

**BEFORE COMMISSIONERS
APPOINTED BY WELLINGTON
CITY COUNCIL**

**WELLINGTON CITY COUNCIL PROPOSED
DISTRICT PLAN**

IN THE MATTER of Hearing Stream 3 –
Heritage

AND

IN THE MATTER of a submission by Jane and Turi
Park – 134 Brougham Street.

**STATEMENT OF EVIDENCE OF
DR SAMUEL ARTHUR KEBBELL
20 APRIL 2023**

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MAY IT PLEASE THE COMMISSIONERS:

Introduction:

1. My full name is Samuel Arthur Kebbell.
2. I hold degrees in architecture including:
 - a. Bachelor of Architecture (1st class honours), Victoria University of Wellington.
 - b. Master of Design in Architectural History and Theory, Harvard University, United States of America.
 - c. PhD, Royal Melbourne Institute of Technology, Australia.
3. I am a Registered Architect and a Fellow of the NZIA.
4. I worked in Boston, New York and Amsterdam before starting a practice in Wellington with John Daish in 2002 which I have been the sole director of since 2009.
5. I am also a part-time Senior Lecturer at the School of Architecture, Victoria University of Wellington.

Scope of Evidence:

6. My evidence is on behalf of Jane and Turi Park, the owners of 134 Brougham Street.
7. In preparing this evidence I have reviewed the following:
 - a. Statement of Moira Smith on behalf of Wellington City Council, dated 5 April 2023.
 - b. Historic Heritage Area Evaluation (HHAE) Moir St Heritage Area.
 - c. The Wellington City Proposed District Plan, incl. SCHED3-Heritage Values.
 - d. Wellington City Council Design Guide Heritage.
 - e. Wellington City Council Design Guide Appendix: Character Precincts.
 - f. The National Policy Statement on Urban Development 2020 (NPS-UD).

8. I have visited the site of 134 Brougham Street and the Moir Street Heritage Area on 17th April 2023.

Code of Conduct:

9. I have read the Environment Court's Code of Conduct for Expert Witnesses, contained in Part 9 of the Environment Court Te Kōti Taiao o Aotearoa Practice Note 2023, and agree to comply with it. My qualifications as an expert are set out above. Other than where I state that I am relying on the advice of another person, I confirm that the issues addressed in this statement of evidence are within my area of expertise. I have not omitted consideration of material facts known to me that might alter or detract from the opinions I express.

Assessment:

Background

10. According to the HHAE (pp87-92), the collection of houses that form the Moir Street Heritage Area is significant for its Historic, Physical, and Social Value, along with its Rarity and the Representative Value of the collection.
11. 134 Brougham Street is distinct from the collection in several ways but included in the Heritage Area because according to the HHAE it "fits within the wider narrative of the heritage area" (p5).

134 Brougham St:

Historic Value - Historical Narrative

12. Arguments within the HHAE, supported by Moira Smith's Statement of Evidence, imbue the house with significance primarily on the grounds that it belonged to Rev. Moir and by implication forms part of a broader historical narrative around his life and contribution to Wellington culture.
13. According to the same documents, 134 Brougham St was built in 1879 as rental accommodation. It was occupied by Rev. Moir (b. 1809) from 1890s until his death in 1895 and subsequently by Rev. Moir's second wife Mary until she moved to 136 Brougham Street in 1920.
14. So, Rev. Moir moved into the house in his early eighties and died within 5 years. Regardless of any historical significance of Rev. Moir himself, there is no evidence in the HHAE or Ms Smith's Statement that 134 Brougham St

was significant to Rev. Moir personally or to the historical narrative that surrounds his life.

Physical Value - Spatial Separation

15. All houses in the collection have a frontage to the North-South axis of Moir St, except 134 Brougham Street which faces away from the collection, towards Brougham Street (Fig 1).
16. Each house in the collection, except 134 Brougham Street, has little or no side yard and a relatively shallow front yard, forming a group of tightly packed houses around a narrow street with a distinct 19th century character. 134 Brougham Street is a notably larger house set back from Brougham Street tilting towards a looser urban grain (Fig 2).



Figure 1. Moir St Heritage Area (solid line) and the Character Precinct (dotted) showing orientation of the main group of houses and 134 Brougham St.

Architectural Integrity

17. According to the HHA Moir St Heritage Area, neither the original architect nor the builder is known.
18. 134 Brougham Street underwent a number of modifications after it was built in 1879, including filling in of a veranda (1923), addition of a bay window on Brougham Street façade, and adjustments to windows on the

Moir Street façade. These changes made a noticeable shift in the architectural language of the former house as the separate roof over the former porch was raised and merged with the main roof.

19. Various changes were made to the rear of the house in 1934, rendering the pre-1930s character of the rear yard imperceptible.
20. 134 Brougham Street is formally more complex than the majority of the collection which are noted for their “repetition of basic form, construction, and materials.” (HHAЕ, p90)
21. While modifications do not necessarily lead to a degradation of heritage integrity, in this case they result in a building that no longer belongs to the era under heritage protection

Social Value - Social Separation

22. The narrow street with no through-traffic combined with the consistency of architectural scale, age, and density lend themselves to a tight knit community. The HHAЕ acknowledges the strength of the community and sense of place to which each house contributes. 134 Brougham Street does not contribute to that sense of place in any spatial sense and thus its occupants will always be to some extent socially separate.
23. The façade of 134 Brougham Street that does face Moir Street, and therefore the most spatially significant façade to the collection, has four modest windows and no doors, limiting spatial and social connection to the group.
24. The majority of the houses along Moir Street, and one of the central reasons for the Heritage Area, were developed for immediate sale to working class occupants. 134 Brougham Street was not developed with the same intention and there is no historical or contemporary spatial instrument to connect it to the Moir Street community. Therefore, 134 Brougham Street does not make a notable contribution to the identified social values of the Moir Street Heritage Area.

Rarity and Representative Value

25. The HHAE document outlines the Rarity and Representative Value of the Moir Street houses with respect to the "consistent visual quality" (p92) among them, and while 134 Brougham Street was developed in the same era, it is spatially distinct at both an urban and architectural level (see 12.b above). In this sense, 134 Brougham Street does not contribute to the Representative Value of the collection.
26. The Rarity of the collection has value for the "short, narrow street flanked by mostly workers' cottages" (p92) which does not pertain to 134 Brougham Street.

Future Value - Streetscape

27. Neighbouring houses at 136-138 Brougham Street are one storey higher than 134 Brougham Street with much shallower front yards, more like 132 Brougham on the north side of Moir Street. A new building on 134 Brougham Street could present a more consistent edge to Brougham Street by being a consistent height, at least two storeys, and a similarly direct addressing of the street.
28. In addition to stronger connections to Brougham Street, a new building on 134 Brougham Street could make stronger connections to Moir Street by presenting some form of active façade.
29. While 134 Brougham Street does not acknowledge the corner condition architecturally, a new building could define the corner more emphatically giving clearer urban form to both Brougham and Moir Streets.



Figure 2. Larger Front Yard of 134 Brougham St relative to adjacent houses.

Building Performance

30. The existing building is poorly oriented for solar gain. A new building could be composed to take full advantage of the sun and contemporary best practice to produce a healthier indoor environment.
31. Higher density housing is a significant factor in the fight against Climate Change. While Mt Victoria is relatively densely populated by New Zealand standards it is sparsely populated by global urban standards. A new building could be conceived to accommodate more people over the same footprint.

Character Precinct

32. Should 134 Brougham Street be removed from the Moir Street Heritage Area, any new building would remain subject to the Character Precinct restrictions of the Proposed District Plan.
33. These restrictions would continue to provide appropriate protection of architectural character in this area. They prevent inappropriate development by requiring careful consideration of, and connection to, the existing built fabric on both Brougham and Moir Streets.

Conclusion

34. For all these reasons, the dwelling at 134 Brougham Street is not representative of the Moir Street collection of workers cottages and, in my opinion, is in several important ways at odds with the distinguishing features of that collection which make them worthy of heritage protection. Accordingly, I recommend removing 134 Brougham Street from the Moir Street Heritage Area.

SA Kebbell
20 April 2023