

**BEFORE A HEARING PANEL APPOINTED
FOR DUNEDIN CITY COUNCIL**

**I MUA NGĀ TE PAEPAE KAIWAWAO MOTUHAKE O
TE KAUNIHERA Ā-ROHE O ŌTEPOTI**

IN THE MATTER of the Resource Management Act 1991 (**RMA**)

AND

IN THE MATTER of the hearing of submissions in relation to Plan
Change 1 – Minor Improvements (PC-2024-1)
(**PC1**) to the Second-Generation Dunedin District
Plan (**2GP**)

HEARING TOPIC: (Hearing Stage 1): Heritage Scheduling

**STATEMENT OF JOSHUA NEVILLE
ON BEHALF OF KĀINGA ORA – HOMES AND COMMUNITIES (#269)**

(CORPORATE)

02 MAY 2025

1. EXECUTIVE SUMMARY

- 1.1 My name is Joshua Neville, I am a Principal Planner at Kāinga Ora – Homes and Communities (**Kāinga Ora**). I am authorised to present this evidence on behalf of Kāinga Ora in support of its primary submission (submitter #269) on the Dunedin City Council's (**the Council**) proposed Plan Change 1 Minor Improvements (PC-2024-1) (**PC1**) to the Second-Generation Dunedin District Plan (**2GP**).
- 1.2 Kāinga Ora opposes the proposed heritage scheduling of 11 Wilkinson Street, Liberton. While Kāinga Ora recognises the importance of protecting historic heritage under section 6(f) of the Resource Management Act, Kāinga Ora does not consider that the scheduling of this site meets the required threshold for significance.
- 1.3 The heritage assessment relied upon to support the scheduling lacks robust analysis and does not apply consistent or recognised criteria. It fails to demonstrate that 11 Wilkinson Street has outstanding or representative historic, architectural, or social values when assessed against relevant planning frameworks including the Proposed Otago Regional Policy Statement 2021, APP8 criteria.
- 1.4 The 2GP Policy 2.4.2.1 b. criteria that was used to establish heritage value, does not represent a best practice approach to heritage value assessment. As such further tests are necessary identify a building to schedule to ensure that any proposal adequately meets the test of being a building that have significant heritage values, as required by Policy 2.4.2.1 a. of the 2GP. No such test has been carried out with respect to 11 Wilkinson Street by the Council.
- 1.5 Kāinga Ora considers that the value attributed to the property is primarily associative or amenity based and, if anything, more appropriately recognised under section 7(c) of the RMA rather than through the scheduling under section 6(f).
- 1.6 Kāinga Ora holds obligations under the Kāinga Ora – Homes and Communities Act 2019 and other legislation to ensure that its public

housing stock remains safe, decent and fit-for-purpose. The proposed scheduling would constrain the ability of Kāinga Ora to maintain or efficiently use and develop the property in line with these statutory responsibilities.

- 1.7 In line with Section 14 of the Kāinga Ora Act (operating principles) Kāinga Ora operates in a manner that recognises environmental, cultural, and heritage values.
- 1.8 Kāinga Ora supports appropriate heritage protection, including for state housing, but considers this should be achieved through contextually grounded and comparative approaches and consistent with regional and national statutory frameworks. This proposed scheduling does not reflect best practice or proportionality.
- 1.9 For these reasons, Kāinga Ora respectfully seeks that 11 Wilkinson Street is not recommended for inclusion in Appendix A1.1 of the 2GP Heritage Schedule.

2. INTRODUCTION

- 2.1 My full name is Joshua Thomas John Neville.
- 2.2 I hold the position of Principal Planner within the Development Planning team at Kāinga Ora, with the focus of my work being predominantly within the South Island. I have held this position since February 2025 and have been working as part of the Development Planning team at Kāinga Ora since August 2021.
- 2.3 I have eleven years' experience in planning, policy, and urban development, which includes working within local government.
- 2.4 I hold the qualifications of a Bachelor of Science (Geography) and a Master of Science (Geography) from the University of Canterbury.
- 2.5 In my role with Kāinga Ora, I have provided planning advice, and management of processes relating to:

- Assessment and identification of redevelopment land within the Kāinga Ora portfolio;
- Strategic future land-use planning;
- Regulatory planning associated with Kāinga Ora residential development projects; and
- Input into regulatory planning activities including plan reviews and plan variations throughout the South Island.

2.6 I was involved in the review of PC1 and preparation of a submission for Kāinga Ora as a submitter on the proposed plan change. I am presenting this corporate evidence in relation to this submission from Kāinga Ora.

2.7 I am familiar with the Kāinga Ora corporate intent in respect of the provision of housing within Dunedin City. I am also familiar with the national, regional and district planning documents relevant to PC1.

2.8 I have previously presented corporate evidence on behalf of Kāinga Ora at Hearings on the Dunedin Future Development Strategy.

2.9 In preparing this evidence I have read the Plan Change material, including the Section 32 assessment and Section 42A reports, together with the associated appendices prepared by the Council.

2.10 I can confirm that I am authorised to give corporate evidence on behalf of Kāinga Ora in respect of the PC1.

Scope of Evidence

2.11 I have been asked to provide corporate evidence in relation to the Kāinga Ora housing portfolio within Dunedin and more specifically 11 Wilkinson Street. This evidence relates to the submission of Kāinga Ora (#269) on the PC1.

2.12 For the benefit of the panel, this statement of evidence provides a background to Kāinga Ora and the organisation's interest in the plan change. Sections 3 of this evidence is relevant across all aspects of the

Kāinga Ora submission on PC1 and while it will be referenced in the subsequent hearing, Kāinga Ora does not propose to repeat this within future hearing evidence.

- 2.13 The body of this evidence is focused only on those submission points addressing matters relating to Heritage scheduling and is therefore primarily related to the proposed scheduling of 11 Wilkinson Street, Liberton and the opposition Kāinga Ora has submitted on to this.

3. BACKGROUND TO KĀINGA ORA

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

The Kāinga Ora – Homes and Communities Act 2019

- 3.2 The Kāinga Ora Act sets out the functions of Kāinga Ora in relation to housing and urban development, as well as its core role as a world class public housing landlord. Kāinga Ora works across the housing spectrum to build and contribute to complete, diverse communities that enable New Zealanders from all backgrounds to have similar opportunities in life.

Overview of the Kāinga Ora public housing portfolio

- 3.3 Kāinga Ora is the largest residential landlord in New Zealand, providing public housing¹ to more than 186,000 people² who face barriers (for a number of reasons) to housing in the wider rental and housing market.
- 3.4 At the local level, Kāinga Ora manages a public housing portfolio of 1,490 homes³, making it a significant landowner. At the time of writing, there are a further 357 households on the public housing waitlist in Dunedin City who need a home, according to the Ministry for Social Development⁴.

¹ Public housing is an umbrella term for state housing and community housing.

² Kāinga Ora – Homes and Communities Annual Report 2022

³ <https://www.hud.govt.nz/stats-and-insights/the-government-housing-dashboard/key-stats-by-tla#tabset> (March 2025)

⁴ The Housing Register, as at 31 March 2025, Ministry of Social Development.

- 3.5 Public housing is a subset of affordable housing and meets the housing needs of people who face barriers to housing in the wider rental and housing market. In general terms, housing supply issues and broader events have made housing less affordable and as such there is an increased demand for public housing.
- 3.6 To address this need, and the priorities given to Kāinga Ora by the government, Kāinga Ora will often redevelop sites it owns to make more efficient use of land it already owns. This means replacing many of our older state houses with more, warm and dry homes in areas of high demand. Kāinga Ora is involved in housing projects of different sizes and types in most of New Zealand's main centres including in Dunedin.

The importance portfolio reconfiguration and maintaining the portfolio

- 3.7 The demographic trends and changing demand on public housing mean the ability for Kāinga Ora to reconfigure its portfolio is not just a 'nice-to-have'. For Kāinga Ora, portfolio reconfiguration is a vital mechanism to unlock the potential of the land and provide sufficient, and decent housing, that will meet the current and future needs of those requiring it.
- 3.8 When redeveloping its portfolio, Kāinga Ora will attempt to make better use of the land, and through providing new housing typologies reconfigure the portfolio to meet the needs of families now and into the future.
- 3.9 In general, the existing state homes of 2 or 3-bedrooms built 50+ years ago on larger sections, no longer meet the needs of today's households. Kāinga Ora is focussed on reconfiguring its portfolio to meet the needs of today's families and better match to current demand. Over time the reconfiguration of the portfolio will enable improvements in the form, function and quality of the housing within Kāinga Ora portfolio. In managing the reconfiguration, Kāinga Ora acknowledges that changes to the built form will be necessary.
- 3.10 Kāinga Ora has obligations to its existing tenants and responsibilities as an asset owner. Under Section 9 of the Kāinga Ora Act, Kāinga Ora is

required ensure the public housing it provides, is maintained in a safe, decent, and fit-for-purpose condition. Further, Section 24 of the Act requires Kāinga Ora to take reasonable steps to ensure the management, maintenance, and improvement of its housing stock. This includes compliance with the Building Act 2004, ensuring properties meet standards for health and safety, insulation, ventilation and thermal efficiency. Other legislation also places further obligations on Kāinga Ora to improve the quality, and comfort of its homes specifically addressing the need to improve heating, insulation and ventilation.

3.11 Kāinga Ora also has duties as a residential tenancy provider and as an employer, and Kāinga Ora must ensure its housing stock is free from hazards. Homes that Kāinga Ora provide must be maintained to an appropriate and safe standard and requests for repairs and addressing maintenance issues within a reasonable timeframe is essential.

3.12 As a result, Kāinga Ora maintains a significant interest in how the 2GP provisions enable the ongoing use, development, renewal and maintenance of its portfolio, so that Kāinga Ora is able to continue to provide its statutory purpose of housing those in need. This includes replacing dwellings which are no longer fit for purpose with warm, dry homes. within the context described above, and in accordance with the principles of the Kāinga Ora Act while giving effect to government policy. As such, Kāinga Ora is particularly concerned with the PC1 proposal to schedule as a protected heritage item, 11 Wilkinson Street, Liberton, Dunedin.

4. THE KĀINGA ORA SUBMISSION

4.1 Kāinga Ora recognises the protection of historic heritage as a matter of national importance under section 6 of the Resource Management Act (“**the Act**” or “**RMA**”). However, for the reasons set out below, Kāinga Ora opposes the proposed scheduling of 11 Wilkinson Street, Liberton as it does not meet the requirements 2GP, the Proposed Otago Regional Policy Statement 2021 (PORPS), nor as a matter that needs to be recognised in the District Plan under section 6 of the RMA.

- 4.2 Kāinga Ora believe that should value be established, this value is more likely to be amenity value and recommends that this is more appropriately addressed as an any other matter value under section 7 of the RMA, or through methods outside of the District Plan.
- 4.3 In arriving at our submission points we considered by way of review, and through internal research what values had actually been established through the *HERITAGE ASSESSMENT FOR SCHEDULED HERITAGE BUILDING: 11 WILKINSON STREET - DUNEDIN'S FIRST STATE HOUSE (1930S STATE HOUSING SCHEME)*. Kāinga Ora found the assessment to lack a clearly established and recognised heritage value that was significant enough to warrant protection, and merit the associated costs and restrictions of such. Kāinga Ora has therefore opposed the scheduling of 11 Wilkinson Street, Liberton.

5. REQUIREMENTS FOR HERITAGE PROTECTION

- 5.1 Under the 2GP, section 13. Heritage, historic heritage is managed in accordance with Section 6(f) of the RMA, which identifies the protection of historic heritage from inappropriate subdivision, use, and development as a matter of national importance. The 2GP gives effect to this through Policy 2.4.1.1 by identifying Heritage buildings and structures in schedule (*Appendix A1.1*) *buildings and structures* and by applying corresponding objectives, policies, and rules to manage their protection. Specifically, the 2GP requires that any modification, demolition, or development affecting a scheduled heritage item or area must avoid, remedy, or mitigate adverse effects on its heritage values, including physical fabric, historical associations, and streetscape contribution. Activities affecting heritage places are subject to assessment criteria that consider the extent of change proposed, the significance of the heritage values affected, and the potential for cumulative loss of character.
- 5.2 Policy 2.4.2.1(B) directs the identification in *schedule (Appendix A1.1)* *buildings and structures* that have **significant heritage values** and use rules to: (...)

- *Identify heritage buildings and structures based on the following criteria:*
 - (i) *historic and social significance;*
 - (ii) *spiritual/cultural significance, including significance to Māori;*
 - (iii) *design significance; and*
 - (iv) *technological/scientific significance.*

5.3 Similarly, decision-makers on the District Plan must have regard to the Proposed Otago Regional Policy Statement 2021 (PORPS) when considering heritage protection, as it sets out clear regional direction for the identification and management of historic heritage. Objective HCV–HH–O3 emphasizes that Otago’s unique historic heritage contributes to the region’s character, sense of identity, and social, cultural, and economic well-being, and should be protected for future generations against inappropriate subdivision, use, and development. Policy HCV–HH–P4 **mandates** the identification of places and areas of historic heritage in Otago **in accordance with APP8**, categorizing them based on their values or qualities. This directs territorial authorities to identify and evaluate historic heritage based on its historic, physical, and cultural significance, and to use planning provisions to avoid adverse effects on that heritage where it is of high or outstanding significance. In decision-making, this means there is a requirement to ensure proposed scheduling are supported by robust evaluation, and that any regulatory mechanisms proposed (such as scheduling or rules under a district plan) are proportionate and justified in terms of the significance of the heritage values being protected. The PORPS reinforces the principle that heritage protection must be balanced against the nature and extent of those values and managed in a way that aligns with broader regional planning outcomes.

5.4 The PORPS states that:

‘A place or area is considered to have historic heritage if it meets any one or more of criteria below:

- Archaeological

- Architectural
- Cultural
- Historic
- Scientific
- Social
- Spiritual
- Technological
- Traditional'

Appendix 8 provides a guide for each criteria, with a helpful description to determine if a criteria is met or otherwise.

- 5.5 The criteria of the PORPS broadly aligns with the *Guidelines for Assessing Historic Places and Historic Areas for the New Zealand Heritage List/Rārangī Kōrero (2019)* which has been adopted by Heritage New Zealand Pouhere Taonga as its Significance Assessment Guidelines⁵.
- 5.6 Reflecting on the above criteria, Kāinga Ora considers that the proposal to schedule 11 Wilkinson Street, lacks merit both in terms of the scheduling information provided, but also the way in which it has been identified. This proposed scheduling unnecessarily and inappropriately constrains the ability to use, manage, maintain and develop the existing site, and it will have impacts on the ongoing management and maintenance of the existing buildings and site in line with the obligations placed on Kāinga Ora outlined above.
- 5.7 Also considering the above, Kāinga Ora ascertain the Section 32 assessment was flawed in that it did not sufficiently consider the wider potential costs of the proposed scheduling against the limited benefits.

⁵<https://hnzpt-prod-web.azurewebsites.net/media/b2emu5pe/significance-assessment-guidelines.pdf>

6. RESPONSE TO MATTERS RAISED IN THE SECTION 42A REPORTS

- 6.1 The Section 42A reports of Mr. Rawson and supporting evidence is relevant to the Kāinga Ora submission and this statement evidence. Kāinga Ora seeks to respond to some of the matters raised in this reporting below.

Background to proposed scheduling

- 6.2 Mr. Rawson notes at section 2.2.2 of his evidence titled *Dunedin Contextual Thematic Study* – that this study was used as part of the basis to update the heritage schedule, and with specific regard to 11 Wilkinson Street, that a gap identified in the thematic study included the large-scale Government housing at Liberton and Wakari.
- 6.3 As identified, this study⁶ did identify gaps in the heritage schedule, noting 0 homes listed under the categories 10.2 *WORKERS HOUSING* or 10.3 *STATE HOUSING*, and potential gaps being:

Workers Dwelling Act Houses, Windle Settlement, Rosebury Street, Belleknowes (these are contained within NZHPT Historic Area No 7640). Large scale Government housing at Liberton and Wakari (1937) and post World War II at Helensburgh, Brockville, Pine Hill, Corstorphine and the inner city Star Flats in Melville Street. Dunedin City housing, Clyde St area, and houses on land made available by DCC for subsidised private houses.

- 6.4 The study however did note a further recommendation to *Commission a study of workers and state housing*.
- 6.5 Neither the Plan Change documents, Section 32 assessment, nor Section 42A report, or supporting evidence explains in detail why 11 Wilkinson Street has been ‘selected’ to be scheduled. No study of workers and state housing seems to have been commissioned to support the work to identify suitable candidates to fill gaps in the

⁶ Dunedin Thematic study: Volume 2 - Analysis and Recommendation
https://www.dunedin.govt.nz/__data/assets/pdf_file/0007/142774/dunedin-contextual-thematic-history-heritage-study-report-vol-2.pdf

schedule with respect to large scale Government housing at Liberton and Wakari.

- 6.6 In 2005 Kāinga Ora supported the production of a book to mark the centenary of state housing in New Zealand, *We Call It Home - A History of State Housing in New Zealand*, by Ben Schrader⁷. This is a useful resource to understand the history of state housing in New Zealand.
- 6.7 Without strong background evidence, Kāinga Ora remain concerned that the identification of 11 Wilkinson Street to be scheduled is based solely on the merit of it being the first state dwelling in Dunedin, not of it being of specific heritage value beyond this novelty. This reinforces our submission position that 11 Wilkinson Street should not be scheduled.

Policy for Government Management of Cultural Heritage Places 2022

- 6.8 In his report Mr. Rawson makes a pointed reference:

'I also refer to sub-section 6.2.3 above, which outlines that government agencies, including Kāinga Ora, are required to comply with the Policy for Government Management of Cultural Heritage Places 2022. I consider that the proposed scheduling of this building is consistent with this (noting that this policy directs state sector agencies, rather than Council decision-makers).'

Kāinga Ora request the panel disregard this statement as an inference that as a result of the policy we must support the scheduling of any place we own. This policy and subsequent guidance are there to ensure Government agencies are stewards of the heritage places in their care and follow best practice ... Kāinga Ora does not support the scheduling of 11 Wilkinson Street on the basis that it does not represent a best practice method for identifying and protecting heritage. We would support other approaches to ensure heritage associated with state housing is appropriately protected and recognised, this proposed scheduling denigrates actual heritage values and seeks protection based on unorthodox methods. In opposing this scheduling, Kāinga Ora

⁷ <https://nzhistory.govt.nz/culture/state-housing-in-new-zealand/further-information>

maintains that is fulfilling its statutory obligations and giving effect to government policy. Kāinga Ora ask that the Council engage with us further, as to what appropriate protection and recognition of state housing heritage could mean for Dunedin.

7. EXPERT HERITAGE EVIDENCE

7.1 In his report Mr. Rawson relies on heritage expert evidence to make his recommendation to reject the Kāinga Ora submission. Upon reading this evidence and the discussion of Mr. Rawson, there are several matters Kāinga Ora believe are relevant to our submission and disagree with the findings of Mr. Rawson.

Limitations of Heritage Assessment

7.2 In their evidence referring to the criteria for scheduling under Policy 2.4.2.1.b, Ms. Bauchop and Mr. Mawdsley, note:

‘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.’

7.3 These being⁸:

- **Historic**

- (i) *Is the feature associated with an important event or activity?*
- (ii) *Is the feature associated with a notable person, group or organisation?*

- **Spiritual/Cultural/Social**

- (i) *Does/did the feature provide an important contribution to a way of life, culture, philosophy, religion or other belief?*

⁸ https://www.dunedin.govt.nz/__data/assets/pdf_file/0006/149514/Chapter-13-Townscape-_29-May-2012_.pdf

- (ii) *Is/was the feature an important landmark or symbol for a particular group or community?*

- **Design**

In the fields of architectural/landscape/urban/technical/engineering design:

- (i) *Is the feature a good example of a particular style, period, function or designer?*
- (ii) *Does the feature have noteworthy aesthetic qualities?*
- (iii) *Does the feature have a significant design relationship with its setting and/or surrounding features, neighbourhood or area?*
- (iv) *Does the feature display noteworthy craftsmanship or creative, aesthetic or innovative use of materials, spaces, finishes and construction methods?*

- **Technological/Scientific**

- (i) *Is the feature associated with the creation, invention, adaption or application of an industry, science or technology?*

7.4 These criteria, and their application in assessment does not align to PORPS APP8 criteria, and the guidance to support their use. As stated in our submission Kāinga Ora is concerned with the methodology and assessment used to identify buildings for scheduling through Plan Change 1. The use of the criteria described by Ms. Bauchop and Mr. Mawdsley, in making heritage assessments result in novel elements contributing to a rating of heritage significance, which would otherwise not have counted had a more established and recognised method been used. Some examples⁹.

⁹<https://www.gw.govt.nz/assets/Documents/2022/03/A-guide-to-historic-heritage-identification.pdf>
<https://www.qualityplanning.org.nz/node/749> (Identification of Historic Heritage)
<https://www.aucklandcouncil.govt.nz/arts-culture-heritage/heritage/protecting-our-heritage/Documents/methodology-guidance-evaluating-aucklands-historic-heritage.pdf>
<https://hnzpt-prod-web.azurewebsites.net/media/i2mo2c4z/guide-to-the-management-of-historic-heritage-district-plans.pdf>
<https://hnzpt-prod-web.azurewebsites.net/media/b2emu5pe/significance-assessment-guidelines.pdf>
<https://wellington.govt.nz/-/media/your-council/plans-policies-and-bylaws/district-plan/proposed-district-plan/files/hearing-streams/03/statements-of-evidence/heritage-assessments/historic-heritage-evaluation-template-final-v1-2022.pdf>

7.5 Regarding 11 Wilkinson Street the heritage assessment states:

Summary of Heritage Significance Assessment	
Historic/Social	<i>Meets criteria</i>
Spiritual/Cultural	<i>Meets criteria</i>
Design	<i>Meets criteria</i>
Technological/Scientific	<i>Does not meet criteria</i>

7.6 If this was alternatively assessed under the methods described in the Proposed Otago Regional Policy Statement, a different assessment of whether the building meets the criteria having significant heritage values required by Policy 2.4.2.1.A to schedule would be arrived at. Below is an assessment against the ORPS criteria in Appendix 8¹⁰, with commentary from Kāinga Ora.

PORPS APP8 – Identification criteria for places and areas of historic heritage	Discussion	Proposed rating
Archaeological	There is no recorded archaeological remains associated with the place	Does not meet criteria
Architectural	The place reflects identifiable methods of construction, architectural style, and the movement associated with the Labour Government's 'State Housing' scheme. However, it is not an important nor representative example associated with Dunedin in comparison to the 1000s of similar homes that exist of the same era.	Does not meet criteria
Cultural	This place cannot be demonstrated to have value by an associated cultural group as an important or representative expression of that culture.	Does not meet criteria
Historic	The place does contribute to the understanding of a significant aspect of New Zealand history. However, it does not have particular characteristics that make it useful for enhancing understanding of this aspect of history, especially when compared to other similar places.	Does not meet criteria
Scientific	This place does not have links to scientific methods of enquiry.	Does not meet criteria
Social	As an individual house, 11 Wilkinson St does not have a clearly associated community that has developed because of the place, and its special characteristics.	Does not meet criteria
Spiritual	There are no known individuals or groups who value the place for its religious, mystical or sacred meaning, association or symbolism.	Does not meet criteria
Technological	This place is not associated with physical evidence of a technological advance or method that was widely adopted.	Does not meet criteria

¹⁰ <https://www.orc.govt.nz/media/ecnmsvkv/15425-tracked-appeals-version-porps-21.pdf>

- 7.7 In his report Mr. Rawson fails to address how different the approach taken by the 2GP is, in its assessment of heritage criteria, and fails to give weight to this when considering Policy 2.4.2.1.a in the process for identifying that a *buildings and structures that have **significant** heritage values* be scheduled. In failing to do an appropriate test of significance, Mr. Rawson has not canvassed the issue that is the crux of the Kāinga Ora submission, in that the approach adopted by DCC has resulted in a novel element of history effectively has become the reason used to justify the scheduling of 11 Wilkinson Street. This matter being that it was the first occupied home of the ‘state housing’ scheme in Dunedin.

Further Heritage Commentary

- 7.8 The heritage assessment for 11 Wilkinson Street draws from both primary and secondary sources. As noted in the sources, eight completed homes in Liberton were handed over to the State Advances Department on Monday 28th February 1938, and on the Wednesday 02nd March tenants began to move into the homes¹¹.
- 7.9 The Evening Star, Issue 22895, 1 March 1938, Page 8¹² noted
- “ ...The first of the houses being built under the Government scheme on the Liberton sub-division was occupied early this morning. The tenant was a busy man when a ‘star’ reporter arrived on the scene, and he had no comments to make beyond the statement that a man was lucky to get a house to-day. Another house was occupied this afternoon, and other are rapidly nearing completion. By Saturday it is expected that seven houses will be occupied. ...”*
- 7.10 Whilst it seems clear from the primary and secondary sources, 11 Wilkinson Street was the first to have furniture moved into it, it is not established that it was the first to have a tenant agreement drawn, nor occupied by residents. This link is presumed, however not established.

¹¹ <https://paperspast.natlib.govt.nz/newspapers/otago-daily-times/1938/03/02/4>

¹² <https://paperspast.natlib.govt.nz/newspapers/evening-star/1938/03/01/8>

- 7.11 Notable about the commentary of both the Evening Star and Otago Daily Times was the absence of fanfare associated with the occupation of the homes.
- 7.12 Kāinga Ora does not support that historical significance is premised on the timing of occupation of a home i.e. (it being the first), and believe this should on its own not be recognised as a legitimate matter to consider as part of establishing heritage significance.

Comparative Significance

- 7.13 There appears to be a link drawn in the heritage assessment to the First State House at 12 Fife Lane. 12 Fife Lane is a listed Historic Place Category 1, which is recognised for its national importance¹³. Since the day it was first occupied in 1937, the First State House in Miramar has served as a symbol of the first Labour Government's extensive housing scheme unparalleled to any other comparative home in New Zealand. In terms of Kāinga Ora recognising the heritage value of 12 Fife Lane, the property was purchased back by the then Housing New Zealand given its significance to the history of state housing.
- 7.14 Similar examples of 'first' homes to be occupied have been scheduled in Auckland - 146 Coates Avenue, Orakei¹⁴ and 27 Niccol Avenue, Narrow Neck (the first in the Northshore). Notable about these examples, and 12 Fife Lane are the fanfare, crowds, and speeches associated with their completion and moving in days. These were attended by key figures from the housing scheme, and Prime Minister Savage attended and assisted in moving new residents into each of their new homes¹⁵. These homes were part of the very first wave of homes to be developed as part of the scheme. The first residents of 11 Wilkinson Street appear to have moved into the dwelling with minimal fuss and were reliant on a moving company to

¹³ <https://www.heritage.org.nz/list-details/1360/First%20State%20House>
<https://nzhistory.govt.nz/media/photo/first-state-house>

¹⁴ <https://www.aucklandcouncil.govt.nz/UnitaryPlanDocuments/pc7-02788-first-state-house.pdf>

¹⁵ [Papers Past | Newspapers | New Zealand Herald | 26 September 1938 | Page 8](#)
[Moving in to the first state house – Housing and government – Te Ara Encyclopedia of New Zealand](#)
[State housing | New Zealand Geographic](#)
https://kaingaora.govt.nz/en_NZ/about-us/history-of-state-housing/

assist in their arrival to their new home. With respect to the aforementioned three homes, very detailed heritage assessments were prepared to document their historic significance. This contrasts with the methodologically weak assessment of 11 Wilkinson Street.

Comparative significance of Liberton

- 7.15 Many towns had their first state houses around the same period, while in Dunedin, Liberton may have had the first completed state house this was one of many “firsts” happening across New Zealand as Labour’s housing scheme took effect.
- 7.16 Liberton is very typical of a first-wave state housing area. It does not appear to have introduced any unique architectural or planning ideas of its own; rather, it implemented the prevailing ideas of the day in a Dunedin context.
- 7.17 When set against its peers, Liberton does not stand out as the very first, largest, or most innovative of the state housing suburbs.
- 7.18 In scale, Liberton’s 64 houses were modest compared to larger developments like Auckland’s Orakei, or the hundreds of houses built in the Hutt Valley and in Christchurch’s Hoon Hay and Aranui post-war. Even within Dunedin, the subsequent Corstorphine development in the 1940s was much larger and more uniform, and perhaps more immediately identifiable as a “state housing suburb” to the casual observer.
- 7.19 Liberton, tucked into a hillside, remained relatively small and when first completed was nearly fully occupied by middle-class tenants (e.g. a government worker, in the first house) rather than exclusively targeting the very poor¹⁶. This could suggest its social impact, while important, was not as visibly transformative as state housing in some neighbourhoods elsewhere.
- 7.20 In innovation, Liberton did not break new architectural ground; it faithfully executed the standard model but did not have features like the

¹⁶ <https://builtindunedin.com/2013/08/31/dunedin-first-state-house/> (accessed 02/05/2025)

experimental flats or unique town-centre planning seen in other projects. Notably, the heritage assessments to date discussing Dunedin's state housing have failed to recognise the genuine innovations that did in fact occur as part of the first state housing build programmes in Dunedin. Including the first homes nationally built for childless couples¹⁷ and innovations in the contracting of state houses.

- 7.21 The subdivision of the land in Liberton was not unique, it was laid out two years prior to the State Housing Scheme being established by the Otago Education Board¹⁸. This subdivision of Liberton occurred around the newly built Pine Hill School, and streets were named for previous education board secretaries. The state acquired sections as part of the scheme to build the homes, and there is no evidence it made use of powers under the Housing Act to do so¹⁹.
- 7.22 Homes located in areas that were laid out and subdivided by the Department of Housing Construction Corporation are arguably of more representative of State housing due to intentional design elements such as the curvilinear streets and cul-de-sac patterns, and intentional street facing engagement that the front sections of the homes had, that were designed to foster neighbourliness and community. These characteristics and subdivision features are notably less prominent in Liberton, having been laid out as part of an earlier scheme by the Otago Education Board.
- 7.23 Liberton, while early, was not the very first, nor did it become part of the national or local iconography in the same way other areas have. Additionally, certain state housing areas have acquired national recognition due to their scale or social history – for instance, Auckland's large post-war suburbs like Māngere/Otara (for their role in Māori and

¹⁷ [Papers Past | Newspapers | Auckland Star | 29 March 1937 | TWO-UNIT FLATS.](#)

¹⁸ [Papers Past | Newspapers | Otago Daily Times | 18 May 1933 | OTAGO EDUCATION BOARD](#)
[Papers Past | Newspapers | Evening Star | 16 March 1937 | CIVIC AFFAIRS](#)
[Papers Past | Newspapers | Otago Daily Times | 28 April 1936 | Page 11 Advertisements Column 7](#)

[Papers Past | Newspapers | Evening Star | 17 March 1936 | Page 10 Advertisements Column 6](#)
[Papers Past | Newspapers | Otago Daily Times | 20 April 1935 | CITY DRAINAGE](#)

¹⁹ <https://paperspast.natlib.govt.nz/newspapers/ODT19370316.2.35>

Pasifika urban migration), or Porirua's Cannons Creek (as a symbol of 1960s state town planning). Liberton does not figure prominently in those broader national stories; it is more a small local chapter in the delivery of state housing. Any significance, if established, can only be tightly bound to Dunedin.

- 7.24 In summary, Liberton's conception and construction as a suburb was undoubtedly linked to the state housing scheme, however it was not unique in a nationally, regionally or locally context.

Heritage Values

- 7.25 Kāinga Ora believe that from a heritage perspective, Liberton's value might be best framed as part of a history of state housing delivery in New Zealand. It contributes to the overall story of a socially progressive policy that shaped mid-20th century NZ, and towns like Dunedin. If one were illustrating the national narrative, one might include Liberton along with other first-wave early housing schemes to show the geographic breadth of the programme – demonstrating that Dunedin like most cities had some State Housing built as part of the first wave of the government new homes in 1937–38. In that sense, Liberton significance is its associative value with the nationally significant state housing programme. However, on its own merits, it does not appear to be the “first, unique or finest” in any particular category that would demand individual recognition, unlike, the nationally recognised first state house in Miramar which has a clear national symbolic significance, or the Greys Avenue Flats which have national architectural significance.
- 7.26 It is also important to note that whilst the homes of Wilkinson, Pryde, and Hislop Streets today still evokes the late-1930s period, almost all homes have had significant modification and the ability of the casual observer to understand the history of this suburb has been degraded.
- 7.27 Like other homes in Liberton, 11 Wilkinson Street is not a pristine example of a ‘state house’ from this era. 11 Wilkinson Street had an extensive renovation in 2021 and it now has several non-heritage fabric elements readily visible as part of the exterior building envelope. These include roof

top ventilation capping, heat pumps, a modified roof, a modified front gable end and new windows. Also, the chimney has been removed, porch altered, and the false shutters gone.

7.28 Similarly, the interior layout of the home has been extensively modified to reflect the needs of modern occupants of the home.

7.29 When comparing 11 Wilkinson Street to many of the homes of this era that were built in Dunedin, it is hard to justify why this stands out as a representative example. Even within Liberton, other homes are more representative of an early 1930's state house in terms of intact design features.

7.30 In their report Ms. Bauchop and Mr. Mawdsley state:

'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).

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.'

- 7.31 With regard to the information above, it is challenging to understand why Ms. Bauchop and Mr. Mawdsley maintain 11 Wilkinson Street meets the criteria for scheduling.

Further Comments on the Heritage Evidence

- 7.32 Kāinga Ora also disagree with some statements made by Ms. Bauchop and Mr. Mawdsley evidence to make the justification for scheduling:

'The dwelling demonstrates the commencement of a nationwide state housing scheme within the local context.'

- 7.33 The historic records indicate the contracts for Liberton and Wakari state house construction were let about the same time, and a strong link is not established to Liberton²⁰.

- 7.34 Ms. Bauchop and Mr. Mawdsley also make several comparisons with other state houses that are scheduled:

'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.'

- 7.35 As addressed above, the historical context of Liberton, and that of 11 Wilkinson Street significantly varies from the homes it has been compared to by Ms. Bauchop and Mr. Mawdsley. 12 Fife Lane is

²⁰ [Papers Past | Newspapers | Evening Star | 24 March 1937 | Page 1](#)

addressed earlier and notably, the Nelson house referenced, whilst being a more intact example of a 1930's state house, was not deemed to have significant enough heritage value to be scheduled in the Nelson Resource Management Plan, despite having even earlier historical associations to social housing efforts²¹.

- 7.36 More local comparisons were made by Ms. Bauchop and Mr. Mawdsley to the homes listed and scheduled as part of an earlier state housing scheme set up under the Workers Dwellings Act 1905, the Windle Settlement, and individually scheduled (B514 & 515) and listed with HNZPT (List No. 3179 & 2168)²². Unlike Liberton, the Windle Settlement is recognised as a historic area by Heritage New Zealand and as a heritage precinct in the 2GP. It appears to highlight the failing of the assessment criteria that these are considered to be comparable.
- 7.37 Considering the discussion above, Kāinga Ora continues to disagree with the conclusions drawn from the expert heritage evidence and the reiterated position that 11 Wilkinson Street meets the criteria for scheduling under policies of the 2GP.

8. CONCLUSION

- 8.1 Kāinga Ora opposes the proposed scheduling of 11 Wilkinson Street as a heritage building because the scheduling is not supported by a robust or consistent assessment of significance under recognised heritage evaluation frameworks, including the Proposed Otago Regional Policy Statement.
- 8.2 The proposed scheduling does not meet the threshold for protection under section 6(f) of the RMA. The site lacks demonstrable architectural, cultural or historic significance at a level that justifies regulatory protection. The justification appears to rely solely on the novelty of occupation timing rather than heritage value.

²¹ [139 Waimea Road - confirmed for exclusion from Appendix 1 April 2024](#)

²² <https://www.heritage.org.nz/list-details/7640/Listing>

- 8.3 The heritage assessment fails to align with national best practice, lacks comparative analysis and does not reflect the guidance in the Proposed Otago Regional Policy Statement. It overlooks that many comparable or more significant state housing examples exist nationally and even locally. In doing so, it undermines the credibility of the schedule and places an inappropriate burden on the ability of Kāinga Ora to meet its statutory purpose.
- 8.4 Kāinga Ora supports appropriate recognition of state housing heritage, however, inclusion of this dwelling in the heritage schedule does not achieve that aim. It isolates an individual house of limited distinction, with altered features and unclear representative value.
- 8.5 For these reasons, Kāinga Ora respectfully requests that 11 Wilkinson Street not be included in the 2GP District Plan Heritage Schedule.

02 May 2025