79. In conclusion, having reviewed the information provided by Mr Christensen, it is our view that:
- a. the building meets the criteria for historic/social, design, and technological significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.
80. Our updated heritage assessment is attached in Appendix D.

BX023 Highgate Presbyterian Church, 580 Highgate

81. John Milnes, on behalf of the Highgate Presbyterian Parish (S38), submits that insufficient case has been made by DCC justifying the church's architectural heritage worth, and contribution that the church has made in the past, or could make in the future, to Dunedin's overall heritage landscape and stock of heritage buildings.

Discussion

82. Further information has been added to expand upon the assessment. Our updated heritage assessment is attached in Appendix E.

83. We are confident that the church meets the threshold for historic, design, and spiritual significance as outlined in the assessment report. The submitter has not provided any new information or research for us to review.
84. Considering historical, design, and spiritual criteria, we note two comparable examples that meet the threshold for scheduling. The Church of Christ on the corner of St Andrew and Filleul Streets (B541) was built at a similar time to the Māori Hill Presbyterian Church and was designed by the same architect. The former Roslyn Presbyterian Church (B334, built in 1904), is also recognised by HNZPT as a Category 2 historic place (List No. 3377). Similar to the former Roslyn Presbyterian Church, the Māori Hill Presbyterian Church is a key landmark in its suburban setting on the ridgeline above the CBD.
85. In conclusion, having reviewed the information provided by Highgate Presbyterian Parish, it is our view that:
- a. the building meets the criteria for historic/social, spiritual/cultural, and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.

BX028 Melrose House, 24 Melrose Street, Dunedin

86. Craig Smith (S235) considers that Melrose House does not meet the criteria for historic/social significance as Thomas Glendining was not a prominent social or historical figure. It also does not meet the technological/scientific criteria or the spiritual or cultural criteria. He states that the house may meet the criteria for design significance as it was designed by Mason & Wales, but notes that other properties were also designed by Mason & Wales. He also notes that the exterior appearance has been extensively modified (for example, paint, windows, entrances, car parking, shared driveway, subdivided).

Discussion

87. We note that Melrose House was not found to meet the technological/scientific or spiritual/cultural criteria in our assessment conclusion.
88. Thomas Glendining was a member of the notable Glendining family, who were significant in Dunedin's business history. The status of the Glendining family enabled them to commission a substantial architect-designed family home.
89. Melrose House is a substantial Edwardian gentleman's residence designed by the prominent architectural partnership of Mason & Wales. Founded in 1862, the practice is the country's oldest architectural partnership and has designed many buildings. Melrose House was conceived as a substantial home of good quality and is a fine example of their work. It has retained a good level of architectural integrity.
90. The property has been subdivided, and its original garden setting has been compromised. We acknowledge that the loss of the garden setting does negatively affect the overall significance of the place. However, in our view, it still meets the threshold for scheduling. Examples of other scheduled dwellings where the original site has been subdivided and developed include

Lisburn House (B370, Category 1 historic place, List No. 2192) and Kawarau (B336, Category 2 historic place, List No. 2186). Both were recognised after they were subdivided.

91. As the submitter states, there have been some alterations to the dwelling, but these are not considered to lessen the overall heritage significance to a degree where the place does not meet the threshold for scheduling. These alterations are noted in the heritage assessment, and restoration of the dwelling is possible, in our view.
92. The house is of similar architectural quality and historic significance as other scheduled residences, including the nearby Mahara (B099, List No. 2161) and Leebank (B595, List No. 2162), which date from a similar period, both of which are also listed as Category 2 historic places by HNZPT.
93. When compared to Mahara, Leebank, Kawarau, and Lisburn House, we consider that Melrose House meets the threshold for scheduling.
94. Having reviewed the information provided by Mr Smith, it is our view that:
 - a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.

BX030 S & F Bowman House (former), 10 Claremont Street

95. Alastair Hepburn and C Ireland (S143) raised the following matters:
 - That the criterion for historic significance is not met, in particular, the case that the Bowman family are historically significant. Founding a business in Oamaru and serving on the NZ Dairy Board is not sufficient. There is no historic significance associated with Peter Chin owning the house in the 1990s/2000s, or the Anglican Diocesan Trust Board owning it from 1940-1990.
 - The house is not 'original' as it has been altered, reducing its design integrity, and therefore it does not meet the design criteria.
 - There are better examples of Basil Hooper's designs proposed for scheduling.
 - The southern end of the house has non-original additions with no wider historical significance. If the building remains on the schedule, the protection required should be limited to the preservation of streetscape elevations and ancillary elements visible to the public from Claremont Street. e.g., "the entire front external building envelope side and boundary wall and entrance gates which front onto Claremont Street" or similar.

Discussion

96. It is our view that 10 Claremont Street meets the threshold for historic/social and design significance. We note that it is the historic significance that enables the dwelling to meet the criterion for historic/social significance.
97. We note that 10 Claremont Street (built in 1919) is of comparable design quality and historic significance to the c.1914 Scoular House (Category 1 historic place, List No. 9273, proposed for scheduling PC1 BX003) that is proposed for scheduling, and the c.1914 Ritchie Residence (Category 1 historic place, List No. 7492). Basil Hooper designed all three buildings. Basil Hooper's c.1909 residence at 19 Wallace Street is also proposed for scheduling. Together, they illustrate the development in Hooper's designs when he was at the peak of his practice.
98. The submitter notes that there have been significant recent alterations to the rear of the building. The submitter's requested amendment to the 'protected parts' is based on excluding later alterations to the dwelling.
99. We do not agree with the submitter's proposed 'protection required' statement as it will substantially reduce the extent of protection. However, we are willing to revise the extent of protection to exclude later alterations at the rear, specifically the c.2003 garage and deck addition.
100. The alterations to the rear of the property have altered the original architectural form; however, they are located at the rear and are small scale when compared to the dwelling. In our view, the dwelling retains a high degree of architectural integrity and design significance.
101. When compared to the other examples of Basil Hooper's domestic architecture, we consider that 10 Claremont Street meets the threshold for scheduling.
102. In conclusion, having reviewed the information provided by the submitter, it is our view that:
 - a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should be amended to read 'Entire external building envelope, excluding the later garage and deck addition (c.2003). Including the Claremont Street ~~and~~ boundary wall and entrance gates."
103. Our updated heritage assessment is attached in Appendix F.

BX055 Dunedin Hospital Administration Block (former), 255 Great King Street

104. Health NZ Te Whatu Ora (S252) considers that the heritage values of the building are not of the level of significance to warrant inclusion in the Heritage Schedule.

Discussion

105. Our view remains that the former Dunedin Hospital Administration Block meets the threshold for design and historical significance as demonstrated in the heritage assessment. The

submitter has not provided any information as to why the building does not meet the threshold for significance. We note that the Dunedin Hospital Administration Block is proposed for listing with Heritage New Zealand as a Category 1 historic place.

106. In terms of the design criterion, we note that the former Dunedin Hospital Administration Block is of a similar architectural quality to the nearby heritage buildings (namely the Lindo Fergusson, Scott, and Hercus Buildings) on Great King Street. The Scott Building is scheduled (B244) and listed with HNZPT as a Category 2 historic place (List No. 4790). The Lindo Ferguson Building is scheduled (B243) and listed with HNZPT as a Category 1 historic place (List No. 4769). The Hercus Building is proposed for scheduling (BX025). Although associated with the medical profession, these three buildings are University teaching buildings associated with the medical school rather than hospital buildings. When compared to these places, we consider that the former Dunedin Hospital Administration Block meets the threshold for scheduling.
107. The DCTH notes the heritage of public hospitals is not represented on the schedule. Public hospital buildings are also under-represented on the Heritage New Zealand list. The former Kew Hospital Buildings in Invercargill, dating from the 1930s, are a Category 1 historic place (List No. 7747), but most have been demolished. The Otago Therapeutic Pool (the Physiotherapy Pool) is recognised as a Category 2 historic place (B1292, List No. 7581). The former Dunedin Hospital Nurses' Home and Maternity Hospital are both proposed for scheduling.
108. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to the former Administration Block.
109. In conclusion, having reviewed the matters raised by Health NZ Te Whatu Ora, it is our view that:
 - a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b.
 - b. the 'protection required' for the building should not be amended.

BX059 Queen Mary Maternity Hospital (former), 310 Castle Street, Dunedin

110. The University of Otago (S251) supports the proposed heritage scheduling of the former Queen Mary Maternity Hospital subject to an amendment to the 'protection required' statement to clarify the exterior protection. The suggested amendment reads:

Entire external building envelope consisting of road frontage façade, plus the first 26m from the road of the south-western wing's façade and the first 12m from the road of the north-western wing's façade. The protection excludes the roof plant, the c.1961 north-west wing, and steel framed windows on all internal elevations beyond the protected facades.

Discussion

111. Only the c.1948 north wall of the northwest wing was excluded in the proposed protection statement. It is understood that this part of the building is likely to change to accommodate

alterations to Hayward College. Excluding this addition in its entirety was discussed before notification, however, the wording of the protection statement has led to confusion. For clarity, we recommend excluding only the north wall, which is, for the most part, obscured by Hayward College. The c.1948 southwest wing has a greater degree of visibility and there is not connection to an adjoining building.

112. We do not agree with the protection required statement proposed by the University as substantially reduces the extent of protection, and describes what we refer to as external elevations as internal. For clarity, we have suggested an alternative wording and have corrected the date of the later addition. A diagram may be useful for clarity.

Entire external building envelope excluding the north (north east) wall of the c.1948 northwest wing, the roof plant, and steel-framed windows on the internal elevations (overlooking the original obstetric theatre). ~~roof plant, the c.1961 northwest wing, and steel framed windows on the internal elevations~~

113. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to the building.

114. In conclusion, having reviewed the matters raised by the University of Otago, it is our view that:

- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
- b. the 'protection required' for the building should be amended for clarity.

115. Our updated heritage assessment is attached in Appendix G.

Figure 1: Extent of protection proposed for BX059 Queen Mary Maternity Hospital (former)



BX060 Dunedin Hospital Nurses' Home (former), 490 Cumberland Street, Dunedin

116. The University of Otago (S251) has submitted in support of the scheduling of the former Dunedin Hospital Nurses' Home, subject to an amendment to the extent of protection. This amendment is requested to provide the University with the flexibility desired for upgrades to the building, particularly window upgrades/replacement, to allow its continued use for student accommodation.
117. The University requests that the 'protection required statement be amended as follows:
- Entire external building envelope excluding roof plant, external fire escape, steel framed windows on the rear (west) elevation of the c.1948 component, windows on the internal southwestern elevation of the building, pressed metal roof tiles and masonry chimneys; Cumberland Street boundary wall.

Discussion

118. We do not agree with the protection required statement proposed by the University as it reduces the extent of protection and describes what we refer to as external elevations as internal. Before notification, we discussed excluding the steel-framed windows on an internal elevation of the c.1948 component (the five/six six-storey component) from the 'protection required'. The University is now proposing to also exclude the timber-framed windows (with a small number of aluminium replacements) on the south elevation of the c.1915-1926 component (the three-storey component) and the Cumberland Street boundary wall. The timber-framed windows of the c.1916-1926 component can be more easily repaired and retrofit double glazed than steel-framed windows. We do not agree with excluding these timber-framed windows in conjunction with the aforementioned steel windows. Our preference is to retain the extent of protection as notified. To avoid any confusion between elevations and differing window joinery material, a diagram may be useful. The protection statement should be worded so that there is no doubt that the Cumberland Street Boundary wall is included.

119. We recommend revising the protection statement to clarify that the Cumberland Street boundary wall is included rather than excluded.

Entire external building envelope excluding roof plant, external fire escape, steel framed windows on the rear (west/north-west) elevation of the c.1948 component, pressed metal roof tiles, and masonry chimneys. Including the Cumberland Street boundary wall.

120. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to this place.

121. In conclusion, having reviewed the matters raised by the University of Otago, it is our view that:

- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
- b. the 'protection required' for the building should not be amended.

122. Our updated heritage assessment is attached in Appendix H.

Figure 2: Extent of protection proposed for BX060 Dunedin Hospital Nurses' Home (former)



BX071(i), (iv) and (v), Cairns' Buildings, 139 Carroll Street, 145 and 147 Carroll Street

123. John Horrocks (S53) requests that 139, 145 and 147 Carroll Street be removed from the schedule for the following reasons:

- The area is subject to subsidence, as it was originally on the seashore, which has caused damage to 139 and 147 Carroll Street. 139 Carroll Street requires earthquake strengthening, and there is severe cracking in the brick walls. 147 Carroll Street has a south and east lean.
- Before 1940, 139 Carroll Street was a coal depot, which caused coal dust contamination. Two of the sash windows have been replaced with aluminium, and the woodstoves and copper tub have been removed. The three remaining windows are planned to be replaced shortly.

- There is deterioration of timber piles in 147 Carroll Street, which date back to 1870. The original sash windows, woodstoves and copper tub have been replaced, and the exterior timber cladding is covered with concrete stucco.
- 145 Carroll Street was destroyed by fire in approximately 2000 and rebuilt.

Discussion

124. The three buildings referred to in Mr Horrocks submission are part of a cluster of nine buildings, all of which are proposed for scheduling and built as part of the same historic development. The nine buildings proposed for scheduling are adjacent to Gladstone Terrace (Schedule No. B393) at 38-50 Melville Street. Gladstone Terrace is listed with HNZPT as a Category 2 historic place. Except for 155 Carroll Street, these buildings (both Gladstone Terrace and the buildings proposed for scheduling) were constructed by the same developer at the same time.
125. No submissions were received directly opposing the remaining six buildings proposed for scheduling (141, 143, 155, 157, 157A, 157B Carroll Street).
126. We have investigated the building records and can confirm that 145 Carroll Street was demolished and reinstated following a fire c.2003 (we are unsure if this was total demolition). We acknowledge that a single residential unit has been rebuilt, however, the dwellings at 141, 143, 145, and 147 Carroll Street are a group of four terraced cottages. By protecting the roof form and principal elevation of 145 Carroll Street, the overall form and presentation of the terrace row (comprising four dwellings) can be managed. However, it is worth noting on the schedule entry that 145 Carroll Street has been rebuilt, so any future resource consents can consider this.
127. 139 Carroll Street fronts Carroll Street. It presents two floors to Carroll Street and is likely to have originally housed shops on the ground floor and residential accommodation above. It has been converted to residential accommodation on both floors. The openings on the ground floor of the street elevation have been altered/infilled; however, the overall openings remain legible. It presents as a commercial building.
128. This development remains as a concentrated group of representative nineteenth century working class terraced housing that was commonly constructed in this area of the city. The subject dwellings are the remnant of a swathe of housing that was demolished as part of the 'slum clearances' of the mid-late twentieth century. As the significance of the place is primarily historic/social, we believe the group of dwellings collectively demonstrate a sufficient level of significance even with the alterations described by Mr Horrocks.
129. Similar scale housing on the 2GP heritage schedule include the cottages at 2-16 Prendergast Street (B440-B447)
130. We have amended the heritage assessment to include the alterations Mr Horrocks describes.
131. In conclusion, having reviewed the information provided by Mr Horrocks, it is our view that:

- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
- b. the protection required for 145 Carroll Street should be amended to note that it has been rebuilt following a fire.

132. Our updated heritage assessment is attached in Appendix I.

BX078 Cintra, 217 Musselburgh Rise

133. Pauline Geddes (S221) submits that a large portion of the house has been altered, which has removed its historical value. In particular:

- The entire back of the house has been extended and shouldn't be included in the proposed protection.
- The upstairs has been extended and altered and is not the original 'external envelope'.
- The front porch has been altered and enclosed.

Discussion

134. Cintra is an Arts and Crafts-style residence significant for its association with architect Edmund Anscombe and his use of his patented construction system, the OK Dry Wall System. The dwelling was designed by Anscombe, a notable architect who made a significant contribution to Dunedin, as his own private residence. An architect's own home is arguably the prime opportunity to explore their personal design and construction philosophies. This is demonstrated by the modest but distinct Arts and Crafts design of the dwelling, constructed using an innovative construction method. The place is significant not only for its architectural design, but its construction method and association with Anscombe.

135. Cintra presents to, and is primarily visible from, Musselburgh Rise, although the rear elevation was designed as a principal elevation to face the north sun and view over Andersons Bay inlet. However, there is now another residence built behind it. This is an instance where the rear of the dwelling is a primary elevation, rather than comprising the service areas as was common in the Victorian era. We have consciously included the rear elevation in the protected parts, despite the previous alterations.

136. The extent of the exterior alterations, especially on the Musselburgh Rise elevation, appear relatively minor. Some of the previous alterations can be reversed e.g., infilling the entry porch, aluminium windows. Restoration of these aspects is possible. Other alterations, including the rear extension (either side of the porch) and enlarged roof dormer, are unlikely to be reversed. However, the rear extensions have been designed with reference to the Arts and Crafts style of the dwelling and it remains legible as an Arts and Crafts dwelling. We note the interior is not included in the protected part of the building.

137. An option is to exclude the later alterations to the rear from the protected part. However, in this particular instance, it is preferable to include them so that they can be managed through

the 2GP provisions. This rear elevation was designed as a primary elevation, and some of the key features, such as the central porch, remain. As it is not original, the rear of the building can accommodate a higher degree of change. Restoration back to the original form is permitted without the need for resource consent.

138. In our view the protected parts should remain as the 'entire external building envelope' and for it to be managed accordingly. It may be useful to identify the later additions that are unlikely to be easily reversed in the protection statement, to assist with the future management of the heritage values of the place, so that these values are not diminished further. The protection statement can be amended as follows 'Entire external building envelope including the later extension to the original dining and drawing rooms and combined dormer of the original den and attic room'.
139. Similar to the former Thomson Residence (B051, List No. 4696), Cintra demonstrates the use of an innovative construction methodology. It can also be compared to existing scheduled dwellings at 2 Warrender Street (B611). Another comparative example is the Bowman House (1953, List No. 9984, Category 2 historic place) in Nelson, architect Alex Bowman's own home, recognised as an early Modern Movement design built using hollow concrete block. Chapman Taylor's former residence at Silverstream is also an example of an architect's own home from a similar period (1908, List No. 4148).
140. In conclusion, having reviewed the information provided by Ms Geddes, it is our view that:
 - a. the building meets the criteria for historic/social, design, and technological/scientific significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should be amended to read 'Entire external building envelope, including the later extension to the original dining and drawing rooms and combined dormer of the original den and attic room'.
141. Our updated heritage assessment is attached in Appendix J.

BX079 – First State House, 11 Wilkinson Street

142. Kāinga Ora (S269) is concerned with the methodology and assessment used to identify specific heritage buildings through PC1, in particular, that a bespoke rating is applied to the significance criteria in Policy 2.4.2.1.b. This rating system is not consistent with that used elsewhere, including in Auckland, or with the ranking used by HNZPT. A ranking of "meets criteria" would typically not justify inclusion in a historic heritage schedule.
143. Kāinga Ora seeks that an assessment should be undertaken in reference to the established criteria in the Otago Regional Policy Statement. The submission proposes a ranking approach that Kāinga Ora considers has greater consistency with established practice across New Zealand:
 - Plan ranking A (equivalent to HNZPT Category 1 places nationally significant)

- Plan ranking B (equivalent to HNZPT Category 2 places, regionally or nationally significant)
- Moderate value (locally of interest, but not nationally significant under Section 6f), to qualify potentially as an 'other matter' under part [sic, section] 7.

144. Kāinga Ora is opposed to the identification of new buildings (including 11 Wilkinson Street) being added to the schedule unless they are assessed as being 'nationally significant'.

Discussion

145. We note 11 Wilkinson Street was selected for heritage assessment as Dunedin's first state house. It is representative of the programme that saw a great number of state houses constructed across Dunedin. The DCTH notes that there are no existing scheduled state houses from the 1930s on the district plan schedule. The dwelling demonstrates the commencement of a nationwide state housing scheme within the local context.

146. For comparison, the country's first state house in Miramar (Wellington) is recognised as a Category 1 historic place (List No. 1360). In Nelson, a 1938 state house is listed by Heritage New Zealand as a Category 2 historic place (List No. 1590). There are also examples where neighbourhoods of state housing are recognised for their heritage values, for example, Hayes Paddock in Hamilton and Savage Crescent in Palmerston North.

147. In Dunedin, an earlier state housing scheme set up under the Workers Dwellings Act 1905, is recognised as a historic area by Heritage New Zealand (Windle Settlement) and as a heritage precinct in the 2GP, as well as representative examples being individually scheduled (B514 & 515) and listed with HNZPT (List No. 3179 & 2168). As the significance of 11 Wilkinson Street is comparable with these buildings, we consider that it meets the threshold for scheduling.

148. The 2GP significance criteria are derived from the criteria included in the PORPS (2021) and HNZPT. We consider that 11 Wilkinson Street meets the threshold and is comparable to a Category 2 historic place. We note that the place has cultural significance (not spiritual) under the spiritual/cultural criterion.

149. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to the building.

150. In conclusion, having reviewed the information provided by Kāinga Ora it is our view that:

- a. the building meets the criteria for historic /social, spiritual/cultural, and design significance in Policy 2.4.2.1.b; and
- b. the 'protection required' for the building should not be amended.

BX080 Archway Lecture Theatres, 290 Leith Street

151. The University of Otago (S251) disagrees with the statement in the heritage assessment that the building is unique and special to Dunedin and that it contributes to a nationwide body of brutalist-inspired architecture. The brutalist-inspired architectural style of the building does

not make it significant. It is simply an example of its type. The Richardson Building, located across the Leith from the Archway Lecture Theatres, represents brutalist-inspired architecture with the 'heritage' values of this building already recognised by way of it being placed on the HNZPT List and scheduled within the 2GP.

152. The University also considers that the lecture theatres are not consistent with and do not contribute to the heritage environment within which they sit, and that the proposed protection of the building will adversely affect the existing recognised and protected heritage values of other nearby buildings (the 'gothic complex') and would 'effectively disrupt the established and thus recognised hierarchy of significance, in terms of heritage values, on the campus.' The heritage assessment should be considered in the context of these surrounding heritage buildings.
153. The submission states that the heritage assessment overstates the heritage values of the building and the significance. A critique is provided, undertaken by New Heritage, which argues that the assessment does not properly consider the heritage context of the site, and does not acknowledge the ideology that Brutalist architecture represents (disruptive and anti-establishment), which the critique considers has no place in New Zealand's cultural landscape.

Discussion

154. We note the critique's assessment of Council's heritage assessment. No alternative assessment has been provided. We consider that the critique's assessment of brutalism supports our argument that the unconventional design and construction philosophy of the building contributes to its heritage significance. We have amended the heritage assessment to include this information.
155. Our heritage assessment is for the Archway Theatres building itself rather than an assessment of the 'fit' of the Archway Theatres in the wider built environment of the central campus. We agree that the brutalist design disrupts the aesthetic of the already scheduled and listed heritage buildings. We would argue, however, that this is part of its architectural intention and now significance. In our view, the visual juxtaposition between the Archway Theatre and the historic central campus buildings adds to the understanding and appreciation of heritage values of both the subject and earlier buildings. The presence of the Archway Theatres contributes historic authenticity and architectural integrity to the collective heritage values and setting of the heritage buildings in the core of the campus.
156. Demolition of the Archway Theatres would be a loss of both the physical building and also an erasure of the social context of the mid-late twentieth century development of the University. The architectural representation of social issues (that brutalism embodies) contributes to an accumulated understanding of the history and development of the campus from a heritage perspective.
157. The extent of the recommended protected part of the building is limited to the exterior and internal circulation corridor. This allows flexibility for interior remodelling of the four lecture theatres (for either teaching space or potentially adaptive reuse). However, it is acknowledged that some of the spatial constraints are intrinsic to the design and construction of the building.

158. It is noted that the 2010 Campus Master Plan proposes to demolish the Archway Theatres. However, it is important not to prematurely conflate the heritage assessment process, the demolition of the Archway Theatres, and the broad brush (and yet unrealised) plan to revitalise and develop the core of the campus on a scale that extends far beyond the site of the Archway Theatres.
159. Comparable examples are difficult, however, there are other examples of brutalism recognised for their heritage values, including Wellington's Hannah Playhouse (List No. 9983) and the nearby Richardson Building, also designed by Ted McCoy (B826) (List No. 7809) for the University of Otago.
160. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to this place.
161. In conclusion, having reviewed the information provided by the University, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.
162. Our updated heritage assessment is attached in Appendix K.

BX087 Hanna Residence (former), 56 Carroll Street

163. Mark Thom (S291) disagrees that the house at 56 Carroll Street has significant heritage value.

Discussion

164. We have reviewed the assessment and are confident that the building meets the threshold for historic and social significance as outlined in the assessment report. The submitter has not provided any information as to why the assessment is insufficient.
165. We note the heritage significance relates to the long association with the Hanna Family, members of the Lebanese community, who were key residents in this part of town in the nineteenth and twentieth centuries. The significance is derived from the association of the community with the place, and we acknowledge that the heritage values are not as tangible or legible as other buildings proposed for scheduling. However, the story of this place and more broadly, immigrant communities, is important to the understanding of the history of the city. The subject dwelling sits alongside the former Chinese Mission Church and Manse at 58, 60 and 60A Carroll Street (BX049(i)(ii)) and has a shared history with BX096 at 89 Carroll Street.
166. We consider the Hanna Residence comparable to a Category 2 historic place. Comparative examples on similar architectural value include the 1898 house on George Street (List No. 7431), the house at 107a and 107b Stafford Street (List No. 4787), and the house at 48-50 Fitzroy Street (List No. 4777). Note, these comparative examples do not relate to the history of ethnic communities. An example of an association with the Lebanese community is the former Corban's Winery and Mt Lebanon Vineyards in Auckland (Category 1 historic place, List No

9336), and the Shalfoon Bros Store in Ōpotiki (List No. 807, Category 1 historic place) although these are not residential buildings.

167. In conclusion, having reviewed the information provided by Mr Thom, it is our view that:

- a. the building meets the criteria for historic/social significance in Policy 2.4.2.1.b; and
- b. the 'protection required' for the building should not be amended.

BX093 Brinsley Residence (former), 169 Forbury Road,

168. Five submissions were received directly opposing scheduling of 169 Forbury Road: Marcel Choo (S113), Sharmaine Pang (S119), Isabelle Ang (S124), Petrus Yen (S125), Weta Family Trust (Petrus Yen) (S270).

169. Marcel Choo (S113) submits that:

- the property lacks unique architectural or historical significance.

170. Sharmaine Pang (S119) submits that:

- the property lacks unique architectural or historical significance.
- the English Revival style is not unique and there are similar examples already preserved in Dunedin.

171. Isabelle Ang (S124) submits that:

- there is insufficient evidence of the historical or architectural uniqueness.
- the English Revival style is not unique and there are similar examples already preserved in Dunedin and numerous other properties better represent this style.
- the assessment does not link to specific historical events.

172. Petrus Yen (S125) submits that:

- the assessment contains factual inaccuracies.
- the assessment makes vague historical and social significance claims, and uses subjective design criteria, which fail to meet the robust thresholds set by HNZPT.
- the building is not linked to specific historical events.
- the building does not meet the threshold for design significance for uniqueness or innovation.

173. Mr Yen's submission contains a detailed 'counter argument' challenging the heritage assessment for BX093 undertaken by the DCC, which includes corrections and makes comparisons with HNZPT's assessment criteria.

174. Weta Family Trust (S270.001) submits that:

- to meet the definition of 'historic heritage' in the RMA, a building must be nationally significant.
- the assessment contains inaccuracies.
- the building does not meet the historic / social criterion, as there is no community association with the property.
- the building does not meet the design criterion, as the dwelling does not exhibit any unique or ground-breaking architectural qualities that would qualify it as an important development in Dunedin architectural history.

Discussion

175. Our view remains that 169 Forbury Road meets the threshold for inclusion on the heritage schedule. We have amended the assessment to correct the minor factual errors, and our view is that these errors did not affect the overall outcome of the assessment. We note that it is the historic significance that enables the dwelling to meet the criterion for historic/social significance. We have clarified the extent of protection.
176. The house was built for William Brinsley, managing director of Brinsley and Co. Brinsley and Co. was a notable and successful Dunedin Company, and the importance of the house is noted in the DCTH. The grandeur and opulence of this interwar period house, designed by Miller and White, a notable local architectural practice, reflect the business success of the company. The scale, quality, and location of the dwelling have meant that it attracted similarly successful and notable subsequent owners.
177. The dwelling dates from the interwar period, identified in the DCTH as being under-represented on the district plan schedule. A review of the construction dates for scheduled heritage buildings, where construction dates are recorded, indicates few, if any, scheduled interwar/post-World War II residences.
178. The dwelling is comparable in design and historic significance (although of a later period) to the Ritchie House (Basil Hooper, 1914, B259, Category 1 historic place, List No. 7492), Threave (JL Salmond, 1903, B312, Category 1 historic place, List No. 2163), and Moata (JL Salmond, 1900, B331, Category 2 historic place, List no. 2195). All of these dwellings are located in Dunedin.
179. The architectural quality of the dwelling is also comparable to, or greater than, early twentieth and interwar houses listed by Heritage New Zealand in other regions, including Te Tawa in Canterbury (1908, JS Turnbull, List No. 2071, Category 2 historic place), Ngahere in Auckland (1907-1908, Noel Bamford, List No. 4501, Category 2 historic place), Marire in Auckland (1915, William Gummer, List No. 4533, Category 2 historic place), and Rendell House in Auckland (1927, Horace Massey, List No. 600, Category 2 historic place), noting that some of these examples are earlier and do not represent the interwar revival of this style.

180. Another comparable dwelling, before its expansion for use as a seminary from 1946 onwards, is Antonio House in Christchurch (1909, Clarkson and Ballantyne, List no. 7336, Category 2 historic place). Note that Antonio House has been damaged by the earthquake and is understood to remain vacant. In comparison to the original residential component of Antonio House, Dunedin is extremely fortunate that the Brinsley House (and its curtilage) retains such a high degree of its original architectural integrity and, as far as visible from the street, appears to be in good condition.
181. We disagree that the dwelling does not demonstrate design significance, and it is our view that 169 Forbury Road demonstrates a very high standard of architectural quality. Typical of the architecture of the interwar period, the dwelling doesn't have the highly decorative elements that define the earlier Victorian period; the quality and detailing are expressed in a manner that is much more intrinsic to the design and materials. The overall form and composition of the dwelling, use of quality materials and restrained decoration all contribute to a magnificent presence on the substantial corner site. A notable aspect of the dwelling is its grandeur, it has been designed to demonstrate the wealth and social standing of a notable family.
182. Considering the wealth and prosperity in Dunedin during the late nineteenth and early twentieth century that enabled the construction of substantial homes, 169 Forbury Road has the potential to be considered amongst the most outstanding and intact interwar homes nationally. If it were to be assessed under HNZPT criteria, we consider the place may meet the threshold for a Category 1 historic place. If a place were to be proposed as a Category 1 historic place, it would be subject to a comparative assessment.
183. As a private dwelling, we have not proposed to protect interior spaces. If the property were to be considered for a Category 1 listing, the list entry report would explicitly consider the heritage value of the interior. Photos of the interior are available online and it appears to be as outstanding as the exterior.
184. In conclusion, having reviewed the information provided by the submitters, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should not be amended.
185. Our updated heritage assessment is attached in Appendix L.

BX112 – Hudson/Petherbridge House, 9 Alton Avenue

186. David Petherbridge (S56) supports the scheduling but requests an amendment to the 'protection required.' In particular:
- protection is extended to the land to protect it from future subdivision and redevelopment. He notes that the house's position and relationship to the section and views is a significant aspect of the design and its wider significance as a landmark. This is addressed in the s42A report.

- the protection excludes the kitchen and small flat off the kitchen, in the interests of the house being able to be adapted by future owners.
- the garages (which pre-date the existing house) be included in the schedule but allow for their repurposing through the planning process.

Discussion

187. We note that the resource consent process for additions and alterations allows for changes to the interior and exterior of the house and to the garages, while considering the effects on heritage values. The submitter has since clarified that they now understand that the resource consent process allows for change, and they are satisfied that the resource consent process addresses their submission. They are comfortable with the kitchen being included in the protection but would prefer the flat to be excluded.
188. The flat was the former maid's accommodation and is not a high-status element of the interior. We consider that it does not have the same heritage values, and it is appropriate to exclude. The kitchen retains much of the original joinery and is a significant element of the interior. It is uncommon to have such an intact period kitchen.
189. The garages, which predate the construction of the current dwelling, are already included as external/ancillary elements in the recommended protection. The garages demonstrate the progressive development of the subject site that started with the earlier dwelling.
190. Further research on the building indicates the roofing material may contain asbestos, typical for construction in this period when materials containing asbestos were frequently used. To facilitate the replacement of the roof, we propose to amend the extent of protection to allow the roofing to be replaced without the need for resource consent (noting acceptable alternatives as a similar fibre cement product is not available). This is consistent with the approach used for other buildings proposed for scheduling.
191. In conclusion, having reviewed the information provided by Mr Petherbridge, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the 'protection required' for the building should be amended to read 'The entire external building envelope and interior excluding the recent fireplace insert in the breakfast room, the later bathroom fittings to the upstairs ensuite, the former maid's flat (identified on the original plans adjacent to the kitchen), and allowing for the roof to be replaced with either a membrane or corrugated steel (that matches the corrugated profile of the existing roofing material). The protection also includes the freestanding garage, iron gates and posts at the entry, and the garden fountain.'
 - c. Our updated heritage assessment is attached in Appendix M.

BX117 Lookout Point Fire Station, 182 and 184 Mornington Road, Kenmure

192. Fire and Emergency NZ (FENZ) (S257) submits that the Lookout Point Fire Station at 184 Mornington Road does not possess the heritage values necessary to warrant protection. No further detail is provided.

Discussion

193. We consider that the Lookout Point Fire Station meets the threshold for design, historical and social significance as outlined in the heritage assessment report for inclusion in the district plan. No information has been provided by the submitter as to why the assessment is disputed.
194. We consider the Lookout Fire Station to be comparable to a Category 2 historic place. Fire stations are an underrepresented heritage type – there are only five purpose-built fire stations included on the HNZPT list (one being the central Dunedin Fire Station, Category 2 historic place, List No 7270). The Lookout Point Fire Station is noted as a potential gap in heritage recognition in the DCTH.
195. The heritage assessment recommends protection for the ‘entire external building envelope of fire station and the attached accommodation’ located on 184 Mornington Road. The ‘freestanding residential accommodation to the north of the fire station’ on 182 Mornington Road has been excluded. The decision to exclude the freestanding residential accommodation at 182 Mornington Road was specifically to enable development over two-thirds of the combined site that, in our view, provides space for a new building to accommodate ongoing FENZ operations at this site (which could also include alternative uses of the existing building). Any entry on the heritage schedule should apply to 184 Mornington Road only.
196. We understand that Policy 9 of the Manatū Taonga Ministry for Culture and Heritage *Policy for Government Management of Cultural Heritage Places* applies to this place.
197. In conclusion, having reviewed the information provided by FENZ, it is our view that:
- a. the building meets the criteria for historic/social and design significance in Policy 2.4.2.1.b; and
 - b. the ‘protection required’ for the building should not be amended.