

## Statement by Melissa Macfarlane regarding my submission on PC13/PC14 impacting on 48 Malvern Street, St Albans, Christchurch

29<sup>th</sup> November 2023

I lodged a submission on PC13 / PC14 in relation to my house at 48 Malvern Street. I understand that the Council has made some changes in response to my submission which I appreciate.

There remain two matters that I still want to bring to the Panel's attention, one is the classification of our house as 'defining'. The second is the level of restrictions that apply to our property due not to the heritage value of the house itself but more due to its location within a residential heritage area.

By way of background, according to the Council's Church Property Trustees North St Albans subdivision (1923) Residential Heritage Area Record Form (Heritage Area Record), our heritage area, comprises 113 houses, a church and a local park and represents the development of an interwar 'bungalow' suburb in St Albans.

The Heritage Area Record states the houses within this area are 'typically California Bungalow style dwellings that retain a high level of integrity and authenticity. Predominantly single-storey houses of timber construction, the houses in the area were built to address the street and sited to accommodate driveways and garaging for privately owned vehicles.'

It refers to these Bungalows as having the following defining characteristics:

- Lower roof pitch than the earlier villa style houses hipped or gabled in form with timber shingles and exposed rafters.
- Bay windows, with sunhoods, casement and fanlight type windows (*these are the little windows above the casements ones and are typically led-light windows*).



- Timber and corrugated metal are the predominant building materials.
- Fencing varies but generally openness to the public domain, low-medium-height hedging, boundary walls and picket fences in sympathy with the character of the houses.
- Garages largely in keeping with the materials and styling of the house.

Online searches, papers and reports also refer to side entrances and covered internal porches being key features of bungalows of the period and these are also referred to in the Heritage Area Record.

The Heritage Area Record sets the following categories:

Defining Buildings are those structures and other features that establish the historic heritage values of the Heritage Area. Defining buildings, structures and features embody the heritage values of the area and retain a level of authenticity and integrity sufficient to demonstrate these values.

Contributory Buildings are those structures and other features that support the historic heritage values of the Heritage Area. Contributory buildings, structures and features are consistent with the heritage values of the area and may be either modified or modern buildings, structures, and features in sympathy with the design and typology of their neighbours.

Neutral Buildings are those structures and other features that neither establish, support nor detract from the historic heritage values of the Heritage Area. Neutral buildings, structures and features may be modern buildings that introduce a new typology or a new pattern of land development but generally respect the overall scale and density of the area.

Presumably therefore, defining buildings are those built during the period of significance, present outwardly the character-defining features of a bungalow, and possess historic integrity in that they have had limited or no alterations to the primary building. In reviewing the Heritage Area Record, contributory buildings largely appear to be those built during the period, retaining some character defining features but having been more significantly altered over the preceding years.

### **1. Is our House a defining building?**

I made a submission (s1003.2) seeking that my house be reclassified as 'contributory' or 'neutral'. The Council rejected my submission as they consider our house retains significant bungalow features to warrant it being defining. Attached as appendices are pictures of various buildings referred to in the Council's Heritage Area Record. I have chosen these as a selection to illustrate my points.

In **Appendix 1** I have included pictures of other defining buildings from the Heritage Area Record together with an identification of their features based on the Council's record, including why the Council considers these are defining.

There are common characteristics: Single story dwellings, shingled, gabled roofs, exposed rafters, bay windows, casements and fanlight fenestrations, side entries and inset porches, lower fencing, and wooden garages in keeping with the house. They are largely unchanged or have had minor alterations in keeping with the style or to the rear of the house.

In **Appendix 2** I have included pictures of contributory buildings together with an identification of their features based on the Council's record and why the Council considers these are contributory.

The common characteristics appear to be related to alterations to the original form, the loss of some character features and the use of windows or materials that are not reflective of the period.

In **Appendix 3** I have included pictures of neutral buildings together with an identification of their features based on the Council's record, including why the Council considers these are neutral.

Finally, in **Appendix 4** I have included pictures and description of our house from the Heritage Area Record and further pictures showing the front and back of our house and a wider view of the street frontage.

As shown in the pictures in Appendix 4, our house is two-stories not single, as was more typical of interwar bungalows. The frontage does not have bay windows or sunhoods and while we have casement windows on the second story these do not have fanlight fenestrations. The lower story has two sets of large French doors and a picture window with an attempt to replicate casements and fanlights on the sides, nice, but not a defining bungalow window.

Significantly in terms of classifying our house, the building has undergone both front and rear facing alterations. The front extension completed circa 1960s, turned the house into a 'T' shape, introduced at least one of the sets of French doors and added significant concrete deck to the front façade of the house. I understand from a previous elderly neighbour (whose husband built our house) that the upstairs right-hand side was also modified around the same time, enclosing what was an external balcony. Further alterations also occurred at the rear in the mid-1990s, involving new French style entrance doors and an extension with new kitchen windows on the ground floor.

I note that we do have one box window with casement windows and led-light fenestrations left on the house, however this is on the western side, at the back against the boundary fence, visible only to that neighbour. We also have timber shingles and exposed rafters, but we have a front, not a side entrance, no porch, and breezeblock concrete garage and a high brick fence along the frontage.

It is a character house and I like to think it contributes to the area, but I don't believe that it is correct to say that it is a defining example of an interwar bungalow, given the absence of many of the bungalow features and the number of alterations over the years.

If it was defining of the heritage values of the area, then our neighbours could conceivably replace all their bay windows, remove their sunhoods, fanlights and porches, add French doors and build a



significant front extension that changes the overall building envelope shape without distracting from the heritage character of the area. I do not think that is the intention of the proposed provisions.

Rule 14.5.3.2.3, Building Height, also sets a new height limit for the area at 5.5m (down from 8m), presumably in keeping with heritage characteristics of interwar bungalows. Our house is approximately 7m in height and therefore does not meet one of the key rules that seeks to maintain the character of the area. How is our house defining if it does not even meet the height limit?

I acknowledge I am not an expert, but working my way through the Heritage Form Record, I do not believe that our house has the same level of integrity as the other defining buildings and its frontage does not present a consistent style as other defining bungalows do.

I also note that I have recently obtained resource and building consent to further modify my house, which includes a ground and second-story rear extension, various window changes (to the front, side, and rear), skylights, a new front and back deck, and a new garage located in front of the main dwelling.

Considering the planned alterations, the changes that have already been made to the house over the years and the closer alignment with other contributing and neutral houses, I request that the panel consider changing the status of my building to contributory, or indeed neutral if they consider this more appropriate.

## **2. What is the appropriate level of restrictions on building changes?**

In PC13, under Rule 9.3.4.1.3 RD1, the alteration of a heritage item or heritage fabric is a restricted discretionary activity. Under Rule 9.3.4.1.3 RD6, in a Residential Heritage Area new buildings and alterations to building exteriors and road boundary fences and walls over 1.5 metres in height require resource consent - unless the buildings are located to the rear of the main residential unit on the site and are less than 5 metres in height, or are alterations to exteriors of neutral buildings or intrusive buildings where the alteration is not visible from the street; or fences and walls on side or rear boundaries. I understand that applications under these rules could be limited or publicly notified.

'Alteration' is defined as a change, modification or addition to a heritage item, heritage setting or heritage fabric,<sup>1</sup> or a building in a heritage area. Alteration of a heritage item includes: permanent modification of, addition to, or permanent removal of, heritage fabric which is not decayed or damaged; partial demolition of a heritage item; changes to the existing surface finish and/or materials; and permanent addition of fabric to a heritage item or heritage fabric. Alteration does not include: maintenance; repairs; restoration or reconstruction.

As I understand it, the above rules mean that if I wanted to replace the non-original windows on the rear of my house (which is not visible from any public place) with other windows I need resource consent. If I wanted to put in a side or rear door on my new garage, I would need resource consent. This seems onerous as the buildings within the residential heritage area are not individually listed – they are collectively 'listed' due to being interwar bungalows.

If they were individually listed, then these restrictions would make a bit more sense. However, what are the impacts on the collective interwar bungalow character of the area from minor changes that cannot be seen from the street? Surely these would be less than minor? Why then do I need resource consent for these changes? Resource consent costs can be in the order of \$5000-8000 if you need a planning application and specialist heritage report on top of the council fees. How is this efficient planning or fair for residents who now find themselves living in a heritage area?

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<sup>1</sup> Heritage fabric means any physical aspect of a heritage area which contributes to its heritage values. Heritage fabric may include: original and later material and detailing which forms part of, or is attached to, the interior or exterior of a building, structure or feature; later fabric introduced as part of repairs, restoration or reconstruction; the patina of age resulting from the weathering and wear of construction material over time; and fixtures and fittings that form part of the design or significance of a heritage item.

I made a submission seeking to make the applicable rules and policies more targeted and less onerous (s1003.1, s1003.6, s1003.10, S1003.11 – s1003.13). Most of my submission points were rejected.

But I would like the panel to reconsider these rules.

Because the buildings are not individually listed, I consider that the rules should be less onerous and more targeted to the matters seeking to be protected i.e., interwar bungalow character. I reiterate my earlier submission points suggesting that the rules be changed, for example, to only apply to areas visible from the street (as applies to neutral or intrusive buildings), include a scale / size threshold so that minor works are not captured, exclude parts of buildings that are clearly not original and exclude existing accessory buildings (such as garages and sheds) irrespective of their location on a property. These should not require public notification and formal heritage reports.

Thankyou for your consideration of my submission.



## Appendix 1 - Defining buildings from the Residential Heritage Record

<p>11 Carrington Street</p> <p>PHYSICAL DESCRIPTION: Single-storey dwelling with L-shaped footprint and gabled roof forms. Shingled gable ends and sun-hoods, bay windows, side entrance, exposed rafters and casement and fanlight type fenestration.</p> <p>ALTERATIONS: Gabled additions to north and west elevations (early 2000s?).</p> <p>REASON FOR RATING: A sympathetically enlarged bungalow that dates to the interwar period.</p>	
<p>15 Carrington Street</p> <p>PHYSICAL DESCRIPTION: Single storey dwelling with irregular rectangular footprint and gabled roof. Shingled gable ends and sun-hoods, bay windows on principal, west-facing elevation. Side entry set in glazed porch on north elevation, casement and fanlight type fenestration.</p> <p>REASON FOR RATING: A bungalow that dates to the interwar period.</p>	
<p>31 Carrington Street</p> <p>PHYSICAL DESCRIPTION: Single storey dwelling with rectangular footprint and gabled roof. Shingled gable ends and sunhoods, casement and fanlight type fenestration; exposed rafters. Side entry on north.</p> <p>ALTERATIONS: Pre-1950 roadside garage replaced by one at rear of property (c.1970). House extended to rear (c.2000?). New roadside garage erected (c.2010).</p> <p>REASON FOR RATING: A bungalow that dates to the interwar period</p>	
<p>31 Gosset Street</p> <p>PHYSICAL DESCRIPTION: Single-storey dwelling with T-shaped footprint and hipped roof forms. Principal, west-facing elevation has half-hipped bay with battened end, two bay windows with flat roofs, and glazed entrance porch. Half-hipped bay with bay window repeated on south elevation. Casement and fanlight type fenestration; picket fence along road boundary.</p> <p>REASON FOR RATING: A bungalow that dates to the interwar period</p>	



## Appendix 2 - Contributory buildings from the Residential Heritage Record form

<p>26 Gosset St</p> <p>PHYSICAL DESCRIPTION: Single-storey dwelling with L-shaped footprint and gabled roof forms. Shingled gable ends and sunhoods, side entry, casement-and-fanlight type fenestration. First floor addition repeats treatment of façade gable end.</p> <p>ALTERATIONS: First floor added (early 2000s?).</p> <p>REASON FOR RATING: An interwar bungalow that has been sympathetically enlarged.</p>	
<p>35 Jacobs Street</p> <p>PHYSICAL DESCRIPTION: One-and-a-half-storey dwelling with L-shaped footprint and gabled roof forms. Shingled gable ends and sunhoods, casement-and-fanlight type fenestration. Entry on north elevation.</p> <p>ALTERATIONS: Shed dormer on west side added (c.1955). Extension at rear (west elevation), dormer on east side extended to north and south (c.2010?).</p> <p>REASON FOR RATING: A modified bungalow dating to the interwar period.</p>	
<p>39 Jacobs</p> <p>PHYSICAL DESCRIPTION: One-and-a-half-storey dwelling with rectangular footprint and gabled roof forms. Shingled gable ends and sunhoods, casement and fanlight type fenestration; gabled dormer addition on north side over main entry.</p> <p>ALTERATIONS: Dormer addition (c.2000?).</p> <p>REASON FOR RATING: A modified bungalow dating to the mid-1920s.</p>	
<p>48 Jacobs Street</p> <p>PHYSICAL DESCRIPTION: Two-storey dwelling with irregular rectangular footprint and gabled roof forms. Shingled gable ends and sunhoods; entry on north elevation; beneath first floor dormer addition; is sheltered by flat-roofed porch with columns.</p> <p>ALTERATIONS: Extended to rear / east (c.1980?). First floor added (1990s?).</p> <p>REASON FOR RATING: A modified bungalow dating to the interwar period.</p>	



### Appendix 3 - Neutral buildings from the Residential Heritage Record

30 Gosset Street

ALTERATIONS: First floor added; house extended to north-east and north-west (1980s?).

RATING: Neutral

REASON FOR RATING: A substantially modified bungalow dating to the interwar period.



26 Jacobs Street

ALTERATIONS: Garage replaced at back of section (c.1965). First floor added and garage extension erected to north (mid-2000s).

RATING: Neutral

REASON FOR RATING: A substantially remodelled interwar bungalow





## Appendix 4 – 48 Malvern Street

48 Malvern Street (page 183)

**PHYSICAL DESCRIPTION:** Two-storey dwelling with T-shaped footprint and hipped roof. Gabled bays on first floor of north elevation, one-storey gabled wing projects forward on same side. Shingled gable ends and exposed rafters, casement and fanlight type fenestration, glazed entrance doors. Road boundary is marked by a tall brick wall that largely screens the house from view.

**ALTERATIONS:** Extension to north (c.1960).

**RATING:** Defining

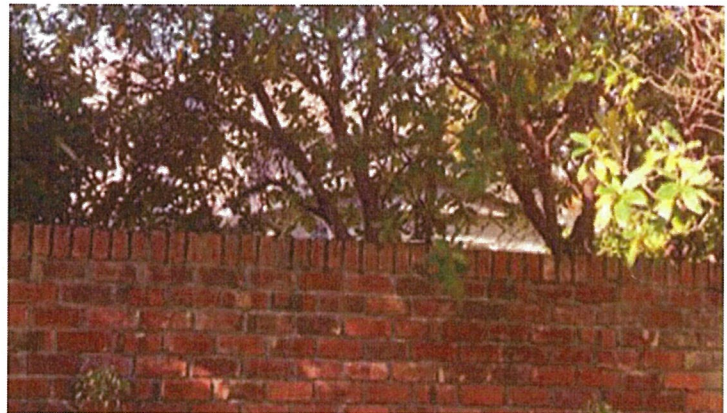
**REASON FOR RATING:** A bungalow dating to the interwar period.

It has the ground floor extension noted but not the upper floor/rear extension.

Our house has no bay windows in the front, no sunhoods and the only original fanlight fenestrations are in the one remaining box window down the righthand side on the West boundary and a small bathroom window at the back on the Eastern boundary.

Our windows are not typical, and we have several sets of French doors and the large 'picture' window in the front extension circa 1960s which while complimentary is not original.

The entrance is in the front not on the side and we breach the recommended height limit set to protect the character of the area. We have a concrete garage and tall brick fence.



French doors



Alterations/Extensions

